

**ANNEX 2**

of the Commission Implementing Decision on the 2014 special measure in favour of Lebanon for the Syria crisis to be financed from the general budget of the European Union

**Action Document for Access to basic services for the vulnerable population in Lebanon  
Palestine Refugees from Syria Education (ABS-PRS)**

**1. IDENTIFICATION**

Title/Number	Access to basic services for the vulnerable population in Lebanon– - Palestine Refugees from Syria Education (ABS-PRS) CRIS number: ENI/2014/351-221		
Total cost	Total estimated cost: EUR 1,500,000 Total amount of EU budget contribution EUR 1,500,000.		
Aid method / Management mode and type of financing	Project Approach  Direct management - direct grant with the United Nations Relief and Works Agency (UNRWA)		
DAC-code	11120	Sector	Education facilities and training
	11130		Teacher training
	11220		Primary education
	11240		Early childhood education
	11320		Secondary education

**2. RATIONALE AND CONTEXT**

**2.1. Summary of the action and its objectives**

The action will seek to strengthen the provision of social services (education) to the most vulnerable people in Lebanon. It aims to build capacity of existing institutions and structures to deal with the repercussions of the Syrian crisis for Lebanon and to empower local communities socially and economically by ensuring sufficient access to services for the most vulnerable. The activities under the action are aligned with priorities identified through structured dialogues held with broad groups of civil society organisations and local administrations.

The action will ensure access to education for Palestine Refugees from Syria (PRS) children from January 2015 till August 2016 in continuation of two previous EU interventions covering these needs from March 2013 till December 2014. The 42,000 PRS currently recorded in Lebanon are among the most vulnerable in the country. The action will form part of an overall response to the deterioration in access to basic

goods and services for the most vulnerable in the country as a consequence of the influx of 1,176,971 refugees from Syria.<sup>1</sup> The avenue for support will be through strengthening of existing structures to assist the country to cope with the unprecedented and continuously growing pressure it and its population are experiencing since 2012. In this case, the existing structures are UNRWA schools.

The action will be aligned with priorities in the international response as part of the United Nations High Commissioner for Refugees (UNHCR) led Regional Response Plans (RRP), which includes the UNRWA response.

## **2.2. Context**

Lebanon has so far been the main recipient country of refugees from Syria with 1,176,971 Syrian refugees registered or awaiting registration with UNHCR in addition to approximately 42,000 Palestine Refugees from Syria (PRS) recorded with the United Nations Relief and Works Agency (UNRWA) in Lebanon. Finally, there is an estimated 17,500 so-called 'Lebanese returnees' according to the International Organization for Migration (IOM).

The number of PRS in Lebanon decreased rapidly in August 2013 from around 100,000 to around 50,000 following tighter restrictions related to cash distributions by UNRWA. A further decrease to the current level of 42,000 PRS was recorded following the reintroduction of strict entry requirements for PRS by Lebanese authorities in May 2014. Refusal to renew visas for PRS beyond one year (most PRS arrived between December 2012 and early 2013) has been reflected in reduced mobility of PRS outside the Palestine Refugee camps in Lebanon out of fear of arrest, detention or deportation. Already before the current crisis, Palestine refugee camps in Lebanon were characterised by overcrowding, weak social services and limited livelihood opportunities. The arrival of PRS has exacerbated conditions in the camps.

The PRS refugees are spread across the 12 UNRWA camps across the country with a higher concentration in Saida (Ain el Hilweh, Mieh Mieh) followed by Tyre (Rashidieh, Burj Shemali, El Buss), Beirut (Shatila, Burj Barajneh, Mar Elias, Dbayeh) and Tripoli (Nahr el Bared, Beddawi).

### *2.2.1. Country context*

#### *2.2.1.1. Economic and social situation and poverty analysis*

Lebanon's macroeconomic situation is deteriorating as a consequence of domestic and regional events, including the Syrian conflict and the ensuing refugee crisis. The influx of refugees is having a number of effects: strains on education, health and other infrastructure, fiscal costs, increasing poverty and unemployment levels, and pressures on the labour market. Economic growth remains positive but subdued, at less than 2% in 2014. The fiscal deficit is on an increasing trend (more than 11% of gross domestic product (GDP) in 2014), putting the government debt-over-GDP ratio (already one of the highest in the world at 141% of GDP in 2013) on an upward trend. The current account deficit also remains at high levels (13% of GDP in 2013).

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<sup>1</sup> Refugee population as of 29 August 2014, UNHCR, <http://data.unhcr.org/syrianrefugees>.

The crisis has emphasised previously existing vulnerabilities and increased risks, pushing Lebanon's resilience to its limits.

Lebanon is characterised by regional socio-economic disparities with almost 30% of the population living under the poverty line and 8% under the extreme poverty line. Due to the absence of a modern legal framework on decentralisation, a lack of appropriate human and financial capacities and a non-performing fiscal system the quality and accessibility of public services is often quite low.

Even before the influx of refugees, access to resources and basic services was limited in many - especially poorer - areas. Often the refugee pressure has been the highest in the poorest communities of the country. After having hosted refugees, often for more than three years, the resources of these communities are stretched to the limit, increasing the risk of tension and conflict.

Palestine Refugees from Lebanon (PRL) make up the second largest group of refugees in Lebanon (after the recent arrival of refugees from Syrians). Approximately 280,000 PRL out of the 425,000 registered with UNRWA since 1948 currently live in the country.

Despite their long presence in Lebanon, the Palestine refugees lack many basic rights and they are excluded from many aspects of social and economic life. Legally considered as foreigners, they are denied the right to own property, to work in more than 30 syndicated professions, and to access national public services and social protection schemes. As a result, 95% of Palestine refugees do not have health insurance, 56% are unemployed, two thirds live under the poverty line (USD 6/day) and 6.6% subsist in extreme poverty (USD 2.17/day), unable to cover their daily food needs. The education attainment is low, with only 50% of 16-18 year olds enrolled and only 6% of all refugees having a university degree.

The Syrian conflict, as well as the issue of Palestine refugees in general, remains highly divisive in Lebanon.

#### 2.2.1.2. National development policy

The Lebanese Prime Minister launched the "*Response of the Government of Lebanon to the Crisis of Syrian Displaced Families*" in December 2012. An inter-ministerial committee (IMC) headed by the Prime Minister was set up to implement the response plan with the Ministry of Social Affairs (MoSA) in charge of coordination. While the plan and the IMC were seen as the first official recognition of the urgency of the crisis and of the responsibility of the Government of Lebanon to address it, there has been limited follow up to the plan from the Government of Lebanon and the response has *de facto* been left for the UN system to deal with, with UNHCR in the lead, except for the area of Lebanese returnees covered by IOM and PRS which is under the mandate of UNRWA.

Since December 2012, the Government of Lebanon has participated in all the UN-led *Regional Response Plan* (RRP) exercises and over the summer of 2013 the Government of Lebanon requested the World Bank to lead an *Economic and Social*

*Impact Assessment (ESIA).*<sup>2</sup> Despite several encouragements, the Government of Lebanon has not yet developed a comprehensive response plan. A so-called "Stabilisation Roadmap"<sup>3</sup> developed by the World Bank and the UN in October 2013 as a follow-up to the ESIA remains incomplete. In June 2014, the Ministry of Education and Higher Education adopted the first sector specific national response plan "Reaching all Children with Education in Lebanon" (RACE) covering the education sector. Other ministries are encouraged to produce similar plans.

Apart from the RRP, the needs of Palestine refugees are not included in the above documents. UNRWA is left with the overall responsibility to provide assistance and services to PRL as well as PRS. UNRWA needs have been outlined in a number of Syria Emergency Response Plans, the latest one issued in December 2013 and reviewed mid-year 2014.<sup>4</sup>

## 2.2.2. *Sector context: policies and challenges*

### PRS Education

Since the beginning of the influx of PRS to Lebanon, UNRWA has recorded their arrival and offered PRS access to education and health services at equal terms as PRL. This has put additional strain on an already insufficient system. Since March 2013, the EU has financed the education of all PRS children enrolled in UNRWA schools – 7,340 children during the academic year 2013-14. The available funding will be exhausted by the end of December 2014. This action will allow the education of PRS children to continue until the end of the academic year 2015-16. While PRS children were initially put in separate classes in an effort to accommodate for integration difficulties caused by the differences in curriculum between Syria and Lebanon (UNRWA follows local curricula in all countries of activities), classes are now integrated mixing PRL and PRS in morning as well as afternoon shifts.

## 2.3. **Lessons learnt**

Already when the Syrian crisis began to have significant consequences for Lebanon in the summer of 2012, the EU recognised the need to upscale and accelerate its cooperation with Lebanon in order to respond to the growing needs of vulnerable Lebanese as well as the refugee population. As in previous crisis the EU adopted a two-step approach where medium to long term needs in local communities are addressed in parallel to emergency humanitarian assistance to refugees. This is done in order to help alleviate the pressure felt by local communities as well as to reduce the risk of confrontation and conflict.

The response has focused on i) support to Lebanese institutions in dealing with crisis; ii) support to local communities (livelihood and basic infrastructure); iii) education; and later iv) primary health care. All interventions are aligned with the priorities identified in the RRP which include contributions from the Government of Lebanon as well as UNRWA. Efforts have been made to implement actions directly through

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<sup>2</sup> <http://documents.worldbank.org/curated/en/2013/09/18292074/lebanon-economic-social-impact-assessment-syrian-conflict>. Exercise conducted with assistance of two EU funded experts.

<sup>3</sup> Lebanon Roadmap of Priority Interventions for Stabilization from the Syrian Conflict, World Bank, 12 October 2013.

<sup>4</sup> <http://www.unrwa.org/resources/emergency-appeals/syria-emergency-appeal>.

the Government of Lebanon, but due procedural obstacles making it difficult to sign financing agreements directly with the Government and concerns about weak financial management as well as very limited implementation capacity, the assistance is mainly implemented through UN agencies (UNHCR, the United Nations Children's Fund (UNICEF), UNRWA) and NGOs. Nevertheless, substantial efforts are made – and will continue to be made - to ensure close coordination and increased involvement of the Government of Lebanon and local administrations in the response.

UN agencies, and in particular UNHCR, UNICEF and UNRWA are entrusted significant responsibility for the response to the crisis. They have proven ability to deliver assistance within the sensitive political context of Lebanon where the Government is less able to manoeuvre. Coordination between the UN agencies and the Government of Lebanon is assured both through regular technical working group meetings (including on education and on health) as well as regular bilateral meetings between the agencies and line ministries. While the political discourse can be critical of the international response to the crisis in Lebanon, at technical level cooperation is generally good.

Although having a smaller absorption capacity than UN agencies, both international and national NGOs have shown proactivity and ability to implement significant projects at a local scale. Following a number of calls for proposals, the EU Delegation has started negotiating direct contracts in order to ensure a swifter contracting and better coordinated interventions.

All responses to the crisis, including previous responses through the European Neighbourhood and Partnership Instrument (ENPI), have shown that the situation on the ground develops fast and often beyond projections made. For that reason, a large degree of flexibility will be required for any intervention addressing medium to long term needs in order to allow for an effective response to the evolving needs of the beneficiary populations.

This action to provide access to education for PRS comes in continuation of two previous actions with the same objectives and partner. Unlike previously, UNRWA has started to teach integrated classes, mixing Palestine refugees from Lebanon (PRL) and PRS in both morning and afternoon shifts. This is meant to improve integration among PRL and PRS children as well as spread the education resources more equally between the two shifts. In the past there have been significant fluctuations in the number of PRS in Lebanon. The action will have to adapt to changes in PRS numbers either by expanding the duration of the intervention in case of a decrease in numbers or by increasing the number of beneficiaries for a shorter implementation period in the event of a new massive influx of PRS.

#### **2.4. Complementary actions**

This action is complementary to the support already provided by the EU, certain EU Member States, other donor countries, international organisations and NGOs, to address the humanitarian and so-called 'stabilisation needs' caused by the conflict in Syria and the unprecedented influx of refugees to Lebanon.

In 2012 and 2013, the EU has allocated EUR 170.8 million for Lebanon through the European Neighbourhood Instrument (ENI) budget<sup>5</sup> to address medium and long term needs in the areas of: education, reinforcing the capacities of the Lebanese authorities to deal with crisis, local community empowerment and support to Palestine Refugees from Syria (PRS). This includes two previous contributions to the education cost for PRS children in Lebanon (ref. below), which covers the costs until the end of December 2014 for 7,430 children. This action will allow for the continuation of education of these children until the end of the academic year 2014-2015.

Through the Instrument for Stability (IfS)<sup>6</sup> the EU has allocated EUR 27.5 million to strengthen the public health sector and to support PRS. The EU's Humanitarian Aid and Civil Protection department (ECHO) has allocated EUR 172.3 million in emergency humanitarian assistance to Lebanon through UN agencies and European NGOs to meet basic needs of the refugee population.

Nine interventions are of particular relevance to this action:

- ***Support to areas affected by the influx of Syrian refugees to Lebanon***<sup>7</sup> which allocated EUR 5 million through a contribution agreement with UNHCR to address medium and long term needs in the areas including capacity building of host country institutions to handle the crisis (ministerial and municipal level as well as civil society organisations) and education;
- ***Support to areas affected by the influx of Syrian refugees to Lebanon II***,<sup>8</sup> which allocate EUR 10 million through contribution agreements with UNHCR and UNICEF, as well as a call for proposal, to address inter alia education; child protection; and capacity building of Lebanese institutions and structures;
- ***EU contribution to the 'Government of Lebanon Response Plan to the Syrian Crisis'***,<sup>9</sup> which allocated EUR 36 million through contribution agreements with UNHCR, UNICEF and UNRWA as well as a call for proposal to address among other education, capacity building of Lebanese institutions, child care and **PRS education** and shelter;
- ***Support to enhance basic infrastructure and economic recovery in Lebanon***<sup>10</sup>, is a EUR 18 million programme to upgrade the provision of basic services and contribute to economic recovery, in particular to mitigate the impact of the Syrian crisis on Lebanon. It is implemented through international and national NGOs;
- ***EU Response to the Consequences of the Syrian Conflict in Lebanon***,<sup>11</sup> which allocated EUR 40 million through UNHCR, UNICEF and UNRWA to address education, including **PRS education**, and capacity building of Lebanese institutions;

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<sup>5</sup> Formerly ENPI.

<sup>6</sup> Since 2014, the Instrument contributing to Stability and Peace (IcSP).

<sup>7</sup> C(2012)3815 adopted on 7 June 2012.

<sup>8</sup> C(2012)9360 adopted on 14 December 2012.

<sup>9</sup> C(2013)2348 adopted on 18 April 2013.

<sup>10</sup> C(2013)5680 adopted on 9 September 2013.

<sup>11</sup> C(2013)5678 adopted on 9 September 2013.

- ***Upgrading water supply facilities for communities in Lebanon affected by the consequences of the conflict in Syria***<sup>12</sup>, which allocates EUR 14.8 million from ENPI to ensure that affected populations have access to adequate quantity of safe water and have means to store water safely;
- ***Recovery of local economies in Lebanon***<sup>13</sup>, which is a EUR 7 million intervention financed through funds from the Support for Partnership, Reform and Inclusive Growth (SPRING) programme. It aims to recover the local economies of communities particularly affected by the influx of refugees;
- ***Upgrading solid waste management capacities in the Bekaa and Akkar regions in Lebanon (SWAM)***<sup>14</sup>, which allocates EUR 14 million in SPRING funds to establish two new sanitary landfills in the Bekaa and Akkar regions. These facilities will be essential for a responsible treatment of solid waste, of which the quantity has drastically increased as the population in Lebanon has increased by more than a quarter since the beginning of the crisis;
- ***Conflict Reduction through Improving Health Care Services for the Vulnerable Population in Lebanon***<sup>15</sup>, which allocate EUR 20 million from the Instrument for Stability (IfS)<sup>16</sup> to build the capacity in the public health sector to i) monitor and manage communicable diseases; ii) strengthen primary health care (with a focus on maternal and child health); and iii) increase access to chronic medication.

ECHO finances access to health care through NGOs and UN agencies that finance access to health services for individual refugees. Through IfS and ENPI funding focus is on building capacity in the existing Lebanese health infrastructure. Close coordination with humanitarian actors and especially with ECHO, EU Member States as well as the main national and international organisations involved in the response to the crisis is ongoing and will be maintained.

## 2.5. Donor coordination

UNRWA organises regular donor briefings and issues bi-monthly PRS updates. Furthermore, UNRWA participates in relevant working groups (WG) under the RRP process. Twelve coordination working groups (WG) have been established on various subjects including education, child protection, sexual and gender-based violence (SGBV), health, water, sanitation and hygiene (WASH), as well as social cohesion and livelihood. The WGs meet regularly both at central (Beirut) and regional level and are open to all parties involved in the sectors, including donors.<sup>17</sup>

Coordination between EU Member States is undertaken regularly in the EU Development Coordination Group meetings organised at the EU Delegation in Beirut. Broader donor coordination is undertaken on a regular basis in an informal donor group of EU Member States, Canada, Japan, Norway, Switzerland and USA

<sup>12</sup> C(2013)6371 adopted on 3 October 2013.

<sup>13</sup> C(2014)2860 adopted on 25 April 2014.

<sup>14</sup> C(2014)2860 adopted on 25 April 2014.

<sup>15</sup> Instrument for Stability; programme reference IfS 2013/14.

<sup>16</sup> Since 2014, the Instrument contributing to Stability and Peace (IcSP).

<sup>17</sup> Information on the WGs, the calendar of meetings as well as minutes can be consulted on the UNHCR web-portal for the Syrian refugee crisis <http://data.unhcr.org/syrianrefugees/country.php?id=122>.

where exchange of information takes place and guest speakers are invited on occasion to brief on particular issues such as the so-called 'stabilisation agenda'.

### **3. DETAILED DESCRIPTION**

#### **3.1. Objectives**

The **overall objective** is to contribute to supporting the most vulnerable population in Lebanon.

The **specific objective** is:

- to ensure access to education for Palestine Refugees from Syria (PRS) children.

#### **3.2. Expected results and main activities**

The expected result is:

Ensure access to education for Palestine Refugee from Syria (PRS) children.

Basic education for Palestine refugees in Lebanon is predominantly provided by UNRWA through its network of schools across the country. Since the influx of PRS began in 2012, UNRWA has opened its schools for PRS children. There are currently more than 7,500 PRS children enrolled for the 2014-2015 academic year. The additional burden for UNRWA of the additional students (staff<sup>18</sup>, rehabilitation, supplies, teachers training etc.) has since March 2013 been funded by the EU. The current funding will be exhausted by the end of December 2014. This action will allow UNRWA to cover the basic costs for education of the same number of children until the end of the academic year 2014-2015. The additional support will be essential for relieving the sector of some of the pressure exerted on it by the substantial increase in student numbers. In addition to educational benefits of offering schooling for PRS children, the psychosocial and protection benefits of participating in educational activities should not be underestimated.

Main activities may include:

- Improved access to education;
- Improved quality of education;
- Provision of basic educational supplies and equipment;
- Running costs for additional shifts.

#### **3.3. Risks and assumptions**

It is widely expected that the Syrian crisis will be protracted and that the influx of Syrian refugees to Lebanon will continue although possibly at a slower rate. In light of the unpredictability of the political and security situation in Syria, the project will

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<sup>18</sup> Teachers, attendants, clerks, counselors, education specialists and assistants.

need to maintain a high degree of flexibility in order to be able to adapt to an evolving context.

Risks include:

- The Syrian conflict could further spill-over into Lebanon. This could jeopardise the project and cut off access to Lebanese territory for international organisations and implementing partners;
- The Lebanese authorities will be hampered in dealing with the crisis due to political constraints and limitations on capacities and resources;
- Tensions between Lebanese, PRL, Syrian refugees and PRS lead to violence in one or several locations;
- Conflict within Palestine refugee camps disrupt service delivery;
- Further restrictions on the presence of PRS introduced in Lebanon including deportation of PRS that have overstayed their one year visas;
- Increased demand for public services and lack of financing leads to a collapse of certain public services;
- Some actors in the international community (state and non-state actors) could provide interventions outside the established coordination mechanisms, which could lead to cases of duplication of support;
- Return of refugees to Syria due to end of conflict and improvement of living conditions in the country (positive "risk").

Mitigating measures include:

- In case of a severe deterioration of the security situation in certain areas of Lebanon either due to a further spill-over of the Syrian conflict into Lebanon or violent tensions between refugees and hosts, the activities of the intervention would be moved to areas deemed safe. In case of a severe deterioration of the security situation in the entire Lebanese territory, the intervention might have to be halted until the situation improves;
- In case of further political constraints for the Lebanese authorities in responding to the needs of the populations living in Lebanon or in case of a partial or complete collapse of public services delivery, basic public services could be continued through local authorities as well as local NGOs and civil society organisations;
- In case of further restrictions on the presence of PRS in Lebanon coordinated demarches by the international community could be mobilised in order to encourage the Lebanese authorities to tolerate the stay of at least the PRS already in the country until the situation in Syria is sufficiently safe for the individuals to return;

- The risk of duplication of support is to be mitigated through continued and active participation in donor coordination for a as well as pro-active outreach to non-traditional donors;
- In case of an end to the violence in Syria and a substantial return of Syrian refugees the activities can continue as foreseen as the needs of the most vulnerable communities in Lebanon for improved public services are believed to persist.

### **3.4. Cross-cutting issues**

During implementation of the intervention it will be ensured that all financed initiatives respect principles in particular human rights, gender equality, good governance and environmental impact as core elements. Conflict sensitivity, conflict mitigation and conflict resolution will also be considered and promoted to the furthest possible extent.

### **3.5. Stakeholders**

Main stakeholders such as ministries, NGOs, local authorities and UN agencies (UNRWA, UNICEF) have been consulted during the preparatory period to identify needs.

The direct beneficiaries include PRS families benefiting from improved access to education for their children, as well as PRL families whose children will benefit from a reduced pressure on the UNRWA educational structures they themselves rely on for their children's education:

- School-age children;
- UNRWA school teachers;
- UNRWA school administrators;
- Parents of school age children; and
- UNRWA.

Indirect beneficiaries include the general PRL, PRS and Lebanese population as increased support for the education of PRS children will alleviate pressure on UNRWA finances and services and reduce the risk of tension and conflict caused by lack of access to basic services.

## **4. IMPLEMENTATION ISSUES**

### **4.1. Financing agreement**

In order to implement this action, it is not foreseen to conclude a financing agreement with the partner country, referred to in Article 184(2)(b) of Regulation (EU, Euratom) No 966/2012.

## 4.2. Indicative operational implementation period

The indicative operational implementation period of this action, during which the activities described in sections 3.2. and 4.3. will be carried out, is **30** months from the adoption of this Action Document, subject to modifications to be agreed by the responsible authorising officer in the relevant agreements. The European Parliament and the relevant Committee shall be informed of the extension of the operational implementation period within one month of that extension being granted.

## 4.3. Implementation components and modules

### 4.3.1. *Grant: direct award (direct management) with UNRWA*

- (a) Objectives of the grant, fields of intervention, priorities of the year and expected results

As referred to in section 3.2, the objective of the grants will be to ensure access to education for Palestine Refugee from Syria (PRS) children in Lebanon.

- (b) Justification of a direct grant

Under the responsibility of the authorising officer by delegation, the grant may be awarded without a call for proposals to UNRWA.

Under the responsibility of the authorising officer by delegation, the recourse to an award of a grant without a call for proposals is justified because Lebanon has been declared to be in a under the declared crisis situation in Lebanon as per Article 190(1)(a) of Commission Delegated Regulation (EU) No 1268/2012.

This arrangement in a crisis situation takes account of the urgency of providing continuing support and allows for the best possible targeting and complementarity with other EU funded interventions UNRWA is already executing with the same objectives for the preceding period.

- (c) Eligibility conditions

In order to be eligible for a grant, potential beneficiaries should comply with the following non-exhaustive conditions:

- be a legal person, and
- be non-profit-making, and
- be a specific type of organisation such as: non-governmental organisation, public sector operator, local authority, international (inter-governmental) organisation as defined by Article 43 of the Rules of Application of the EU Financial Regulation, and
- be established in a Member State of the European Union, or in another country eligible according to Regulation (EU) No 232/2014 ("ENI Regulation"). This obligation does not apply to international organisations.

- (d) Essential selection and award criteria

The essential selection criteria are financial and operational capacity of the applicant.

The essential award criteria are relevance of the proposed action to the objectives of the programme; design, effectiveness, feasibility, sustainability and cost-effectiveness of the action.

(e) Maximum rate of co-financing

The maximum possible rate of co-financing for this grant is 100%.

The maximum possible rate of co-financing may be up to 100 % in accordance with Articles 192 of Regulation (EU, Euratom) No 966/2012 if full funding is essential for the action to be carried out. The essentiality of full funding will be justified by the responsible authorising officer in the award decision, in respect of the principles of equal treatment and sound financial management.

(f) Indicative trimester to contact the potential direct grant beneficiary

First trimester of 2015.

(g) Exception to the non-retroactivity of costs

The Commission authorises the eligibility of costs prior to the submission of the grant application as of 1 September 2014.

#### 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 shall apply.

The responsible authorising officer may extend the geographical eligibility in accordance with Article 9(2, b) of Regulation (EU) No 236/2014 on the basis of urgency or of unavailability of products and services in the markets of the countries concerned, or other duly substantiated cases where the eligibility rules would make the realisation of this action impossible or exceedingly difficult.

#### 4.5. Indicative budget

<b>Module</b>	<b>Amount in EUR thousands</b>	<b>Third party contribution (indicative, where known)</b>
4.3.1. – Direct grant with UNRWA	1,500	0
Total amount	1,500	

#### 4.6. Performance monitoring

The performance of the project will be closely monitored by the project implementing bodies (UNRWA). Appropriate reporting and reviewing measures will be built into each contract/agreement to ensure close follow-up on part of the

Commission. The Commission reserves the right to carry out on-the-spot and monitoring missions as needed.

External results oriented monitoring missions may also be carried out by the Commission.

#### **4.7. Evaluation and audit**

Without prejudice to the obligations applicable to contracts/agreements signed for the implementation of this project, the Commission may, on the basis of a risk assessment, contract independent audits or expenditure verification assignments for one or several contracts or agreements.

These audit/verification costs will be financed from sources outside the budget of this project.

This action will be evaluated as part of the overall response of the EU Delegation to the current crisis in Lebanon with funding from other related programmes.

#### **4.8. Communication and visibility**

Communication and visibility of the EU is a legal obligation for all external actions funded by the EU.

This action shall contain communication and visibility measures which shall be based on a specific Communication and Visibility Plan of the Action, to be elaborated before the start of implementation and supported with the budget indicated in section 4.5 above.

The measures shall be implemented either (a) by the Commission, and/or (b) by the partner country, contractors, grant beneficiaries and entrusted entities. Appropriate contractual obligations shall be included in, respectively, financing agreements, procurement and grant contracts, and delegation agreements.

The Communication and Visibility Manual for European Union External Action shall be used to establish the Communication and Visibility Plan of the Action and the appropriate contractual obligations.

Through the contracting of a communication company the EU Delegation will ensure appropriate and adequate visibility and communication for the EU response to the implications of the Syrian crisis for Lebanon. The contract will be included under the programme “Access to basic services for the vulnerable population in Lebanon– Education & Health (ABS-EH)”, which is also part of this financing Decision and will encompass all the related programmes, allowing coordinated messaging, consistent branding and economies of scale. An important budget will be allocated to ensure communication both to local and European audiences and that the various components of the EU's multi-sectorial response can be covered sufficiently.