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ANNEX

to the Commission Implementing Decision on the special measure in favour of Syria 2023

Action Document for 2023 Special Measure in support of the Syrian people

SPECIAL MEASURE

This document constitutes the annual work programme in the sense of Article 110(2) of the Financial Regulation, and action plan/measure in the sense of Article 23(4) of NDICI-Global Europe Regulation.

1. SYNOPSIS

1.1. Action Summary Table

1. Title OPSYS Basic Act	2023 special measure in support of the Syrian people OPSYS business reference: NDICI-GEO-NEAR/ACT-61777 ABAC Commitment level 1 number: JAD.1230682 Financed under the Neighbourhood, Development and International Cooperation Instrument (NDICI-Global Europe).
2. Economic and Investment Plan (EIP)	No
EIP Flagship	No
3. Team Europe Initiative	No
4. Beneficiar(y)/(ies) of the action	The action shall be carried out in Syria, and neighbouring countries (Iraq, Jordan, Lebanon and Türkiye) where relevant.
5. Programming document	Not applicable
6. Link with relevant MIP(s) objectives/expected results	Not applicable
PRIORITY AREAS AND SECTOR INFORMATION	
7. Priority Area(s), sectors	Education - 110 Health - 120 Government and Civil Society – 150 Conflict, Peace and Security – 152 Agriculture – 311

8. Sustainable Development Goals (SDGs)	Main SDG (1 only): SDG 16 Peace, Justice and Strong Institutions Other significant SDGs (up to 9) and where appropriate, targets: SDG 1 No Poverty, SDG 2 Zero Hunger, SDG 3 Good Health and Well-Being, SDG 4 Quality Education, SDG 5 Gender Equality, SDG 8 Decent Work and Economic Growth, SDG 10 Reduced Inequalities and SDG 11 Sustainable Cities and Communities.			
9. DAC code(s)	11220 – Primary Education – 10% 11260 – Lower Secondary Education – 5% 11320 – Upper Secondary Education – 5% 11330 – Vocational Education – 10% 12110 – Health policy and administrative management – 13% 12281 – Health personnel development – 19% 15150 – Democratic participation and civil society – 5% 15160 – Human rights – 8% 15220 – Civil peacebuilding, conflict prevention and resolution – 8% 31161 – Food Crop production – 3% 31191 – Agricultural Services – 3% 31194 – Agricultural co-operatives – 3% 31195 – Livestock-Veterinary Services – 3% 43031 – Urban land policy and management – 5%			
10. Main Delivery Channel	Non-Governmental Organisations (NGOs) and Civil Society NGOs – 20000 International NGOs – 21000 UN entities – 41000 Private Sector Institutions - 60000			
11. Targets	<input checked="" type="checkbox"/> Migration <input type="checkbox"/> Climate <input checked="" type="checkbox"/> Social inclusion and Human Development <input checked="" type="checkbox"/> Gender <input type="checkbox"/> Biodiversity <input checked="" type="checkbox"/> Human Rights, Democracy and Governance			
12. Markers (from DAC form)	General policy objective	Not targeted	Significant objective	Principal objective
	Participation development/good governance	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Aid to environment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Gender equality and women’s and girl’s empowerment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Reproductive, maternal, new-born and child health	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Disaster Risk Reduction	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Inclusion of persons with Disabilities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

13. Internal markers and Tags

Nutrition	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
RIO Convention markers	Not targeted	Significant objective	Principal objective
Biological diversity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Combat desertification	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Climate change mitigation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Climate change adaptation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Policy objectives	Not targeted	Significant objective	Principal objective
EIP	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
EIP Flagship	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>	
Tags	YES	NO	
transport	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
energy	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
environment, climate resilience	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
digital	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
economic development (incl. private sector, trade and macroeconomic support)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
human development (incl. human capital and youth)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
health resilience	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
migration and mobility	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
agriculture, food security and rural development	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
rule of law, governance and public administration reform	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
other	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Digitalisation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tags	YES	NO	
digital connectivity	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
digital governance	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
digital entrepreneurship	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
digital skills/literacy	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
digital services	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Connectivity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Tags	YES		NO
digital connectivity	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
energy	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
transport	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
health	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
education and research	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Migration	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Reduction of Inequalities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
COVID-19	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

BUDGET INFORMATION

14. Amounts concerned	Budget line(s) (article, item): 14.020110 Southern Neighbourhood Total estimated cost: EUR 57 100 000.00 Total amount of EU budget contribution: EUR 57 000 000.00 This action is likely to be co-financed in joint co-financing for an estimated maximum amount of EUR 100 000.00.
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MANAGEMENT AND IMPLEMENTATION

15. Implementation modalities (management mode and delivery methods)	Direct management through: - Grants - Procurement Indirect management with the entity(ies) to be selected in accordance with the criteria set out in section 4.3.3
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1.2. Summary of the Action

More than twelve years after the start of the crisis, conflict violence is largely sporadic and unpredictable. There are, however, few grounds for hope, as needs now appear to be greater than at almost any time before. Years of conflict caused by the Syrian regime pushed the country into a severe economic and social crisis, which has reached unprecedented levels and currently represents the greatest danger for most of the Syrian population. Against this backdrop, on 6 February 2023, multiple earthquakes struck southern Türkiye and northern Syria. Severe human and material damage was reported, mainly in Aleppo, Hama, Idleb, and Latakia Governorates.

As consequence of the war and the suppressive behaviour of the Syrian regime, the condition today is direr than ever before. An estimated 8.8 million people live in areas affected by the earthquake. Public service provision, which was already under strain before, is under severe pressure. With almost 15.3 million people in need of assistance, the changing nature of the crisis requires a more robust medium-term approach supporting the resilience and early recovery efforts of Syrian citizens wherever possible at a grassroots level, going beyond emergency and life-saving responses. The current situation undermines the development of sustainable livelihoods, destroying traditional social safety nets and coping mechanisms of families and local communities.

The longer-term recovery of critical public services, such as health and education, faces huge challenges. Children and adolescents, who have grown up knowing nothing but conflict, are in danger of becoming a lost generation as they face continuing obstacles to accessing quality education, or indeed any education. All of these elements taken together have dire consequences for the psychosocial health of individuals, resulting in

rising community tensions, radicalisation and a severely frayed social fabric. Human rights abuses in Syria are widespread and systematic. Syrian families of over 130,000 missing persons struggle to receive comprehensive support and continue to seek justice, truth, and reparation.

In this context, the need to support the resilience and early recovery of the Syrian population through activities aimed at the provision of essential services, while supporting the development and maintenance of social cohesion at the local level, is seen as key. This action therefore prioritises bottom-up and community-driven interventions at the local level, strengthening the resilience of communities, building their capacity for future recovery, as well as nurturing civic space and promoting and protecting human rights. The proposed interventions provide a comprehensive response to the challenges faced by Syrians.

The additional needs arising in areas affected by the February 2023 earthquakes, while not new in nature, are on a scale not seen before. Additional funding made available as part of this special measure will be channelled to address those needs, while also addressing broader challenges which exacerbate community resilience and hinder recovery efforts.

All interventions will be guided by the local needs of specific communities, taking into account their vulnerabilities. Interventions in the health and education sectors will focus on strengthening the provision of key services now, but will also increase resilience, by supporting healthcare personnel to manage services and systems, or through investments in vocational education providing youth with viable livelihood opportunities. In addition, the resilience of communities will be strengthened by seeking the active contribution of non-state actors in locally owned productive initiatives, cornerstones of sustainable early recovery. This approach will complement actions to strengthen food security by supporting livelihoods, above all in the agricultural sector, with due attention to climate change mitigation.

Furthermore, the ongoing struggle of Syrians to defend their rights will also receive further assistance. The approach will be two-pronged: firstly, there will be a continued focus on the missing persons file and, secondly, support for actions on the restoration of, and access to, civic documentation. Both these areas will contribute to progress in the area of justice and accountability. Addressing more long term challenges, urban profiling knowledge, analysis, tools and planning frameworks, communities – and their needs - will be the fulcrum of an urban recovery response.

Due attention to cross-cutting issues, especially gender and support for vulnerable community members will lead to contributions towards SDG5 on achieving gender equality as well as SDG10 on reducing inequalities for all. Together, the separate interventions will contribute towards the overarching goal of promoting peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels. EU cooperation with the Syrian regime remains suspended and EU policy as regards to reconstruction, remains firmly in place.

Implementation of this action will be in line with the political parameters for engagement of non-humanitarian assistance in Syria as set out in the Council Conclusions adopted by the Foreign Affairs Council (FAC) on 3 April 2017¹, which endorsed the EU Strategy on Syria² and remains the guiding framework for engagement in Syria. These Conclusions were then confirmed through the Council Conclusions adopted by the FAC on 16 April 2018³. The action will give priority to a ‘Whole of Syria’ approach as long as the operational context allows, and to communities where significant numbers of returnees (refugees and/or Internally Displaced

¹ <https://www.consilium.europa.eu/en/meetings/fac/2017/04/03>

² <https://www.consilium.europa.eu/en/press/press-releases/2017/04/03/fac-conclusions-syria/>

³ <https://www.consilium.europa.eu/en/meetings/fac/2018/04/16>

Persons (IDPs)) and IDPs are located. This is also in line with United Nations Security Council Resolution (UNSCR) 2254, which underscores the critical need to build conditions for the safe and voluntary return of refugees and internally displaced persons to their home areas.

Robust risk monitoring and mitigation measures form the backbone of this support, including time-sensitive analysis of programme locations and activity-specific risks, security and context developments, partners and entity checks, as well as thematic analysis across geographies. The EU will closely monitor developments on the ground and constantly assess risks and opportunities, in order to avoid interference or legitimisation of any unwarranted entity or to avoid putting people, incl. returnees, at risk.

In line with the EU's Council Conclusions, EU assistance will benefit the population of Syria and avoid benefits accruing to the Syrian regime that would legitimise its national and local governance.

The entirety of this Action Document must be read against the background of the Council Conclusions, which remain the political guidance for the EU's intervention in Syria. In particular, EU support will only be maintained under the following conditions:

- there is space for implementing partners to work without endangering their lives/freedom;
- assistance can be provided without unwarranted interference by the regime, armed factions or regional actors that may aim to steer or change the focus of interventions by influencing the selection of target locations, beneficiaries or modes of implementation;
- assistance is geared towards empowering local communities and legitimate Non-State Actors (NSA) whilst avoiding to contribute to further fragmentation and/or demographic engineering;
- access and capacity to (remotely) monitor are maintained;
- full compliance with EU Restrictive Measures is ensured.

1.3. Beneficiaries of the action

The action shall be carried out in Syria, Iraq, Jordan, Lebanon and Türkiye, all of which are included in the list of ODA recipients.

2. RATIONALE

2.1. Context

The Syria crisis is now entering its thirteenth year. While large-scale military offensives have subsided following the March 2020 Idlib ceasefire agreement, localised violence has persisted throughout 2022 and the effects of the conflict continue to be widely felt. Pressure in neighbouring countries on refugees to go back has been increasing, yet no part of the country is safe for return. Syria still has 6.8 million internally displaced people and, currently, the highest number of people in need since 2011. The economic crisis, a consequence of a combination of the conflict, Syrian regime policies, the economic crisis in neighbouring Lebanon and the Russian war in Ukraine, is a major driver of needs even in areas that have been less directly affected by hostilities and displacement: for the first time, Syrians in every part of the country are experiencing some degree of vulnerability and in 2023, 15.3 million people are estimated to require humanitarian assistance, with women and children particularly badly impacted.

Economic indicators continue to deteriorate, basic services are under extreme pressure, and an ongoing cholera outbreak and climatic shocks compound an already dire situation. The cost of the November 2022 standard reference food basket had increased fourteen-fold since November 2019, fourfold in two years and by 80% in

the last twelve months. The upward trajectory reflects supply chain shocks for the net food-importer, stemming, in part, from Russia's illegal and unjustified aggression against Ukraine while back-to-back drought conditions and soil degradation, both results of climate change, have significantly reduced agricultural production in recent years. The depth of the crisis is reflected in the exchange rate of the Syrian pound (SYP) relative to the US dollar (USD). On 28 December 2022, the USD exceeded SYP 7,000 for the first time on record. The new rate effectively represented a doubling of the value of the USD on the Syrian black market relative to its value at the beginning of the year. Meanwhile, in January 2023 the Central Bank of Syria adjusted the official exchange rate to 4,552 SYP per 1 USD. Against this backdrop, wages remained largely stagnant.

As already mentioned in the 2022 Special Measure, the nature of the crisis has changed, with the most urgent needs in Syria now fuelled by the secondary and tertiary effects of the conflict, such as economic volatility, lack of basic services and state collapse. The lack of sustained access to health care, education, housing, food and - lately - oil has exacerbated the effects of the conflict, pushing millions of people into unemployment and poverty. This has already influenced increasing political unrest and rising dissatisfaction and it could further fuel radicalisation as well as new waves of migration towards the neighbouring countries and Europe. The shifting context requires to shape EU response around the Triple Nexus paradigm: development assistance must plug in sustainability elements into ongoing humanitarian interventions and the peace angle must be factored in through civic participation and local agency.

Complementarity with other donor actions is ensured through regular exchanges, among EU Member States in Beirut, and with other donors in online formats. The relatively limited pool of implementers for actions in Syria allows for a good overview of ongoing activities and encourages coordination of inputs. The EU maintains a high profile among the civil society organisations, both local and international, and has the ability to discuss with them in a transparent manner current needs and commensurate approaches. Nevertheless, implementation in Syria remains challenging for a variety of reasons, including the safety and security of implementing partners, reputational issues when engaging with certain local actors, exchange rate volatility, over-compliance with restrictive measures and the dangers of interference and aid diversion.

Bilateral co-operation with the Syrian government remains suspended since 2011. This action is framed by the 2012 Geneva Communiqué, the United Nations Security Council Resolution (UNSCR) 2254 adopted on 18 December 2015 and by the Council Conclusions adopted by the Foreign Affairs Council (FAC) on 3 April 2017, which endorsed the EU Strategy on Syria and remains the guiding framework for engagement in Syria. As confirmed in the Council Conclusions adopted by the Foreign Affairs Council (FAC) of 16 April 2018, a lasting peace in Syria is the EU's ultimate objective.

Meanwhile the latest development of 7 May 2023, when the League of Arab States readmitted Syria after more than a decade of suspension, might be perceived as regional push from the League of Arab States to normalise ties with the Syrian regime. The EU will closely continue monitoring the developments.

2.2. Problem Analysis

Short problem analysis

Though conflict violence is largely sporadic and localised, it remains unpredictable, as seen with the launch of Turkish operation Claw-Sword in north Syria, or with the November 2022 intense confrontations in the south, where the leader of the Islamic State, Abu al-Hasan al Hashimi al-Quraysh, was killed by former opposition fighters. Currently, the greatest danger for most of the Syrian population stems from the severe domestic - and regional - economic crises, which have reached unprecedented levels, with seven out of ten people in Syria in need of assistance.

Against this backdrop, on 6 February 2023, multiple earthquakes struck southern Türkiye and northern Syria. There was severe damage and widespread casualties, mainly in Aleppo, Hama, Idleb, and Latakia

Governorates. An estimated 8.8 million people live in areas affected by the earthquake. Public service provision, which was strained, is under severe pressure. In this context, the need to support the resilience and early recovery of the Syrian population through activities aimed at the provision of key services, while supporting the development and maintenance of social cohesion at the local level, is seen as key. This action therefore prioritises bottom-up and community-driven interventions at the local level, strengthening the resilience of communities, building their capacity for future recovery, and nurturing civic space. All interventions will be guided by the local needs of specific communities, taking into account their vulnerabilities.

In early May, the United Nations released the Syria Earthquake Recovery Needs Assessment (SERNA), which assesses a total damage of USD 6.8 billion and total losses of USD 2.1 billion, thereby amount to a total of USD 8.9 billion. The findings of the SERNA will be taken into consideration throughout the implementation, when it comes to earthquake-related activities.

Health

The Syrian health system has been severely impaired by a serious deterioration in socio-economic conditions and massive emigration of Health Care Workers (70% have left the country) over a decade or more. A cholera outbreak in 2022 impacted the entire country and spread to neighbouring Lebanon, highlighting the inherent fragility of health systems in both Lebanon and Syria. Health services are under extreme pressure, especially in the areas of sexual and reproductive health (SRH), mental health, Non Communicable Diseases (NCDs) and disability. A body of evidence shows that Syrian women and girls have significant unmet SRH needs.

Furthermore, several recent studies suggest that Syrian women and girls experience high rates of sexual violence and early and forced marriage, have more difficulty accessing family planning services, and in turn experience higher rates of unintended and unwanted pregnancy. Prior to the crisis, NCDs accounted for 80% of all deaths in Syria, and the underlying health behaviours such as tobacco use, poor nutrition and obesity are still prevalent. Climate change and the economic crisis also impact on health through environmental factors, such as soil degradation or air pollution through increased use of generators. Humanitarian actors have mostly deployed short term strategies with a focus on direct service delivery and mobile clinics. As the crisis has become protracted, there is an urgent need to refocus such strategies on longer term objectives aiming to strengthen – while avoiding any interference of Syrian regime - local health systems and primary health care in order to better address the needs of both host and displaced populations.

With regards to mental health, available data indicates that nearly half of all Syrian children display symptoms of Post-Traumatic Stress Disorder (PTSD) and a quarter face intellectual and developmental challenges. A worrying rise in suicide attempts has been reported across Syria recently. The phenomenon speaks to broader issues of despair, dire living conditions, and a lack of Mental Health and Psychosocial Support (MHPSS) services. 28 % of the total population aged two and above live with some form of disability, but some estimates put the number of people living with disability (PWDs) up to a third (36 %). Due to attitudinal, environmental, and institutional barriers, PWDs face structural inequalities and are disproportionately affected by the ongoing socio-economic crisis, and access to physical rehabilitation and livelihoods opportunities is limited.

From a development perspective, there are few issues more urgent than the need to address serious deficiencies in the health workforce. Securing the availability of sufficient and sufficiently qualified human resources continues to be a key priority. The proposed intervention will continue to identify and operationalise parameter-compliant strategies for health system resilience focused on the ability to prepare for, manage (absorb, adapt and transform) and learn from shocks. Strategies to enhance health system resilience can be best articulated around four key dimensions: i) health system stewardship: developing or strengthening the capacity to steer the system to respond to major challenges and crises as part of a long-term health strategy; ii) financing: ensuring flexibility, efficiency, stability and sustainability of health system funding; iii) resources: protecting or generating the necessary human and information resources, including information

systems and effective disease surveillance; and iv) service delivery: supporting alternative and flexible approaches to deliver quality health care services, including for at-risk populations.

Education

After twelve years of conflict, around half of Syria's children have known nothing but a lifetime of crisis. About 6.4 million school-aged children (3-17 years old) are in need of education assistance (47 % girls). In 2021, an estimated 2.4 million children were out of school. Only half of children with a reported health condition, injury or disability reported school attendance, compared to 84 % of children without these issues. Exclusion of children with disabilities is multifaceted and includes accessibility to and within schools, lack of qualified teachers, lack of special devices and learning materials, as well as social stigma. The formal system is unable to absorb and retain all school age children.

Many students continue to learn in uncondusive and/or unsafe learning environments. Limited availability of non-formal education services will continue to reduce the opportunities for children to return to learning and be brought to age-appropriate learning levels. One in three schools cannot be used because they have been destroyed, damaged, shelter displaced families, or are used for military purposes. With 25 verified attacks on schools and seven verified instances of military use of schools, attacks affecting schools in 2021 remain high. Adolescents and youth face a critical lack of access to secondary education in many areas, while the lack of vocational education prevents them from learning skills needed for economic opportunities.

With worsening economic conditions, families increasingly resort to harmful coping strategies including withdrawing children from school for child labour and early child marriage. One third of households reported signs of psychological distress in children in 2021, almost double the 2020 figure. Children and youth residing in camps and informal settlements are particularly affected by the lack of education, Vocational Education and Training (VET) services and job opportunities, and are especially vulnerable to radicalisation. Displaced school-aged children residing in-camps are less likely than children outside of camps to attend any form of learning (36 %-only attendance rate). Many teachers left the education system due to displacement, injuries or death, resulting in insufficient numbers of qualified and experienced teachers available and a reliance on unskilled teachers, which negatively impacts the quality of teaching.

The EU has ensured continuous support to the education sector since the start of the crisis in Syria, both through humanitarian and non-humanitarian funds. It targets education at primary and secondary level with interventions aimed at out-of-school children or those at risk of dropping out. It also supports vocational education and training to provide skills for youth and increase their livelihood capacity. Psychosocial support is an integral part of the approach, as well as activities that can reinforce resilience and social cohesion. Such a comprehensive education/livelihoods assistance responds well to the needs outlined above. Building on results achieved so far, and in order to avoid disruption to the services currently supported, such assistance will be continued across communities in Syria, including for Palestine refugee children and youth, paying particular attention to children with disabilities

Justice, Accountability and Access to Civil Documentation

Syrians suffered from forced disappearances, arbitrary arrests, torture and violent repressive tactics not just after the start of the conflict, but throughout the last four decades. In fact, the continued human rights violations and restrictions on civil liberties and personal freedoms by the Syrian regime were amongst the main causes of the 2011 uprising in Syria which, in turn, triggered some of the most severe violations and abuses of international humanitarian law and international human rights law from all parties. Human rights abuses in Syria are still widespread and systematic: from extrajudicial arrests and assassinations to torture, unfair trials, indiscriminate violence against civilians, and violation of housing, land and property (HLP) rights and targeting of civilian infrastructure.

The regime and its allies as well as the large number of armed groups and militias present on Syria's territory (some backed by foreign actors) all contribute to the high number of violations. Lack of access to civil documentation remains a serious concern – with large parts of the population without legal documents, which further compounds issues of freedom of movement, access to services, and HLP rights, all of which constitutes an increasing obstacle to reconciliation. Within this context, there is evidence that women are targeted differently than men during conflict. Women in Syria were and are subject to multiple gender-based discriminations and violence, including conflict-related sexual violence, in forms such as rape, forced and early marriages, trafficking for the purposes of sexual exploitation and abuse, and honour killings.

Estimates cited by the UN in 2020 indicate that over 130,000 persons are detained or missing as a result of the current conflict. In Syria itself, persons are missing as a consequence of summary executions, arbitrary and incommunicado detention, and kidnapping and abduction committed by all sides in the conflict, but primarily by the Syrian regime. Combatants and civilians are also missing as a direct result of fighting and the day-to-day ravages of war, and war crimes, while others have gone missing along migratory routes, in Mediterranean crossings or because of human trafficking. There are also children living in detention centres, and whose parents – Daesh fighters and others – are missing or who are at risk of further radicalisation. Facing multiple challenges, Syrian families of the missing, especially those headed by women, often do not know the whereabouts of the missing person and struggle to receive comprehensive support. Local and diaspora networks currently lack solid knowledge and capacities to lead a coordinated search and identification process, to advocate to secure the rights of surviving families to justice, truth and reparations – including practical provisions such as inheritance, economic benefits, and custody of children, as well as return - and lastly to ensure accountability of all the stakeholders involved.

The European Union's commitment to transitional justice and accountability translated into continuous support to Syrian civil society and relevant international institutions. Currently discussion is ongoing on the creation of a new international mechanism that would deal with detainees, the missing and accountability around these issues, which the EU will continue to follow closely. Particular support has been given to this file as accounting for the missing constitutes a pivotal element of the future of Syria. Consultation with Syrian civil society organisations (CSOs) and international actors underlined the importance of supporting accountability processes and efforts to locate and identify the missing through both capacity-building efforts for CSOs to lead justice and accountability processes and direct provision of tailored and comprehensive support to the families of the missing.

Food Security

The historically robust agricultural sector in Syria has declined in recent years. The food value chains - from production to markets - was adversely impacted by conflict, protracted/multiple displacement, destruction of vital agricultural infrastructures, climate change, and the disruption of heavily subsidized policies and investments. Entire livelihood systems have collapsed in view of high costs of critical inputs and services, high unemployment rates and limited income generating opportunities, while costs of food, housing and basic commodities continue to soar. The depletion of savings and increased use of debt have drawn even more Syrians into severe socio-economic hardship and forced many to resort to harmful coping strategies.

Following the major earthquake in Turkey and northwest Syria, strengthening food security and livelihoods of rural communities affected by the earthquake in northwest Syria is of paramount importance, especially to build on the achievements of humanitarian responses, thus fostering early recovery and self-reliance. Interventions will focus on supporting the early recovery of agricultural, including livestock, and agri-business sectors at local level through the provision of inputs, equipment, and of technical and organizational training, especially on value addition of agricultural commodities through agro-processing, marketing, branding and promotion of food safety standards and other existing norms and quality attributes. The intervention will also support, chiefly through training, the capacities of private sector operators such as primary producers of

commodities, services, value addition, marketing, export and development of quality attributes of agricultural commodities, to deliver specialised services to targeted value chains.

Area Based Recovery

Twelve years of crisis and conflict have destroyed the physical and social fabric of Syrian communities. Syria has experienced a massive conflict-induced urbanisation. While in 2011, Syria's population was 53% urban, today cities are home to an estimated 75% of the Syrian population, making cities the necessary sites for rebuilding the social contract, which is the keystone to long-term change. The Syrian civil conflict has pitted families, neighbourhoods and communities against one another in ways that have historic roots in ethnic and identity divisions that have only deepened through the course of the conflict. These cleavages are concentrated in cities where diverse ethnic groups are co-located but increasingly divided. Hence, the presence of millions of internally displaced persons added pressure on already socially delicate hosting communities.

Against this backdrop, with spontaneous return only sporadically occurring (even if conditions for voluntary, safe and dignified return are not met yet), urban recovery is essential. Planning in regime-held areas, such as it exists, follows a sectoral planning approach which ignores specificities and social dynamics of post-conflict urban settings – i.e., social cohesion, human rights, and protection issues are not sufficiently factored in. There is also no recognition of the large-scale nature of urban displacement and that a significant portion of the conflict's collateral damage has been inflicted on urban infrastructure, services, and economic linkages. Furthermore, national, local, administrative and municipal structures have eroded due to the conflict, and these reports and plans have limited impact on the way that the local administrations manage urban recovery, which is sometimes fragmented and not directed towards sustainable or participatory processes.

The EU has ensured continuous support to development of the Urban Recovery Framework approach for Syria, which has required active engagement and convening of local and international stakeholders, connecting them directly with the population. This has permitted communities to express their needs and partners to have access to up-to-date urban data that informs multi-stakeholder and multi-constituency policy advocacy, conflict-sensitive planning, and recovery programming.

Early Recovery and Social Cohesion

The poor performance of the agricultural sector in Syria and the subsequent deterioration of food systems, food security and livelihoods in urban and rural areas are conditioned by conflict, climate change, deteriorating economic conditions, extensive destruction of rural infrastructure, and the massive exodus of farming communities and qualified providers of technical services. Comparatively little attention is paid to the negative impacts of sectoral policies on the performance of the sector, especially in terms of equitable access to productive assets, sustainable use of natural resources in general and water in particular, biodiversity conservation, responsiveness to climate changes, research and innovation, gender equality, employment creation and decent working conditions, food safety and overall governance of the sector.

Past agricultural policies, driven by the pursuit of social welfare in rural areas and self-sufficiency in strategic crops, were supported by instruments of economic control such as annual agricultural production plans, marketing controls, directed credit, trade restrictions, price subsidies, input subsidies, irrigation subsidies and fuel subsidies. Policies that already proved unsustainable before the crisis continue, though funded at much lower scale, to hinder the full potential of the agricultural sector as an important contributor to economic recovery, employment creation and possibly a source of foreign exchange. Furthermore, protracted humanitarian interventions over the last 13 years have mainly addressed the most urgent needs of vulnerable rural and urban populations affected by the food crisis and did not focus on building livelihoods or on building capacities of local actors operating along agricultural value chains, and did not tackle the root causes of the poor performance of food systems.

Of particular concern is the very limited recognition of the key role the organised private sector plays in the operation of the agricultural sector on the one hand, and also as a powerful interlocutor in relation to agricultural reform. Hence it might be important to discover entry points of potential support to Non-State Actors. A mapping exercise will need to be done to get a full understanding of where such entry points could be, being it unions, cooperatives, associations, etc.). In a following step, capacity-building, advocacy support and similar to strengthen the capacity of the NSA identified of positive agents of change could be envisaged.

The presence of competent and well-organised interlocutors may create a counterbalance to actors who currently control all the levers of power, thereby strengthening accountability and social cohesion. With a view to increasing capacities and promoting spaces for civic engagement, empowering community actors and leaders at the local level with an independent mind-set rooted in principles of participation, leadership and inclusion, further investments in Syrian NSAs of all forms and shapes — from small initiatives and processes, to new or nascent platforms, networks, grass-root and civic organisations and/or non-formal networks of professionals – will serve the EU’s medium term political interests in Syria. In this regard, Non State Actors also have an important role to play in linking individuals, communities and networks within Syria, as well as within refugee communities and diaspora groups based outside Syria, to reduce the social fragmentation and polarisation and re-create a sense of identity and shared purpose regarding the future of the country. Furthermore, as demonstrated during the earthquake response, the civil society can play a key role as promoter of the nexus approach, facilitating the evolution of donor responses from a purely humanitarian focus to active engagement in interventions targeting recovery and longer term resilience of communities.

Identification of main stakeholders and corresponding institutional and/or organisational issues (mandates, potential roles, and capacities) to be covered by the action

In a complex and uncertain operational context, the biggest assets the EU must take advantage of are the Syrians themselves, and their relentless resilience as individuals, as actors of change, as communities, as urban and rural dwellers. As a people they deserve agency over their futures and local realities in Syria. Correspondingly, bottom-up and community-driven interventions are prioritised wherever operationally feasible, in order to nurture self-reliance and accountability within and between Syrian communities. Opportunities to support grassroots and locally based initiatives which generate and facilitate a local demand for inclusion, participation and service delivery will be sought.

The longer-term impact of these interventions should be to build capacity for future recovery, while at the same time ensuring that social cohesion is restored and maintained, thereby sowing the seeds for possible political and social transformation across the Syrian regions. The main stakeholders for the intervention areas described above include the following: Syrian communities, rights holders, civil society and Non-State Actors, but also potentially universities. In particular with a view to the Non-State Actors, the identification needs to be based on a mapping exercise to understand, which Actors could be potential agents for a positive change that EU parameter compliant.

All of the main stakeholders mentioned will not only form a part of the primary target groups for the respective interventions, but they will also be proactively included in the design of interventions as well as being asked to contribute their own resources in any way they can. Communities where actions are implemented will be consulted and involved throughout the process starting with formulation and ending with accountability. Ownership of project activities and outputs, as well as investment of own resources, whether these be financial or in-kind, will lead to greater sustainability and impact. This holds true for beneficiaries, as well as for implementing partners. Syrian beneficiaries have for too long been perceived as passive recipients of aid; one of the underlying objectives of this Special Measure is to encourage Syrians to become active citizens, either through their very own individual or their collective agency as grassroots organisations, small CSOs or parts of other networks. International NGOs, UN Agencies, EU Member States Agencies and other international organisations have advisory, consultative and implementing roles.

2.3. Lessons Learned

Humanitarian assistance alone cannot solve protracted instability in Syria. A failed Syrian state is in neither the region's nor Europe's interests as this could trigger new refugee flows across the region and into Europe, while renewed chaos could facilitate the eruption of new pockets of violent extremism. The overall approach to Syria remains valid; nevertheless, methods of implementation should be open to review and adjustment in the interests of maximising impact and achieving improved aid effectiveness. A structured discussion on the nature of the crisis from every perspective, political, economic, social, national, and international is needed if the EU is to maximise its influence and leverage available resources more effectively. The only way to stop the constant rise of the humanitarian caseload, is to address root causes while aiming to achieve medium-term development goals. A transition from support to resilience intended as repairing damage caused in the past, to resilience reinterpreted as a strengthening of systems gradually and proactively expanding to encompass new actors who can be involved both in shaping policy and in increasing access to services is very much needed. As the crisis is protracted, an explicit engagement strategy and vision are required in each sector of intervention.

Programmatic evidence has emerged showing that where investments in civic actors and communities have been sustained, these actors have been able to articulate their rights and needs and express their grievances more assertively. Past experience shows that there is a huge scope to leverage local demand/potential for change and for civic engagement. Moving forward, EU support to Syrian Non-State Actors and diaspora networks can be further refined if informed by in depth assessments exploring the scope and potential for action in new areas, notably that of professional associations: diversifying and spreading support across a wider spectrum has the potential to create a critical mass of stakeholders less vulnerable to pressures and restrictions. Investing in technical capacity and competences offers key opportunities to both promote a space for dialogue and participation at all levels and to facilitate greater productivity, hence, to increase communities' resilience.

The Syrian context is inherently uncertain. Through several cycles of implementation, it has become apparent that interventions must be adaptable to changing political and contextual circumstances. Since 2017, Monitoring and Evaluation (M&E) has, for the most part, been done remotely and information is regularly triangulated using a multitude of reliable sources, including Third Party Monitoring contractors. The EU can now draw on a variety of resources including Results-oriented Monitoring (ROM), the possibility to commission ex-post and final evaluations, and a dedicated service contract, which provides invaluable insight with regards to parameters for engagement, stakeholders, activities, and outcomes. Continuous support to a wide range of analytical services must be ensured and can further be broadened to key topical issues such as the monitoring of returns - a programmatic area that may gain momentum in the future and would already warrant forward planning. Feedback obtained from partners, beneficiaries and activists shows that the EU is on the right track in terms of the content of the assistance provided through programmes in all the priority sectors proposed in this document.

3. DESCRIPTION OF THE ACTION

3.1. Objectives and Expected Outputs

The Overall Objective /Impact of this action is peace and resilience efforts are enhanced in Syria.

The Specific Objective(s) (Outcomes) of this action are to:

1. The resilience of the local population is increased, particularly in areas affected by the earthquakes of 6 February;
2. Positive change is supported through promoting local actors' "agency" role, human rights and justice and accountability efforts.

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

- 1.1 **Health** - contributing to Outcome 1 (or Specific Objective 1): Access, management, affordability and quality of health services are improved.
- 1.2 **Education** - contributing to Outcome 1 (or Specific Objective 1): Provision of education and vocational education and training services for children and youth is improved, particularly those in marginalised and vulnerable situations, such as girls and young women, IDPs, refugees - including Palestine refugees -, earthquake survivors, out-of-school children or those enrolled but at risk of dropping out, and people with disabilities.
- 1.3 **Food Security** - contributing to Outcome 1 (or Specific Objective 1): Availability and access to agri-food commodities among households are improved.
- 2.1 **Urban profiling** - contributing to Outcome 2 (or Specific Objective 2): Urban areas are profiled and the understanding of how an inclusive area-based early recovery approach positively impacts the life of the Syrian people is improved.
- 2.2 **Non-State Actors** - contributing to Outcome 2 (or Specific Objective 2): The capacity of Non-State Actors to influence and effect change in in early recovery initiatives is strengthened.
- 2.3 **Justice and accountability** - contributing to Outcome 2 (or Specific Objective 2): The capacity of Syrian civil society to ensure justice, accountability and due processes of law in missing persons cases is increased.
- 2.4 **Civil documentation** - contributing to Outcome 2 (or Specific Objective 2): Access to civil documentation for persons affected by conflict and displacement in Syria is increased.
- 2.5 **Third-Party monitoring** - contributing to Outcome 2 (or Specific Objective 2): Robust diagnoses and monitoring of stakeholders and interventions is produced in a timely manner.

3.2. Indicative Activities

Any activity foreseen under the present Special Measure will be implemented in full respect Council Conclusions adopted by the Foreign Affairs Council (FAC) on 3 April 2017, which endorsed the EU Strategy on Syria and remains the guiding framework for engagement in Syria, as confirmed in the Council Conclusions adopted by the Foreign Affairs Council (FAC) of 16 April 2018. As overarching principle for this Special Measure, the below mentioned activities must be read in light of the Council Conclusions. This means, in particular, that EU support will only be maintained under the following conditions:

- there is space for implementing partners to work without endangering their lives/freedom;
- assistance can be provided without unwarranted interference by the regime, armed factions or regional actors that may aim to steer or change the focus of interventions by influencing the selection of target locations, beneficiaries or modes of implementation;
- assistance is geared towards empowering local communities and legitimate Non-State Actors (NSA) whilst avoiding to contribute to further fragmentation and/or demographic engineering;
- access and capacity to (remotely) monitor are maintained;
- full compliance with EU Restrictive Measures is ensured.

Health

Activities related to Output 1.1 may include but are not limited to:

- Mapping of Syrian Non-State Actors in the health sector;

- Partnerships with Syrian Non-State Actors to improve access, management, affordability and quality of health services and essential medicines;
- Pre-and in-service training of Syrian health workers from Syria and the diaspora and complementary capacity building of health professionals associations and Non-State Actors;
- Investments in surveillance and health information systems, disaster preparedness, contingency planning, research, health financing, cost effectiveness analysis, coordination, stewardship and capacity building, nurturing an organisational learning culture that is responsive and proactive to future shocks, deliberately forward looking, cost conscious and sustainable.
- Identification of lessons learned in the aftermath of the earthquake and improved preparedness.

Education

Activities related to Output 1.2 may include but are not limited to:

- Activities to encourage children to (re)integrate and/or stay in school or to provide alternative learning opportunities, such as: equitable and inclusive basic education; remedial and catch-up classes; non-formal education; early childhood education; basic literacy and numeracy; mine-risk education; life-skills training; and potential other sub-sectors, particularly in earthquake affected areas.
- Activities to provide skills for youth and increase their employment and livelihood capacity, such as: Technical and Vocational Education and Training (TVET), micro-entrepreneurship, income-generating activities, coaching and mentoring to employment, cash interventions, business start-up and support services, and other investments supporting skills development and employment/livelihood facilitation, support to business recovery in earthquake-affected regions.
- Child protection and Mental Health and Psychosocial Support (MHPSS) services (in particular for earthquake survivors), establishment of referral mechanisms, recreational and volunteering activities, and other activities that can reinforce and promote resilience, social cohesion, non-discrimination and non-violence.
- Needs assessment for vulnerable groups such as children and youth with disabilities and design of tailored education and TVET activities.
- Training of teachers/trainers engaged in education and TVET as well as child protection/MHPSS.

Food Security

Activities related to Output 1.3 may include but are not limited to:

- Provision of inputs, infrastructure and services to farmers, including livestock keepers, and fishers for sustainable increase of productivity, risk mitigation and climate change adaptation;
- Strengthen marketing, storing and agro-processing capacities of private sector operators and promotion of food safety standards and other existing norms and quality attributes;
- Provision of technical and organisation skills to farmers and fishers co-operatives or associations for sustainable increase of productivity, risk mitigation, climate change adaptation and marketing capacities.

Urban profiling

Activities related to Output 2.1 may include but are not limited to:

- Disseminate and train local actors on profiling and planning methodology.
- Empowering Syrian citizens to engage and utilise data to make more informed decisions about their own cities.
- Produce responsive and demand-driven situation reports that inform multi-stakeholder and multi-constituency policy advocacy, recovery programming and conflict-sensitive planning.

Non-State Actors

Activities related to Output 2.2 may include but are not limited to:

- Review and map current Non-State Actors operating in the wider agricultural sector, assess their main mandates, roles, structures, capacities, needs and elaborate specific actions to address their more important needs.
- Promote engagement of local Non-State Actors such as professional syndicates and organisations, chambers of producers, traders and manufactures and their federations in effective involvement in early recovery;
- Strengthen capacities of Non-State Actors to provide qualified support and services, with an initial focus on non-state actors operating along agricultural and agribusiness value chains;
- Facilitate coordinated positions of their constituency members in stakeholder consultations, dialogue with public institutions and development and monitoring of sectoral policies.
- Promote dialogue and social cohesion within communities and between different regions of Syria.
- Expand the role of the Syrian Civic Space Initiative both as a venue for dialogue and as a generator and repository of knowledge on the Syrian civic space.
- Enhance the capacity of civil society actors in making the transition from the provision of humanitarian assistance incl. early recovery to effective involvement in early recovery in sectors of relevance.

Justice and accountability

Activities related to Output 2.3 may include but are not limited to:

- Investigation of human rights violations and collection and analysis of information about missing people.
- Strengthen advocacy efforts on survivor-led accountability for crimes committed in Syria.
- Building capacity of Syrian families and CSOs engaged in the “missing file”.
- Provide direct, tailored and comprehensive support to families of the missing.

Civil documentation

Activities related to Output 2.4 may include but are not limited to:

- Provision of information, counselling and referral services on legal identity including civil documentation.
- Training delivery on civil documentation rights and responsibilities to duty-bearers / humanitarian partners / community leaders.
- Produce research reports / policy briefs on legal identity / compendium of Syrian civil documentation, including from the Syrian regime, de facto authorities and refugee-hosting countries.

Third-Party monitoring

Activities related to Output 2.5 may include but are not limited to:

- Continued support to third party monitoring and assessments, risk analysis and other diagnostic tools including support to results-based monitoring of stakeholders, ongoing interventions leveraging the skills and know-how of various partners active in this field.
- Robust analysis and research to enhance collective understandings of in-country and regional dynamics.

3.3. Mainstreaming

Environmental Protection, Climate Change and Biodiversity

Outcomes of the Strategic Environmental Assessment (SEA) screening (relevant for budget support and strategic-level interventions).

An SEA is not required but key environment and climate-related aspects will be addressed during the design of the action.

Outcomes of the Environmental Impact Assessment (EIA) screening (relevant for projects and/or specific interventions within a project).

The EIA screening classified the action as Category B (not requiring an EIA, but for which environment aspects will be addressed during design).

Outcome of the Climate Risk Assessment (CRA) screening (relevant for projects and/or specific interventions within a project).

The CRA screening concluded that this action is no or low risk (no need for further assessment).

Gender equality and empowerment of women and girls

As per OECD Gender DAC codes identified in section 1.1, this action is labelled as G1. This implies that Gender and elimination of all forms of discrimination based on gender will be mainstreamed throughout the programme. Women and girls, including widows and divorcees, adolescents, older women and people with disabilities, are affected by multiple forms of violence and discrimination. Violence against women has become so normalised across all facets of life that it must now be recognised as a key phenomenon within modern Syrian culture, one that is quickly eroding the resilience of women. Women and girls in Syria are disadvantaged by patriarchal biases, as well as by social norms, which limit the role that women and girls can play in the public space. This element, in particular, can be partially mitigated through inclusion of counter-messages delivered through education and other activities, as well as by supporting women-led civil society organisations, those working on relevant themes and by supporting advocates who speak out for women's role in the public and professional space. Alongside a patient-centred approach, gender issues will also be mainstreamed in curricula for training of health professionals where relevant, whilst investments in workforce development will pay particular attention towards ensuring equal access and opportunity.

The Gender Profile for Syria and the gender sectoral analyses will guide the choice of main entry points to address changing power relations taking into account the rights and needs of women, men, girls and boys as well as LGBTI. Further, programmatic indicators will be gender disaggregated to ensure a structured approach to inclusivity for all interventions planned under the umbrella of this programme.

Human Rights

A rights-based approach is mainstreamed throughout the Programme. The action explicitly supports rights holders with a particular focus on conflict-affected, marginalised and/or disempowered individuals and communities and in particular victims of violence, the families of the disappeared, youth, women, children and people living with disabilities (PWDs).

Disability

As per OECD Disability DAC codes identified in section 1.1, this action is labelled as D1. This implies that People with Disabilities (PWDs) will explicitly be supported by this action, seeking not only to target them as beneficiaries, but where possible, to enable their voice and participation in addressing their needs. Planned capacity building of health professionals working in rehabilitation will also assist improving skills, quality and access to rehabilitation services for PWDs and PWDs will be explicitly involved in service redesign and curricula review.

Democracy

As part of the EU Strategy, the EU supports sustained consultation and dialogue with Syrian civil society in the political process and in the process of reconciliation and aims to ensure that civil society can play a

prominent role in post-conflict Syria. In the preparation of the 6th Brussels Conference on the Future of Syria, the EU utilised its “virtual space”, providing a forum where participants from all geographies inside Syria could engage in an active exchange on issues of concern at present and for the future. This civic space permanently supports dialogue with civil society and within civil society inside Syria, and improves the targeting and transparency of EU support. For instance, the platform has been a successful tool to carry feed stakeholders’ inputs into the formulation of this Special Measure in support to the people of Syria.

Conflict sensitivity, peace and resilience

Particular attention will be paid to Fragile States Principles (FSPs) and especially the “Do No Harm” (DNH) approach and its operationalisation to ensure that EU assistance minimises risks of doing harm. Syria faces unique circumstances that have challenged the implementation of DNH, including fragmentation along different fault lines (socio-economic, religious, sectarian, tribal and class divides, rural-urban dynamics, intersections and juxtapositions between regime and non-regime controlled areas, specificities of Turkish controlled areas, diasporic versus local identities, and the general population’s alienation from their leadership and institutions) and logistical challenges arising from extreme insecurity. A DNH analytical framework of ‘dividers’ and ‘connectors’ will be developed to identify how EU assistance may avoid aggravating fragmentation along different fault lines. Fragmentation is reversible: joint values are still strong and Syrian NSAs are an important connector. A checklist of questions may be developed to ensure that interventions and partnerships truly embrace a DNH approach.

Existing local level and area-based diagnostic and conflict sensitive analysis, coupled with third party risk mitigation analysis, continues to provide a good foundation for sound programming, implementation and monitoring. The action will give priority (1) to a whole of Syria approach, as long as the operational context allows (2) to communities where significant numbers of internally displaced persons or returnees are.

Disaster Risk Reduction

This action does not target disaster risk reduction.

Preventing and Countering Violent Extremism

Although the general level of violence in Syria has markedly decreased, there is still considerable potential both for the resurgence of existing extremist movements, as well as for the radicalisation of vulnerable populations. All interventions under the measure will address issues of equitable access to services and socio-economic opportunities, thereby supporting social cohesion in communities, including communities of return, and mitigating the risks of radicalisation.

3.4. Risks and Assumptions

Category⁴	Risks	Likelihood (High/ Medium/ Low)	Impact (High/ Medium/ Low)	Mitigating measures
1	Deterioration of the security situation, but also	M	H	Implementing partners undertake periodic assessments of the operational context in order to respond to changes.

⁴ vThe risk (category) can be related 1-to the external environment; 2-to planning, processes and systems; 3-to people and the organisation; 4-to legality and regularity aspects; 5-to communication and information. See pp 44-48 of [Implementation Guide of the Risk management in the Commission](#). [\[EC internal link\]](#)

	because of potential consequences of the Russian war on Ukraine and/or of the escalating violence in Iran such as recruitment of mercenaries, Russian forces' depletion and Iranian forces repositioning.			Flexibility is built into project design to allow for necessary adaptation and re-orientation of activities if necessary.
1	Increased control on operational and/or political space and resources by the Syrian regime and other parties to the conflict.	M	H	<p>Assistance is specifically designed to counter such dynamics by empowering Civil Society Organisations (CSOs) to withstand pressure exerted by unwarranted parties.</p> <p>Political opportunity costs of non-engagement are weighted. It may prove exceedingly difficult to re-engage once space is lost.</p> <p>Communities advocate for sufficient operating space and are willing to take calculated risks.</p> <p>Partnerships are sufficiently strong to raise 'red flags' whereby the EU can reassess and adjust activities/timing/location/partner.</p> <p>Third party monitoring (TPM) and other analytical resources will be leveraged to monitor and minimise risks.</p> <p>Where interference persists, the reputational risk for the EU is deemed too high, and/or where the intervention logic is severely compromised, the EU will partially/ fully suspend activities, or terminate them in justified cases.</p>
1	Increased food insecurity due to rising food prices caused by reduced availability of commodities	H	H	<p>Coordination between DGs ECHO and NEAR to monitor coherence and effectiveness of interventions.</p> <p>Design of programmes to ensure promotion of community resilience to external food shocks</p>
1	Significant shift in displacement trends are observed,	L	H	Monitoring of the push/pull factors for displacement are in place, partnerships and dialogue with key 'returns' actors are established.

	including an uptick in spontaneous return movement or new waves of displacement.			Programmes can be re-steered to address emerging return-related needs more specifically. Maintain close dialogue with Member States and DG ECHO.
2	Remote management increases risks of aid diversion.	M	M	Implementation partners (IPs) have robust compliance systems and well established internal monitoring and management capacity. Due diligence checks, supervision and frequent reporting are already contractual requirements. TPM and other analytical resources are regularly leveraged.
2	Activities aimed at promoting dialogue between potential agents of change carries protection or reputational risks for participating stakeholders.	M	M	Dialogue is organised in neutral environment. TPM and other analytical resources are leveraged to provide detailed analysis, and identify risks.
2	Project activities have unintended negative consequences for particular stakeholder groups	L	M	All interventions will be designed using conflict sensitivity tools and taking a do no harm approach. Mitigating measures will include a thorough understanding of societal norms, while at the same time undertaking awareness-raising and advocacy for the rights of vulnerable groups such as women, youth and PWDs.
4	Implementing partners are not able/do not adhere to the EU Restrictive Measures	M	H	Regular communication with implementing partners and provision of access to relevant information.
4	Local partners lack capacity implement in accordance with EU rules and procedures	M	M	Regular communication with implementing partners and provision of access to training and relevant information.
	Further worsening of socio-economic situation as a	H	M/H	Relevant environmental and climate change aspects will be analysed and integrated in the supported activities.

	consequence of the environmental degradation and the climate change.			
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External Assumptions

In order for the outputs of this action to achieve the identified outcomes, it is necessary that stakeholders share a common understanding of priorities and that EU partners have access to activities implemented inside Syria and can perform their tasks in full safety.

The support of positive change by promoting local actors’ agency, human rights and justice and accountability efforts can successfully contribute to support peace building efforts and early recovery needs of the Syrian population as long as:

- EU assistance can be provided without unwarranted interference by regime entities, armed factions or regional actors that may aim to steer or change the focus of interventions;
- Organisations have sufficient technical and absorption capacities to engage in programmes;
- Local ownership principles are honoured through processes of validation by a wide cross-section of stakeholders.

Similarly, addressing immediate needs, reducing vulnerabilities and increasing the resilience of the Syrian population through the provision of and better access to basic services (health and education) can positively support peace building efforts and Syrian early recovery needs, if stakeholders share a common understanding of priorities and political expectations around curriculum development are managed adequately.

3.5. Intervention Logic

The underlying intervention logic for this action is that prioritising bottom-up and community-driven interventions wherever operationally feasible, nurturing self-reliance and accountability within communities, facilitating opportunities to support grassroots and locally-based initiatives which generate and facilitate a local demand for inclusion, participation and service delivery will have the effect of strengthening the agency of Syrian stakeholders at all levels and will increase their individual resilience and that of their communities.

This will be achieved by using urban profiling knowledge, analysis, tools and planning frameworks, communities – and their needs – to generate an urban recovery response. The ongoing struggle of Syrians to defend their rights, starting with the most basic access to civic documentation, will receive further assistance through the continued support and expansion of EU efforts in this thematic areas. Attention to the issue of missing persons and establishing capacities on the part of relevant organisations, as well as mechanisms for investigation, redress and closure for victims and their families affected by a range of conflict-related violence, will contribute to progress in the area of justice and accountability. The resilience of communities will be strengthened through approaches that seek the active contribution of non-state actors - especially professional syndicates and organisations of producers, traders and manufactures - in locally owned productive initiatives, corner stones of sustainable early recovery. Local civil society actors will be capacitated and empowered to become agents of change and promote processes of participation and inclusion in their communities, including of vulnerable groups. Finally, socio-economic rights and the right to lead a dignified life will be emphasised through actions which ensure access to essential services, including quality healthcare and quality primary, secondary and vocational education.

The intermediate outcome of the intervention will be the safeguarding of Syrians' right to live in a peaceful and prosperous society. The longer-term impact of these interventions should be to build capacity for future recovery, while at the same time ensuring that social cohesion is supported, thereby sowing the seeds for eventual political and social transformation across the Syrian regions.

This intervention is underpinned by the assumption that the security situation will remain at current levels of stability, at least, and that implementing partners will continue to have access to the country and to local partners at least at present levels.

Any intervention foreseen under the present Special Measure will be implemented in full respect of the Council Conclusions adopted by the Foreign Affairs Council (FAC) on 3 April 2017, which endorsed the EU Strategy on Syria and remains the guiding framework for engagement in Syria, as confirmed in the Council Conclusions adopted by the Foreign Affairs Council (FAC) of 16 April 2018. Whereas this is an overarching principle and therefore not repeated under the specific areas of intervention, for the intervention logic this means in particular that EU support will only be maintained under the following conditions:

- there is space for implementing partners to work without endangering their lives/freedom;
- assistance can be provided without unwarranted interference by the regime, armed factions or regional actors that may aim to steer or change the focus of interventions by influencing the selection of target locations, beneficiaries or modes of implementation;
- assistance is geared towards empowering local communities and legitimate Non-State Actors (NSA) whilst avoiding to contribute to further fragmentation and/or demographic engineering;
- access and capacity to (remotely) monitor are maintained;
- full compliance with EU Restrictive Measures is ensured.

3.6. Indicative Logical Framework Matrix

PROJECT MODALITY (3 levels of results / indicators / Source of Data / Assumptions - no activities)

Results	Results chain: Main expected results [maximum 10]	Indicators [it least one indicator per expected result]	Baselines (values and years)	Targets (values and years)	Sources of data	Assumptions
Impact	To enhance peace and resilience efforts in Syria	1 Country ranking according to the Global Peace Index 2 Proportion of the population living below the international poverty line by sex, age, employment status and geographic location (urban/rural) (SDG 1.1.1.) (OPSYS core indicator)	1 161 (2022) 2 tbc (2023)	1 158 (2027) 2 tbc (2027)	1 Global Peace index by Vision for Humanity 2 UNDP Human Development index	<i>Not applicable</i>
Outcome 1	1. Increased resilience of local population, particularly in areas affected by the February 6 earthquakes.	1.1 Proportion of beneficiaries reporting improved access to education and health services disaggregated by gender, age and type of population 1.2 Number of vulnerable communities with improved food security	1.1 70% (2022) 1.2 tbc	1.1 90% (2027) 1.2 tbc	1.1 – 1.2 Projects reports and internal monitoring	Stakeholders share a common understanding of priorities. Political expectations around curriculum development are managed adequately.

Outcome 2	2.2. Positive change supported through promoting local actors' "agency" role, human rights and justice and accountability efforts	2.1 Number of civil society organisations participating in decision making, disaggregated by identity groups 2.2 Extent to which the capacities of civil society actors to guide community change processes are enhanced	2.1 tbc (2022) 2.2 Low	2.1 tbc (2027) 2.2 Medium	2.1 Peacebuilding and State-building Indicators (www.pbsbdialogue.org ; www.newdeal4peace.org) 2.2 EU Roadmap for engagement with civil society	Assistance can be provided without unwarranted interference by regime entities, armed factions or regional actors that may aim to steer or change the focus of interventions. Organisations have sufficient technical and absorption capacities to engage in programmes. Local ownership principles are honoured through processes of validation by a wide cross-section of stakeholders.
Output 1 related to Outcome 1	1.1 Health Improved access, management, affordability and quality of health services	1.1.1 Number of beneficiaries reporting improved access and affordability of health services and essential medicines 1.1.2 Number of decisions informed by evidence and HIS	1.1.1 To be defined at inception phase 1.1.2 To be defined at inception phase	1.1.1 To be defined at inception phase 1.1.2 To be defined at inception phase	1.1.1 – 1.1.2 Projects reports and internal monitoring	Implementation sequencing is adequate and proceeds at a reasonable pace. Plans and proposals are realistic and feasible. Stakeholders share a common understanding of priorities.

<p>Output 2 related to Outcome 1</p>	<p>1.2 Education Improved provision of education and vocational education and training services for children and youth, particularly those in marginalised and vulnerable situations.</p>	<p>1.2.1 Number of students supported to access primary, secondary or vocational education within the action disaggregated by gender, age and type of population</p> <p>1.2.2 Number of teachers / trainers trained within the action</p>	<p>1.2.1 0 (2022)</p> <p>1.2.2 0 (2022)</p>	<p>1.2.1 140,000 (2027)</p> <p>1.2.2 550 (2027)</p>	<p>1.2.1 – 1.2.2 Projects reports and internal monitoring</p>	<p>Risks are managed adequately by partner organisations.</p> <p>EU partners have access to activities implemented inside Syria and can perform their tasks in full safety.</p> <p>The quality analyses produced allows the EU to tailor its approaches/actions, or adopt new ones, according to the changing environment.</p>
<p>Output 3 related to Outcome 1</p>	<p>1.3 Food Security Improved availability and access to agri-food commodities among households</p>	<p>1.3.1 Number of vulnerable households having access to affordable food commodities</p> <p>1.3.2 Number of farmers and agribusiness operators receiving inputs, services, training and infrastructures.</p>	<p>1.3.1 To be defined at inception phase</p> <p>1.3.2 To be defined at inception phase</p>	<p>1.3.1 To be defined at inception phase</p> <p>1.3.2 To be defined at inception phase</p>	<p>1.3.1 – 1.3.2 Projects reports and internal monitoring</p>	
<p>Output 1 related to Outcome 2</p>	<p>2.1 Urban profiling Profiling of urban areas and improved understanding of how an inclusive area-based early recovery</p>	<p>2.1.1 Number of civil society and people whose awareness and engagement on Urban Recovery issues was strengthened.</p> <p>2.1.2 Number of civil society actors engaged in local development</p>	<p>2.1.1 To be defined at inception phase</p> <p>2.1.2 To be defined at</p>	<p>2.1.1 To be defined at inception phase</p> <p>2.1.2 To be defined at inception phase</p>	<p>2.1.1 – 2.1.2 Projects reports and internal monitoring</p>	

	approach positively impacts the life of the Syrian people	processes with EU support.	inception phase			
Output 2 related to Outcomes 2	2.2 Non-State Actors Strengthened capacity of Non-State Actors to influence and effect change in in early recovery.	2.2.1 Number of Non-State Actors directly benefitting from (or reached by) EU support 2.2.2 Number of civic actors engaged in dialogue	2.2.1 To be defined at inception phase 2.2.2 To be defined at inception phase	2.2.1 To be defined at inception phase 2.2.2 To be defined at inception phase	2.2.1 – 2.2.2 Projects reports and internal monitoring and feedback through the virtual platform and other consultations	
Output 3 related to Outcomes 2	2.3 Justice and accountability Strengthened capacity of Syrian civil society to ensure justice, accountability and due processes of law in missing persons	2.3.1 Number of people whose awareness and engagement of transitional justice and accountability was strengthened by CSOs thanks to funding they received from the EU (disaggregated by sex and age) 2.3.2 Number persons affected by conflict-related violence informed about their rights and assisted to access justice mechanism	2.3.1 To be defined at inception phase 2.3.2 To be defined at inception phase	2.3.1 To be defined at inception phase 2.3.2 To be defined at inception phase	2.3.1 – 2.3.2 Projects reports and internal monitoring	

Output 4 related to Outcomes 2	2.4 Civil documentation Increased access to civil documentation for persons affected by conflict and displacement in Syria	2.4.1 Number of information, counselling and referral services on legal identity provided. 2.4.2 Number of duty-bearers, humanitarian partners, community leaders reporting increased knowledge and awareness about civil documentation rights.	2.4.1 To be defined at inception phase 2.4.2 To be defined at inception phase	2.4.1 To be defined at inception phase 2.4.2 To be defined at inception phase	2.4.1 – 2.4.2 Projects reports and internal monitoring	
Output 5 related to Outcomes 2	2.5 Third-Party monitoring Robust diagnoses and monitoring of stakeholders and interventions timely produced	2.5.1 Number of TPM analyses timely produced 2.5.2 Number of analyses and researches produced	2.5.1 To be defined at inception phase 2.5.2 To be defined at inception phase	2.5.1 To be defined at inception phase 2.5.2 To be defined at inception phase	2.5.1 – 2.5.2 Projects reports and deliverables	

To be noted that baselines and targets that are not yet established will be established during inception phase of the activities.

4. IMPLEMENTATION ARRANGEMENTS

4.1. Financing Agreement

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

4.2. Indicative Implementation Period

The indicative operational implementation period of this action, during which the activities described in section 3 will be carried out and the corresponding contracts and agreements implemented, is 60 months from the date of adoption by the Commission of this Financing Decision.

Extensions of the implementation period may be agreed by the Commission's responsible authorising officer by amending this Financing Decision and the relevant contracts and agreements.

4.3. Implementation Modalities

The Commission will ensure that the EU appropriate rules and procedures for providing financing to third parties are respected, including review procedures, where appropriate, and compliance of the action with EU restrictive measures.

4.3.1. Direct Management (Grants)

a) Purpose of the grant(s)

The grants shall contribute to achieving outputs 1.1, 1.2, 1.3 and 2.1, 2.2, 2.3 and 2.4.

b) Type of applicants targeted

Civil society organisation, non-governmental organisation, public sector operator, private entity with a public service mission, private legal entities, or an international (inter-governmental) organisation as defined by Article 156 of the EU Financial Regulation⁵.

c) Exception to the non-retroactivity of costs

The Commission authorises that the costs incurred may be recognised as eligible as of 6 February 2023 because of the urgency to deliver aid to the affected Syrian population in the immediate aftermath of the earthquake which occurred that day in southeast Turkey near the Syrian border.

4.3.2. Direct Management (Procurement)

The purpose of the procurement is to contribute to output 2.5.

4.3.3. Indirect Management with pillar-assessed entities⁶

A part of this action may be implemented in indirect management with one or more pillar-assessed entity(ies), which will be selected by the Commission's services for each of the following sectors:

⁵ In line with the 2018 Council conclusions, public sector operators and private entities with a public service mission from Syria are not eligible.

⁶ The signature of a contribution agreement with the chosen entity is subject to the completion of the necessary pillar assessment.

- Health,
- Education

using the following criteria:

- Proven experience and operational capacity in the management and implementation of actions in relation to the relevant output
- Technical competence and expertise in relation to the relevant output;
- Administrative capability and the experience to implement this type of intervention due to international mandate of the entity (if any) and/or expertise;
- Extensive network of national and international partners, which can be drawn upon;

The implementation by this entity entails achievement of the activities foreseen under outputs 1.1 and 1.2.

Exception to the non-retroactivity of costs

The Commission authorises that the costs incurred may be recognised as eligible as of 6 February 2023, which corresponds to the date of the first earthquake that struck Türkiye and Syria. Retroactivity would allow for a greater scope of pilot interventions in the health sector, to shift from a humanitarian focus to early recovery and resilience as well as secure an efficient operational transition to the 2023-24 academic year in Syria in the education sector, which requires prior preparatory activities for teachers and students during the summer. Furthermore, supporting justice and accountability without further delay will allow for a swifter provision of tailored and comprehensive support to the families of the missing.

4.3.4. Changes from indirect to direct management (and vice versa) mode due to exceptional circumstances

In case the parts of the action identified under section 4.3.3 cannot be implemented in indirect management, due to circumstances outside of the Commission's control, the alternative implementation modality in direct management is described under section 4.3.1 and vice versa.

4.4. Scope of geographical eligibility for procurement and grants

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

The Commission's authorising officer responsible may extend the geographical eligibility on the basis of urgency or of unavailability of services in the markets of the countries or territories concerned, or in other duly substantiated cases where application of the eligibility rules would make the realisation of this action impossible or exceedingly difficult (Article 28(10) NDICI-Global Europe Regulation).

For this multi-country action, natural persons who are nationals of, and legal persons who are effectively established in the following countries and territories covered by this action, are also eligible: Lebanon, Jordan, Türkiye, Iraq.

4.5. Indicative Budget

Indicative Budget components	EU contribution (amount in EUR)	Third-party contribution, in currency identified
Output 1.1 Health composed of	19 000 000.00	
Grants (direct management) – cf. section 4.3.1	N/A	N/A
Indirect management with entrusted entities – cf. section 4.3.3	1 000 000.00	100 000.00
Output 1.2 Education composed of	17 000 000.00	
Grants (direct management) – cf. section 4.3.1	N/A	N/A
Indirect management with entrusted entities – cf. section 4.3.3	4 000 000.00	
Output 1.3 Food security composed of	6 000 000.00	
Grants (direct management) – cf. section 4.3.1	N/A	N/A
Output 2.1 Urban profiling composed of	3 000 000.00	
Grants (direct management) – cf. section 4.3.1	N/A	N/A
Output 2.2 Non-state actors composed of	2 500 000.00	
Grants (direct management) – cf. section 4.3.1	N/A	N/A
Output 2.3 Justice and accountability composed of	6 000 000.00	
Grants (direct management) – cf. section 4.3.1	N/A	N/A
Output 2.4 Civil documentation composed of	2 500 000.00	
Grants (direct management) – cf. section 4.3.1	N/A	N/A
Output 2.5 Third-Party monitoring composed of	1 000 000.00	
Procurement (direct management) – cf. section 4.3.2	1 000 000.00	N/A
Grants – total envelope under section 4.3.1	51 000 000.00	N/A
Procurement – total envelope under section 4.3.2	1 000 000.00	N/A
Evaluation – cf. section 5.2 Audit – cf. section 5.3	will be covered by another Decision	N/A
Communication and visibility – cf. section 6	will be covered by another Decision	N/A
Totals	57 000 000.00	100 000.00

4.6. Organisational Set-up and Responsibilities

Considering the political sensitivity of any action in Syria, the EU Delegation will maintain close monitoring of all projects, regardless of management modalities. The EU Delegation to Syria will provide oversight on

project implementation through the establishment of steering committees for specific interventions foreseen under the action and through regular monitoring and evaluation using all the tools outlined above.

In view of the suspension of bilateral co-operation, no role is foreseen for the Syrian authorities in the organisational set-up of the action. Instead, in order to pursue mutual accountability objectives, the EU Delegation to Syria will ensure adequate participation from Syrian civil society leveraging existing and new mechanisms, including online/digital platforms and tools to engage a wide variety of Syrian actors in dialogue and review processes. Periodic consultations will increase transparency and promote an unbiased assessment on progress.

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

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

5. PERFORMANCE MEASUREMENT

5.1. Monitoring and Reporting

The day-to-day technical and financial monitoring of the implementation of this action will be a continuous process, and part of the implementing partner's responsibilities. To this aim, the implementing partner shall establish a permanent internal, technical and financial monitoring system for the action and elaborate regular progress reports (not less than annual) and final reports. Every report shall provide an accurate account of implementation of the action, difficulties encountered, changes introduced, as well as the degree of achievement of its Outputs and contribution to the achievement of its Outcomes, and if possible at the time of reporting, contribution to the achievement of its Impacts, as measured by corresponding indicators, using as reference the logframe matrix.

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

Arrangements for monitoring and reporting, including roles and responsibilities for data collection, analysis and monitoring:

- Implementing partners' monitoring will aim at collecting and analysing data to inform on progress towards planned results' achievement to feed decision-making processes at the action's management level and to report on the use of resources.
- EU operational manager monitoring will aim at complementing implementing partners' monitoring, especially in key moments of the action cycle. It will also aim at ensuring a sound follow-up on external monitoring recommendations and at informing EU management. This monitoring could take different forms (meetings with implementing partners, action steering committees, on the spot checks), to be decided based on specific needs and resources at hand.

The Commission may request for ad hoc reporting and 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), where this is feasible. A comprehensive Third Party Monitoring contract funded under the Special Measure 2022 is already in place for Syria, which foresees monitoring of projects, vetting of partners and analysis of the political context and local political economy, allowing for a flexible and adaptable programme and project implementation. This possibility will be extended under a procurement contract funded under the current Special Measure.

5.2. Evaluation

Having regard to the importance of the action, final and ex-post evaluations will be carried out for this action or its components via independent consultants contracted by the Commission.

They 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 Syrian context is constantly undergoing changes. In order to reach the best policy decisions, it is important to evaluate the programmes to make necessary adjustments.

The Commission shall inform the implementing partner at least one calendar month in advance of the dates envisaged for the evaluation exercise and missions. The implementing partner shall collaborate efficiently and effectively with the evaluation experts, and inter alia provide them with all necessary information and documentation, as well as access to the project premises and activities.

The evaluation reports shall be shared with key stakeholders following the best practice of evaluation dissemination. The implementing partner and the Commission shall analyse the conclusions and recommendations of the evaluations and, where appropriate, in agreement with jointly decide on the follow-up actions to be taken and any adjustments necessary, including, if indicated, the reorientation of the project.

Evaluation services may be contracted under a framework contract.

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

5.3. Audit and Verifications

Without prejudice to the obligations applicable to contracts concluded for the implementation of this action, the Commission may, on the basis of a risk assessment, contract independent audit or verification assignments for one or several contracts or agreements.

6. STRATEGIC COMMUNICATION AND PUBLIC DIPLOMACY

All entities implementing EU-funded external actions have the contractual obligation to inform the relevant audiences of the Union's support for their work by displaying the EU emblem and a short funding statement as appropriate on all communication materials related to the actions concerned. To that end they must comply with the instructions given in the 2022 guidance document [*Communicating and raising EU visibility: Guidance for external actions*](#) (or any successor document).

This obligation will apply equally, regardless of whether the actions concerned are implemented by the Commission, the partner country, service providers, grant beneficiaries or entrusted or delegated entities such as UN agencies, international financial institutions and agencies of EU Member States. In each case, a reference to the relevant contractual obligations must be included in the respective financing agreement, procurement and grant contracts, and delegation agreements.

For the purpose of enhancing the visibility of the EU and its contribution to this action, the Commission may sign or enter into joint declarations or statements, as part of its prerogative of budget implementation and to safeguard the financial interests of the Union. Visibility and communication measures should also promote transparency and accountability on the use of funds. Effectiveness of communication activities on awareness about the action and its objectives as well as on EU funding of the action should be measured.

Implementing partners shall keep the Commission and the EU Delegations fully informed of the planning and implementation of specific visibility and communication activities before the implementation. Implementing

partners will ensure adequate visibility of EU financing and will report on visibility and communication actions as well as the results of the overall action to the relevant monitoring committees.

Because of political sensitivities attached to EU-funded actions in Syria and related risks for implementing partners and beneficiaries, some interventions financed under the framework of this programme may be exempted from visibility requirements. Nonetheless, where compliance does not imply particular risks - for instance, in case of activities implemented in the region or via ICT - enabled platforms - implementing partners will consult the EU Delegation to Syria with a view to define appropriate visibility requirements and activities.

It is envisaged that a contract for communication and visibility may be contracted under a separate contract financed under the Global Allocation.