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ANNEX 1

to the Commission Implementing Decision on the financing of the multi-country multiannual action plan in favour of the Western Balkans and Turkey for 2021-2022

Action Document for "EU4 Rule of Law: Supporting evidence-based policy-making on justice system performance in the Western Balkans and Turkey"

1. SYNOPSIS

1.1. Action Summary Table

Title	EU4 Rule of Law: Supporting evidence-based policy-making on justice system performance in the Western Balkans and Turkey					
	Multi-country multiannual action plan in favour of the Western Balkans and Turkey for 2021-2022					
CRIS/OPSYS number	IPA III/2021/043-643/01					
Basic Act	Financed under the Instrumen	t for Pre-Accession	on Assistance (IPA III)			
Team Europe Initiative	No	No				
Zone benefiting from the action		Western Balkans (Republic of Albania, Bosnia and Herzegovina, Kosovo*, Montenegro, Republic of North Macedonia, and Republic of Serbia) and Republic of Turkey				
Programming document	IPA III Programming Framework					
	PRIORITY AREAS A	ND SECTOR IN	FORMATION			
Window and	Window 1 - Rule of law, fundamental rights and democracy					
thematic priority	Thematic priority: 1 - Judiciary					
Sustainable Development Goals (SDGs)	Main SDG(s) on the basis of section 3: SDG 16 – Access to justice					
DAC code(s)	15110 - Public sector policy and administrative management – 100%					
Main Delivery Channel @	World Bank Group - 44000					
Markers (from DAC form)	General policy objective	Not targeted	Significant objective	Principal objective		
	Participation development/good governance					

^{*} 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.

Ī	Aid to environment				
	Aid to environment	\boxtimes			
	Gender equality and	quality and			
	women's and girl's empowerment				
	Trade Development	\boxtimes			
	Reproductive, maternal,	\boxtimes			
	new born and child health			Ц	
	Disaster Risk Reduction	\boxtimes			
	Inclusion of	$oxed{\boxtimes}$			
	persons with				
	disabilities				
	Nutrition	\boxtimes			
	RIO Convention markers	Not targeted	Significant objective	Principal objective	
	<u>@</u>				
	Biological diversity	\boxtimes			
	Combat desertification	\boxtimes			
	Climate change mitigation	\boxtimes			
	Climate change adaptation	\boxtimes			
Internal markers	Policy objectives	Not targeted	Significant objective	Principal objective	
	Digitalisation	\boxtimes			
	Migration	\boxtimes			
	COVID-19	\boxtimes			
	BUDGET	INFORMATI	ON		
	Amounts concerned Total estimated cost: EUR 5 200 000 Total amount of EU budget contribution: EUR 5 200 000 – year 2021				
	MANAGEMENT A	AND IMPLEM	ENTATION		
Type of financing	Project Modality				
and method(s) of implementation	Indirect management with the World Bank Group				
Relevant priorities and flagships from Economic and Investment Plan for the Western Balkans	Priority 8: Governance, Rule of Law, Public Administration Reform - not in financial terms				
If Financing Agreement(s) is/are not foreseen: final date for concluding contribution / delegation agreements, procurement and grant contracts	At the latest by 31 December	2022			
Indicative operational implementation period	72 months following the adoption of the Financing Decision				

1.2. Summary of the Action

Pursuing reforms in the area of rule of law is the key benchmark against which the IPA III beneficiaries progress towards becoming an EU Member State is assessed by the EU. Over the recent years, progress on reforms enabling strong independent, accountable, efficient and qualitative justice systems has varied considerably across the IPA III beneficiaries. Strengthening the rule of law is not only a matter for institutions. It requires profound and sustainable societal transformation.

In line with the Enlargement strategy¹ and the IPA III Programming Framework, this action aims at contributing to improve the conditions for justice reforms in the IPA III beneficiaries. Through justice perception surveys complemented by in-depth analytical reports and awareness-raising, the action will (1) enhance conditions for targeted reforms in the justice system of each IPA III beneficiary and (2) enhance participation of justice users in assessing performance of justice systems in each IPA III beneficiary. The World Bank Group will implement this action.

2. RATIONALE

2.1. Context Analysis

The rule of law and respect for fundamental rights, functioning of democratic institutions and public administration are not only at the heart of the European accession process, but also the main engines for the economic recovery of the Western Balkans region and for enhancing resilience to potential future crises and economic shocks, as articulated in the Enlargement strategy¹.

Citizens have a key interest in a functioning system of checks and balances in which a visibly empowered and independent, impartial and effective judiciary ensures that all institutions abide by the law, maintain integrity and that citizens are protected from arbitrary decisions and can exercise their rights fully. Businesses need legal certainty, absence of corruption and efficiently functioning administrations to be able to set up their operations and rely on efficient and independent institutions to enforce their economic rights.

As articulated in the IPA III Programming Framework Thematic Priority 1 – Judiciary, the EU is committed to support the strengthening of the rule of law and delivery of judicial services in IPA III beneficiaries. As a result, this action to be implemented by the World Bank Group aims to support IPA III beneficiaries to develop a track record of improvement in justice system performance that is tangible and measurable.

2.2. Problem analysis by areas of support

Despite improvements, there remains a need to strengthen the evidence base of judicial and wider rule of law reform in the IPA III beneficiaries. This includes a stronger emphasis on developing baselines and robust tools to monitor and evaluate the performance of justice. Measuring justice is a challenge which requires the setting up of reliable mechanisms allowing for comparisons over time. In this context, there is a need to continue implementing current ongoing pilot efforts in the Western Balkans to collect and analyse data measuring the perception and experience of justice by a wide range of justice users and stakeholders in IPA III beneficiaries and to connect and complement this data with other justice measurement tools. This will allow for a regular and comprehensive evidence based assessment and dialogue among key stakeholders to emerge.

The main stakeholders and beneficiaries of the action include: members of the judiciary (judges; court staff; prosecutors); professional organisations representing the judges and prosecutors (such as High Council); relevant Ministries (such as Ministry of Justice); civil society organisations and international partners active on judicial reform;

Communication from the Commisson 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", COM(2020)641 final of 6.10.2020

justice users and the public more largely. The action will interact with other justice measurement tools/ processes such as those carried out by the European Commission for the Efficiency of Justice (CEPEJ).

The action is designed to support beneficiary implementation of strategies underpinning the European perspective. The engagement of the EU in this effort is key due to the fundamental importance of Rule of Law in the enlargement context. The action will accompany dialogue and engagement with IPA III beneficiaries in the framework of the Stabilisation and Accession process.

2.3. Relevance and complementarity with strategies supported by key national stakeholders

The action will enable IPA III beneficiaries to continue to plug critical information gaps as concerns progress in judicial reform. It will complement and bring together other tools measuring the performance of justice systems, thus supporting a more consolidated picture of progress.

The results of the action will also feed into relevant communications and/or staff working documents by the European Commission, as appropriate.

The action is in line, and in support of, the respective IPA III beneficiary plans for alignment with the EU acquis.

2.4. Relevance and complementarity with EU policy and EU and other donors' assistance

This action is in line with, and in support of, Thematic Priority 1 (judiciary) under Window 1 (Rule of law, fundamental rights and democracy) of the IPA III Programming Framework. The specific objective in this area is to further improve the independence, accountability, quality and efficiency of the judicial systems of each IPA III beneficiary. By focusing on measuring the perception and experience of justice users and providers, this action fills a specific information gap and will complement other actions implemented in the concerned area.

The action is also in line, and in support of, the Enlargement strategy, conclusions under the negotiating frameworks, the recommendations of the 2021 Communication on EU Enlargement Policy², the Economic Reform Programmes (ERPs), the policy guidance agreed annually in the joint conclusions and the conclusions of the meetings organised in the context of the Stabilisation and Association Agreements.

It will also contribute to Sustainable Development Goal 16 Access to justice.

2.5. Lessons learned and links with previous financial assistance

The action will continue and expand on a prior IPA II-funded pilot action setting up justice surveys across the Western Balkans IPA II beneficiaries. This continuation is necessary to enable measuring progress over time in justice system performance. The experience of this prior action, which was implemented in the context of the COVID-19 pandemic, has demonstrated not only the feasibility of using online questionnaires but also their value added in allowing expedited implementation and improved monitoring. This action will therefore consider primarily using online questionnaires, with the possibility to use paper questionnaires when necessary. The implementation of the prior action has also demonstrated the importance of continuous engagement with the various stakeholders to ensure the collection of data and dissemination of results. This action will thus look at ways to increase stakeholders' understanding of and commitment to the action and, thus, increase the use of justice surveys and ultimately the sustainability of the action. Another important lesson learned relates to the need to act on the complementarity between perception- and experience-based justice measurement tools and other existing tools measuring justice system performance, such as the CEPEJ Western Balkans Dashboard. The perception and experience-based survey results which will be produced under this action will thus be supplemented by analytical products providing in-depth analysis of systemic issues and policy recommendations arising from an assessment of complementary information. These will serve as a basis for future policy dialogue and/or future support to IPA III beneficiaires on how to address the challenges as part of beneficiary-led justice sector reform efforts, including in Turkey, which is part of this multicountry action.

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COM(2021) 644 final, of 19.10.2021

3. DESCRIPTION OF THE ACTION

3.1. Planned results and intervention logic (describing causal links between impact, outcome(s) and output(s) and including assumptions)

To enhance the independence, accountability, efficiency and quality of the judicial systems of each IPA III beneficiary, there is a need to strengthen the evidence base of judicial reform, including with strong data collection and analysis for measuring results, and monitoring and evaluating progress.

To that effect, the action will indicatively conduct two rounds of multi-stakeholders' perception surveys about justice system performance in each IPA III beneficiary at an average 3-year frequency. Assuming that an adequate level of justice users and stakeholders take part in the surveys, they will provide insights on the perspectives of different players, especially by gauging the satisfaction, views and experiences of citizens and businesses. They will also help to gauge the levels of engagement and satisfaction among service providers (judges, prosecutors, court staff, and lawyers) and understand their expectations from reform processes. It is expected that the results from each survey will further feed into in-depth research and analytical reports, which will combine the findings of the perception surveys with other relevant data on justice system performance, such as the CEPEJ Western Balkans Dashboard tool. To feed into relevant communications and/or staff working documents by the European Commission, as appropriate, the analytical reports are expected to be complemented, every second year, by a regional comparative report to enable detailed comparisons and the benchmarking of justice system performance. Ultimately, these surveys and the related reports are foreseen to provide **improved evidence on the functioning of the justice system in each IPA III beneficiary (output 1).** This includes identification of systemic issues and the provision of recommendations to support policy dialogue and targeted reforms.

To ensure the successful conduct and understanding of the perceptions surveys, the action will aim to engage in various ways with, and consult, key stakeholders ahead of the actual launch of the surveys. To further increase the **knowledge of stakeholders on the functioning of the justice system in each IPA III beneficiary and ways to address systemic issues (output 2)**, each survey as well as analytical reports are foreseen to be discussed and shared with domestic stakeholders and then largely disseminated.

As a direct result of the surveys, the analytical and comparative reports, consultations and disseminations, conditions for targeted reforms in the justice system of each IPA III beneficiary will be enhanced (**outcome 1**) and justice users will enhance their participation in assessing performance of justice system of each IPA III beneficiary (**outcome 2**).

These outcomes will in turn **contribute to justice reforms in the IPA III beneficiaries** (impact), provided that the IPA III beneficiaries demonstrate the necessary political will to utilise the findings to support justice reform.

Given the high policy relevance of the foreseen outcomes and outputs, the action will at all stages dovetail and support the overall policy engagement of the EU with the IPA III beneficiaries.

3.2. Indicative type of activities

The action will indicatively include the following main activities:

Under Output 1: Improved evidence on the functioning of the justice system in each IPA III beneficiary

- Conducting two perception surveys of justice performance in each IPA III beneficiary;
- Conducting in-depth research and analysis to draft analytical reports (incl. recommendations) of the functioning of the justice system in each IPA III beneficiary;
- Conducting biyearly comparative analysis.

<u>Under Output 2: Stakeholders have better knowledge on the functioning of the justice system in each IPA III</u> beneficiary and ways to address systemic issues

• Awareness-raising, consultation and dissemination activities such as meetings, workshops, peer-to-peer exchanges, publications.

3.3. Risks and assumptions

Risks	Risk level (H/M/L)	Mitigating measures
Risk 1 Lack of authorities' commitment	M	Through a series of workshops at the beneficiary level with judicial stakeholders and close coordination with the European Commission, the World Bank Group will work to ensure ownership

		over the process. In addition, in close coordination with the EU delegation/ offices, the World Bank Group will maintain a close contact with the judicial authorities to provide guidance and to address any issues that might arise during the action implementation.
Risk 2 Political Context (including unscheduled elections)	Н	The technical aspects of this action (survey work, data collection, and analysis) should not be affected by the political context, however, the dissemination of results will require political support and a certain degree of political stability. In close coordination with the European Commission, the World Bank Group will organise technical meetings to present the preliminary findings from the survey to secure adequate level of political support.

Assumptions (to be reflected in the Logical Framework Matrix above) - grouped by outputs and outcomes

Outcome 1

Necessary political will to utilise findings to support justice reform.

Output 1

The stakeholders within the IPA III beneficiaries are open to discuss the findings in the context of justice reform.

Output 2

The stakeholders within the IPA III beneficiaries fully participate to the dissemination activities.

3.4. Mainstreaming

How does this Action contribute to Gender Equality and Women's and Girls' Empowerment (in line with the EU gender equality strategy 2020-2025)?

The survey results will provide a gender breakdown that will help to inform the design of policy actions which can address possible gender gaps.

How does this Action address Environment and Climate change?

There is no direct link to environment and climate change as the action is centered on the judiciary within IPA III beneficiaries. However, caution will be taken to reduce any associated environmental impact where possible. The impact of methods of transportation used by action staff will be taken into consideration when travelling.

How does this Action address the Rights Based Approach?

The action is fully directed towards improving conditions for justice reform in IPA III beneficiaries. As such, the action contributes in the long-term to enable further implementation of rights-based systems across the beneficiaries.

How does this Action promote the systematic engagement with Civil Society?

The survey results will be publicly available, which will allow for additional analytical work by civil society organisations (CSOs). The action will also raise awareness of civil society organisations as to the survey results and findings. In addition, selected groups of CSOs that are working with Roma will be included in the dissemination of the results to the Roma population.

Others (such as Resilience and Conflict Sensitivity, Roma, people with disabilities and other vulnerable groups)

The action will be implemented in a way to cooperate with and include vulnerable groups, including Roma. Within the target group of the general population, the survey will target a selected number of members of the Roma community. This will help to get a better understanding of their perceptions and experiences with the justice system in the respective IPA III beneficiaries. The results from the survey will help to measure and analyse perceptions and experiences of such groups as to the concerned justice system performance. Disaggregated data will be used in comparison with data related to the general public.

3.5. Conditions for implementation

The action will be implemented in 3 phases. Given that participation in the surveys will be voluntary, for all 3 phases, the key condition for implementation is to secure the participation of each IPA III beneficiary in the surveys.

Phase 1 – The Preparatory Phase

The preparatory phase will ensure that the justice surveys will be ready to be implemented effectively and in a timely fashion across the IPA III beneficiary during the implementation phase.

This preparatory phase will require the World Bank Group to consult relevant stakeholders to build consensus, agree on the survey instrument (questionnaire) and prepare for the implementation of the survey. This phase will be implemented in close coordination with the European Commission. It will also be repeated for the second round of the survey.

Phase 2 - The Implementation Phase

The implementation phase includes the selection of the survey company for data collection and getting support from the judicial authorities for the survey. Once this is secured, the fieldwork will be initiated in phases, based on the level of commitment and readiness of each IPA III beneficiary. The World Bank Group will coordinate this closely with the European Commission and the EU Delegation/ Offices in the respective IPA III beneficiary.

Phase 3 – Analysis, Presentation of Results, and Dissemination

This phase includes statistical analysis and presentation of the key findings, discussion with authorities, and dissemination of the action's results. The World Bank Group will coordinate this closely with the European Commission and the EU Delegation/Offices in the respective IPA III beneficiary. In addition, in order for the World Bank Group to deliver an in-depth analysis combining the perception survey results with other tools, effective access to such other relevant data and reports such as CEPEJ Western Balkans Dashboard reports needs to be secured.

3.6. Logical Framework for PROJECT MODALITY (3 levels of results / indicators / Baselines / Targets / Source of Data / Assumptions - no activities)

Results	Results chain: Main expected results (maximum 10)	Indicators (at least one indicator per expected result)	Baselines (year)	Targets (year)	Sources of data (1 per indicator)	Assumptions
Impact	To contribute to justice reforms in the IPA III beneficiaries	Composite indicator on the readiness of enlargement beneficiaries on fundamental areas of the political accession criteria (including democracy, rule of law, judiciary, fight against corruption and fight against organised crime and human rights)	Western Balkans (49,50) and Turkey (41,77) (2017)	10% increase, Western Balkans (55) and Turkey (46) (2027)	European Commission	Not applicable
Outcome 1	Enhanced conditions for targeted reforms in the justice system of each IPA III beneficiary	A)Number of reform processes that utilise action outputs	A) For Western Balkans IPA III: to be determined on the basis of the prior action on regional justice surveys (2021) A) For Turkey: 0 (2021)	A) To be determined during preparatory phase (2026)	Implementing partner reporting Policy briefs Commission reports	Necessary political will to utilise findings to support justice reform.
		B) Policy dialogue between the Commission and IPA III beneficiaries has been informed by action	B) No (2021)	B) Yes (2026)		
Outcome 2	Enhanced participation of justice users in assessing performance of justice systems in each IPA III beneficiary	Level of participation of justice users (including Roma)	A) For Western Balkans IPA III: to be determined on the basis of the prior action	A& B) To be determined during preparatory phase (2026)	Implementing partner reporting Policy briefs	
			on regional		Commission	

			justice surveys (2021) B) For Turkey: 0 (2021)		reports	
Output 1 related to outcomes 1 and 2	Improved evidence on the functioning of the justice system in each IPA III beneficiary	A) Number of surveys completed in each IPA III beneficiary B) Number of analytical reports produced C) Number of regional comparative reports produced	A) 0 (2021) B) 0 (2021) C) 0 (2021)	A) 2 surveys completed per each IPA III beneficiary (2026) B) 2 analytical reports/beneficiary (2026) C) 2 regional comparative reports (2026)	Implementing partner reporting	The stakeholders within the IPA III beneficiaries are open to discuss the findings in the context of justice reform.
Output 2 related to outcomes 1 and 2	Stakeholders have better knowledge on the functioning of the justice system in each IPA III beneficiary and ways to address systemic issues	A) Number of participants to dissemination activities (disaggregated by categories, including Roma)	A) 0 (2021)	A) To be determined during preparatory phase (2026)	Implementing partner reporting	The stakeholders within the IPA III beneficiaries fully participate to the dissemination activities.

4. IMPLEMENTATION ARRANGEMENTS

4.1. Financing agreement

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

4.2. 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 measures³.

4.2.1 Indirect management with an international organisation

This action may be implemented in indirect management with the World Bank Group. This implementation entails the full implementation including through direct implementation of activities and conducting budget implementation tasks (procurement and grants award procedures as relevant) of this action entitled "EU4 Rule of Law: Supporting evidence-based policy-making on justice system performance in the Western Balkans and Turkey" and the corresponding impact, outcomes and outputs as above described under section 4. The envisaged entity has been selected using the following criteria: the World Bank Group is uniquely placed to implement this action in light of its core mandate; sound expertise and strong practical experience in conducting justice surveys; its presence in the Western Balkans and Turkey; its capacity to work at multi-country level across the IPA III beneficiaries; and its financial and operational capacity. As this action will be the continuation of justice surveys already implemented by the World Bank Group and in order to measure progress on the basis on same comparative standards, it is necessary to implement this action with the same implementing partner.

4.3. 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.

4.4. Indicative budget

	EU contribution (amount in EUR) 2021	Indicative third party contribution, in currency identified
Outcomes 1 and 2/Outputs 1 and 2		
Indirect management with the World Bank Group - cf. section 4.2.1	5 200 000	N/A
Totals	5 200 000	N/A

4.5. Organisational set-up and responsibilities

The World Bank Group will set up a Steering Committee to provide strategic guidance, advice and oversight during the action implementation. The Steering Committee will include at a minimum representatives of the World Bank Group and the EU and meet at a minimum once a year. The Steering Committee can agree to extend participation to other stakeholders to its meetings when relevant.

Whenever relevant and appropriate, the World Bank Group shall ensure due coordination with relevant regional and international organisations, bilateral partners and non-governmental organisations. Particular attention shall be made to

³ www.sanctionsmap.eu 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.

coordination with EU Delegations/Office.

The World Bank Group will provide the EU with regular reports on the action's implementation, at least on a quarterly basis. These reports will include information such as the state of play of implementation, challenges encountered and mitigating measures as well as updated work plans.

5. PERFORMANCE/RESULTS MONITORING AND REPORTING

5.1. Internal monitoring

The day-to-day technical and financial monitoring of the implementation of this action will be a continuous process and part of the responsibilities of the World Bank. The Steering Committee will detail the internal monitoring processes to be followed. In addition, the action might be subject to external monitoring in line with the European Commission rules and procedures.

5.2. Roles & responsibilities for data collection, analysis & reporting

The World Bank Group will be requested to continuously capture, record and track key statistical information on the implementation of activities. Particular emphasis will be placed on systematic collection of data required to track progress on indicators identified in the logical framework. The monitoring methods and sources will include the following as relevant: action records showing details about events held and actions taken; website and social media analysis showing viewership, reach, and engagement of target audiences; visibility and impact of social media campaigns; number of mainstream media stories published using material provided through the action; and feedback from participants through questionnaires designed for the action.

5.3. Evaluation

Having regard to the importance of the action, a mid-term evaluation will be carried out for this action or its components through a joint mission.

It will be carried out for problem solving as well as learning purposes, in particular with respect to possible future phases of the action.

The evaluation reports shall be shared with the relevant IPA III beneficiaries and other key stakeholders. The implementing partner and the Commission shall analyse the conclusions and recommendations of the evaluations and, where appropriate, in agreement with the relevant IPA III beneficiaries, jointly decide on the follow-up actions to be taken and any adjustments necessary, including, if indicated, the reorientation of the action.

6. AUDIT

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 audits or expenditure verification assignments for one or several contracts or agreements.

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

7. COMMUNICATION AND VISIBILITY

Visibility of EU funding and communication about objectives and impact of actions are a legal obligation for all actions funded by the EU, as set out in the EU communication and visibility requirements in force.

In particular, the recipients of EU funding shall acknowledge the origin of the EU funding and ensure its proper visibility by:

- providing a statement highlighting the support received from the EU in a visible manner on all documents and communication material relating to the implementation of the funds, including on an official website and social media accounts, where these exist; and
- promoting the actions and their results by providing coherent, effective and proportionate targeted information to multiple audiences, including the media.

Visibility and communication measures shall be implemented, as relevant, by the public administrations (for instance, concerning the reforms linked to EU budget support), entrusted entities, contractors and grant beneficiaries.

Appropriate contractual obligations shall be included, respectively, in financing agreements, delegation agreements, and procurement and grant contracts.

The measures shall be based on a specific Communication and Visibility Plan, established and implemented in line with the EU communication and visibility requirements in force. The plan shall include, inter alia, a communication narrative and master messages for the action, customised for the various target audiences (stakeholders, civil society, general public, etc.)

Visibility and communication measures specific to this action shall be complementary to the broader communication activities implemented directly by the European Commission services and/or the EU Delegations and Offices. The European Commission and the EU Delegations and Offices should be fully informed of the planning and implementation of the specific visibility and communication activities, notably with respect to the communication narrative and master messages. It is the responsibility of the implementing partner(s) to keep the EU Delegations/Office and the European Commission fully informed of the planning and implementation of the specific visibility and communication activities.

Communication on this action should also take into consideration the risks from misinformation and disinformation, and the ways of countering these in order to avoid undermining the Union's efforts and image in the Western Balkans and Turkey.

8. SUSTAINABILITY

The activities will be implemented in close cooperation with the main stakeholders to build on their actual needs and priorities as well as to ensure full ownership and sustainability. The awareness-raising and dissemination activities will support the sustainability of the action by sharing and discussing the findings and recommendations.