



ANNEX IV

of the Commission Implementing Decision on the Special Measures in favour of the Republic of Belarus for 2018

Action Document for Enhancement of Professional Reporting and Free Flow of Information in Belarus

INFORMATION FOR POTENTIAL GRANT APPLICANTS

WORK PROGRAMME FOR GRANTS

This document constitutes the work programme for grants in the sense of Article 110(2) of the Financial Regulation and action programme/measure in the sense of Articles 2 and 3 of regulation N° 236/2014.

The following sections concern calls for proposals:

5.3.1. Grants: Calls for proposals for Enhancement of Professional Reporting and Free Flow of Information in Belarus (direct management)

1. Title/basic act/ CRIS number	Supporting Enhancement of Professional Reporting and Free Flow of Information in Belarus CRIS number: ENI/2018/041-439 financed under European Neighbourhood Instrument	
2. Zone benefiting from the action/location	Belarus The action shall be carried out at the following location: country wide	
3. Programming document	Not available (Special Measure)	
4. Sector of concentration/ thematic area	Complementary support for civil society development	DEV. Aid: YES
5. Amounts concerned	Total estimated cost: EUR 2,000,000 Total amount of EU budget contribution EUR 2,000,000	
6. Aid modality(ies)	Project Modality Direct management: grants – calls for proposal	

and implementation modality(ies)				
7 a) DAC code(s)	Main DAC code: 15153 Media and free flow of information (80%) Sub codes: 22030 Radio/television/print media and 22040 Information and communication technology (ICT) (altogether 20%)			
b) Main Delivery Channel	Non-Governmental Organisations (NGOs) and Civil Society			
8. Markers (from CRIS DAC form)	General policy objective	Not targeted	Significant objective	Main objective
	Participation development/good governance	<input type="checkbox"/>	<input type="checkbox"/>	X
	Aid to environment	X	<input type="checkbox"/>	<input type="checkbox"/>
	Gender equality (including Women In Development)	<input type="checkbox"/>	X	<input type="checkbox"/>
	Trade Development	X	<input type="checkbox"/>	<input type="checkbox"/>
	Reproductive, Maternal, New born and child health	X	<input type="checkbox"/>	<input type="checkbox"/>
	RIO Convention markers	Not targeted	Significant objective	Main objective
	Biological diversity	X	<input type="checkbox"/>	<input type="checkbox"/>
	Combat desertification	X	<input type="checkbox"/>	<input type="checkbox"/>
	Climate change mitigation	X	<input type="checkbox"/>	<input type="checkbox"/>
	Climate change adaptation	X	<input type="checkbox"/>	<input type="checkbox"/>
9. Global Public Goods and Challenges (GPGC) thematic flagships	N/a			
10. SDGs	SDG 5: End all forms of discrimination against all women and girls everywhere. SDG 16: Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels			

SUMMARY

The present action, amounting to EUR 2 million, will provide support for enhancement of professional reporting and free flow of information under the 2018 ENI budget. The action is in line with the Joint declaration of the Brussels Eastern Partnership Summit adopted on 24 November 2017 and the EU policy to support freedom of expression in Belarus.

The overall objective of this programme is to contribute to the diversification of the media sector in Belarus, promoting an enabling, resilient and democratic environment. The specific

objectives are to increase media professionals' capacities in quality reporting on Belarus, supporting financial self-sustainability of non-state media for them to provide their core activities, as well as to enhance the capacities of the entities working in favour of free and diverse flow of information in Belarus through advocacy and policy dialogue.

1 CONTEXT

1.1 Sector/Country/Regional context/Thematic area

Belarus' political context has been shaped to a significant extent, over the past few years, by changes in the regional geopolitical environment. Since the start of the Ukraine crisis, Belarus has played a constructive role in the region, appreciated by the international community. At the same time, Belarus has moved towards increased international openness, including discussions on the state of affairs regarding democracy and human rights in the country.

The EU continues to follow a policy of critical engagement with Belarus, which translates into incremental engagement with the country while paying great attention to the human rights situation. In February 2016 the European Council reiterated its firm commitment to strengthening the EU's engagement with the Belarusian people and civil society.

Following the 2010 Presidential elections, tough measures have been imposed on civil society, non-state media and individuals (human rights activists, journalists, students participating to manifestations, etc.). After more lenient period, notably in 2016, similar tough measures have been applied ever since the demonstrations against "law on social parasites" took place in March 2017.

On the occasion of the 100th anniversary of the proclamation of the Belarusian independence (25 March 2018) Minsk city executive committee granted a permission to hold a concert organised by the opposition. Despite this more than 100 people including journalists were arrested on the day as the opposition initially wanted to organise a rally which was not allowed.

Tangible steps taken by Belarus to respect human rights will continue shaping the EU policy towards Belarus. Special attention will continue to be given to the abolition of death penalty, the fight against torture and ill-treatment and the freedom of expression and assembly. Furthermore, the respect of internationally recognised environmental and nuclear safety standards remains an essential element for our cooperation.

From independent journalist point of view Belarus is one of the most challenging media environments. The authorities have put in place a repressive legal framework to justify intimidation and persecution of reporters which has continued for years. Regular denials in accreditation are considered as one of the most pressing issues around Freedom of media in Belarus. Indeed, according to the Regulations for the Accreditation of Foreign Journalists in the Republic of Belarus, to work in Belarus foreign journalists should be accredited at the Ministry of Foreign Affairs of the Republic of Belarus.

In addition to aspects related to accreditation, the Belarusian law contains operating principles for the media (Article 4 of the Law of the Republic of Belarus of July 17, 2008 No. 427-Z “On the Media”), including principles such as reliability of information, respect for human rights and freedoms, protection of morals, and observance of professional ethics rules for journalists and universal moral rules. However, discrimination of women in the media is not banned and therefore journalists, editorial boards and editors are not held liable for their discriminatory actions and materials.

Belarusian media, advertising and cinema tend to reproduce patriarchal gender patterns. Often women are first of all portrayed as mothers, wives and housewives while men are portrayed as experts. Over the last years discussions on gender considerably increased in Belarusian mass media. They had educational character and were meant to deconstruct existing stereotypes and create new normative models. Especial attention was given to domestic violence.

This programme targets directly diversification of the media sector in Belarus, promoting an enabling, resilient and democratic environment.

1.1.1 Public Policy Assessment and EU Policy Framework

The EU continues to follow a policy of critical engagement with Belarus, which translates into incremental engagement with the country while paying great attention to the human rights situation. Since 2016 EU-Belarus relations are positively developing. In February 2016 the Council reiterated its firm commitment to strengthening the EU's engagement with the Belarusian people and civil society. The Council also decided to accelerate the implementation of measures aimed at enhancing EU-Belarus cooperation in a number of economic, trade and assistance related fields, with the goal of modernising Belarus and its economy and for the benefit of the Belarusian people. Both sides are finalising discussions on joint Partnership Priorities which will set the strategic framework for further cooperation in the coming years.

In the joint Declaration agreed in the 2017 Brussels Eastern Partnership Summit, Belarus and the other Summit participants reconfirmed their shared commitment to this strategic and ambitious Partnership, based on common values, mutual interests and understanding, shared ownership and responsibility, differentiation and mutual accountability, bringing Belarus and the Eastern European partner countries closer to the European Union. Under the four priorities reconfirmed at the 2017 Eastern Partnership Summit in Brussels, 20 key areas with targets for 2020 were identified for Belarus and the other Eastern Partnership countries and are conceived as our joint working tool.

This action is in line with the objectives of the Eastern Partnership Priorities (cross-cutting issues) as well as the joint staff working document 20 deliverables for 2020 (1: civil society, 3:Communication). The 20 deliverables for 2020 also aims at providing a stronger support to women's rights, empowerment and gender balance in the region and to put particular efforts on addressing negative gender stereotypes. EU assistance to Belarus will support the implementation of national reform plans and depend on their concrete progress, which will be regularly monitored and evaluated.

The Eastern Partnership "20 Deliverables for 2020" are in accordance with the 2030 Agenda for Sustainable Development and the 2015 Paris Agreement on Climate Change and their commitment to combat climate change, poverty and inequality and aim at supporting the implementation of Belarusian national policies wherever they are aligned with them.

The current programme is also in line with activities number 55¹ and 100² of the Interagency Action Plan³ (also known as National Human Rights Action Plan – NHRAP 2016-2019) on implementing the recommendations of the Universal Periodic Review (UPR) accepted by Council of Ministers of Belarus on 24.10.2016, as well as recommendations received from the Human Rights Treaty Bodies for 2016-2019. Belarus has also taken note of other relevant UPR recommendations as specific actions, in particular on bringing the legislative framework partially in line with the recommendations made by the OSCE Representative on Freedom of the Media. However, there is further need of aligning with OSCE recommendations on freedom of media. OSCE Special Representative on Freedom of Media has recently issued a number of statements precisely on this issue⁴.

Moreover, the programme also adheres to principles set down in the EU Human Rights Guidelines on Freedom of Expression Online and Offline⁵. Belarusian policy/legislation is currently not in line with EU policy and principles laid down in these guidelines.

1.1.2 Stakeholder analysis

Target groups include **media professionals reporting on Belarus, non-state media outlets** in need of financial capacity building, and **entities working in favour of free and diverse flow of information** through advocacy and policy dialogue. (see 5.3.1.b for detailed eligibility criteria).

In addition to repressive legal framework which has been described before, Belarusian freelance journalists lack of social security and have low income. Freelance journalists are usually paid by the published articles, regardless the time they spent for it. Although interest in trainings is generally speaking high among freelance journalists, the participation is sometimes challenged by the fact that it implies smaller incomes. Long term benefits of the trainings have been however acknowledged, ie skills to produce better quality news which attract wider audiences. In addition to training, the journalists need support to advocate in favour of less strict accreditation policy, which is currently considered as one of the most pressing issues around Freedom of media in Belarus.

¹ Conducting regular international events for the editorial boards of the Media outlets, journalists and members of the expert communities (e.g. exhibitions, forums, conferences) with a view to promote the right to the freedom of speech

² Promoting regular coverage of gender equality issues in the Mass Media, conducting public information and awareness campaigns and educational activities aimed at eradicating gender stereotypes and improving the gender culture in the society.

³ Available in Russian on http://mfa.gov.by/upload/doc/plan_all_ru.pdf

⁴ <https://www.osce.org/representative-on-freedom-of-media/380248> and <https://www.osce.org/representative-on-freedom-of-media/384786>

⁵ Available on https://eeas.europa.eu/sites/eeas/files/eu_human_rights_guidelines_on_freedom_of_expression_online_and_offline_en.pdf

In the field of independent media, there are approximately 10 independent newspapers that have a representative association able to function as a financing channel, and another ~10 independent media organisations, such as publishing houses or internet platforms. The government maintains a virtual monopoly on domestic broadcast media. Only state or indirectly state-owned television stations broadcast nationwide. Belarusian-language broadcasters transmitting from Poland, including Belsat television, Radio Racyja, and European Radio for Belarus, employ Belarusian journalists mainly with foreign financial support.

Most independent newspapers are not commercially viable. They have to register as commercial entities, but rely on grants from international donor organisations, because of higher costs of printing and paper, a ban on commercial advertisements, and a lack of access to the distribution network monopolized by the state. It is necessary to support independent media's capacities for financial self-sustainability to operate in Belarus.

The Belarusian Association of Journalists (BAJ) is the most famous and most prominent Belarusian non-governmental organisation, a country wide platform, aimed at ensuring freedom of speech and rights of receiving and distributing information and promoting professional standards of journalism. Due to relatively strict requirements for financial viability that EU grantees must have, EU support to BAJ and other smaller Belarusian media CSOs, goes usually via European CSOs which are capable and willing to operate in this challenging sector. Number of potential CSO applicants for this Call for proposals is estimated being 10 – 15.

Final beneficiary of the Programme is the general population in Belarus as it will have improved access to more diversified and more objective information.

The action has been designed in the EU Delegation as a response to the amendments to Media law, to mitigate the impact that it might have for the activities of non-state media. Moreover, the experiences received through project implementation of the projects selected in the CSO – Media Call in 2015 have been taken into account, as well as regular dialogue with CSO partners in different consultations.

1.1.3 Priority areas for support/problem analysis

Belarusian non-state media is constrained. Most non-state newspapers are not commercially viable. According to law they must register as commercial entities, in practise they rely on grants from international donor organisations, because of higher costs of printing and paper, difficulties in getting commercial advertisements, and a lack of access to the distribution network controlled by the state. There is no countrywide non-state television. Today non-state radio and TV operate from outside the country, via satellites or via internet, struggling to reach their audiences. Civil society hardly has any access to public broadcasting, but it cooperates with non-state and regional media.

The recent amendments on Media law will toughen the situation of non-state media. Until now it was relatively easy for non-state media and civil society organisations to operate via Internet even when reporting on sensitive issues. Technical aspects related to accessing Internet and its coverage in the country has improved rapidly in recent years enabling increased utilisation of social media platforms for most organisations and civil initiatives.

However, recent amendments on the Media law will oblige all internet-based media to register themselves. A non-registration may lead to charges on tax evasion and fines. Moreover, the law provides wide range of justifications that can be applied when closing down internet-based media through a simple administrative act. Finally, the law obliges all subscribers of internet-based media to register themselves. Internet-based media will become legally responsible for all the comments that are posted on their discussion platforms which will force them to apply strict moderating (censorship) on their discussion platforms.

Another problem concerns access to public data and accreditation of journalists to cover public events. In addition, journalists are being detained on regular basis and their activities are hindered in different ways.

In the light of the above, it is necessary to improve media professionals' capacities in quality reporting, to support financial self-sustainability of non-state media for them to provide their core activities, as well as to enhance the capacities of the entities working in favour of free and diverse flow of information in Belarus through advocacy and policy dialogue.

2 RISKS AND ASSUMPTIONS

Risks	Risk level (H/M/L)	Mitigating measures
The New Media Law shrinks the enabling space for non-state media to operate	H	Active advocacy to amend the New Media Law to avoid shrinking space.
Social unrest provokes authorities to tighten the control over non-state media	L	EU promotes in all communication channels the importance of constructive dialogue
Decreasing economic trends make the competition over limited advertisement money extremely demanding	M	Training on quality issues and business planning (pricing etc).
Non-state media may be subjected to arbitrary tax inspections and other controls, etc.	M	Waved visibility clauses on project activities where duly justified. Supporting political statements, where appropriate.

<p>Not sufficiently interested journalists to be trained</p>	<p>L</p>	<p>Emphasizing the benefits of the training in the long term although in the short term that might imply material losses.</p>
<p>Overlapping projects and duplication of funding due to limited absorption capacity and same organisations applying.</p>	<p>L</p>	<p>Donor co-ordination For example: Belarusian International Implementers' Meeting (BIIM), Belarus Media Sector Co-ordinator Group, any other ad-hoc co-ordination mechanism.</p>
<p>Limited number of good quality project proposals for the call in general or for either of the specific objective in particular.</p>	<p>M</p>	<p>Priorities of the call shall be defined in an open and accommodating manner.</p>
<p>Assumptions</p>		
<p>-Despite restrictive environment and the difficulty to register donor aid, non-state media remain willing to seek donor funding for their activities; -Non-state media and/or entities working in favour of free and diverse flow of information have necessary capacities to submit eligible and satisfactory project proposals for a call; -Internet continues to be relatively well accessible for the population and it continues to be possible for non-state media broadcasting inside and outside country; -Belarus is committed to the implementation of the commitments undertaken under the Eastern Partnership Joint Declaration; - Continued Policy dialogue is ensured, including in the EU-Belarus Coordination Group and the Human Rights Dialogue.</p>		

3 LESSONS LEARNT, COMPLEMENTARITY AND CROSS-CUTTING ISSUES

3.1 Lessons learnt

The EU Delegation can draw a number of lessons from its previous and on-going actions, notably the ones financed under the ENI 2015 programme "Support to Civil Society Organisations and Independent Media" and European Instrument for Democracy and Human Rights (EIDHR) Country Based Support Schemes (CBSS) 2009 and 2010, as well as action financed under Special Measure (ad-hoc individual support measure) 2013:

- The modalities of the Call must be as accommodating and as open as possible to ensure sufficient number of applications. There is only a limited number of organisations able and willing to apply for funding under this programme. Difficult operating environment and complicated EU grant procedures are factors decreasing number of applicants.
- The maximum amount for grants must not exceed EUR 1,000,000.00. The entities having competence in this sector would not be able to absorb larger amounts. For example, all proposals submitted under ENI 2015 programme were between EUR 550,000.00 and EUR 750,000.00.
- Due to the nature of the activities, the duration of the activities should be between 36 and 60 months to ensure long term impact. The learning and advocacy processes benefits from longer project implementation period.
- Financial support to third parties (sub-granting) is important and should be included in this programme. This support must be open to all entities regardless their legal status due to current Belarusian legislation that obliges all media to register as profit-making companies.

3.2 Complementarity, synergy and donor coordination

The current programme will complement the ongoing projects that EU Delegation selected in 2015 specific Call for proposals for Civil Society Organisations and Independent Media. All of these projects will finish early 2019 and therefore it is of utmost importance to continue supporting this sector through new projects.

Due to a small number of donors operating in this challenging and sensitive area it is indisputable that the co-ordination is of the utmost importance to ensure efficient use of limited resources. At the same time donors are obliged to maintain a high degree of confidentiality over their support measures, particularly in order to protect their implementing partners. This might result in missing some windows of opportunity for synergies and co-ordination.

The most active EU MS in this sector in Belarus are United Kingdom, Czech Republic, Denmark and Poland. Other donors, notably United States of America, Norway and the Organisation for Security and Co-operation in Europe (OSCE) are also active in this sector. In addition to donors in its classical meaning, the EU also co-ordinates its actions as far as possible with organisations, that have re-granting as their main or partial activity. These organisations are, for example, European Endowment for Democracy (EED), German Marshall Fund (GMF), International Research & Exchanges Board (IREX) Europe, National Endowment for Democracy (NED), People Achieving Change Together (PACT), and the

Stefan Batory Foundation. Bi-annual "Media Co-ordination Meeting", which usually takes place in Lithuania, is particularly instrumental in this regards.

3.3 Cross-cutting issues

In line with the EU Consensus on Development and the Gender Action Plan II and other relevant sources, cross cutting issues are considered equally central to the programme and inherent to its **right based approach**, encompassing all human rights. The five working principles below will be applied at all stages of implementation: Legality, universality and indivisibility of human rights; Participation and access to the decision-making process; Non-discrimination and equal access; Accountability and access to the rule of law; Transparency and access to information.

As per standard templates and guidelines for grant applicants, the potential grantees are encouraged to include in their project designs attention to gender equality aspects; to the Rights Based Approach and needs of vulnerable groups; to promotion of good governance of public policies; and to environmental concerns. These aspects are also examined and points awarded upon evaluation of the project proposals. Furthermore, the cross cutting issues will be separately emphasised in the guidelines for grant applicants.

4 DESCRIPTION OF THE ACTION

4.1 Objectives/results

The overall objective of this programme is to contribute to the diversification of the media sector in Belarus, promoting an enabling, resilient and democratic environment. The specific objectives are to increase media professionals' capacities in quality reporting, supporting financial self-sustainability of non-state media for them to provide for their core activities, as well as to enhance the capacities of the entities working in favour of free and diverse flow of information in Belarus through advocacy and policy dialogue.

The expected results are:

- Improved capabilities (skills and material) to produce quality reporting that attracts further audiences and further advertisement money.
- Improved skills to find legal ways of receiving income such as logistical support for events, advertisements, etc.
- Increased capacity to advocate for enabling environment for less strict accreditation policy, publishing non-state outlets, advertisements and evidence based reports etc.;
- Increased capacity to contribute to policy dialogue notably in the field of free and diverse flow of information, free of gender stereotypes;

This programme is relevant for the Agenda 2030. It contributes primarily to the progressive achievement of SDG Goal 16 (Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive

institutions at all levels). This does not imply a commitment by the Government of Belarus benefiting from this programme.

4.2 Main activities

Non-exhaustive list of activities:

- Training for journalists reporting on Belarus to increase quality of reporting (with specific focus on investigative journalism and training on how to address gender equality and how to refrain from gender stereotypes in reporting).
- Thematic trainings for media representatives on issues related to European Union.
- Study trips (or similar events) for EU media representatives to Belarus (and the other way round) to improve knowledge of and enhance contacts for reporting on Belarus and the European Union.
- Advocacy campaigns in favour of a more enabling legal environment (notably less strict accreditation policy).
- Preparation of evidence based reports in the field of free and diverse flow of information to contribute to policy dialogue.
- Legal services for non-state media, both regarding advocacy activities and financial management of the media outlet.
- Technical support for non-state media to improve the quality of their products, thus making them more attractive for advertisements.
- Material (in case of confiscated equipment) and legal support to journalists.

4.3 Intervention logic

This action is aimed at supporting the creation of necessary conditions for more enabling legal environment for non-state media to operate in Belarus. This is done notably via capacity building activities of the entities working in favour of free and diverse flow of information in Belarus through advocacy and policy dialogue.

Moreover, this action aims to increase the capacity of media professionals working for Belarus to produce quality reporting on Belarus, which can be published freely in enabling environment regardless of the subjects. Finally, quality reporting attracts further audiences and sponsors, which contributes to self-sustainability of non-state media.

5 IMPLEMENTATION

5.1 Financing agreement

In order to implement this action, it is not foreseen to conclude a financing agreement with the partner country.

5.2 Indicative implementation period

The indicative operational implementation period of this action, during which the activities described in section 4.2 will be carried out and the corresponding contracts and agreements implemented, is 84 months from the date of adoption by the Commission of this Action Document.

Extensions of the implementation period may be agreed by the Commission's authorising officer responsible by amending this decision and the relevant contracts and agreements; such amendments to this decision constitute technical amendments in the sense of point (i) of Article 2(3)(c) of Regulation (EU) No 236/2014.

5.3 Implementation modalities

Both in indirect and direct management, the Commission will ensure that the EU appropriate rules and procedures for providing financing to third parties are respected, including review procedures, where appropriate, and compliance of the action with EU restrictive measures affecting the respective countries of operation⁶.

5.3.1 Grants: call for proposals "Enhancement of Professional Reporting and Free Flow of Information in Belarus" (direct management)

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

The global objective of this open Call for Proposals is to identify projects that will strengthen and build capacity of Belarusian journalists and non-state media as well as entities working in favour of free and diverse flow of information in Belarus in order to provide a contribution to the realisation of civil and political rights in Belarus. **Specific objectives** of the Call for Proposals are to increase media professionals' capacities in quality reporting on Belarus, supporting financial self-sustainability of non-state media for them to provide their core activities, as well as to enhance the capacities of the entities working in favour of free and diverse flow of information in Belarus through advocacy and policy dialogue. (see section 4.1.). **Results** of the grants are expected to be in line with the results listed in section 4.1. **Activities** of the grants are expected to be in line with the activities listed in section 4.2.

(b) Eligibility conditions

In order to be eligible for a grant, it is envisaged that the applicant must:

- be a legal person or an entity without legal personality⁷ and
- be non-profit-making⁸ and

⁶ https://eeas.europa.eu/sites/eeas/files/restrictive_measures-2017-04-26-clean.pdf

⁷ Grant applications may be eligible if submitted by entities which do not have legal personality under the applicable national law, on the condition that the representatives of that applicant can prove that they have the capacity to undertake legal obligations on behalf of the applicant, and that they offer financial and operational guarantees equivalent to those provided by legal persons.

⁸ Due to low financial capacity of Belarusian non-state media it is not foreseen that they would apply directly support but with an entity that has sufficient financial and managerial capacities to apply for EU grant.

- be specific types of organisation such as: civil society organisations, including non-governmental⁹ non-profit organisations and independent political foundations; community based organisations, and private sector non-profit agencies, institutions and organisations, and networks thereof at local, national, regional and international level and
- be established¹⁰ in eligible countries specified in Article 9(1) of Regulation (EU) No 236/2014. Entities without legal personality must be based/have strong links and operational capacities in Belarus and respect the same rules of nationality.

The eligibility criteria stipulated above do not apply to third party support (sub-granting) recipients; they can be any type of organisations.

Subject to information to be published in the call for proposals, the indicative amount of the EU contribution per grant is EUR 500,000.00 – 1,000,000.00 and the grants may be awarded to sole beneficiaries and to consortia of beneficiaries (coordinator and co-beneficiaries). The indicative duration of the grant (its implementation period) is 36 – 60 months.

(c) 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.

(d) Maximum rate of co-financing

Given a weak fundraising capacity of the targeted beneficiaries and small number of donors operating in this section which makes fundraising difficult the maximum possible rate of co-financing for grants under this call is 95% of the eligible costs of the action.

If full funding is essential for the action to be carried out, the maximum possible rate of co-financing may be increased up to 100 %. The essentiality of full funding will be justified by the Commission's authorising officer responsible in the award decision, in respect of the principles of equal treatment and sound financial management.

⁹ I.e. not a state, national or international governmental institution or organisation or an organisation effectively controlled by such an institution. Whether a potential applicant is likely to be considered as effectively controlled by such an institution will depend on the extent to which such an applicant can demonstrate that it is independent of the state as regards decision-making, budgetary control and the appointment of staff (including members of its controlling body).

¹⁰ To be determined on the basis of the organisation's statutes, which should demonstrate that it has been established by an instrument governed by the national law of the country concerned and that its head office is located in an eligible country. In this respect, any legal entity whose statutes have been established in another country cannot be considered an eligible local organisation, even if the statutes are registered locally or a 'Memorandum of Understanding' has been concluded.

(e) Indicative timing to launch the call

First quarter of 2019.

5.4 Scope of geographical eligibility for procurement and grants

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

The Commission's authorising officer responsible 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 in other duly substantiated cases where the eligibility rules would make the realisation of this action impossible or exceedingly difficult.

5.5 Indicative budget

	EU contribution (amount in EUR)	Indicative third party contribution, in currency identified
5.3.1.1 Call for proposals (direct management)	2,000,000.00	
5.8 – Evaluation	0 (included in grants)	N.A.
5.10 – Audit	0 (covered by another measure constituting a financing decision)	N.A.
5.10 – Communication and visibility	0 (included in grants)	N.A.
Totals	2,000,000.00	N.A.

5.6 Organisational set-up and responsibilities

The beneficiaries, identified via Call for proposals, will be solely responsible in all implementation aspects of the actions.

5.7 Performance monitoring and reporting

The day-to-day technical and financial monitoring of the implementation of projects resulting from a call for proposals will be a continuous process and part of the implementing partner's responsibilities. To this aim, the implementing partner shall establish a permanent internal,

technical and financial monitoring system for the action and elaborate regular progress reports (not less than annual) and final reports. Every report shall provide an accurate account of implementation of the action, difficulties encountered, changes introduced, as well as the degree of achievement of its results (outputs and direct outcomes) as measured by corresponding indicators, using as reference the Logical Framework matrix (for project modality) or the list of result indicators (for budget support). The report shall be laid out in such a way as to allow monitoring of the means envisaged and employed and of the budget details for the action. The final report, narrative and financial, will cover the entire period of the action implementation.

The Commission may undertake additional project monitoring visits both through its own staff and through independent consultants recruited directly by the Commission for independent monitoring reviews (or recruited by the responsible agent contracted by the Commission for implementing such reviews).

5.8 Evaluation

Having regard to the nature of the action, a final evaluation will be carried out for this action or its components via an implementing partner.

It will be carried out for accountability and learning purposes at various levels (including for policy revision), taking into account in particular the fact that the EU pays special attention to freedom of expression and wishes to continue its support, where possible, also in the coming years.

The implementing partner and the Commission shall analyse the conclusions and recommendations of the evaluations and, where appropriate, in agreement with the partner country, jointly decide on the follow-up actions to be taken and any adjustments necessary, including, if indicated, the reorientation of the project.

5.9 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.

5.10 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 at the start of implementation and supported with the budget indicated in section 5.5 above.

In terms of legal obligations on communication and visibility, the measures shall be implemented by the Commission, the partner country, contractors, grant beneficiaries and/or entrusted entities. Appropriate contractual obligations shall be included in, respectively, the financing agreement, 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.

With regards to the Neighbourhood East, all EU-supported actions shall be aimed at increasing the awareness level of the target audiences on the connections, the outcome, and the final practical benefits for citizens of EU assistance provided in the framework of this action. Visibility actions should also promote transparency and accountability on the use of funds.

The implementation of the communication activities shall be the responsibility of the implementing organisations, and shall be funded from the amounts allocated to the Action.

All necessary measures will be taken to publicise the fact that the action has received funding from the EU in line with the Communication and Visibility Manual for EU External Actions. Additional Visibility Guidelines developed by the Commission (European Neighbourhood Policy and Enlargement Negotiations) will be strictly adhered to.

It is the responsibility of the implementing organisation to keep the EU Delegations and, where relevant, DG NEAR, fully informed of the planning and implementation of the appropriate milestones specific visibility and communication activities.

The implementing organisation shall report on its visibility and communication actions, as well as the results of the overall action to the relevant monitoring committees.

This action will be communicated externally as part of a wider context of EU support to the country, and where relevant to the Eastern Partnership region in order to enhance the effectiveness of communication activities and to reduce fragmentation in the area of EU communication.

The implementing organisation shall coordinate all communication activities with EU Delegations as well as regional communication initiatives funded by the European Commission, such as EU4Business, to the extent possible. All communication strategies developed as part of this action shall ensure they are in line with the priorities and objectives of regional communication initiatives supported by the European Commission and in line with the relevant EU Delegation's communication strategy under the "EU4Country" umbrella initiative.

In case the safety of the local implementing partners and thus success of the project require waiving the visibility of the EU financing, this will be done by inserting respective clause in the Special Conditions of the grant contract.

APPENDIX - INDICATIVE LOGFRAME MATRIX (FOR PROJECT MODALITY)

Indicators aligned with the relevant programming document are marked with '*' and indicators aligned to the EU Results Framework with '**'.

	Results chain	Indicators	Baselines (incl. reference year)	Targets (incl. reference year)	Sources and means of verification	Assumptions
Overall objective: Impact	The overall objective of this programme is to contribute to the diversification of the media sector in Belarus, promoting an enabling, resilient and democratic environment.	<ul style="list-style-type: none"> - Observed level of media freedom - Observed level of safety of journalists - number of non-state media - number of non state news 	<p>In 2018:</p> <p>52.59 (155 most restricted out of 188)</p> <p>Low (Although detentions and administrative fines take place often)</p> <p>40 (incl newspapers, radio, websites etc)</p> <p>7</p> <p>1200</p>	<p>In 2024 (at least 30% increase):</p> <p>Positive trend (position better than 140).</p> <p>Positive trend: less detentions and fines</p> <p>At least 52</p> <p>At least 9</p>	Results acquired during the revision process(es) of EU Roadmap for Engagement with Civil Society in Belarus; Annual reports and statistics of Reporters sans Frontiers (including World Press Freedom Index), Freedom House, Belarusian Association of Journalists etc.	

		agencies - number of people working for non state media		At least 1560		
Specific objective(s): Outcome(s)	The specific objectives are: 1) to increase media professionals' capacities in quality reporting on Belarus	- Quality of reporting	In 2018: Low to medium level (low level of investigative journalism)	In 2024: Positive trend (increased amount of investigative journalism)	Monitoring made by the EU Delegation	Media professionals' are interested and committed for training.
	2) to support financial self-sustainability of non-state media for them to provide their core activities	- Number of trainings organised to improve the quality reporting	0	At least 4 per year	Project documentation	
		- Level of financial health of non-state media	Low (All printed non-state media is donor dependent, electronic non-state media partially donor dependent)	Positive trend: (Clear decrease in donor dependency in all non-state media)	Annual reports and statistics of Reporters sans Frontiers, Freedom House, Belarusian Association of Journalists (BAJ) etc.	Positive economic trend which support non-state media's search for further funding
	3) to increase capacity to advocate for enabling environment for less strict	- Number of non-state media able to survive economically	7	At least 9		
		- Easiness of accreditation process	Difficult (Journalist	Positive trend (Accreditation	Results acquired during the revision	New media law is not adopted or

	accreditation policy, publishing non-state outlets, advertisements and evidence based reports etc.		representatives report on frequent refusals)	granted if application administratively eligible)	process(es) of EU Roadmap for Engagement with Civil Society in Belarus; Annual reports and statistics of Reporters sans Frontiers, Freedom House, Belarusian Association of Journalists (BAJ) etc.	its adoption is delayed, thus providing still enabling space for advocacy and policy dialogue
	4) to increase capacity to contribute to policy dialogue notably in the field of free and diverse flow of information;	- Number of trainings organised to improve the advocacy capacity - Outcomes of the policy dialogue	0 Poor (CSO representation low or inexistent in public decision making procedures)	At least 4 per year Positive trend (CSO have increased capacity and official venues to contribute to policy dialogue)	Project documentation Results acquired during the revision process of EU Roadmap for CSO activities in Belarus, annual reports and statistics of Reporters sans Frontiers, Freedom House, Belarusian Association of Journalists (BAJ) etc.	Access to internet remains unimpeded thus providing principal instrument for advocacy and policy dialogue.
		- Number of trainings organised to improve the capacity to contribute to policy dialogue	0	At least 4 per year	Project documentation	
Out pu ts	Technical support for non-state media to improve the quality of their products	Amount of sponsor money in non-state media's	0 (baseline will be established at	At least 20% increase	Annual reports of Belarusian	Positive economic trend

	(with special focus on investigative journalism and training on how to address gender equality related issues and how to refrain from gender stereotypes in reporting), thus making them more attractive for advertisements	budgets	the beginning of the project)		Association of Journalists (BAJ)	which support non-state media's search for further funding
	Thematic trainings for media representatives on issues related to European Union	Number of trainings organised by the project	0	4 (at least once a year)	Project documentation	Positive relationship between EU and Belarus continues encouraging such reporting
	Study trips (or similar events) for EU media representatives to Belarus (and the other way round) to improve knowledge (for example on gender related issues) and enhance contacts for reporting on Belarus and the European Union.	Number of study trips organised by the project	0	4 (at least once a year either from EU to Belarus or from Belarus to EU)	Project documentation	Journalists in both sides remain interested in networking and gaining knowledge on this topic
	Third Party Support (sub-granting) programme to support journalists / bloggers (ie skills training, replacement of confiscated equipment)	Number of sub-grants provided**	0	At least 50% of the project grant is further channelled as third party support	Project documentation	Implementing partners find safe way to provide such support
	Advocacy campaigns in favour of a more enabling legal environment	Number of advocacy campaigns implemented	0	At least 1 per year per action	News. Belarusian Association of Journalists annual	Social unrest in Belarus or neighbouring

	Preparation of evidence based reports in the field of free flow of information to contribute to policy dialogue	Number of evidence based report prepared and published	Not known, baseline to be established at the beginning of the project	At least 1 per year	reports, project documentation News. Belarusian Association of Journalists annual reports, project documentation	countries which leads tightened control over non-state media decreasing effect of any advocacy campaigns or policy papers
	Legal services for non-state media, both regarding advocacy activities and financial management of the media outlet	Number of non-state media entities supported **	0	160 (each non-state media at least once a year)	Project documentation	Implementing partners find safe way to provide such support