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ANNEX

to the Commission Implementing Decision of the individual measure providing post-earthquake support for health and education infrastructure in Türkiye

Action Document Providing post-earthquake support for health and education infrastructure in Türkiye

INDIVIDUAL MEASURE

This document constitutes the annual work programme in the sense of Article 110(2) of the Financial Regulation, and an annual measure in the sense of Article 9 of IPA III Regulation and Article 23(3) of NDICI - Global Europe Regulation.

1. SYNOPSIS

1.1. Action Summary Table

Title	Providing post-earthquake support for health and education infrastructure in Türkiye
OPSYS	OPSYS: ACT-62264
ABAC	ABAC Commitment level 1 number: JAD.1283538
Basic Act	Financed under the Instrument for Pre-accession Assistance (IPA III)
Economic and Investment Plan (EIP)	No
EIP Flagship	No
Team Europe	No
Beneficiary of the action	The action shall be carried out in the Republic of Türkiye
Programming document	N/A
PRIORITY AREAS AND SECTOR INFORMATION	
Window and thematic priority	N/A
Sustainable Development Goals (SDGs)	Main SDG: SDG 4 (Quality Education) Other significant SDG: SDG 3 (Good health and well-being)
DAC code(s)	110 Education – 11120 Education facilities – 57% 120 Health – 12230 Basic health infrastructure – 43%
Main Delivery Channel	Public sector institution - 10000 Regional development bank - 47000
Targets	<input checked="" type="checkbox"/> Climate

	<input checked="" type="checkbox"/> Gender <input type="checkbox"/> Biodiversity			
Markers (from DAC form)	General policy objective	Not targeted	Significant objective	Principal objective
	Participation development/good governance	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Aid to environment	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>
	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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Internal markers and Tags	Policy objectives	Not targeted	Significant objective
EIP		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
EIP Flagship		YES <input type="checkbox"/>		NO <input type="checkbox"/>
Tags:		YES		NO
Transport		<input type="checkbox"/>		<input checked="" type="checkbox"/>
Energy		<input type="checkbox"/>		<input checked="" type="checkbox"/>
Environment and climate resilience		<input type="checkbox"/>		<input checked="" type="checkbox"/>
Digital		<input type="checkbox"/>		<input checked="" type="checkbox"/>
Economic development (incl. private sector, trade and macroeconomic support)		<input type="checkbox"/>		<input checked="" type="checkbox"/>
Human Development (incl. human capital and youth)		<input type="checkbox"/>		<input checked="" type="checkbox"/>
Health resilience	<input type="checkbox"/>		<input checked="" type="checkbox"/>	
Migration and mobility	<input type="checkbox"/>		<input checked="" type="checkbox"/>	

Agriculture, food security and rural development	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Rule of law, governance and Public Administration reform	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Digitalisation	<input checked="" 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"/>
Tags	YES	NO
digital connectivity	<input type="checkbox"/>	<input checked="" type="checkbox"/>
energy	<input type="checkbox"/>	<input checked="" type="checkbox"/>
transport	<input type="checkbox"/>	<input checked="" type="checkbox"/>
health	<input type="checkbox"/>	<input checked="" type="checkbox"/>
education and research	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Migration	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Reduction of Inequalities	<input type="checkbox"/>	<input checked="" type="checkbox"/>
COVID-19	<input checked="" type="checkbox"/>	<input type="checkbox"/>

BUDGET INFORMATION

Amounts concerned	Budget line: 15.020101.03 Total estimated cost: EUR 115 600 000 Total amount of EU budget contribution EUR 115 600 000
MANAGEMENT AND IMPLEMENTATION	
Implementation modalities (management mode and delivery methods)	Indirect management with pillar assessed entities: Kreditanstalt Für Wiederaufbau (KfW) and the Council of Europe Development Bank (CEB)
Final date for concluding contribution / delegation agreements	At the latest by 31 December 2024
Indicative operational implementation period	72 months following the adoption of the Financing Decision

1.2. Summary of the Action

The proposed action aims to provide support in the area of health and education infrastructure in Türkiye following the earthquakes of 6 February 2023. It should continue to build on the results, experience and

deliverables of the Facility for Refugees in Turkey and additional European Union (EU) refugee support provided after 2019. The projects are part of the EU pledge made at the international donors' conference for the people in Türkiye and Syria¹ that took place in Brussels on 20 March 2023 and aim to support refugees and host communities to rebuild their lives in harmony following the disaster.

In partnership with relevant stakeholders and Turkish ministries, the action seeks to improve the conditions of refugees and host communities in the areas (directly or indirectly) affected by the earthquakes by enhancing the accessibility of education and healthcare services. The specific objectives are to:

1. improve access for refugees and host communities to education.
2. increase access to primary healthcare services for refugees and host communities.

The action will be implemented in indirect management with pillar-assessed entities, respectively Kreditanstalt Für Wiederaufbau (KfW) and the Council of Europe Development Bank (CEB) for the education and health components.

By seeking to improve access to education and health services of refugees and host communities, the action will contribute to the Sustainable Development Goals 3 (Good Health and Well-being) and 4 (Quality Education). It will contribute to gender equality and women's empowerment as well as the inclusion of persons with disabilities through its accessibility approach. Strong environmental, climate, and disaster risk reduction components will shape this action. Eventually, it will also address the root causes of migration.

1.3 Beneficiary of the Action

The action shall be carried out in the Republic of Türkiye, targeting (but not limited to) Kahramanmaraş, Gaziantep, Şanlıurfa, Diyarbakır, Adana, Adıyaman, Osmaniye, Hatay, Kilis, Malatya and Elazığ.

2. RATIONALE

2.1. Context

Due to its geographic position, Türkiye is a prominent reception and transit country for refugees. Türkiye has been hosting more than four million refugees. This includes more than 3.3 million registered Syrians², and around 330 000 registered refugees and asylum seekers³ mainly from Afghanistan, Iraq, Iran and Somalia⁴. The magnitude of the refugee influx has exerted a profound influence on various aspects of the host communities' lives, encompassing public education, healthcare, transportation, housing, municipal services, and the overall capacity of the related infrastructure and services. The challenge lies in effectively addressing the multifaceted impact and ensuring the adequate absorption and integration of the refugee population into the existing systems and resources, while simultaneously meeting the needs of the host communities.

Since 2011, the EU has mobilised close to EUR 10 billion for refugees and host communities in Türkiye. This includes the EUR 6 billion Facility for Refugees in Turkey - as a key component of the 2016 EU-Turkey Statement - and an additional EUR 3 billion in refugee support following the European Council of 24-25 June 2021. The action is funded under the 2023 allocation of the latter envelope and complements EUR 825 million

¹ https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/stronger-europe-world/donors-conference-turkiye-and-syria_en

² <https://en.goc.gov.tr/temporary-protection27>

³ Through this Action Document, 'refugee', 'migrant' and 'asylum seeker' are used interchangeably and regardless of the people's registration status in Türkiye. A specificity of the Turkish asylum system is linked to the fact that the country has signed the 1967 New York Protocol of the 1951 Geneva Convention with a reservation. Accordingly, the vast majority of refugees in Türkiye cannot apply for fully-fledged refugee status but for "conditional refugee" status only, which, if granted, limits the stay in the country until the moment a recognised refugee is "resettled to a third country".

⁴ <https://www.unhcr.org/tr/wp-content/uploads/sites/14/2022/11/Turkiye-factsheet-September-2022.pdf>

of funding to education and health infrastructure under which 160 schools and 2 hospitals were already built and 550 hospitals and migrant health centres upgraded.

On 6 February 2023, two earthquakes hit Türkiye causing widespread destruction of public and private infrastructure, affecting millions of households, causing thousands of casualties, including wounded and displaced persons. On 20 March, the Commission and the Swedish presidency of the Council organised an international donors' conference for the people in Türkiye and Syria to mobilise support for the victims of this tragedy. The conference collected a total of EUR 7 billion in pledges, including an EUR 1 billion pledge from the EU for people in Türkiye. In preparation of the conference, the Turkish government collaborated with the United Nations Development Programme (UNDP) and the World Bank (WB), along with the EU, to prepare a preliminary post-disaster needs assessment (PDNA), known as the Türkiye Earthquakes Recovery and Reconstruction Assessment (TERRA)⁵.

In March 2023, the TERRA estimated that the damage caused by the earthquakes amounted to USD 103.6 billion, or equivalent to 9% of Türkiye's GDP forecast for 2023. The total population of the 11 provinces affected by the earthquakes was 14 million in 2022, including 1.7 million refugees (almost half of the refugee population in the country). In addition to loss of life, the impact on the physical capital has been substantial and damages to public infrastructure amount to USD 13 billion. The damage caused to schools was extensive, with 1,842 facilities fully destroyed, 637 partially damaged and 17,951 experiencing minor harms. Moreover, schools in provinces receiving internally displaced children and youth are dealing with overcrowded classrooms. 42 hospitals in the region suffered severe or moderate damage, and another 94 hospitals were lightly damaged. In addition, 34 (out of 97) migrant health centres have stopped functioning.

The action is part of the above framework and aims to support the TERRA objectives.

2.2. Problem Analysis

Short problem analysis

The devastating earthquakes have left a trail of destruction, with a significant number of schools and health centres destroyed or severely damaged. This has triggered an urgent and pressing need to address the increased demand for essential educational and healthcare facilities.

Moreover, the earthquakes have added another layer of vulnerability to refugees and exacerbated the issues the Facility sought to address in the field of education and health. The cost increases in recent years as a result of the economic situation and high inflation has resulted in a reduction in the number of facilities built with EU support.

The tragedy also led to shifts in demographic patterns and internal displacements in the affected provinces and beyond, which in turn has had an impact on the use of the operational facilities (e.g. the transfer of thousands of children to other pre-schools and schools). Particular attention will be paid to these changes and the density of refugees in the selection of the facilities.

The TERRA recommends a range of changes in construction standards and regulatory policies to ensure that public buildings across the country are resilient to earthquakes and other disasters. In this regard, key principles to ensure that the recovery is resilient, inclusive, green and sustainable are outlined.

Education is one of the priorities of the EU support to refugees in Türkiye since 2016, as illustrated by the PIKTES⁶ and CCTE⁷ projects. In line with previous EU education infrastructure support – implemented by KfW⁸ and the World Bank (WB)⁹ - and since children are among the most affected by the disaster, this action

⁵ <https://www.sbb.gov.tr/wp-content/uploads/2023/03/Turkiye-Recovery-and-Reconstruction-Assessment.pdf>

⁶ 'Promoting Integration of Syrian Kids into Turkish Education System'.

⁷ 'Conditional Cash Transfer for Education'.

⁸ 'Education for All in Times of Crisis' projects by KfW

⁹ 'Education Infrastructure for Resilience Project' by the World Bank

will finance the construction of schools and/or kindergartens, providing them with safe and conducive learning environment to help them recover and thrive. The action will build up and complement previous aforementioned EU support by taking consideration of the lessons learnt and design improvements based on the ‘build back better’ approach.

Prior the earthquakes, one the main health-related issue faced by refugees was difficult access to healthcare services. In addition to the hospitals in Kilis and in Dörtyol/Hatay¹⁰, SIHHAT¹¹ - a series of EU direct grants with the Ministry of Health - and SHIFA¹² - implemented by CEB - were addressing this challenge by constructing and operating new Migrant Health Centres (MHCs) and Extended MHCs (E/MHCs), in line with the MoH Health Strategic Plan 2019-2023¹³. SHIFA focuses on expanding the number of health centres by constructing new ones, reducing rental costs, and improving the operational efficiency of the Ministry. Additionally, efforts were made to renovate existing centres, optimise their utilisation, - procure essential medical equipment and supplies for hospitals. As a consequence of the catastrophe, the health care needs of both refugees and host communities (e.g. psychosocial support) increased while health care services are partially disrupted. MHCs were already identified as strong assets and constitute the best opportunity to meet this challenge under the new circumstances.

Identification of main stakeholders and corresponding institutional and/or organisational issues

Organisation	Mandate and role
Ministry of National Education – DG Construction and Real Estate	Line ministry on education, DG in charge of infrastructure
Ministry of Health – DG for EU and External Relations	Line ministry on health, DG with a coordinating role
Presidency of Migration Management	Coordinator of migration and refugee assistance at national level
Turkish municipalities	Where the facilities will be located
CEB	Implementing health infrastructure projects funded by the EU
Agence française de développement (AFD)	Implementing health infrastructure project funded by the EU
KfW	Implementing education infrastructure projects funded by the EU
World Bank	Implementing education infrastructure projects funded by the EU

2.3. Lessons Learned

The action builds on previous related EU support. According to the Facility mid-term evaluation (MTE) (2016-2020) – and its sections on education¹⁴ and health care¹⁵ – the Facility contributed to a safe, inclusive, equitable, quality education to refugees along host community students and made a significant contribution to the availability of healthcare services.

The action will be the continuation of previous EU support with adapted activities based on lessons drawn from the preceding actions and an evolving context. The designs of the latest projects were improved, and new ones will be enhanced in line with the ‘build back better’.

The number of facilities built so far with EU support was lower than initially envisaged due to the economic situation and high inflation. Therefore, price estimations should be carefully calculated, considering the adverse effects of market conditions in the near future. Steps will also be taken to ensure contract stability and

¹⁰ ‘Health Infrastructure in Kilis’ project by CEB and ‘Construction of a State Hospital in Hatay’ project by AFD

¹¹ ‘Supporting Migrant Health Services in Turkey’.

¹² ‘Strengthening Health Infrastructure for All’.

¹³ <https://dosyamerkez.saglik.gov.tr/Eklenti/35748,stratejikplan2019-2023pdf.pdf?0>

¹⁴ <https://neighbourhood-enlargement.ec.europa.eu/system/files/2021-09/Vol%20II%20-%20Sector%20Report%20-%20Education.pdf>

¹⁵ <https://neighbourhood-enlargement.ec.europa.eu/system/files/2021-09/Vol%20II%20-%20Sector%20Report%20-%20Health.pdf>

minimise the possibility of contract termination. Constant on-the-ground monitoring and potential proactive mitigation measures from the implementing partners are also essential to ensure a successful project implementation.

The ministries faced significant overload - due to capacity constraints - which has led to delays in project implementation. In addition to their ongoing investments, the ministries also receive support from the EU and loans from various international organisations, which overburden some key services. To address this bottleneck, efforts will be made to enhance the absorption capacity of the ministries, including by increasing the number of staff, as it was done with previous EU education and health infrastructure projects.

Nevertheless, the preparatory works of the schools and health centres have been performed and the technical assistance to deliver the procurement and supervision services is already in place. This will be used to ensure a smoother and quicker construction phase.

The EU-funded construction will focus on higher quality standards with improved seismic-risk preparedness and adopt a greener, energy-efficient approach. It will also be carried out in a manner to foster inclusiveness in order to ensure equal and safe access to girls, women and persons with disabilities, in all their diversity, to the education and health institutions.

3. DESCRIPTION OF THE ACTION

3.1. Intervention Logic

The Overall Objective of this action is to enhance access to education and healthcare services for refugees and host communities, focussing on the provinces affected by the earthquakes or by the demographic changes caused by them.

The Specific Objectives (Outcomes) of this action are to

1. improve access to education for refugees and host communities,
2. increase the access to primary healthcare services for refugees and host communities.

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

- 1.1 contributing to Outcome 1 (or Specific Objective 1) by constructing education infrastructure.
- 2.1 contributing to Outcome 2 (or Specific Objective 2) by constructing health infrastructure.

The underlying intervention logic for this action is that by constructing schools and primary health centres, it will directly contribute to achieving the desired outcomes of improved access to education and healthcare for refugees and host communities.

3.2. Indicative Activities

Indicative activities may include but are not limited to:

Activities related to Output 1.1

Construction of minimum 20 education facilities (completion of 9 schools, 11 kindergartens).

Activities related to Output 2.1:

Construction of minimum 20 primary health centres.

3.3. Mainstreaming

Environmental Protection, Climate Change and Biodiversity

Following an environmental screening, Strategic Environmental Assessment (SEA), Environmental Impact Assessment (EIA), and Climate Risk Assessment (CRA) are not required. Nevertheless, the environment impacts will be taken into consideration in accordance with the Environment and Social Management Framework that will be established for each project. The framework will encompass the selection of the sites (against deforestation, biodiversity loss, and soil erosion), the construction (material used, waste management)

and the operation phases (sustainability and energy efficiency of the buildings). The action will encourage the use of the green public procurement (GPP) approach to purchase equipment. Particular attention will be paid to potential pollution (air, groundwater, surface water, etc.), which presents possible environmental and health risks. In addition, the design phase will anticipate the adverse effects of climate change (floods, droughts etc.) and take appropriate action to prevent or minimise the damage they can cause.

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 the action has a significant objective on gender equality. In line with the EU Delegation's Country Level Implementation Plan setting the priorities stemming from the Gender Action Plan III, it will contribute to overcome the gender gap on education and tackle persistent inequalities in sexual and reproductive health and rights the construction of accessible and inclusive facilities. Moreover, once operational, the health centres should pay attention to the specific healthcare needs of women and girls, in all their diversity, stemming from the earthquakes.

Human Rights

This action considers education and health as fundamental human rights and aims to achieve universal coverage which means ensuring all people and communities have access to quality education and health services. It will therefore target all refugees (including non-Syrians) in line with the 'one-refugee' and 'leaving no-one behind' approaches.

Prior to the construction phase, expropriation and displacement issues will be carefully managed to minimise any adverse effects and ensure that these processes are conducted in accordance with legal requirements and best practice.

Additionally, during the implementation phase, the action will ensure the health and well-being of workers involved in the project and safeguarding their rights. Measures will be put in place to ensure proper and safe working conditions.

Disability

As per OECD Disability DAC codes identified in section 1.1, this action is labelled as D1. People with disabilities are addressed in the action mainly through the accessibility of the infrastructure. This does not apply only to the main buildings but to the entire facilities (e.g. adapted recreational areas in schools) and should go beyond physical disabilities to cover the entire spectrum (vision impairment, deaf, *etc.*). Once in-use, schools will host children with disabilities; and people affected by autism disorder, mental health conditions and others will be treated in the health infrastructures, including on the specific post-earthquakes needs.

Conflict sensitivity, peace and resilience

This action should be understood in the wider context of EU support to refugees and host communities in Türkiye, as well as EU overall support in the region. In this regard, the action will contribute to increasing social cohesion and refugee resilience in an inclusive and sustainable manner.

Disaster Risk Reduction

The action will apply EU standards for a greater resilience to earthquakes and other disasters. The selection of the sites will follow a soil survey and risk assessment in order to obtain the most suitable design for the selected land. Whenever possible, nature-based solutions will be integrated to the overall designs to absorb the impacts of floods, heat island effects, droughts, etc. During the handover of the infrastructure, responsible authorities will be strongly encouraged to develop comprehensive contingency and management plans. These plans will outline coordinated strategies and protocols for emergency situations, enabling the infrastructure to better withstand and recover from adverse events.

3.4. Risks and Assumptions

Category	Risks	Likelihood (High/Medium/Low)	Impact (High/Medium/Low)	Mitigating measures
1-External environment	Occurrence of an earthquake	Medium	High	The action will build on the lessons learnt of the disaster of February 2023.
	Major COVID 19-like crisis	Medium	High	In alignment with national health guidelines and regulations, adequate measures will be put in place, such as hygiene protocols, physical distancing, usage of personal protective equipment, enhanced cleaning and disinfection, health screening and monitoring, appropriate communication and training.
	Increased social tensions	High	Medium	The action contributes to social cohesion. Close monitoring of the situation and communication shall be ensured for the action not to be impacted by the political rhetoric and mitigation actions taken at the local level.
	Deterioration of the economic situation leading to significant price increase and delays	Medium	Medium	The line ministries should commit to cover any financial gaps that may arise during the project implementation. This would ensure the absence of significant interruptions caused by funding constraints.

External Assumptions

The main necessary conditions for a successful action are:

- No major further change in the density of refugees in the targeted provinces;
- The national policy and security environment continue to allow for proper refugee assistance;
- The availability of suitable land, building permits and construction material;
- Willingness, ownership and sustainability is ensured by the relevant Turkish authorities, thereby ensuring long-term positive impacts of the action.
- Availability and accessibility of reliable statistics for meaningful monitoring and evaluation of the action are ensured;
- Refugees will wish to continue benefiting from the services provided in the funded-facilities.

3.5. Indicative Logical Framework Matrix

Results	Results chain: Main expected results	Indicators	Baselines	Targets ¹⁶	Sources of data	Assumptions
Impact	Enhanced access to education and healthcare services for refugees and host communities, in the provinces directly or indirectly affected by the earthquakes	1 Number of students enrolled in education with EU support in the targeted provinces 2 Number of patients benefiting from health services financed by the EU in the targeted provinces	0 (January 2017) 0 (January 2017)		Project interim and final reports	<i>Not applicable</i>
Outcome 1	Improved access for refugees and host communities to education	1.1 Number of additional students benefiting annually	1.1 0		1.1 Project interim and final reports	Local economy and exchange change fluctuations do not negatively affect the construction costs PIU and staff will not be negatively impacted by any political decisions. Force major actions similar to Covid-19 or earthquake will not occur during the implementation There will be full ownership of the implementing partners and the ministries
Outcome 2	Increased access to primary healthcare services for refugees and host communities	2.1 Number of additional patients annually benefiting from the primary health centres	2.1 0		2.1 Project interim and final reports	
Output 1 related to Outcome 1	Schools constructed in provinces directly or indirectly affected by the earthquakes	1.1.1 Number of schools constructed	1.1.1 0		1.1.1 Project interim and final reports 1.1.2 Project interim and final reports	
Output 1 related to Outcome 2	Primary health centres constructed in provinces directly or indirectly affected by the earthquakes	2.1.1 Number of primary health centres constructed	2.1.1 0		2.1.1 Project interim and final reports	

¹⁶ Targets will be defined at the contract negotiation phase.

4. IMPLEMENTATION ARRANGEMENTS

4.1. Financing Agreement

In order to implement this action, it is not envisaged to conclude a Financing Agreement with the Republic of Türkiye.

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 72 months from the date of the adoption by the Commission of this Financing Decision.

Extensions of the implementation period may be agreed by the Commission's responsible authorising officer in duly justified cases.

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 measures¹⁷.

4.3.1. Indirect Management with a pillar-assessed entity

A part of this action may be implemented in indirect management with KfW. This implementation entails carrying out tasks relating to objective 1 and output 1.1., described in section 3, in order to improve access to education for refugees and host communities in the areas affected by the earthquakes. The envisaged entity has been selected using the following criteria: significant experience in working on education/sport infrastructure in Türkiye; well-established partnerships with the relevant Turkish authorities; known entity ensuring continuity with the first phase of the education component, aware of target country facts and challenges (public institutions' structure, construction sector and regulations, earthquake risks, etc); physical presence in Türkiye, experienced in project (especially in handling EU-funded projects) and team monitoring and management.

Another part of this action may be implemented in indirect management with CEB. This implementation entails carrying out tasks relating to objective 2 and output 2.1., described in section 3, in order to increase the access to primary healthcare services for refugees and host communities in the areas affected by the earthquakes. The envisaged entity has been selected using the following criteria: significant experience in working on health infrastructure in Türkiye, well-established partnerships with the relevant Turkish authorities, known entity, aware of target country facts and challenges (public institutions' structure, construction sector and regulations, earthquake risks etc), physical presence in Türkiye, and experienced in project (especially in handling EU-funded projects) and team monitoring and management.

In case the envisaged entities would need to be replaced, the Commission's services may select replacement entities using the same criteria. If the entity(ies) is (are) replaced, the decision to replace one or both of them needs to be justified.

¹⁷ [EU Sanctions Map](#). Please note that the sanctions map is an IT tool for identifying the sanctions regimes. The source of the sanctions stems from legal acts published in the Official Journal (OJ). In case of discrepancy between the published legal acts and the updates on the website it is the OJ version that prevails.

Exception to the non-retroactivity of costs

The Commission authorises that the costs incurred may be recognised as eligible as of 1 July 2023 because of the urgent post-earthquake needs. This will allow to initiate the required procurement procedures in the second semester of 2023 and therefore ensure a swifter completion of the infrastructures.

4.4. Indicative Budget

Indicative Budget components	EU contribution (amount in EUR)
Methods of implementation – cf. section 4.3	
Outcome 1: Improved access to education for refugees and host communities composed of	65 600 000
Indirect management with KFW – cf. section 4.3.1	
Outcome 2: Increased access to primary health care services for refugees and host communities composed of:	50 000 000
Indirect management with CEB – cf. section 4.3.1	
Evaluation – cf. section 5.2 Audit – cf. section 5.3	may be covered by another Decision
Strategic Communication and Public Diplomacy – cf. section 6	will be covered by another Decision
Contingencies	N/A
Totals	115 600 000

4.5. Organisational Set-up and Responsibilities

The implementation responsibility of the action lies with the implementing partners. The activities will be implemented with the relevant Turkish authorities, respectively MoNE on education and MoH on health. Project Implementation Units (PIU) will be set up as per previous practices. The PIU will be composed of related department staff of the ministries. The respective Steering Committees will meet every six months, with the participation of the EU Delegation. Moreover, implementing partners will meet with the EUD and the ministries at a technical level on a monthly basis. The meetings will be presented with a review of project activities' implementation, progress on communication and visibility aspects and the state of play regarding the execution of the projects' budget. It is the place to bring critical issues and implementation bottlenecks to the attention of management so that Steering Committee participants can discuss the strategic decisions needed for implementation progress, solving problems and future planning.

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 partners' responsibilities. To this aim, the implementing partners shall establish a permanent internal, technical and financial monitoring system for the action and elaborate regular (quarterly) progress reports and final reports to be approved by EUD. Every report shall provide an accurate account of implementation of the action, difficulties encountered, changes introduced, as well as the degree of achievement of its results (Outputs and direct Outcomes) as measured by corresponding indicators, using as reference the logframe matrix.

The Commission may undertake additional project monitoring visits both through its own staff and/or 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:

- the implementing partners are the primary actor responsible for data collection, analysis, monitoring and reporting.
- Besides reporting on its specific components' logframe matrix as per General Conditions and contractual documents, the implementing partners will be collecting and submitting data to the Commission on a quarterly basis, on relevant indicators of the overall Results Framework that has been developed in the context of the EU support to refugees in Türkiye.

Monitoring by the Commission will be also carried out, with the support of an external contractor, and will consist of activities such as:

- Analysis and feedback on the action's reporting documents and data;
- Assessment of the quality of the action's internal monitoring systems and where required, plans/provides support to improve them (e.g. provision for periodical "data cleaning"; check for mistakes and look for duplications, systematic misunderstanding, or missing data; support data users in understanding them: how they are collected, what they mean);
- Attendance to the action's Steering Committee meetings, quarterly monitoring meetings; monthly management meetings and other meetings, information sharing and discussion;
- Missions/visits to premises/action's sites where activities are taking place and on-the-spot checks.

Interim and final reports shall assess how the action is considering the principle of gender equality, human rights-based approach, and rights of persons with disabilities including inclusion and diversity. Indicators shall be disaggregated at least by sex, whenever relevant.

The statistical and monitoring systems as well as the quality of official data in the policy field covered have been assessed. This assessment has fed into the design of the action as follows: the action was prepared based on the Türkiye Earthquakes Recovery and Reconstruction Assessment (TERRA) described under section 2.1.

5.2. Evaluation

Having regard the importance of the action, an evaluation may be carried out. In case an evaluation is to be carried out and is to be contracted by the Commission, the Commission shall form a Reference Group (RG) composed by representatives from the main stakeholders at both EU and national (representatives from the government, from civil society organisations (private sector, NGOs, etc.), etc.) levels. If deemed necessary, other donors will be invited to join. The Commission shall inform the implementing partners at least 45 days in advance of the dates envisaged for the evaluation missions. The implementing partners 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 the partner country and other key stakeholders following the best practice of evaluation dissemination. The implementing partners and the Commission shall analyse the conclusions and recommendations of the evaluations and, where appropriate, in agreement with the partner country, jointly decide on the follow-up actions to be taken and any adjustments necessary, including, if indicated, the reorientation of the action.

Evaluations shall assess to what extent the action is taking into account the human rights-based approach as well as how it contributes to gender equality and women's empowerment and disability inclusion. Expertise will be ensured in the evaluation teams accordingly.

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 action concerned is 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 contribution agreements.

Any expenditure related to communication and visibility is part of the action and can benefit from EU funding allocated to the action.

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.

The implementing partners shall keep the Commission and the EU Delegation fully informed of the planning and implementation of specific visibility and communication activities before work starts. The 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.

The financing of the communication and visibility activities for the overall EU support to refugees in Türkiye will be covered by another measure constituting a Financing Decision.

7. SUSTAINABILITY

By nature, the outcomes of properly built, fit-for-purpose and well-managed infrastructure continue beyond the implementation period of the action. This will be guaranteed by a strong involvement of the relevant

Turkish authorities and pillar-assessed implementing partners in the design of the action, throughout its implementation and after the defect liability period of the facilities. Once in place, running-costs, maintenance and other responsibilities and associated costs shall be covered by the Turkish authorities, thereby ensuring their long-term operability. Moreover, the rental cost of the health facilities will be reduced following the completion of the new centres. The sustainability will be strengthened by the synergy with the overall EU support to education and health, as well as the lessons learned of previous infrastructure projects. Nevertheless, the sustainability relies on the Turkish efforts to meet the staff and supply needs (e.g. teachers and learning materials) of these new facilities, their integration into the mainstream Turkish system, and complementary soft measures.