# ANNEX IV

# of the Commission Decision on the a Special Measure (Part III) in favour of Palestine, to be financed from the general budget of the European Union

#### **Action Fiche for Palestine**

#### 1. **IDENTIFICATION**

Title/Number	Support to the Delivery of Community Services in East Jerusalem			
	ENPI/2013/024-697			
Total cost	Total estimated cost: EUR 8 million			
	Total amount of EU budget contribution: EUR 8 million			
Aid method / Method of implementation	Project Approach —			
	Component 1 and 2: Direct centralised management — grants — direct award.			
	Component 3: Joint management with UN HABITAT.			
	Component 4: Joint management with World Health Organisation.			
DAC-code	16010	Sector	Social/Welfare Services	

## 2. RATIONALE AND CONTEXT

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

By adopting a practical approach to sustain and develop the living conditions of Palestinians in East Jerusalem, the project seeks to prevent the population from being further coerced into leaving the city, thus pre-empting possibilities for future talks on the final status of East Jerusalem.

Through targeted interventions in the following sectors: (i) ensuring the resilience and protection of women, (ii) economic development, (iii) housing (and cultural heritage) and (iv) health, the project responds to the continued deterioration of socioeconomic trends, characterised by insufficient public investment in community services, as well as housing and infrastructure, inadequate municipal public services, low labour force participation, limited opportunities for women, low private investment and minimal economic development.

#### 2.2. Context

# 2.2.1. Country context

# 2.2.1.1. Economic and social situation and poverty analysis

The economy of Palestine has been marked by the disruption of more than 40 years of occupation and conflict, during which the economic growth path has paralleled political developments. The obstacles imposed by Israel have deterred growth and resulted in an economy highly dependent on the Israeli market and on donor aid. The Palestinian economy is characterised by low levels of investment, low exports, geographical fragmentation, the decline of the industrial and agricultural sectors, deficiencies in workers' skills across all sectors, high unemployment rates (women and youth in particular) and increasing poverty levels, despite a certain comparative advantage arising from a workforce with low wages compared to its high level of education.

Since mid-2011, the Palestinian Authority (PA) has been experiencing a serious fiscal crisis. Its liquidity problems have resulted in the PA paying its salaries and pensions with delays and in instalments in various occasions. The PA has also accumulated significant domestic payment arrears, notably to the private sector. The situation has been aggravated by the withholding on several occasions of the transfer of 'clearance revenues' by Israel for various political reasons. Although Israel has resumed the transfer of the clearance revenues, the outlook for the near future remains challenging. In September 2012, disturbances and demonstrations aimed against the PA took place, in the wake of increasing prices, high unemployment and the authority's inability to pay civil servants' salaries for the previous month.

In April 2013, Salam Fayyad resigned as Prime Minister of the Palestinian Authority. A new government, led by Rami Hamdallah, was formed at the beginning of June 2013. According to the May agreement between Fatah and Hamas this Cabinet should make way for a consensus government by 15 August 2013.

During the past years the Middle East Peace Process has largely stalled, with little progress made during 2012. In December 2012 the Council concluded that "In light of recent developments and taking into account previous Council Conclusions, the European Union firmly believes that now is the time to take bold and concrete steps towards peace" underlining "the urgency of renewed, structured and substantial peace efforts in 2013" and declared that "towards this end, it is ready to work with the US and other international partners, including within the Quartet". The United States' Secretary of State, Kerry has launched a new initiative to resume the peace talks recently.

## 2.2.1.2. National development policy

The three-year 'Palestinian Reform and Development Plan 2008-2010' (PRDP) that laid out a three-year fiscal and policy agenda for reform and development received an unprecedented level of external support, notably from the European Union (EU). Subsequently, Prime Minister Fayyad presented in August 2009 the Palestinian Authority's (PA) 'Ending Occupation, Establishing the State (Programme of the 13th Government)' plan. Based on the PRDP, it aims to build strong governmental

institutions that should serve as the basis for a future independent Palestinian State within a two-year time frame.

In August 2010, the PA presented a new document, entitled 'Homestretch to Freedom', which reviews the achievements made in the first year of the aforementioned 'Ending Occupation, Establishing the State' and puts forward the plans for its second and final year. In April 2011, during the Ad Hoc Liaison Committee (AHLC) in Brussels, the PA presented the 'National Development Plan' (NDP) for the years 2011-13 to the donor community. The NDP is consistent with 'Homestretch to Freedom' and the PRDP and has also received donor support. The NDP identifies the Strategic Multi-sectoral Development Plan (SMDP) as the specific planning instrument for East Jerusalem. The PA has now started working on a new Palestinian NDP to take over from 2014.

## 2.2.2. Sector context: policies and challenges

East Jerusalem has traditionally served as the focus of political, commercial, religious and cultural life for the entire Palestinian population. Since the 1967 occupation and its annexation by the Israeli Government in 1980, East Jerusalem depends de facto on the Israeli municipality for its governance and the delivery of public services, although the international community has never recognised this annexation.

Israel has followed a policy of isolating East Jerusalem from the rest of the West Bank, notably through the construction of the Separation Barrier and settlement expansion in and around the eastern parts of the city. This physical separation has severely affected the economic activities of East Jerusalem, and has weakened the social fabric of its Palestinian community. Moreover, East Jerusalem has been even more marginalised by the asymmetric delivery of public services provided by the Israeli municipality to Jerusalem's Palestinian population. This complexity in the political reality and its resulting instability exacerbate the vulnerability of women and girls confronted with gender-based violence, violations of rights and the lack of appropriate protection services. As for the East Jerusalem private sector, it is characterised by very low levels of investment, deficiencies in workers' skills across many sectors, high unemployment rates, the permits regime, limited access to land and building permits and segregation from the West Bank market. Recent trends in substantial land confiscation, increased house evictions and demolitions in highly populated urban neighbourhoods also affect the Palestinian population in the city. Finally, the financial crisis of the PA is severely affecting the operations of East Jerusalem's hospitals, which are bastion of Palestinian service provision in occupied East Jerusalem.

The necessary political support to encourage actions in East Jerusalem has been regularly reiterated in the Council of the European Union's conclusions on the Middle East Peace Process since 2010. Hence, the European Union has clearly restated that it has never recognised the annexation of East Jerusalem and has

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In December 2012, the East Jerusalem Hospital Network (EJHN) issued an urgent appeal calling on donors to support the PA in meeting its obligation towards the East Jerusalem hospitals.

reaffirmed its commitment to Jerusalem as the future capital of two states. Pending a final status agreement, East Jerusalem should remain an integral part of Palestine and should be maintained as a centre of life for its Palestinian population.

#### 2.3. Lessons learnt

Lessons learnt have been drawn from an external evaluation of the EU funded programme to support the delivery of public services in East Jerusalem between 2007 and 2011.

In addition, reports from regular Results Oriented Monitoring of on-going projects are used to support identification and formulation of new actions in East Jerusalem.

The lessons learned for actions in East Jerusalem as a whole can be summarised as follows:

- While the EU will maintain its method of implementation to work through partnerships between European/International organisations and local organisations, thus creating an umbrella mechanism, it should also consider working directly with Palestinian organisations when conditions matching the highly sensitive and political context are met.
- The EU must maintain its flexible and creative approach towards means of implementation. The EU approach of working across sectors has enabled interventions to respond to various needs in East Jerusalem, ensuring relevancy and responsiveness.
- Enhancing coordination on all on-going operations in East Jerusalem in order to avoid duplication and to increase the potential for synergies between all the actions remains critical.

#### 2.4. Complementary actions

On the basis of the matrix of donors' interventions in East Jerusalem gathered by the EU Representative Office in 2012, and in coordination with the Office of the President of the Palestinian Liberation Organisation (PLO), the EU has identified the present operation as complementary to present actions in East Jerusalem. In addition, the operation builds on synergies created with on-going EU-funded projects in the East Jerusalem programme, as well as with other EU-funded initiatives within either thematic activities or the private sector development programme. A specific action is moreover designed to complement the specific response provided through the Direct Finance Support to the Palestinian Authority (PA) in support to hospitals in East Jerusalem.

# 2.5. Donor coordination

Donor coordination in East Jerusalem remains a challenge, despite the political will of major donors to engage in the city. The absence of Palestinian institutions in East Jerusalem and the lack of a clear institutional framework guiding and monitoring the implementation of the Strategic Multi-sectoral Development Plan (SMDP) make donor coordination at operational level extremely difficult.

At EU level, East Jerusalem is one of the complementary sectors of the EU local strategy on development cooperation of Palestine. Yet, in the absence of an EU lead, there is limited coordination. In 2012, the EU Representative Office initiated information sharing among all donors and produced a mapping of on-going interventions (Arab donors are virtually absent). The EU Representative Office reinitiated an attempt to strengthen coordination between EU Member States at the beginning of 2013.

#### 3. DETAILED DESCRIPTION

#### 3.1. Objectives

The **overall objective** is to support the process of institution building and to deliver on the EU commitment to maintaining sustainable development, dignity and welfare of East Jerusalem's communities, to consolidate the possibility of reaching a future political agreement on the status of Jerusalem as the future capital of two states.<sup>2</sup>

The **specific objective** is to improve the socio-economic living conditions of the Palestinian population living in East Jerusalem, in particular:

- To improve protection and advance rights of vulnerable women and girls and to enhance women's local employment opportunities (Component 1).
- To support the development of the private sector in East Jerusalem (Component 2).
- To improve living conditions of Palestinian families in the Old City (Component 3).
- To maintain quality improvement and patient safety in East Jerusalem hospitals (Component 4).

## 3.2. Expected results and main activities

Component 1: Gender-oriented initiative

To remedy the increasing vulnerability of women in East Jerusalem, the initiative will aim to improve protection against gender-based or domestic violence, to advance the rights of vulnerable children (particularly girls), to enhance women's entrepreneurship, and to support professional opportunities for young female artists through a multi-sectoral approach.

The main **expected results** are improved access to protection, social and professional training services for Palestinian women and girls.

Five **main activities** are envisaged under this component: i) setting up of women's empowerment groups and of mobile clinics; ii) implementation of creative

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EU Council Conclusions, 13 December 2010 and 23 May 2011.

psychosocial services and rehabilitation of child-friendly spaces; iii) job training for young women artists; iv) training and capacity-building activities for women micro entrepreneurs; v) activities with small community-based organisations (use of subgranting) to reach out to isolated and marginalised women.

#### Component 2: Support to the private sector in East Jerusalem

Only a dynamic and rapidly-growing private sector will be able to provide the jobs needed by the East Jerusalem Palestinian population to stop the migration of middle class Palestinian and of businesses from East Jerusalem to the West Bank.

The main **expected results** are a reduction of the constraints to private sector development and better access to finance.

The **main activities** will focus on technical assistance enabling access to investments, financial support to the private sector and training of human resources.

## **Component 3:** Housing initiative

In order to improve the living conditions of Palestinian families in the Old City, the action will aim to achieve sustainable (green and inclusive) models of residential development and to enhance the Old City's functionality and services available to its residents. The action will target a historical complex that comprises 50 deteriorating houses inhabited by low-middle income and poor families (mostly elderly residents). This complex is owned by the Custody of Holy Land, thus pre-empting any ownership issue. In addition, the action will make use of an un-used space located in the same complex and turn it into a public open space, centrally located in the Old City, which will be developed in an eco-friendly operation to deliver social, urban and cultural services to the wider community.

The main **expected results** are improved living conditions for 50 families, the creation of a new Palestinian civic and commercial hub of historic value within the Old City, and the restoration of a complex rich in cultural and civic identity.

The **main activities** will focus on the rehabilitation and maintenance of a historical complex with residential units, and the capacity-building of young people to operate and manage a new multi-use space.

#### <u>Component 4</u>: Support to East Jerusalem Hospitals Network (EJHN)

In order to ensure institutionalisation of quality improvements within the hospitals, the action will grant continuity to *World Health Organisation* (WHO) support in quality, safety, governance and management of the EJH and their network, also in light of new Israeli requirements of international accreditations for hospital licensure.

The main **expected results** are improved quality and patient safety and improved hospital management.

The **main activities** will focus on technical assistance in the areas of quality improvement and patient safety, on support to structural adjustments, on building the

capacity of hospital managements and operations, and on strengthening the East Jerusalem Hospitals Network coordination.

Specific qualitative and quantitative indicators will be developed for each component.

# 3.3. Risks and assumptions

The implementation of EU support to Palestine is subject to unusual types of risk and to high levels of risk. As in previous years, any political developments directly affect the situation in East Jerusalem and may immediately have an impact on the ability of organisations to operate and implement actions. In addition, all projects implemented in East Jerusalem, especially those requiring the import of goods, equipment and the free movement of service providers or of qualified workers, are at substantial risk from unpredictable policies on the part of Israel. Israeli policy to restrict working visas for international NGO staff members remains a risk to the operational capacity of such organisations. Consequently, the alternative option of supporting well-established Palestinian organisations directly will continue to be assessed on a case-by-case basis, although they are also at risk of undergoing political pressures, or even closure by Israeli authorities.

Despite the continued interest of international actors in providing support to communities in East Jerusalem, risks pertaining to donor fatigue and insufficient donor financing persist. In addition, in the absence of the PA in East Jerusalem, uncertainty concerning which Palestinian entity should be primarily responsible for assistance to East Jerusalem remains, increasing the risks that assistance may not be delivered in a coordinated and strategic manner. The risk can be mitigated by a unified position on the part of the donor community, and at least within the EU, on the channelling of funds targeting East Jerusalem.

# 3.4. Cross-cutting issues

Good governance principles are applied to the implementation mechanism and ownership on the part of Palestinian civil society (in the absence of the PA) is assured. Furthermore, good governance and the use of local systems are embedded in the design of the activities, notably in components 2 and 4, which promote high standards of financial management.

Gender equality will be promoted in every component of the action and sexdisaggregated data will be used when possible. In addition, the present action provides services vital to the social and economic rights of the Palestinian population of East Jerusalem, focusing in particular on the needs of children and women.

*Environmental sustainability* is a central cross-cutting issue for component 3 and environmentally-friendly business practices will be promoted through components 2 and 3.

#### 3.5. Stakeholders

The direct beneficiary of the present action is the Palestinian population living in East Jerusalem, and particularly vulnerable women and girls, inhabitants of the Old City and the business community.

Key stakeholders remain primarily community-based organisations, local and international NGOs and international organisations serving or targeting East Jerusalem communities, and community leaders. As in previous years, the institutional capacity of the remaining East Jerusalem organisations, such as the East Jerusalem Hospitals or the Chamber of Commerce, remains fragile, and it is still important to support them.

The EU directly relates to the Office of the President of the Palestine Liberation Organisation (PLO) in matters related to the EU Programme of Support to East Jerusalem. The link with the Office of the President of the PLO and its continued commitment to East Jerusalem is critical and should be fostered. Coordination with PA Line Ministries takes place as and when most appropriate.

#### 4. IMPLEMENTATION ISSUES

## 4.1. Financing agreement

In order to implement this action, concluding a financing agreement with the partner country, referred to in Article 184(2) (b) of the Financial Regulation, is not envisaged, and a financing agreement is to be concluded with the Office of the President of the Palestinian Liberation Organisation, in line with international law and agreements on the status of East Jerusalem.

#### 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 48 months, subject to modifications to be agreed by the responsible authorising officer in the relevant agreements.

## 4.3. Implementation components and modules

## 4.3.1. Component 1 — Grant: direct award (direct centralised management)

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

The **general objective** is to remedy the increasing vulnerability of women in East Jerusalem.

## The **specific objectives** are:

to enhance the protection and advance the rights of women and girls;

to support professional opportunities and entrepreneurship for women.

The **fields of intervention** will include women's rights, protection for women and girls, access to education and recreational activities for women and girls', and access to income generating activities for women.

The main **expected results** are increased awareness and respect of women's rights, improved access to education and increased availability of recreational spaces, and an increased number of women with income.

## (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 the *Heinrich Böll Stiftung*.

Under the responsibility of the authorising officer by delegation, the recourse to an award of a grant without a call for proposals is justified on the one hand because Palestine has been acknowledged to be in a 'crisis situation' as referred to in Article 190(2) Rules of Application, allowing for the use of flexible procedures in accordance with applicable provisions, and on the other hand due to the scarcity of organisations working in East Jerusalem. In order to implement this component, the *Heinrich Böll Stiftung* has been identified in view of its well-known experience in East Jerusalem, which covers both the gender expertise and the project and financial management expertise needed to ensure proper running of a multi-sector gender consortium with multiple partners.

The beneficiary of the direct grant could be modified at a later stage with regard to the results to be achieved via Component 1.

## (c) Eligibility conditions

Potential applicants could be legal entities, groupings without legal personality, public bodies, international organisations, NGOs, economic actors or other type of applicant as defined in section 2.1.1. of the Practical Guide to EU External Aid Contracts (annex E3a) based on a case-by-case analysis.

#### (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 call; 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 90%.

The maximum possible rate of co-financing may be up to 100% in accordance with Articles 192 of the Financial Regulation 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 2014.

(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 01/01/2014. This exception is justified should Palestine continue to be acknowledged as being in a 'crisis situation'.

#### 4.3.2. Component 2 — Grant: direct award (direct centralised management)

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

The **general objective** is to promote private sector growth in East Jerusalem.

## The **specific objectives** are:

- to create new jobs and other forms of positive economic impact on the Palestinian population;
- to support development and production of new and existing business enterprises.

The **fields of intervention** will include technical assistance to build corporate capacity or to develop specific expertise, technical assistance to develop business plans, sub-granting to support adoption of new technology or machinery, subgranting to increase competitivity and boost production and export potential.

The main **expected results** are increased growth in sales, exports, job creation, and attraction of investment in capital to the city.

(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 the *Palestinian Investment Fund (PIF)*.

Under the responsibility of the authorising officer by delegation, the recourse to an award of a grant without a call for proposals is justified on the one hand because Palestine has been acknowledged to be in a 'crisis situation' as referred to in Article 190(2) Rules of Application, allowing for the use of flexible procedures in accordance with applicable provisions, and on the other hand due to the scarcity of organisations involved in private sector development in East Jerusalem. The complexity and volatility of the political situation, combined with the impact of Israeli laws on Palestinian businesses in East Jerusalem, are strong deterrents to foreign investment. In addition, the complexity of the banking system, with Palestinian banks not being in a position to issue loans for the East Jerusalem area,

further hampers the development of the private sector. In late 2012, the Palestinian Investment Fund developed a strategy to support private sector development in East Jerusalem and now possesses a unique capacity to intervene in this sector. It has the necessary technical expertise to support business development and has already undertaken a pre-assessment of the private sector situation.

The beneficiary of the direct grant could be modified at a later stage with regard to the results to be achieved via Component 2.

## (c) Eligibility conditions

Potential applicants could be legal entities, groupings without legal personality, public bodies, international organisations, NGOs, economic actors or other type of applicant as defined in section 2.1.1. of the Practical Guide to EU External Aid Contracts (annex E3a) based on a case-by-case analysis.

#### (d) Essential selection and award criteria.

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

The essential award criteria are the relevance of the proposed action to the objectives of the call; 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 the Financial Regulation 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 2014.

(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 01/01/2014. This exception is justified should Palestine continue to be acknowledged as being in a 'crisis situation'.

# 4.3.3. Component 3 — Joint management with an international organisation

A part of this action with the objective of improving the living conditions of Palestinians families in the Old City of Jerusalem and enhancing the Palestinian cultural and civic identity will be implemented in joint management with UN HABITAT. This implementation is justified as over the past three years, UN

HABITAT has become increasingly involved in the urban planning and housing sectors in East Jerusalem, acting as the coordinating body for most initiatives in these sectors. The organisation always works with local partners, thus ensuring local ownership in its actions, and its UN status is crucial in these extremely sensitive sectors. Joint management with this international organisation in accordance with Article 53d of Financial Regulation 1605/2002 is possible because the organisation is bound by a long-term framework agreement (FAFA). The project is elaborated jointly between the organisation and the Commission. UN HABITAT will work in partnership with Associazione di Terra Santa and Al-Quds University.

The international organisation will be responsible for the whole implementation, and particularly for the tender procedures and for securing required authorisations with all stakeholders involved.

The change of method of implementation constitutes a substantial change, except where the Commission 're-centralises' or reduces the level of budget-implementation tasks previously entrusted to the international organisation.

## 4.3.4. Component 4 — Joint management with an international organisation

The part of this action with the objective of supporting East Jerusalem Hospitals in the process of Joint Commission International (JCI) accreditation will be implemented in joint management with WHO. This attribution is justified as over the past six years, WHO has been actively involved in supporting the East Jerusalem Hospitals Network (EJHN) and is the co-chair of the Health Working Group of donor coordination. WHO has demonstrated that it has adequate capacity for proper management throughout the implementation of different Contribution Agreements with the EU. Joint management with this international organisation in accordance with Article 53d of Financial Regulation 1605/2002 is possible because the organisation is bound by a long-term framework agreement (FAFA). The project has been developed jointly by the WHO and the Commission.

The international organisation will be responsible for all budget implementation tasks.

The change of method of implementation constitutes a substantial change except where the Commission 're-centralises' or reduces the level of budget-implementation tasks previously entrusted to the international organisation.

# 4.4. Scope of geographical eligibility for procurement in direct centralised and decentralised management

Subject to the following, the geographical eligibility in terms of place of establishment for participating in procurement procedures and in terms of origin of supplies and materials purchased as established in the basic act shall apply.

In accordance with Article 27(4) of the basic act, the Commission decides that natural and legal persons from the countries eligible for funding under the European Neighbourhood and Partnership Instrument shall be eligible for participating in procurement procedures under this action because it is co-funded by that instrument.

The responsible authorising officer may extend the geographical eligibility in accordance with Article 21(7) of the basic act on the basis of the unavailability of products and services in the markets of the countries concerned, for reasons of extreme urgency, or if the eligibility rules would make the realisation of this action impossible or exceedingly difficult.

# 4.5. Indicative budget

Module	Amount in EUR thousands	Third party contribution
4.3.1. — Component 1 — Direct grant 'Gender-oriented Initiative' (direct centralised)	3 000	0
4.3.2. — Component 2 — Direct grant 'Support to the private sector in East Jerusalem' (direct centralised)	1900	0
4.3.3. — Component 3 — Joint management with UN HABITAT	2500	0
4.3.4. — Component 4 — Joint management with WHO	500	0
4.7. — Evaluation and audit	50	0
4.8. — Communication and visibility	30	0
Contingencies	20	0
Totals	8000	0

## **4.6.** Performance monitoring

The project will be monitored by the Beneficiaries according to relevant indicators of performance, including gender-disaggregated data. The choice of key progress indicators will form part of the project formulation process and each action will be supported by a logical framework, including objectively verifiable indicators to evaluate each stage's level of achievement. In case of non-availability of existing information on baseline values necessary to establish relevant indicators, the projects could be designed in such a way that the baseline is established during the first months of implementation and target values adapted accordingly.

The Commission may carry out Results Oriented Monitoring via independent consultants.

#### 4.7. Evaluation and audit

Grants agreements under direct centralised management will include at least one external audit and an external final evaluation. If appropriate, a global evaluation of the whole action will be conducted in accordance with European Commission procedures. When necessary, external audits/verification missions of specific projects will be undertaken by the EU.

# 4.8. Communication and visibility

If appropriate, the Commission will carry out information and communications activities (via service providers) to raise awareness on the project, on EU support and policy in East Jerusalem and on the impact of this support.

Within each of the project's components, actions will be implemented in line with the EU visibility guidelines for external actions, in consultation with the EU office in Jerusalem. The Beneficiary/contractor shall inform the EU about upcoming communication activities and invite the EU to visibility events. Considering the sensitive situation of East Jerusalem and in order not to jeopardise the implementation of activities, the implementation of the EU visibility guidelines for external actions may require adaptation on a case-by-case basis.