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ANNEX 1

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 Multi-country 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

Title	EU Civil Society Facility and Media Programme - Multi-country for 2024-2025 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
OPSYS	OPSYS business reference: ACT-61778
ABAC	ABAC Commitment level 1 number: JAD.1299145 (allocation 2024) JAD.1299146 (allocation 2025)
Basic Act	Financed under the Instrument for Pre-accession Assistance (IPA III)
Economic and Investment Plan (EIP)	No
EIP Flagship	No
Team Europe	No
Beneficiary(y)/(ies) of the action	The action shall be carried out in the Western Balkans (Albania, Bosnia and Herzegovina, Kosovo*, Montenegro, North Macedonia, and Serbia) and Türkiye.
Programming document	IPA III Programming Framework
PRIORITY AREAS AND SECTOR INFORMATION	

* This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

Window and thematic priority	Window 1. Rule of law, fundamental rights and democracy Thematic Priority 5: Fundamental rights (with reference to media - freedom of expression) – 50% Thematic Priority 7: Civil Society – 50% (Partially Windows 2 and 3)			
Sustainable Development Goals (SDGs)	SDG 16: Peace and Justice Strong Institutions Others: SDG 01: No Poverty SDG 05: Gender Equality SDG 08: Decent Work and Economic Growth SDG 10: Reduce Inequalities SDG 11: Sustainable cities and communities SDG 17: Partnerships for the goals			
DAC code(s)	15150 Democratic participation and civil society – 50% 15153 Media and free flow of information – 50%.			
Main Delivery Channel	20000 - Non-governmental organisations (NGOs) and civil society 41000 - United Nations agencies 60000 - Private sector institution			
Targets	<input type="checkbox"/> Climate <input checked="" type="checkbox"/> Gender <input type="checkbox"/> Biodiversity			
Markers (from DAC form)	General policy objective	Not targeted	Significant objective	Principal objective
	Participation development/good governance	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Aid to environment	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Disaster Risk Reduction	<input checked="" type="checkbox"/>	<input 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"/>
	RIO Convention markers	Not targeted	Significant objective	Principal objective
	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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Climate change adaptation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Internal markers and Tags

Policy objectives	Not targeted	Significant objective	Principal objective
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 type="checkbox"/>
Energy	<input type="checkbox"/>		<input type="checkbox"/>
Environment and climate resilience	<input type="checkbox"/>		<input type="checkbox"/>
Digital	<input type="checkbox"/>		<input type="checkbox"/>
Economic development (incl. private sector, trade and macroeconomic support)	<input type="checkbox"/>		<input type="checkbox"/>
Human Development (incl. human capital and youth)	<input type="checkbox"/>		<input type="checkbox"/>
Health resilience	<input type="checkbox"/>		<input type="checkbox"/>
Migration and mobility	<input type="checkbox"/>		<input type="checkbox"/>
Agriculture, food security and rural development	<input type="checkbox"/>		<input type="checkbox"/>
Rule of law, governance and Public Administration reform	<input type="checkbox"/>		<input type="checkbox"/>
Other	<input type="checkbox"/>		<input type="checkbox"/>
Digitalisation	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>		<input type="checkbox"/>
digital services	<input checked="" type="checkbox"/>		<input 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 checked="" type="checkbox"/>	<input 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"/>
BUDGET INFORMATION				
Amounts concerned	<p>Budget line: 15.020101.01</p> <p>Total estimated cost: EUR 48 750 000</p> <p>Total amount of EU budget contribution: EUR 46 500 000</p> <p>The contribution is for an amount of EUR 4 000 000 from the general budget of the European Union for financial year 2024 and for an amount of EUR 42 500 000 from the general budget of the European Union for financial year 2025, 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"> - Implementing partners/grant beneficiaries for an amount of EUR 1 950 000; - Selected pillar-assessed entity for an amount of EUR 300 000. 			
MANAGEMENT AND IMPLEMENTATION				
Implementation modalities (management mode and delivery methods)	<p>Direct management through:</p> <ul style="list-style-type: none"> - Grants - Procurement <p>Indirect management with United Nations Educational, Scientific and Cultural Organization (UNESCO).</p>			
Final date for concluding contribution / delegation agreements, procurement and grant contracts	<p>For 2024 Budget: At the latest by 31 December 2025</p> <p>For 2025 Budget: At the latest by 31 December 2026</p>			
Indicative operational implementation period	<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 Civil Society Facility and Media Programme offers a single window of support to civil society and media freedom, bringing together EU support at bilateral and regional level. The present action intends to strengthen participatory democracies and EU integration and approximation in the Western Balkans and Türkiye, through an enhanced contribution by civil society and media (overall objective). In particular, the action aims at achieving the following specific objectives/outcomes:

1. Strengthened and more gender-responsive civil society sector through a more conducive environment, a strengthened cooperation and partnership between Civil Society Organisations (CSOs) and public institutions, and reinforced CSO capacity and resilience.
2. Independence and pluralism of media fostered through a more conducive environment for the freedom of expression, improved internal governance of media outlets, and established professional and ethical standards of quality content production.

To this end, the action includes a multi-faceted and integrated set of activities, providing different and complementary modalities of support to CSOs and media actors. Among these, the action includes regional action grants to CSOs, technical assistance, direct awards to intermediary organisations such as European Endowment for Democracy and the Western Balkans Fund, contribution agreements with organisations such as UNESCO. Extensive use of Financial Support to Third Parties' support modalities is also foreseen.

The action is in line with the IPA III Programming Framework¹ - thematic window (1) Rule of law, fundamental rights and democracy, with some cross-cutting impacts in other windows: (2) Good governance, EU *acquis* alignment, good neighbourly relations and strategic communication and (3) Green agenda and sustainable connectivity. It also is in line with the objectives and priorities of the Economic and Investment Plan (EIP) for the Western Balkans², and the “*DG NEAR Guidelines for EU Support to Civil Society in the enlargement region 2021-2027*”³.

1.3 Beneficiaries of the Action

The action shall be carried out in the Western Balkans (Albania, Bosnia and Herzegovina, Kosovo, Montenegro, North Macedonia, and Serbia) and Türkiye.

2. RATIONALE

2.1. Context

Following Russia's war of aggression against Ukraine, all of Europe found itself in a new geopolitical reality. The immediate applications for EU membership submitted by Ukraine, Moldova and Georgia in spring 2022 demonstrated, once again, that the perspective of membership of the European Union is a strong anchor not only for prosperity, but also for peace and security. As a result of this new scenario, EU enlargement has been put back to the fore of the European agenda, with direct consequences on the Western Balkans. Following the 2020 Council decision to open the accession negotiations with Albania and North Macedonia, the first intergovernmental conferences took place on 19 July 2022, opening a new phase in the EU's enlargement policy for these two IPA beneficiaries. Similarly, in the 2023 Communication on EU Enlargement Policy⁴, the Commission has recommended the opening of accession negotiations with Bosnia and Herzegovina once the necessary degree of compliance with the membership criteria is achieved. In December 2022, Kosovo applied for EU membership. The EU agreed in spring 2023 on visa liberalisation for Kosovo, applicable from 1 January 2024.

In this context, civil society and media play a key role in the EU negotiation process, including promoting confidence building and good neighbourly relations. An active civil society is a critical component of democratic systems and an important player in reform processes taking place in the Western Balkans and Türkiye. CSOs can contribute to addressing many societal challenges, by engaging in policy debates, proposing innovative, sustainable and inclusive solutions and monitoring the results of reform processes at beneficiary, regional and local level. A free and pluralistic media serves to reveal the multifaceted nature of society and promotes dialogue and tolerance. Critical scrutiny by media of the political processes guarantees their transparency and ensures that governments adhere to predictable policies – free from the interests of narrow pressure groups.

¹ COM (2021) 8914 final. COMMISSION IMPLEMENTING DECISION of 10.12.2021 adopting the Instrument for Pre-Accession Assistance (IPA III) Programming Framework for the period 2021-2027 Brussels, 10.12.2021

² COM (2020) 641 final. COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS “An Economic and Investment Plan for the Western Balkans”, Brussels, 6.10.2020

³ [DG NEAR Guidelines for EU Support to Civil Society in the Enlargement Region 2021-2027 \(europa.eu\)](#)

⁴ COM (2023) 690 final. 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 IPA III Programming Framework considers the support to civil society and media as one of the priorities to improve democracy and the rule of law. It calls, *inter alia*, for “*particular focus (...) to safeguard the freedom of expression and independence of media as pillars of democracy.*” The Action will primarily contribute to Window 1: Rule of law, fundamental rights and democracy, and more specifically Thematic Priority 5: Fundamental rights (with reference to media- freedom of expression) and Thematic Priority 7: Civil Society, with gender mainstreaming relevant across all the windows of the IPA III framework.

The EU support to civil society is programmed in line with the “*DG NEAR Guidelines for EU Support to Civil Society in the enlargement region 2021-2027*”, published in June 2022. The Guidelines outline the results towards which EU support to civil society will aspire in the period 2021 – 2027, which are identified by three main areas of support:

1. A conducive environment for civil society to carry out its activities;
2. Strengthened cooperation and partnership between CSOs and public institutions;
3. Reinforced CSO capacity and resilience to carry out their activities effectively.

The guidelines are anchored in a solid set of standards. These are based on EU Rule of law *acquis* (Chapter 23 “Judiciary and fundamental rights” and Chapter 24 “Justice, freedom and security”) and other relevant international and European standards. They are furthermore aligned with recommendations, opinions and guidelines adopted by international organisations and inter-governmental fora. They also extensively refer to the Global Standards for CSO Accountability.

In the EU, the media sector has been subject to a number of important policy and regulatory initiatives in the past 5 years, which aimed to address global political and economic dynamics and associated trends impacting media. The EU updated its Audiovisual Media Services Directive (AVMSD) in 2018 and later complemented it by the Digital Service Act⁵, the 2022 Strengthened Code of Practice on Disinformation⁶ and a proposal for the European Media Freedom Act (EMFA)⁷ - key actions for further consolidating democracy and building resilient societies in the context of the European Democracy Action Plan (EDAP)⁸. The comprehensive package of initiatives aimed to contribute to the independence and pluralism of media, including their transparency and accountability. It also aimed to safeguard the protection of human and fundamental rights of consumers and journalists in response to digital transformation of the media space and the wave of malign practices (disinformation, hate speech, attack against journalists, etc). In parallel, the EU has also proposed a Directive on ‘strategic lawsuits against public participation’⁹, commonly known as ‘SLAPPs’, which enables judges to swiftly dismiss manifestly unfounded lawsuits against journalists and human rights defenders. In this regard, continuous assistance is needed for the Western Balkans and Türkiye in order to keep various stakeholders in the media sector abreast with the latest policy and regulatory developments in the context of the enlargement process.

Against the above backdrop, the candidate countries and potential candidates for EU membership in the Western Balkans and Türkiye continue to face significant challenges in terms of media independence and ensuring freedom of expression. In this regard, the progress was limited in the past years as reconfirmed by the 2023 Communication on EU Enlargement Policy. The contrast between principal pluralism of media across the region is counterbalanced by relative dependence of journalism in terms of capture by interconnected business and political interests, non-transparent or unbalanced funding to public and private media, poor protection of safety and labour rights of journalists. This leads to self-censorship, neglect of self-

⁵ L 277/1 “Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC”, 27.10.2022

⁶ <https://digital-strategy.ec.europa.eu/en/library/2022-strengthened-code-practice-disinformation>

⁷ COM (2022) 457 final. “Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing a common framework for media services in the internal market (European Media Freedom Act) and amending Directive 2010/13/EU”, Brussels, 16.9.2022

⁸ COM (2020) 790 final. COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS “On the European democracy action plan”, Brussels, 3.12.2020.

⁹ COM (2022) 177 final. Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on protecting persons who engage in public participation from manifestly unfounded or abusive court proceedings (“Strategic lawsuits against public participation”), Brussels, 27.4.2022

regulation and ethical norms, and eventual vulnerability of the citizens to disinformation. More efforts are deemed necessary to assure the independence of media regulators and public broadcasters, as well as to provide for sustainable financial models for the effective functioning of independent self-regulatory bodies and the public service media. Additionally, the information environment in the Western Balkans and Türkiye is contaminated by manipulation, disinformation, and foreign interference, which further undermine the already fragile democratic processes in the region.

While the EIP is mainly about large-scale investments, it asserts that the respect for fundamental rights (like the freedom of expression) is vital for economic recovery and resilience in the region. Similarly, the “*Guidelines for the Implementation of the Green Agenda for the Western Balkans*”¹⁰ affirm that the involvement of civil society is essential.

Lastly, although there is no explicit reference to civil society in the Economic Reform Programmes (ERPs)¹¹ of the targeted IPA beneficiaries and in the new Growth Plan for the Western Balkans¹², civil society can provide input to and monitor the progress of the regulatory environment and structural reforms that authorities need to implement in the coming years in order to achieve socio-economic convergence. For instance, the civil society is well placed to engage in a dialogue about labour reforms and youth unemployment measures.

2.2. Problem Analysis

Area of support 1: Civil society and local governance

Short problem analysis

In its 2023 Communication on EU Enlargement Policy, the European Commission notes that, despite the progress achieved by several IPA beneficiaries in the areas of the ‘fundamentals’, many challenges still persist. In particular, it states that “*Freedom of association and assembly is enshrined in legal frameworks and generally enjoyed. However, reforms are still needed to fully apply international standards, and implementation needs to be much more consistent. Civil society faces continuous pressure, and its space to operate freely has continued to diminish, with restrictions on its activities and those of human rights defenders*”. Furthermore, institutionalised mechanisms for cooperation between civil society and the government show several weaknesses, which prevent CSOs from participating in policymaking processes in a meaningful and effective way. The Communication also mentions negative developments that have been observed in some IPA beneficiaries. These include an increasingly hostile environment for civil society, freedom of expression and freedom of the media, with particular regard to Serbia, the Republika Srpska entity of Bosnia and Herzegovina (for the development of ‘foreign agent laws’ leading to the stigmatisation and repression of civil society organisations), and Türkiye. In relation to the latter, the Communication recognises that “*serious backsliding regarding civil society issues continued. Civil society organisations faced increased pressure and shrinking space to operate, limiting their freedoms of expression, association and assembly*”.

As for public funding, significant progress needs to be made in several IPA beneficiaries, with particular regard to transparency and accountability. As described in the Assessment Report for 2021 of the “*DG NEAR Guidelines for EU Support to Civil Society in the enlargement region 2021-2027*”¹³, the majority of CSOs in the region was of the view that the provision of public funding to CSOs was insufficiently or not at all transparent. Information on selection procedures and awards was not always publicly available, sufficiently

¹⁰ SWD (2020) 223 final. COMMISSION STAFF WORKING DOCUMENT “Guidelines for the Implementation of the Green Agenda for the Western Balkans Accompanying the Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions – An Economic and Investment Plan for the Western Balkans”, Brussels, 6.10.2020

¹¹ https://neighbourhood-enlargement.ec.europa.eu/enlargement-policy/policy-highlights/economic-governance_en

¹² COM (2023) 691 final. COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS “New growth plan for the Western Balkans”, Brussels, 8.11.2023

¹³ <https://www.tacso.eu/eu-civil-society-guidelines/>.

comprehensive and transparent in all IPA beneficiaries. The same report also showed that over 40% of interviewed CSOs relied on a single donor type providing more than 50% of their funding. This demonstrates that, in many cases, CSO funding base is not sufficiently diversified, with consequent concerns regarding their financial sustainability and independence. With regard to gender equality, the report highlighted that fewer than half CSOs in the region, 44%, reported having an organisational gender equality policy in 2021.

Main stakeholders

- Civil Society Organisations (CSOs)¹⁴, whose main organisational/capacity issues are: i) shrinking civic space, limiting the actual implementation of freedom of association, expression and peaceful assembly, ii) limited capacities and opportunities to engage in policy dialogue and policy making processes, iii) weak financial and organisational sustainability. They will be extensively involved as implementing partners and target groups of the activities funded under this action.
- IPA beneficiary policy- and decision-makers, who have limited capacities in setting up effective cooperation and dialogue mechanisms with CSOs. They will be mainly involved as target groups of the activities funded under this action.

Area of support 2: Media

In November 2022, a comprehensive and inclusive policy discussion, to gather various media stakeholders, EU and other donor representatives, among others, took stock of the current state of art in the media sector in the Western Balkans¹⁵. Independent media in the region continue to face structural challenges embedded in the symbiotic and intersectional relation between media owners, business, and politics, chiefly in terms of media capture, media ownership concentration, and lack of financing transparency, which in turn hinders independent quality journalism and its sustainability. Financial pressure on independent outlets was increased due to the impact of COVID-19 and the current economic crisis in the context of the war in Ukraine. Equally, the development of quality professional journalism remains hampered by precarious working conditions for journalists, mainly young and women journalists. The work of media actors, e.g. investigative journalists and fact-checkers, is further hindered by limited access to public information due to the public authorities' lack of transparency and accountability. The alternative voice of fringe media (e.g. non-registered entities or individuals) mostly lacks financial support and market-based conditions for sustainability due to their size.

The 2023 Communication on EU Enlargement Policy¹⁶ noted very similar issues in Türkiye, where the serious backsliding in the freedom of expression continued. Media in Türkiye face large area of legal, administrative and operational restrictions. A set of prohibitive and restrictive laws diverge from ECtHR case law, thus leaving journalists unprotected and exposed to a large array of threats and abuse of power by law enforcement, judiciary and other state authorities. The new Media Law of 2022 also holds the potential to further reinforce self-censorship and stifle public debate. There is high concentration of ownership of the Turkish media outlets, linked to political and economic circles close to the government. The process of distribution of public advertisement is also biased. Last but not least important, journalism in Türkiye remains a risky low-paid profession, with almost no job security.

¹⁴ Civil society is highly heterogeneous and encompasses a wide range of actors and aims. The EU considers CSOs to embrace a wide range of actors with multiple roles and mandates which includes all non-State, not-for-profit, independent and non-violent structures, through which people organise to pursue shared objectives and ideals, whether political, cultural, religious, environmental, social or economic or related to health [...] They include, but are not limited to: Nongovernmental organisations, organisations representing indigenous peoples, women's and youth organisations, diaspora organisations, migrants' organisations, local traders' associations and citizens' groups, cooperatives, employers' associations and trade unions (social partners), organisations representing economic and social interests, organisations fighting corruption and fraud and promoting good governance, civil rights organisations and organisations combating discrimination, local organisations (including networks) involved in decentralised regional cooperation and integration, consumer organisations, environmental, teaching, cultural, research and scientific organisations, universities, churches and religious associations and communities, philosophical and non-confessional organisations, the not-for-profit media and any non-governmental associations and independent foundations, including independent political foundations. This definition is established in the Neighbourhood, Development and International Cooperation Instrument (NDICI) Thematic Programme for Civil Society Organisations - Multi Annual Indicative Programme 2021-2027.

¹⁵ "EU-Western Balkans Media Conference: Summary of the Conference and Way Forward" - https://www.wb-mediaconference.eu/wp-content/uploads/2023/03/Key-take-aways_final.pdf

¹⁶ COM (2023) 696 final. COMMISSION STAFF WORKING DOCUMENT "Türkiye 2023 Report", Brussels, 8.11.2023

Main stakeholders

The main stakeholders are media actors in the region. They still lack sufficient capacities, resources, and infrastructure to cope with key elements of the current global context such as media development, audiences' behaviour, technology advancements, and foreign interference in the information environment. Media still need to adapt fully to the overwhelming technological and digital changes, such as the impact of big tech, social media, and AI on media operations, their relations to audiences, and content production. The problem of information manipulation becomes even more complex considering the fertile ground for disinformation in the region (low level of trust in traditional media and increased polarization in society; lack of government transparency and heavy propaganda). As such, the media space in the region needs strong and professional editorial boards and newsrooms with integrity to be resilient to information manipulation, with fact-checking as a core task of news media. Online media, a principal channel of disinformation where most of digital rights violations, hate speech, unlawful removal of content happens, is still subject to co-regulation (i.e. further regulation and establishment of principles of self-regulation).

2.3. Lessons Learned

Civil Society

The Civil Society Facility and Media Programme offers a single window of support to civil society and media freedom, bringing together EU support at bilateral and regional level. Under IPA II, a mid-term evaluation of the Civil Society Facility¹⁷ was conducted in 2017. It found that the CSF effectively contributes to addressing the needs and priorities of civil society in the region. However, it also indicated that real cooperation between the central level and civil society remains weak and that the creation of an enabling environment is one of the critical areas that has to be improved.

Coordination between regional and bilateral level support activities is crucial and can best be ensured through the CSF single programming exercise, and through regular exchanges between the relevant stakeholders. Cooperation and coordination between the Headquarters and the EU Delegations/Offices of the region has been further enhanced through the recently launched “de-concentration” practice¹⁸ concerning several regional contracts implemented by CSOs and CSO networks (resulting from the activity “Support to regional thematic networks of CSOs operating in the Western Balkans and Türkiye”). This new approach has, so far, proved to be an effective way to ensure better monitoring and technical support to the implementation of the project activities.

Importantly, efforts continue to be made to complement the financial support to CSO and media actors with direct EU engagement with civil society, through mainstreaming, yearly monitoring meetings and consultations at regional and bilateral levels.

Furthermore, a recent ROM report¹⁹ recommended that the EU support more initiatives focusing on philanthropy and CSO financial and organisational sustainability. Considering the importance of this topic and the need for improvement in legislation in several IPA beneficiaries, the expert noted that further efforts in this field would bring businesses and individuals to be more open to give and thus contribute to their local communities, and, consequently, would contribute to strengthen CSO capacity and independence. The modality of support should also include a strong component of Financial Support to Third Parties (FSTP).

¹⁷ “Mid-term Evaluation of the Civil Society Facility for the Western Balkans and Turkey”, Contract N°2016/380154/1. FWC BENEFICIARIES 2013 – LOT 7: GOVERNANCE AND HOME AFFAIRS EuropeAid/132633/C/SER/multi

¹⁸ This “de-concentration” practice has been applied, for the first time, to some of the regional contracts resulting from the 2022 call for proposals ref. EuropeAid/174154/DH/ACT/Multi, replicating the already established “de-concentration” approach concerning the Kosovo – Serbia contracts resulting from the activity “Support to small scale projects in support of good neighbourly relations between Serbia and Kosovo”.

¹⁹ ROM Report dated 03/12/2021 on the contract “SIGN Up for Impact: Philanthropy Development for Stronger Civil Society” (Contract no. IPA/2018/395-435).

The Action will also benefit from the conclusions and recommendations emerging from the ongoing evaluation of the three previous phases of the “*Technical Assistance to Civil Society Organisations in the Western Balkans and Turkey – TACSO programme*”, and the recent ROM mission on the “*Support to the promotion of Civil Society regional actions in the Western Balkans*” contract (no. IPA/2021/424-879)²⁰, implemented by the Western Balkans Fund.

Media

The EU provided a limited assistance to the media sector in the Western Balkans and Türkiye under IPA I. For IPA II, however, the EU organised wide consultations with stakeholders, such as the Speak-up! and EU – Western Balkans Media Days Conferences to set out the policy vision for support on media in the enlargement context, freedom of expression being an important part of fundamentals. The European Commission developed a long-term strategic approach for EU assistance to media freedom in the region: the Guidelines for EU support to media freedom and media integrity in enlargement countries (2014-2020)²¹. The guidelines structured the EU assistance architecture for the IPA II period, which consisted of primarily holistic regional programmes for the Western Balkans and Türkiye to support various aspects of freedom of expression and media. In the context of the new Instrument for Pre-Accession (IPA III), the acceleration of the enlargement process warrants gradual de-concentration of EU assistance to bilateral assistance. Whereas peer-to-peer learning, peer pressure for reform, regional collaboration approaches, among others, still hold added value in case of regional projects, the implementation of the often politically sensitive media programmes require a level of closer and regular political and operational engagement on the ground.

The most optimal formula for EU assistance is the holistic approach of supporting key stakeholder groups - duty-bearers (state authorities, media outlets, etc) and rights holders (journalists and citizens). Media outlets themselves need to explore alternative sources of revenue including collaboration with domestic and international partners and tech companies (e.g. cooperation between mainstream media and fact-checkers).

Since its inception in 2018, the assistance to the Western Balkans and Türkiye through the European Endowment for Democracy (EED) remains one of the principal channels to provide access to finance to generally smaller civic actors and media, including fringe media, unregistered actors and individuals. The EED approach is demand-driven and flexible to respond to local realities. A 2023 ROM report reconfirmed the high relevance of the assistance, which was additionally tested during the Covid pandemic restrictions and the economic crisis in the context of the war in Ukraine. This approach and good outreach of EED is largely appreciated by various stakeholders. However, lessons learned include the risk for donor dependence of supported actors that still experience difficulties to find their economic model forward. As suggested by the report, EED should provide further targeted and tailor-made support in the form of mentoring and coaching on fund-raising and business development models. EED should further operationalise cooperation with EU Delegation of the ground and other regional projects in order to exchange information and seek opportunities for synergies, including on the tackling the issue of sustainability.

3. DESCRIPTION OF THE ACTION

3.1. Intervention Logic

The Overall Objective/(Impact) of this action is “*Strengthened participatory democracies and EU integration and approximation in the Western Balkans and Türkiye, through an enhanced contribution by civil society and media*”.

²⁰ROM Report dated 24/05/2023 on the contract “Support to the promotion of Civil Society regional actions in the Western Balkans” (Contract no. IPA/2021/424-879).

²¹ https://neighbourhood-enlargement.ec.europa.eu/guidelines-eu-support-media-freedom-and-media-integrity-enlargement-countries-2014-2020_en

The Specific Objectives/(Outcomes) of this action are:

1. Strengthened and more gender-responsive civil society sector through a more conducive environment, a strengthened cooperation and partnership between CSOs and public institutions, and reinforced CSO capacity and resilience.
2. Independence and pluralism of media fostered through a more conducive environment for the freedom of expression, improved internal governance of media outlets, and established professional and ethical standards of quality content production.

The Outputs to be delivered by this action contributing to the corresponding Specific Objectives (Outcomes) are:

- 1.1 *contributing to Specific Objective 1 (or Outcome 1)*: Enhanced CSO and CSO networks' systematic involvement in policy- and decision-making processes across various thematic areas
- 1.2 *contributing to Specific Objective 1 (or Outcome 1)*: Improved CSO financial and organisational sustainability
- 1.3 *contributing to Specific Objective 1 (or Outcome 1)*: Improved CSOs' cross-cutting capacity development and networking opportunities
- 2.1 *contributing to Specific Objective 2 (or Outcome 2)*: Improved systemic conditions for Media Information Literacy, media integrity, and co-regulation of online media platforms.
- 2.2 *contributing to Specific Objective 2 (or Outcome 2)*: Increased professional capacity of journalists, media outlets, media-related institutions as well as professional organisations and networks to exercise the right to freedom of expression, deliver quality content and fight disinformation
- 2.3 *contributing to Specific Objective 2 (or Outcome 2)*: Pluralism of civil society and media sustained through grants for innovative media initiatives, fringe media, grass-roots and community based organisations, individual activists and emerging actors, notably those in restrictive environments

The underlying intervention logic for this action is that:

If CSO and CSO networks' systematic involvement in policy- and decision-making processes is enhanced, CSO financial and organisational sustainability and CSOs' cross-cutting capacity development and networking opportunities are improved then the civil society sector will be strengthened, and will benefit from a more conducive environment, a strengthened cooperation and partnership between CSOs and public institutions, and reinforced CSO capacity and resilience.

If systemic conditions for Media Information Literacy, media integrity, and co-regulation of online media platforms are improved then the independence and pluralism of media will be preserved through a more conducive environment, improved internal governance of media outlets in terms of accountability and established ethical standards of quality content production. Moreover, if journalists, media outlets, media-related institutions, professional organisations and networks deliver quality content and fight disinformation with increased professional capacities then independence and pluralism of media will be fostered in the Western Balkans and Türkiye. Lastly, if grants for innovative media initiatives, fringe media, grass-roots and community based organisations, individual activists and emerging actors are sustained then pluralism will be fostered in the Western Balkans and Türkiye.

Ultimately, if the civil society sector is strengthened and the independence and pluralism of media are fostered then participatory democracies and EU integration and approximation in the Western Balkans and Türkiye are strengthened, through an enhanced contribution by civil society and media.

3.2. Indicative Activities

Activities related to Output 1.1

- **Support to regional thematic networks of CSOs operating in the Western Balkans.**

In an overall vision of enhanced regional cooperation, this activity will support regional thematic CSO networks active in various fields to strengthen their capacities to systematically and effectively contribute to the decision-making process and to a sustainable and inclusive socio-economic development at beneficiary and regional level.

- **Support to small scale projects in support of good neighbourly relations between Serbia and Kosovo.**

This activity will be support grass root level actions in the selected region. Financed actions will support CSOs and local authorities in Serbia and Kosovo in tackling common challenges and in promoting intercultural dialogue and stronger cooperation between local communities.

- **Support to small scale regional cooperation projects.**

This activity will be implemented through support to the Western Balkans Fund. The support will enable CSOs to increase their participation in tackling various thematic societal challenges, through the implementation of small-scale regional projects involving grassroots CSOs and local authorities.

Activities related to Output 1.2

- **Support to the financial and organisational sustainability of CSOs.**

Support CSOs in setting up structured fundraising strategies, aimed at promoting funding diversification and their engagement in philanthropy, corporate social responsibility, social entrepreneurship, etc. Additionally, the activity will foster enhanced cooperation with IPA beneficiaries' decision makers in promoting an enabling, transparent, accountable, fair and non-discriminatory financial environment for civil society.

Activities related to Output 1.3

- **Provision of regional technical assistance to CSOs (TACSO).**

This activity will enhance civil society capacity in cross-cutting themes such as resilience, management and organisation and thematic sector specific capacity building. Additionally, this activity will support a People-to-People programme which offers the opportunity for CSOs in the region to expand their knowledge about the EU and the accession process, as well as the opportunity to network internationally and regionally.

Activities related to Output 2.1

- **Support to Media Information Literacy and media self-regulation.**

The activity is a continuation of previous work supporting media accountability mechanisms, such as self-regulation and implementation of ethical norms, and empowering women and men through media information literacy in particular youth, to think critically about the information they receive through media and counter disinformation. The action will also address the need for a rights-based regulation of digital platforms and online media.

Activities related to Output 2.2

- **Quality Journalism initiatives in the Western Balkans**

The action will provide structural support to media freedom and media integrity in the Western Balkans. It will aim to enhance trust in media among citizens and create a safe environment for journalists to produce independent news content through trainings, mentoring, technical and financial support, publishing and recognizing best examples of high-quality journalism.

- **Support to Regional CSO networks in the Western Balkans promoting media freedom, freedom of expression and fighting disinformation**

Under this activity, the action will provide support to civil society and media networks to seek innovative ways and collaborative approaches in upholding media freedom and pluralism, which will include a number of challenges and opportunities related to the media environment (e.g. safety of journalists, media and information literacy, resilience, disinformation, hate speech, audience trust and engagement, etc.), internal governance (e.g. economic sustainability, protection of labour rights, online platform regulation, etc), professional standards for quality content production (e.g. self-regulation, ethical standards, etc), amongst others.

Activities related to Output 2.3

- **Support to media initiatives, grass-roots and community based organisations, activists and emerging actors in the Western Balkans and Türkiye**

Financial and technical support will be provided to grass-roots and community-based organisations, activists and emerging actors (including individuals, small-scale and unregistered actors), as well as to independent media actors in the Western Balkans and Türkiye. The EU financial contribution will cover both direct support to target groups through financial support to third parties and operating costs of the European Endowment for Democracy (EED) for the years 2026 and 2027. The operating grants will contribute to the functioning of the EED in its primary role as a flexible and added-value based grant-making organisation.

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. Specific focus on environment- and climate-related topics will be ensured in all the calls for proposals that will be launched, including the ones managed by intermediary actors such as Western Balkans Fund and/or in the framework of financial support to third parties' activities. In addition, specific technical assistance and mentoring activities to CSOs focusing on green transition and green practices will be also foreseen. Environmental and climate change topic are frequent in investigative journalism in the Western Balkans, which will be supported through the action. Climate change disinformation is also an emerging trend with high probability to be taken up by beneficiaries. Along with the process of digitalisation, programme beneficiaries have adopted more environmentally friendly patterns of implementing of activities (reduced use of paper, electronic materials and reports, online meetings as opposed to polluting air travelling, among others). Additionally, all programme's activities will be environmental friendly and sensitive to specific challenges that communities face in terms of environment protection.

Gender equality and empowerment of women and girls

As per OECD Gender DAC codes identified in section 1.1, this action is labelled as G1²². This implies that gender equality, in particular women's and girls' safety and empowerment will be supported under all the foreseen results and activities in line with the approach outlined in the EU Gender Action Plan (GAP III) 2021-2025. These aspects will be explicitly and consistently addressed, and gender mainstreaming will be promoted throughout the implementation of the action in line with the EU Action Plan on Gender Equality and Women's Empowerment in External Action 2021–2025. Gender analysis and disaggregated indicators at programme and contract levels will be also foreseen, as to measure the effects of the Action with regard to gender equality and women's and girls' empowerment. Regional calls for proposals, or negotiation of direct grant contracts and calls for tenders will also include specific requirements on or inclusion of gender as a topic, e.g. safety of women journalists, in line with the above. The action will benefit from existing sound regional cooperation of gender institutional mechanisms from Western Balkans, established by signing Regional Declaration (2005) and Joint Statement on Regional Cooperation (2014), emphasizing strongly the need for close cooperation of gender mainstreaming institutional mechanisms and civil sector in the Western Balkans.

Human Rights

This action will be implemented in a non-discriminatory manner and according to equal opportunities principles that guarantee that no distinctions will be made based on race, ethnicity, religion, sexuality, ability or other possible grounds in any aspect. It will also adopt a human-rights based approach, taking into consideration special individual needs of different groups, and make sure that all the foreseen activities are sufficiently inclusive. In this regard, all civil society and media activities will put an emphasis on engaging, representing and reporting on the rights of most vulnerable groups, including people living in poverty, vulnerable women, children, persons with mental and/or physical disabilities, Roma, Ashkali and Egyptian communities as well as other minority groups. The Action will contribute to improve the social inclusion of the above-mentioned vulnerable groups, fight racism and various forms of discrimination, including antigypsyism. At project level, the Rights Based Approach will be included in the design of the Guidelines for individual calls and requested for the project applications. The action will target freedom of expression, which is a core human right, whereas more specifically, for instance, output 2.1 will assist the introduction of rights-based regulation of digital platforms and online media. It is acknowledged that the action is subject to certain limitation due to fact that it 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 through its different components, the action encourages the involvement of vulnerable population, including persons with disabilities, and the development and mainstreaming of adequate community-based tailored social services implemented by civil society.

Democracy

As per overall objective/impact, this action aims at strengthening participatory democracies in the Western Balkans and Türkiye, through an enhanced contribution by civil society and media. It will also promote principles of good governance, rule of law, active citizenship, and freedom of expression and media freedom.

²² Significant objective

3.4. Risks and Assumptions

Category	Risks	Likelihood (High/Medium/Low)	Impact (High/Medium/Low)	Mitigating measures
1 (external environment)	<u>Risk 1</u> Political instability/lack of political will	M	M	<ul style="list-style-type: none"> - Regular inclusive and evidence-based regional political dialogue with the parties concerned; - Continuous monitoring of progress achieved; - Steering Committees to be set up.
1 (external environment)	<u>Risk 2</u> Emerging of new disruptive emergencies/crises in the region	L	M	<ul style="list-style-type: none"> - Adoption of flexible approaches; - Capitalise on resilience/sustainability elements when building capacities of partners and beneficiaries.
3 (people and organisations)	<u>Risk 3</u> Lack of cooperation between CSOs/media and Institutions	L	L	<ul style="list-style-type: none"> - Link projects activities to monitoring and evaluation plan and a risk management plan; - Work on regular inclusive and evidence-based regional political dialogue with the parties concerned.
1 (external environment)	<u>Risk 4</u> Restrictive environments/lack of safety of journalists	M	M	<ul style="list-style-type: none"> - Closely monitor the situation with other partners; - Deepen dialogue with governments.
3 (people and organisations)	<u>Risk 5</u> Insufficient quality/quantity of applications received for subgranting.	L	M	<ul style="list-style-type: none"> - Wide promotion campaigns; - Implementers engage in capacity building/information sessions.

Assumptions

The most significant conditions for implementation of the action is the enabling environment for civil society and media to perform their core mandate and implement programme activities. Legal frameworks ensuring that the exercise of the freedom of association and expression is formally guaranteed in all IPA III beneficiaries, although their implementation varies. Thus, the assumption is that the situation as regards the exercise of fundamental rights and freedoms will not further deteriorate.

Another assumption is that IPA beneficiary institutions share the common interest of succeeding with various reforms and advance in the enlargement process and will thus be receptive to the constructive inputs of the civil society and objective reporting of the media and are willing to develop and maintain a constructive dialogue/cooperation with CSOs. The same assumption is true for CSOs and media: they share common values and goals and are willing to create networks and cooperate in constructive manner. Further, CSOs and media actors benefiting from activities should be willing to apply the acquired knowledge and skills to their work.

3.5. Indicative Logical Framework Matrix

Results	Results chain: Main expected results	Indicators	Baselines (values and years)	Targets (values and years)	Sources of data	Assumptions
Impact	To strengthen participatory democracies and the EU integration and approximation process in the Western Balkans and Türkiye, through an enhanced contribution by civil society and media	1 Value of V-Dem Participatory Component Index ²³ disaggregated by IPA Beneficiary	1 (2022) AL 0.55 BA 0.54 XK 0.5 ME 0.53 MK 0.62 RS 0.57 TR 0.42	1 (2030) For all IPA Beneficiaries: at least 0.64	1 V-Dem Annual Democracy report	<i>Not applicable</i>
Outcome 1	1 Strengthened and more gender-responsive civil society sector through a more conducive environment, a strengthened cooperation and partnership between CSOs and public institutions, and reinforced CSO capacity and resilience	1.1 DG NEAR Guidelines Assessment Report: conducive environment index ²⁴ disaggregated by IPA Beneficiary 1.2 DG NEAR Guidelines Assessment Report: CSO – public institution cooperation index disaggregated by IPA Beneficiary 1.3 DG NEAR Guidelines Assessment Report: CSO capacity and accountability index	1.1 (2021) AL 3.18 BA 2.53 XK 3.29 ME 3.35 MK 3.53 RS 3.21 TR 1.00 1.2 (2021) AL 2.60 BA 1.40 XK 3.60 ME 2.00 MK 1.60 RS 1.33 TR 1.00 1.3 (2021) AL 2.93 BA 3.07 XK 3.53 ME 3.33 MK 3.20	1.1 (2030) For all IPA Beneficiaries: at least 3.8 1.2 (2030) For all IPA Beneficiaries: at least 3.8 1.3 (2030) For all IPA Beneficiaries: at least 3.8	1.1, 1.2, 1.3 DG NEAR Guidelines for EU Support to Civil Society in WBT Baseline Assessment report and Assessment report for subsequent years	The exercise of fundamental rights and freedoms does not further deteriorate

²³ The Participatory Component Index is one of the indexes that compose the V-Dem liberal democracy index. The latter is made up of 5 components: ELECTORAL DEMOCRACY INDEX (EDI); LIBERAL COMPONENT INDEX (LCI); EGALITARIAN COMPONENT INDEX (ECI); PARTICIPATORY COMPONENT INDEX (PCI); DELIBERATIVE COMPONENT INDEX (DCI). For more information, <https://www.v-dem.net/publications/democracy-reports/>

²⁴ The proposed index is based on the quantitative values allocated to selected indicators in the Assessment reports against the DG NEAR Guidelines for EU Support to Civil Society. Enabling environment index: simple average of allocated score (1 = low, 5 = high) for Guidelines indicators 1.1.a 1.2.a 1.2.b 1.3.a 1.4.a 1.5.a 1.5.b 1.6.a 1.7.a 1.7.c 1.7.d 1.7.e 1.7.f 1.8.a 1.9.a 1.10.a 1.10.b.

		disaggregated by IPA Beneficiary	RS 3.20 TR 3.47			
Outcome 2	2 Independence and pluralism of media fostered through a more conducive environment for freedom of expression, improved internal governance of media outlets, and established professional and ethical standards of quality content production	2.1 MPM index of fundamental protection 2.2 MPM index of Market Plurality 2.3 MPM index of Political independence	2.1 (2022) AL 58 ME 45 MK 32 RS 49 TR 80 2.2 (2022) AL 87 ME 68 MK 62 RS 68 TR 76 2.3 (2022) AL 69 ME 64 MK 49 RS 75 TR 88	2.1 (2030) at most 36% for all IPA Beneficiaries except MK; MK = 30% 2.2 (2030) AL 82 ME 63 MK 57 RS 63 TR 71 2.3 (2030) at most 59% for all IPA Beneficiaries except MK; MK = 40%	2.1 2.2, 2.3 Media Pluralism Monitor from the Centre for Media Pluralism and Freedom at the Robert Schuman Centre (https://cmpf.eui.eu/mpm-2022-interactive/).	The exercise of fundamental rights and freedoms does not further deteriorate
Output 1 related to Outcome 1	1.1 Enhanced CSO and CSO networks' systematic involvement in policy- and decision-making processes across various thematic areas	1.1.1 No. of regional interventions focusing on various thematic areas, involving at least two IPA beneficiaries, supported under the current action 1.1.2 DG NEAR Guidelines	1.1.1 (2023) 0 1.1.2 (2021) AL 2.67 BA 1.67 XK 2.67	1.1.1 (2028) At least 80 1.1.2 (2030)	1.1.1 Signed contracts, WBF progress reports 1.1.2 DG NEAR Guidelines for EU Support to Civil Society in the Western	IPA beneficiary institutions are willing to develop and maintain a constructive and meaningful dialogue/cooperation with CSOs

		Assessment Report: CSO participation in public policy index	ME 2.67 MK 2.00 RS 1.5 TR 1.00	For all IPA Beneficiaries: at least 3.5	Balkans and Türkiye Baseline Assessment report and Assessment report for subsequent years indicators 2.1a, 2.2.a and 2.3.f;	
Output related Outcome 1	2 to 1.2 Improved CSO financial and organisational sustainability	1.2.1 Proportion of CSOs benefiting from relevant activity which claim an improvement in their financial and organisational sustainability 1.2.2 DG NEAR Guidelines Assessment Report: CSO funding sources index	1.2.1 n/a 1.2.2 (2021): AL 4 BA 4 XK 3.5 ME 3 MK 4 RS 3.5 TR 4.5	1.2.1 (2029) At least 75% 1.2.2 (2030) For all IPA Beneficiaries: at least 4.5	1.2.1 Project reports 1.2.2 DG NEAR Guidelines for EU Support to Civil Society in Western Balkans and Türkiye Baseline Assessment report and Assessment report for subsequent years	Legal and environmental conditions allow CSOs to raise funds from different sources

					indicators 3.7a and 3.7b	
Output related Outcome 1	3 to 1.3 Improved CSOs' cross-cutting capacity development and networking opportunities	1.3.1 Proportion of CSOs benefiting from TACSO activities which claim an improvement in organisational capacity 1.3.2 Proportion of CSOs benefiting from TACSO activities which claim an improvement in networking opportunities	1.3.1 To be defined (first survey in the last quarter of 2023) 1.3.2 To be defined (first survey in the last quarter of 2023)	1.3.1 To be defined based on the baseline value 1.3.2 To be defined based on the baseline value	1.3.1, 1.3.2 TACSO annual survey of CSO beneficiaries	CSOs benefiting from TACSO activities apply the acquired knowledge and skills to their work
Output 1 related Outcome 2	to 2.1 Improved systemic conditions for Media Information Literacy, media integrity, and co-regulation of online media platforms	2.1.1 No. of young people reached by project activities related to media awareness and media literacy 2.1.2 Proportion of young people reached by project activities who report improved media awareness and media literacy 2.1.3 Number of media completing the Journalism Trust	2.1.1 (2023) 3000; (projected for 2025) 9,400 2.1.2 n/a 2.1.3 (2023) 28	2.1.1 (2029) additional 10,000 2.1.2 (2029) At least 80% 2.1.3 (2029) At least 160	2.1.1 Project implementation reports 2.1.2 Project implementation reports 2.1.3 JTI records, Project	IPA beneficiary institutions are willing to develop and maintain a constructive dialogue/cooperation with CSOs

		Initiative (JTI) self-assessment audits			implementation reports	
Output related to Outcome 2	2.2 Increased professional capacity of journalists, media outlets, media-related institutions as well as professional organisations and networks to exercise the right to freedom of expression, deliver quality content and fight disinformation in the Western Balkans and Türkiye	2.2.1 No. of supported media actors	2.2.1 (2023) 130	2.2.1 (2029) at least 130 media institutions newly supported	2.2.1 Project implementation reports	CSOs and media actors share common values and goals and are willing to create networks and cooperate in constructive manner.
Output related to Outcome 2	2.3 Pluralism of civil society and media sustained through grants for innovative media initiatives, fringe media, grass-roots and community based organisations, individual activists and emerging actors, notably those in restrictive environments in the Western Balkans and Türkiye	2.3.1 No. of supported innovative media initiatives, fringe media, grass-roots and community based organisations, individual activists and emerging actors	2.3.1 (2022) 364	2.3.1 (2030) at least 350 new initiatives supported, of which at least 30% awarded to initiatives with a gender component	2.3.1 EED implementation reports	The exercise of fundamental rights and freedoms does not further deteriorate

4. IMPLEMENTATION ARRANGEMENTS

4.1. Financing Agreement

In order to implement this action, it is not envisaged to conclude financing agreements with the IPA III beneficiaries.

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 measures²⁵.

4.3.1. Direct Management (Grants)

4.3.1.1. Grants

Support to regional thematic networks of CSOs operating in the Western Balkans

(a) Purpose of the grant(s)

The grants will contribute to achieving the output 1.1, thus contributing to the outcome 1 of the Action.

(b) Type of applicants targeted

- be a legal person and
- be non-profit-making and
- be a civil society organisation, or a consortium of civil society organisations, and/or
- be social enterprises

²⁵ [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.

4.3.1.2. Grants

Support to small scale projects in support of good neighbourly relations between Serbia and Kosovo

(a) Purpose of the grant(s)

The grants will contribute to achieving the output 1.1, thus contributing to the outcome 1 of the Action.

(b) Type of applicants targeted

- be a legal person and
- be non-profit-making and
- be a civil society organisation, or a consortium of civil society organisations, and/or
- be a local or central authority of the targeted IPA beneficiaries

4.3.1.3. Grants

Support to small scale regional cooperation projects

(a) Purpose of the grant(s)

The grants will contribute to achieving the output 1.1, thus contributing to the outcome 1 of the Action.

(c) 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 Western Balkans Fund (WBF). The WBF aims to promote cooperation and common values between local authorities, citizens, and CSOs and people to people contacts, by providing funding for small- sized regional projects among local authorities and CSOs, in the following key areas: 1) sustainable economic development; 2) education exchange and cooperation and 3) cultural cooperation. Youth, cross-border cooperation, European integration and gender are overarching issues, covering all WBF areas of cooperation. The regional and small-size nature of projects funded by the WBF make its activities complementary to the larger-sized regional projects normally financed by the EU in the Western Balkans for CSOs and local authorities. Thus, it would enable grassroots organisations and local authorities directly benefitting from EU support and the IPA beneficiaries to stay further engaged in the conducive environment for civil society and regional cooperation. The WBF possesses the necessary technical competence and the capacity to conduct the proposed calls for proposals due to its previous documented activities. The fact that the organisation is owned and governed by all the Western Balkans IPA beneficiaries places it in a unique position to be able to promote regional cooperation. The type of activities proposed under this activity are closely linked to the WBF mandate to advance regional cooperation and thus fall outside the scope of a call for proposals.

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, in accordance with Article 195 (1) (f) of the Financial Regulation (EU, Euratom) 2018/1046, the specific nature of the proposed activities, which involves highly specialised work with small-sized and grassroots CSOs and local authorities at a regional level, requires a unique combination of capacities and modus operandi that only WBF in the region can boast and places it outside the scope of a call for proposals. WBF provides a unique combination of ownership by all the Western Balkans IPA beneficiaries. Its status of inter-governmental organisation, coupled with its mandate to promote regional cooperation and its focus on providing financial support to grassroots CSOs, makes the WBF a unique body with no peers in the Western Balkans. These characteristics place the organisation in a position not matched by any other in the region. The establishment of the WBF is considered as a clear sign of a new

cooperation spirit taking roots in the Western Balkans at the highest institutional level. The Agreement for the creation of WBF was indeed signed by the Ministers of Foreign Affairs of the six Western Balkans IPA beneficiaries in November 2015 and the WBF became operational in October 2017, after the conclusion of the ratification procedures by all six Parliaments of its constitutive members. The latter equally finance the WBF.

4.3.1.4. Grants

Support to the financial and organisational sustainability of CSOs

(a) Purpose of the grant(s)

The grants will contribute to achieving the output 1.2, thus contributing to the outcome 1 of the Action.

(b) Type of applicants targeted

- be a legal person and
- be non-profit-making and
- be a civil society organisation, or a consortium of civil society organisations

4.3.1.5 Grants

Quality Journalism initiatives in the Western Balkans

(a) Purpose of the grant(s)

The grants will contribute to achieving the output 2.2, thus contributing to the outcome 2 of the Action.

(b) Type of applicants targeted

- be a legal person and
- be non-profit-making and
- be a civil society organisation, or a consortium of civil society organisations

4.3.1.6 Grants

Support to Regional CSOs networks in the Western Balkans promoting media freedom, freedom of expression and fighting disinformation

(a) Purpose of the grant(s)

The grants will contribute to achieving the output 2.2, thus contributing to the outcome 2 of the Action.

(b) Type of applicants targeted

- be a legal person and
- be non-profit-making and
- be a civil society organisation, or a consortium of civil society organisations

4.3.1.7 Grants

EED Action Grant

a) Purpose of the grants:

The grant will contribute to achieving the output 2.3, thus contributing to the outcome 2 of the Action, by channelling financial support to:

- independent mission media outlets, including bloggers and emerging media actors, in particular small ones
- pro-democracy grass-roots and community based organisations, activists and emerging actors, including individuals, and including small scale and emerging unregistered actors in sensitive environments

b) Justification of a direct grant:

Under the responsibility of the Commission's Authorising office responsible, the grants may be awarded without a call for proposals to the European Endowment for Democracy, aiming to build on its respective mandate, strengths and expertise in the area of financial support to grass-root, community-based organisations, small scale media outlets, bloggers, independent media, activists and emerging actors. The direct grants are in accordance with Article 195 (1) (f) of the Regulation (EU, Euratom) 2018/1046 of the European Parliament and of the Council of 18 July 2018 on the financial rules applicable to the general budget of the Union, i.e. "for activities with specific characteristics that require a particular type of body on account of its technical competence, its high degree of specialisation or its administrative powers, on condition that the activities concerned do not fall within the scope of a call for proposals".

Under the responsibility of the Commission's authorising officer responsible, the recourse to the award of a grant without a call for proposals is justified because EED is a body uniquely positioned to respond to the highly specific characteristics of this activity. EED was set up specifically to provide financial support to pro-democratic movements and other pro-democratic actors in favour of a pluralistic multiparty system on democratic ground; social movements and actors; CSOs; young leaders; independent media and journalists (including bloggers, social media activists, etc), non-governmental institutions, including foundations and educational institutions functioning also in exile; provided that all the beneficiaries adhere to core democratic values, and human rights as well as subscribe to principles of non-violence. EED is specialised in supporting those among the above stakeholders that have difficulties benefitting from assistance through traditional funding channels due to their size, legal status (e.g. non-registered entities or individuals), geopolitical context (e.g. civil war situation), and particular needs etc. Furthermore, EED offers a unique credibility when carrying out these activities, due to the formal backing it enjoys from a broad European constituency. Launched through a Council Declaration, EED has a distinctive institutional set-up, being steered and monitored by representatives of the European Parliament, the EU Member States, the European External Action Service and the civil society of the region. The specific nature of the proposed activities under Output 2.3, which involves sensitive work with media outlets, civil society actors and democracy activists, places it outside the scope of a call for proposals, as it would need to rely on the unique *modus operandi* used by EED based on the mechanisms and reasons described above.

This, along with its experience and already established network in the region, allows EED to deliver the needed support to the target beneficiaries, including in sensitive situations, and justifies the direct award. This unique position was recognised by the European Commission and EEAS in the Joint Communication of the

Commission and High Representative on tackling COVID- 19 disinformation²⁶. EED’s good track-record, also confirmed during a 2023 ROM report, with efficient award procedures (that are compliant with the general principles applicable to the use of public funds) and with a standing good reputation, makes it an adequate vehicle for providing financial support to local beneficiaries at a micro- or mini-scale, allowing beneficiaries such as non-registered associations, political movements, individual activists, bloggers etc. to benefit from the donors community funding where this would not be possible through more traditional funding channels.

4.3.1.8 Grants

EED Operating Grants for years 2026 and 2027

a) Purpose of the grants:

The grants will contribute to achieving the output 2.3, thus contributing to the outcome 2 of the Action, by covering parts of the EED’s operating costs in 2026 and 2027 respectively. The operating grants will be combined with resources drawn from NDICL. The operating costs correspond to the functioning of the foundation and to the implementation of the other (beyond financial support to third parties) activities that the EED performs as part of its mandate: seminars, studies, conferences, publications, networking events, workshops, training and visibility activities, capacity building for beneficiaries, etc.

b) Justification of a direct grant:

Under the responsibility of the Commission’s Authorising office responsible, the grants may be awarded without a call for proposals to the European Endowment for Democracy, aiming to build on its respective mandate, strengths and expertise in the area of financial support to grass-root, community-based organisations, small scale media outlets, bloggers, independent media, activists and emerging actors. The direct grants are in accordance with Article 195 (1) (f) of the Regulation (EU, Euratom) 2018/1046 of the European Parliament and of the Council of 18 July 2018 on the financial rules applicable to the general budget of the Union, i.e. “for activities with specific characteristics that require a particular type of body on account of its technical competence, its high degree of specialisation or its administrative powers, on condition that the activities concerned do not fall within the scope of a call for proposals”.

Under the responsibility of the Commission’s authorising officer responsible, the recourse to the award of a grant without a call for proposals is justified because EED is a body uniquely positioned to respond to the highly specific characteristics of this activity. EED was set up specifically to provide financial support to pro-democratic movements and other pro-democratic actors in favour of a pluralistic multiparty system on democratic ground; social movements and actors; CSOs; young leaders; independent media and journalists (including bloggers, social media activists, etc), non-governmental institutions, including foundations and educational institutions functioning also in exile; provided that all the beneficiaries adhere to core democratic values, and human rights as well as subscribe to principles of non-violence.

The EED is specialised in supporting those among the above stakeholders that have difficulties benefitting from assistance through traditional funding channels due to their size, legal status (e.g. non-registered entities or individuals), geopolitical context (e.g. civil war situation), and particular needs etc. Furthermore, EED offers a unique credibility when carrying out these activities, due to the formal backing it enjoys from a broad European constituency. Launched through a Council Declaration, EED has a distinctive institutional set-up, being steered and monitored by representatives of the European Parliament, the EU Member States, the

²⁶ JOIN(2020) 8 final. JOINT COMMUNICATION TO THE EUROPEAN PARLIAMENT, THE EUROPEAN COUNCIL, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS “Tackling COVID-19 disinformation - Getting the facts right”, Brussels, 10.6.2020.

European External Action Service and the civil society of the region. The specific nature of the proposed activities under Output 2.3, which involves sensitive work with media outlets, civil society actors and democracy activists, places it outside the scope of a call for proposals, as it would need to rely on the unique modus operandi used by EED based on the mechanisms and reasons described above.

This, along with its experience and already established network in the region, allows EED to deliver the needed support to the target beneficiaries, including in sensitive situations, and justifies the direct award. This unique position was recognised by the European Commission in its Action Plan in Support of the Transformation of the Western Balkans and in the Joint Communication of the Commission and High Representative on tackling disinformation. EED's good track-record, also confirmed during a 2023 ROM report, with efficient award procedures (that are compliant with the general principles applicable to the use of public funds) and with a standing good reputation, makes it an adequate vehicle for providing financial support to local beneficiaries at a micro- or mini-scale, allowing beneficiaries such as non-registered associations, political movements, individual activists, bloggers etc. to benefit from the donors community funding where this would not be possible through more traditional funding channels.

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 will contribute to achieving the outputs 1.3, thus contributing to the outcome 1 of the Action.

4.3.3. Indirect Management with a pillar-assessed entity

A part of this action, Support to Media Information Literacy and media self-regulation, may be implemented in indirect management with UNESCO, the UN agency in charge for freedom of expression, whose programmes cover the promotion of independent media and freedom of the press. This implementation entails management and implementation of all aspects of Output 2.1 of the action, including budget implementation tasks (procurement and grant award procedures as relevant).

The envisaged entity has been selected using the following criteria: UNESCO has relevant extensive technical experience in working with beneficiaries and local media organisations/press councils (it implemented the preceding phases of the activity). It has demonstrated operational capacity to manage a project of this size, and to ensure a proper implementation of the foreseen financial support to third parties.

In case the envisaged entity would need to be replaced, the European Commission's services may select a replacement entity using the same selection criteria given above. If the entity is replaced the decision to replace it needs to be justified.

4.3.4. Changes from indirect to direct management mode due to exceptional circumstances

If the implementation modality under indirect management 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 4.3.1.6:

(a) Subject matter of the grant (s): The grants will contribute to achieving the output 2.1, thus contributing to the outcome 2 of the Action.

(b) Type of applicants targeted: same as for section 4.3.1.6

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

Indicative Budget components	EU contribution 2024 (amount in EUR)	EU contribution 2025 (amount in EUR)	Indicative third-party contribution ²⁷ (amount in EUR)
Methods of implementation – cf. section 4.3			
Outcome 1 “Strengthened civil society sector through a more conducive environment, a strengthened cooperation and partnership between CSOs and public institutions, and reinforced CSO capacity and resilience” composed of	4 000 000	14 500 000	1 350 000
<i>Grants (direct management) – cf. section 4.3.1</i>			
Support to regional thematic networks of CSOs operating in the Western Balkans		10 000 000	1 000 000
Support to small scale projects in support of good neighbourly relations between Serbia and Kosovo		2 000 000	100 000

²⁷ The indicative third-party contribution will be provided by the selected implementing partners.

Support to small scale regional cooperation projects		1 250 000	100 000
Support to the financial and organisational sustainability of CSOs		1 250 000	150 000
<i>Procurement (direct management) – cf. section 4.3.2</i>			
Provision of regional technical assistance to CSOs (TACSO)	4 000 000		
Outcome 2 “Independence and pluralism of media fostered through a more conducive environment for freedom of expression, improved internal governance of media outlets, and established professional and ethical standards of quality content production” composed of		28 000 000	900 000
<i>Grants (direct management) – cf. section 4.3.1</i>			
Quality Journalism initiatives in the Western Balkans		2 000 000	200 000
Support to regional CSO networks in the Western Balkans promoting media freedom, freedom of expression and fighting disinformation		4 000 000	400 000
EED Action Grant		15 000 000	
EED Operating Grant for year 2026		2 000 000	
EED Operating Grant for year 2027		2 000 000	
<i>Indirect management with a pillar-assessed entity – cf. section 4.3.3.</i>			
Support to Media Information Literacy and media self-regulation (UNESCO)		3 000 000	300 000
Grants – total envelope under section 4.3.1		39 500 000	
Procurement – total envelope under section 4.3.2	4 000 000		
Indirect management with a pillar-assessed entity – total envelope under section 4.3.3		3 000 000	
Evaluation – c.f. section 5.2 Audit – c.f. section 5.3 Strategic Communication – c.f. section 6	N.A.	To be covered by another Decision	N.A.
Totals	4 000 000	42 500 000	2 250 000

4.6. Organisational Set-up and Responsibilities

As part of its prerogative of budget implementation and to safeguard the financial interests of the Union, the Commission may participate in the governance structures set up for governing the implementation of the action.

The main institutional stakeholder involved in the management and implementation process of the action is DG NEAR, Unit D.5 as the contracting authority. Unit D.5 will manage most of the contracting foreseen, with the possibility of de-concentration to other units in DG NEAR or EU Delegations/EU Office. However, as a regular practice, Unit D.5 will exchange information and coordinate with the relevant EU Delegations/EU Office to strengthen synergies among the different EU funded actions. In this regard, it is worth mentioning the civil society facility and the media working groups, involving both NEAR and EU Delegations/EU Office focal points, which meet regularly in order to ensure proper coordination and joint monitoring of the action implementation.

Other institutional stakeholders that will be involved at beneficiary level include:

- For activities under Outcome 1 – CSOs, central, regional and local public authorities, contracting parties.
- For activities under Outcome 2 – CSOs, media outlets, media and journalist associations, relevant authorities, contracting parties (e.g. UNESCO, EED).

DG NEAR D5 will facilitate synergies and coordination among the implementing partners involved in the activities under Outcome 1. DG NEAR D5 will also be in lead of organising regular implementers' coordination meeting under outcome 2 to foster synergies and complementarities among these actions and further optimise resources.

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 logframe matrix.

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:

DG NEAR D5's methodology for continuous monitoring of the action is based on the *DG NEAR Guidelines for EU Support to Civil Society in the Enlargement Region*, with particular regard to the relevant annual assessment against the standards and indicators set out in the Guidelines (to this purpose, most of the logical framework indicators of this action are consistent with the ones of the Guidelines), and the *Guidelines for EU support to media freedom and media integrity*, as well as on *GAP III* and *IPA III indicators* whenever relevant. The guidelines are formulated in the form of a results framework, which contains results to be achieved by a combination of political and financial support. The selection of results and indicators in the logical framework of the present document is therefore consistent with the Guidelines.

Monitoring of the guidelines is supervised by DG NEAR in collaboration with the EU Delegations/EU Office in the region, international organisations, partner institutions, the regional Technical Assistance to CSOs (TACSO) and networks of CSOs. Both qualitative and quantitative data is collected, by means of surveys, peer reviews, independent assessment, etc. The results framework allows for the measurement of progress at IPA III beneficiaries level.

5.2. Evaluation

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

The mid-term evaluation will be carried out for learning purposes, in particular with respect to the relevance and effectiveness of the architecture of EU assistance to civil society and media.

The ex-post evaluation will be carried out for accountability and learning purposes at various levels (including for policy revision), taking into account in particular the fact that civil society and media play a particularly important role consolidating the democracy in the enlargement context and well-tailored assistance in that regard is crucial.

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 CSOs (private sector, NGOs, etc.), etc.) levels. If deemed necessary, other donors will be invited to join.

The evaluation reports shall be shared with the Beneficiaries and other key stakeholders following the best practice of evaluation dissemination. The implementing partner and the Commission shall analyse the conclusions and recommendations of the evaluations and, where appropriate, in agreement with the Beneficiaries, 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 Beneficiaries, 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.

7. SUSTAINABILITY

Institutional sustainability

The main objective of the action, to stimulate and enable the legal and financial environment for civil society and pluralistic media, aims precisely at achieving long term institutional sustainability for the activities of civil society and media actors in the IPA III beneficiaries. Ultimately, this will contribute to strengthen participatory democracies and the EU approximation process in the area of rule of law and good governance in the Western Balkans and Türkiye (Impact level-result of the Action).

The activities implemented in the framework of the action will be designed to develop and strengthen existing local resources and reinforce the expertise and capacity of relevant regional actors. The action will help create the conditions for a self-sustainable free civil society and media environment that will be further maintained by the regional, beneficiary level and local stakeholders involved in the project's implementation from the start. The action will be tailored to the specific civil society and media context of each IPA III beneficiary, thereby fostering local ownership. The planned exchanges of good practices and approaches will also encourage the replication and scaling-up of actions and open avenues for new complementary partnerships. All activities will build on regional and local networks' capacities and expertise, ensuring that the action results will have a long-term impact in the region and that benefits will be sustained beyond the implementation period.

Financial sustainability

One of the main objectives of the action is to strengthen the financial sustainability of CSOs and free media outlets, including through strengthening their resilience and modernising/improving their activities. The increased financial sustainability of these actors will, in turn, contribute to improve their effectiveness and independence.

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

Group of contracts level (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)	
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<input checked="" type="checkbox"/>	Group of contracts
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