



Brussels, 15.12.2021
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COMMISSION IMPLEMENTING DECISION

of 15.12.2021

on the financing of the special measure in favour of Syria for 2021

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THE EUROPEAN COMMISSION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Regulation (EU, Euratom) 2018/1046 of the European Parliament and of the Council of 18 July 2018 on the financial rules applicable to the general budget of the Union, amending Regulations (EU) No 1296/2013, (EU) No 1301/2013, (EU) No 1303/2013, (EU) No 1304/2013, (EU) No 1309/2013, (EU) No 1316/2013, (EU) No 223/2014, (EU) No 283/2014, and Decision No 541/2014/EU and repealing Regulation (EU, Euratom) No 966/2012¹, and in particular Article 110 thereof,

Having regard to Regulation (EU) 2021/947² of the European Parliament and of the Council of 9 June 2021 establishing the Neighbourhood, Development and International Cooperation Instrument - Global Europe and amending and repealing Decision No 466/2014/EU and repealing Regulation (EU) 2017/1601 and Council Regulation (EC, Euratom) No 480/2009, and in particular Article 23(4).

Whereas:

- (1) In order to ensure the implementation of the special measure 2021 for Syria, it is necessary to adopt an annual financing Decision, which constitutes the annual work programme, for 2021. Article 110 of Regulation (EU, Euratom) 2018/1046 establishes detailed rules on financing Decisions.
- (2) The envisaged assistance is to comply with the conditions and procedures set out by the restrictive measures adopted pursuant to Article 215 TFEU³.
- (3) In light of the ongoing repression and restrictive measures taken by the Council of the European Union, the Commission has suspended its cooperation with the Syrian Government since May 2011. Since then, normal programming for Syria has not been possible due to the ongoing conflict. Direct support to the affected population in Syria however has been maintained through various special measures complementary to humanitarian assistance in sectors such as education, livelihoods and civil society. Taking into account the crisis situation and the need to respond to the increasing needs, a declaration of crisis was issued in February 2012. Since then, the declaration has been annually extended due to the deteriorating situation. The most recent prolongation was issued in July 2021 and will be valid until June 2022. This special

¹ OJ L 193, 30.7.2018, p.1.

² OJ L 209, 14.6.2021, p.1.

³ www.sanctionsmap.eu Please note that the sanctions map is an IT tool for identifying the sanctions regimes. The source of the sanctions stems from legal acts published in the Official Journal (OJ). In case of discrepancy between the published legal acts and the updates on the website it is the OJ version that prevails.

measure falls under the Joint Communication to the European Parliament and the Council ‘Elements for an EU strategy for Syria’⁴.

- (4) The objectives pursued by the special measure 2021 for Syria to be financed under the Neighbourhood geographic programme of the Neighbourhood, Development and International Cooperation Instrument, are to address early recovery, resilience and self-reliance needs of Syrian communities and local agents for change in Syria in a manner that promotes inclusive and active citizenship, preserves the social fabric, protects fundamental rights, is environmentally sustainable and ultimately creates conditions for stability and peace.
- (5) It is appropriate to authorise the award of grants without a call for proposals and to provide for the conditions for awarding those grants.
- (6) Pursuant to Article 26(1) of Regulation (EU) No 2021/947 of 9 June 2021, indirect management is to be used for the implementation of the measure.
- (7) The Commission is to ensure a level of protection of the financial interests of the Union with regards to entities and persons entrusted with the implementation of Union funds by indirect management as provided for in Article 154(3) of Regulation (EU, Euratom) 2018/1046.
- (8) To this end, such entities and persons are to be subject to an assessment of their systems and procedures in accordance with Article 154(4) of Regulation (EU, Euratom) 2018/1046 and, if necessary, to appropriate supervisory measures in accordance with Article 154(5) of Regulation (EU, Euratom) 2018/1046 before a contribution agreement can be signed.
- (9) It is necessary to allow for the payment of interest due for late payment on the basis of Article 116(5) of Regulation (EU, Euratom) 2018/1046.
- (10) In order to allow for flexibility in the implementation of the measure, it is appropriate to allow changes, which should not be considered substantial for the purposes of Article 110(5) of Regulation (EU, Euratom) 2018/1046.
- (11) The measure provided for in this Decision is in accordance with the opinion of the Committee established under Article 45 of Regulation (EU) No 2021/947 of 9 June 2021.

HAS DECIDED AS FOLLOWS:

Article 1
The measure

The annual financing Decision, constituting the annual work programme for the implementation of a special measure in favour of Syria for 2021, as set out in the Annexe, is adopted.

⁴ Joint communication of the European Commission and the High Representative to the European Parliament and the Council ‘Elements for an EU strategy for Syria’. JOIN (2017)11 of 14/03/2017.

Article 2
Union contribution

The maximum Union contribution for the implementation of the measure for 2021 is set at EUR 41 000 000 and shall be financed from the appropriations entered in the following line of the general budget of the Union:

- budget line BGUE-B2021-14.020110: EUR 41 000 000;

The appropriations provided for in the first paragraph may also cover interest due for late payment.

Article 3
Methods of implementation and entrusted entities or persons

The implementation of the actions carried out by way of indirect management, as set out in the Annex, may be entrusted to the entities or persons referred to or selected in accordance with the criteria laid down in points 4.3.2 of the Annex.

Article 4
Flexibility clause

Increases or decreases of up to EUR 10 million not exceeding 20% of the contribution set in the first paragraph of Article 2, or cumulated reassignments of funds between actions contained in an action plan not exceeding 20% of that contribution, as well as extensions of the implementation period shall not be considered substantial within the meaning of Article 110(5) of Regulation (EU, Euratom) 2018/1046, where these changes do not significantly affect the nature and objectives of the actions.

The authorising officer responsible may apply the changes referred to in the first paragraph acting in accordance with the principles of sound financial management and proportionality.

Article 5
Grants

Grants may be awarded without a call for proposals in accordance with the conditions set out in the Annex. Grants may be awarded to the bodies selected in accordance with point 4.3.1 of the Annex.

Done at Brussels, 15.12.2021

For the Commission
Olivér VÁRHELYI
Member of the Commission



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THIS ACTION IS FUNDED BY THE EUROPEAN UNION

ANNEX

Commission Implementing Decision on the financing of the special measure in favour of Syria for 2021

SPECIAL MEASURE

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

1 SYNOPSIS

1.1 Action Summary Table

1. Title CRIS/OPSYS Basic Act	Special Measure for Syria Annual measure CRIS number/OSPYS number: NDICI-GEO-NEAR/2021/043-067 Financed under the Neighbourhood, Development and International Cooperation Instrument (NDICI-Global Europe)
2. Team Europe Initiative	No
3. Zone benefiting from the action	The action shall be carried out in Syria, and neighbouring countries, where relevant
4. Programming document	Not applicable
5. Link with relevant MIP(s) objectives/expected results	Not applicable
PRIORITY AREAS AND SECTOR INFORMATION	
6. Priority Area(s), sectors	Livelihoods, Health and Human Rights
7. Sustainable Development Goals (SDGs)	Main SDG (1 only): SDG 1 “No Poverty” Other significant SDGs (up to 9) and where appropriate, targets: SDG 10 “Reduced Inequalities” while also contributing to SDG 3 “Good Health and Well-being”; SDG 5 “Achieve Gender Equality and Empower All Women and Girls, SDG 8 “Decent Work and Economic Growth”; SDG 13 “Climate Action”; and, SDG 16 “Peace, Justice and Strong Institutions”

8 a) DAC code(s)	12281 Health personnel development 25% 15220 Civilian Peace-Building, Conflict Prevention and Resolution 10% 15150 Democratic Participation and Civil Society 15% 15160 Human Rights 15% 15180 Ending violence against women and girls 5% 16050 Multisector Aid for Basic Social Services 20% 16020 Employment Creation 10%			
8 b) Main Delivery Channel	20,000 Non-Governmental Organisations (NGOs) and Civil Society 40,000 Multilateral Organisations 51,000 University, college or other teaching institution, research institute or think tank 60,000 Private Sector Institution			
9. 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 type="checkbox"/> Education <input checked="" type="checkbox"/> Human Rights, Democracy and Governance			
10. 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"/>
	Trade development	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. Internal markers	Policy objectives	Not targeted	Significant objective	Principal objective
	Digitalisation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Tags: digital connectivity digital governance digital entrepreneurship job creation digital skills/literacy digital services		<input type="checkbox"/>	<input type="checkbox"/>
	<u>Connectivity</u> Tags: transport people2people energy digital connectivity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Migration	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Reduction of Inequalities	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	COVID-19	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

BUDGET INFORMATION

12. Amounts concerned	Budget line: BGUE-B2021-14.020110-C1-NEAR Total estimated cost: EUR 41 000 000 Total amount of European Union (EU) budget contribution EUR 41 000 000
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MANAGEMENT AND IMPLEMENTATION

13. Implementation modalities (type of financing and management mode)	Project Modality Direct management through: - Grants in accordance with criteria set out in section 4.3.1 Indirect management with the entity(ies) to be selected in accordance with the criteria set out in section 4.3.2
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1.2 Summary of the Action

Now in its eleventh year, the conflict in Syria continues to represent one of the most protracted and complex crises in the world. Communities have faced ruthless violence, social dislocation and socio-economic exclusion, exacerbated in 2020 by the Coronavirus pandemic. Although the level and intensity of armed hostilities has overall declined in good parts of the country, violent conflict lines between an arrays of armed actors remain. The scale, severity and complexity of needs of the Syrian population remain extensive, with over 13.4 million people in need of humanitarian assistance, almost half of this number children. Large-scale, conflict-related displacement also persists at significant levels. Over 6.7 million Syrians are internally displaced and a further 5.6 million are refugees, primarily in neighbouring countries. The severe domestic and regional economic crisis, combined with the impact of the Covid-19 pandemic, have eroded even further the resilience of Syrian communities and pushed the poverty rate closer to 90%. Deteriorating environmental conditions and climatic stress contribute to worsen living conditions of the population.

As stipulated by the Council Conclusions of 16 April 2018, the EU will only assist in reconstruction when a comprehensive, genuine and inclusive political transition is firmly under way. Syria's emerging

pattern of chronic instability and the lingering political ramifications of conflict, displacement and potential returns, require an even more robust medium-term approach supporting the resilience efforts of Syrian citizens wherever possible at a grassroots level – going beyond emergency and life-saving responses, further addressing the second and third pillars of the Humanitarian Response Plan (protection, resilience and access to services). The logic is to provide medium-term support to the Syrians themselves, as communities, non-state actors or individual agents of change in their quest to live in a peaceful and prosperous society. Thus, socio-economic rights and the right to lead a dignified life will be emphasised through actions, which ensure the availability of decent work and access to essential services, including primarily health services. The fundamental human rights to shelter and security will be supported through additional work in the area of Housing Land and Property rights and a special focus on justice and accountability for crimes committed. In a context where the on-going economic crisis is likely to deteriorate further, building the resilience of the Syrian population is key to maintaining social cohesion.

Correspondingly, this action prioritises bottom-up and community-driven interventions at the local level, strengthening the resilience of communities, building their capacity for future recovery and return, as well as nurturing civic space. In this spirit, and in line with EU Council Conclusions of 16 April 2018 and the outcomes of the Brussels V Conference on the Future of Syria and the Region (March 2021), the Overall Objective of the action is to address early recovery, resilience and self-reliance needs of Syrian communities and local agents for change. The aim will be to do this in a manner that promotes inclusive and active citizenship, preserves the social fabric, protects fundamental rights, is environmentally sustainable and ultimately creates conditions for stability and peace. In particular, this action will focus on improving access to, and quality of, health services as well as supporting Syrian healthcare workers. It will focus on building long-term resilience to contribute to food and nutrition security and support the effective resolution of House, Land and Property (HLP) rights related challenges. It will also aim at increasing the agency of Syrian stakeholders on the issue of the missing and on justice matters in Syria.

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, in particular paragraph 7; “The EU will continue to work with Syrian civil society, as essential stakeholders in an inclusive process, to promote democracy and human rights in support of peace and stability in Syria”, and paragraph 12; “The EU will continue to support the resilience of the Syrian population, in line with the EU Strategy on Syria. (...) The EU will seek to increase assistance, combining cross-border assistance with support from inside Syria and will aim at delivering aid as part of a larger effort to address the needs of the population all across Syria, to prevent violent extremism and sectarianism and to build local resilience”.

The action will give priority (1) to areas outside the regime’s control as long as the operational context allows, and (2) to communities where significant numbers of returnees and Internally Displaced Persons (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. This is complemented by an increased level of research and analysis, enabling the Delegation to take informed programmatic and operational decisions in real-time, as the conflict context evolves.

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. In line with 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. 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.

2 RATIONALE

2.1 Context

According to the United Nations Office for the Coordination of Humanitarian Affairs' (OCHA) Global Humanitarian Overview 2021, the dramatic socioeconomic decline has reduced purchasing power and the availability of essential goods and services. It has also severely limited employment opportunities, adding to growing poverty. The average food basket in Syria cost 247 per cent more in October 2020 than at the same time in 2019. Most people's livelihoods depend on day labour, and they do not have a safety net. According to the Food and Agriculture Organisation's Humanitarian Response Plan for 2020, 65% of average monthly salaries is spent on food. These trends have resulted in a sharp increase in food insecurity from – 9.3 million in July 2020 to 13.4 million currently. This increase is the highest ever recorded. Years of conflict have affected the lives and nutritional status of some of the country's most vulnerable people, including women and children.

The Syrian crisis has also created more than five and a half million refugees. The most severe needs are concentrated in areas of ongoing conflict or communities hosting a large number of Internally Displaced Persons and returnees. Protection interventions are required countrywide. In early 2020, response capacity was hindered by access constraints, inflation, increased fuel prices and fuel shortages, and the volatile security situation. Approval of United Nations Security Council (UNSC) Resolution 2504 on 10 July 2020 reduced the scope of cross border operations by authorising the United Nations (UN) to deliver aid through one border crossing only along the Turkish border for the next twelve months. The decision to reduce the crossing points to one drastically reduced UN agencies and humanitarian actors' ability to reach millions of people in Northwest Syria the uncertainty surrounding its renewal is a cause of major concern amongst humanitarian aid agencies. Subsequently, the UN Security Council adopted on 9 July 2021 a compromise resolution (resolution 2585) extending the use of the Bab al-Hawa for the delivery of humanitarian aid for six months, with the expectation of a subsequent renewal for another six months, until 10 July 2022.

There is also an evident and ever evolving regional dimension to the Syrian crisis that cannot be underestimated: the worsening political and socio-economic crisis in Lebanon continues to have a major impact on Syria, further crippling the country's economy, especially its currency stability. The hostility towards Syrian refugees is growing in neighbouring countries. . The entire region is facing a new cycle of instability, which may trigger further sizable waves of population movement.

Refugees face a difficult trade-off in deciding between living in a secure environment as a refugee and having a potentially better quality of life with access to better services and livelihoods than if they returned home. The attendance ratio of school-aged children remains higher in Syria, despite the conflict, than in Lebanon or Jordan, mainly because some of the coping strategies adopted by Syrians as refugees adversely affected children. For example, Syrian girls dropped out of school to marry younger, while Syrian boys dropped out to bring in extra income for their families' survival. For these children, the accumulation of human capital stopped at that level of education, with persistent effects on lifetime well-being.

About 6.7 million Syrians are internally displaced, with 2.98 million in hard-to-reach and besieged areas, and over 5.6 million officially registered as refugees (UNHCR, November 2020). Women and children make up 80% of the population of displaced persons in Syria. As well as the vulnerabilities of displacement

and the effects that may have on their health, the Covid-19 pandemic poses a wealth of increased protection risks for women.

The social and economic impact of the conflict is huge and worsening: the lack of sustained access to health care, education, housing, and food has exacerbated the effects of the conflict, pushing millions of people into unemployment and poverty. 13.4 million people are in need. In addition, the severe decline in oil revenues and disruption of other trade have placed more pressure on Syria's external balances, leading to a rapid depletion of its international reserves. A severely degraded healthcare system makes Syrians extremely vulnerable to additional shocks, such as an outbreak of Covid-19.

The economic impact of lockdown measures also poses a threat. Prices of basic foodstuffs and sanitation products have risen. Women risk being exploited in exchange for aid. In times of scarcity, women are often the last person in the family to eat, despite at times being the person who may need nutrition the most because they are pregnant, breastfeeding or menstruating. Women bear the burden of childcare, which has increased in many cases due to the closure of education facilities. In camps, informal settlements and apartments, women must educate, entertain and protect children in already difficult living circumstances. The impact of the outbreak on the mental health of women cannot be overstated. In addition to their own stress, women need to deal with their children's anxieties and confusion; for example, many of them do not understand why they cannot go to school anymore. With the ongoing trends, it seems questionable whether access to psychosocial support will at all improve in the future.

The situation for human rights in Syria is considered egregiously poor. In 2020, there were deliberate attacks on civilian infrastructure, arbitrary detention, abduction and enforced disappearances, sexual and gender-based violence, and restrictions on property rights and freedom of movement. Coupled with mass destruction of urban environments and rural land and infrastructure, an economy in full stagnation, deteriorating living conditions and substandard (or even non-existent) public services, these violations resulted in HLP rights violations affecting millions of residents, refugees, IDPs, as well as political detainees, the missing persons and their family members. In addition, women and particular social groups with a history of suffering discrimination in property rights – such as women, Palestinian refugees, and Syrian Kurds – stand to be disproportionately affected, including people living in informal settlements. Restrictions on humanitarian aid eased somewhat, an indication of the dire economic situation the Syrian regime finds itself in. Similar violations and abuses were observed, to varying extents, in areas controlled by other types of actors, some of them UN-registered terrorist organisations.

Social and economic impacts are made more acute by deteriorating environmental conditions and climate change. Water resources are limited and not evenly distributed. Thus, water shortages are common due to heavy use for irrigation agriculture (about 88% of all fresh water). In spite of availability of water from several river basins, including the Yarmouk and Orontes, Syria has an annual water deficit currently estimated at about 3 billion cubic meters (about 20% of its total water needs). Increased environmental stress due to excessive water use and pollution, deforestation, overgrazing and soil erosion are likely to negatively impact on the country's agricultural production, and the effects of climate change will only exacerbate these issues. Key projected climate trends include a mean annual temperature increase of 2°C and annual precipitation decrease by 11% by 2050.

Policy Framework (Global, EU)

The 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. As such, the Council Conclusions set out as a primary objective to support work with Syrian civil society, as essential stakeholders in an inclusive process to promote peace and stability in Syria.

The Action is in line with the major EU policy documents, such as the European Green Deal. The European Green Deal is the backbone of the new programming phase and the EU's policy response to sustainable

development, aiming at decoupling environmental degradation from economic activities. To the extent possible, the action will support a “farm to fork” approach and circular business models.

It takes into account EU commitments to engage in nexus programming in crisis contexts, which will emphasise coordination, technical support, referral mechanisms and harmonisation of practices in the Syrian context. EU policy as regards reconstruction remains firmly in place. The EU has been exploring an approach on returns that recognises the fact that individual spontaneous returns are already happening and may still increase, and that there is a need to take steps to prepare the ground for possible future organised returns. This is in line with 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. For the future, the emerging pattern of chronic instability and the lingering political ramifications of conflict, displacement and potential returns requires an even more robust medium-term approach supporting the resilience efforts of Syrian citizens wherever possible at a grassroots level – going beyond emergency and life-saving responses. This is where development assistance can play an important role, building on humanitarian efforts through supporting actions that emphasise resilience and sustainability, and reflecting a stronger political conditionality. Given the forthcoming phase of continuing chronic instability in Syria, a further reinforcement of assistance through development instruments is critical, capitalising on communities, non-state actors or individual agents of change at a grassroots level. At the same time, the EU will constantly assess risks and opportunities, in order to avoid interference or legitimisation of any unwarranted entity.

2.2 Problem Analysis

Short problem analysis

On 23 May 2011, the EU suspended its cooperation with the Syrian regime under the ENI. As such, the action is designed irrespective of relevant policies enacted by the Syrian regime. In full respect of the EU Council Conclusions of 16 April 2018, the EU will not assist in reconstruction efforts until a comprehensive, genuine and inclusive political transition is firmly under way

As the Syria conflict has entered its eleventh year, the scale, severity and complexity of needs of the Syrian population remain extensive. This is the result of continued hostilities in localized areas, new and protracted displacement, and spontaneous returns. In addition, the severe domestic and regional economic crisis, combined with the impact of the Covid-19 pandemic, have eroded even further the resilience of Syrian communities.

In a context where the on-going economic crisis is likely to deteriorate further, building the resilience of the Syrian population is key to maintaining social cohesion. 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 return, as well as nurturing civic space.

EU non-humanitarian assistance focuses on supporting resilience, social cohesion and inclusiveness, rights protection, and empowering communities for changes on the grassroots level.

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

In an operational context characterised by a high degree of complexity and uncertainty, the EU must focus on Syrians and their ability to recover from prolonged conflict, displacement and fragility, as communities. The biggest assets the EU must capitalise upon are 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. Support will focus on efforts to support local communities in the face of severe socio-economic deterioration and the onslaught of the Covid-19 pandemic. While the pandemic has posed challenges for implementation, there have also been

opportunities. In response to the coronavirus threat, a small EU project provided local organisations with the means to raise awareness about proper hygiene practices in selected communities in Idlib province, benefitting 50,000 people living in the area. Volunteers were provided with gloves, masks and hygiene kits, which enabled them to go into communities and talk to people face-to-face about the virus. Posters and videos were also produced to support the awareness raising. As is often the case, the initial EU seed funding inspired others to provide support; one community member provided 50 USD worth of materials for local women to paint a Coronavirus-themed mural in a public space.

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 maintained, thereby sowing the seeds for possible political and social transformation across the Syrian regions.

The interventions will focus on the maintenance of Syrians' rights to live in a peaceful and prosperous society. Thus, socio-economic rights and the right to lead a dignified life will be emphasised through actions which ensure the availability of decent work and access to essential services, particularly health services. The ongoing struggle of Syrians to defend their rights to housing, land and property will receive further assistance through the continued support and expansion of EU efforts in this sphere. 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 protection, with the long-term aim of ensuring safe and secure conditions for return and a normal life.

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 areas outside the regime's control, as long as the operational context allows (2) to communities where significant numbers of returnees are.

Priority Area and sectors

A. Preserving social and human capital of Syrian communities through improved access to health services and livelihood opportunities

The historically robust agricultural sector in Syria has declined in recent years. The food chain - from production to markets- was adversely impacted by conflict and protracted/multiple displacement. 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.

In 2019, agricultural production remained well below pre-conflict levels for all crops. Despite the increased area for cereal cultivation and ample rains, flooding damaged agricultural land and fires destroyed over 85,000 hectares just before the harvest. Further, throughout 2020, Syrians' purchasing power continued to decrease. Food prices reached record levels, 14 times the average before the ten-year-old conflict, whilst the Syrian pound continues to plummet reaching ever new lows against the US dollar. Various factors such as the financial crisis in neighbouring Lebanon and the new US sanctions were aggravating factors in the Syrian regime's mismanagement of the economy, which prioritises the interests of an inner circle at the expense of the needs of the population. Syria's ability to import grain or flour has been substantially reduced. As a result, in September 2020, the Syrian regime introduced rules limiting the amount of subsidised bread available per person at bakeries, putting larger families at risk of starvation as the country's crippling economic crisis deepens further. Moving forward, the political, financial and economic landscape in Syria is likely to remain complex, not least in view of the economic and financial crisis globally and regionally and the impact of the Covid-19 pandemic. Consequently, the severe humanitarian situation is expected to persist and worsen.

Further, climatic research and ethnographic studies have shed light on the possibility that water shortages and climate variability contributed to the conflict. Multiple years of crop failure drove mass migration to urban areas, where unemployment, poor governance, and a multitude of other stressors contributed to the

civil unrest in 2011. Research also suggests that the frequency and intensity of droughts, particularly in the eastern Mediterranean region, will increase as global temperatures continue to rise. With much of the infrastructure in ruins and minimal governance because of the war, Syria is extremely vulnerable to future climate-influenced shocks.

At least 370,000 Syrians have been killed with many more injured, among them women and children; many health staff have also been killed and injured, while many others have fled the country. Access to health care remains problematic, with the ongoing deliberate assault on health care facilities and personnel since the start of the conflict being a defining factor. Vital civilian infrastructure, such as water and sanitation and health services have been severely damaged or destroyed. For instance, in 2017, the World Bank estimated total damage to health facilities across the cities of Aleppo, Hama and Idlib to range between US\$255 000 000 and US\$312 000 000. With an estimated 58% of public hospitals and 49% of primary health centres either closed or only partially functioning, millions of Syrians, especially those in conflict and/or remote areas, have limited access to health care.

While need has increased, instability has meant that many healthcare professionals have fled the country. In addition, functioning medical equipment and medicines are in short supply and if available, then at exorbitant prices. Vaccination coverage has shrunk and outbreaks of communicable diseases such as polio, cholera, leishmaniosis and rabies periodically resurface. Predictably, in 2020, Syria was also heavily impacted by the Covid-19 pandemic with reports of 20, 713 cases and 1, 414 deaths as of 16 April 2021 and observers pointing to a much broader spread of the disease for various reasons, including limited testing capacity. From a development perspective, there are few issues more urgent than the need to address serious deficiencies in the health workforce. However, the regional response to the health workforce crisis has been under-resourced and poorly coordinated, contributing to a generational gap in health workforce supply.

Multiple cycles of dialogue with Syrian civil society and NSAs have once more highlighted the importance of coherent mobilisation of technical dialogue. Human Resources for Health investment has been widely recognised as a key driver of resilience. In spite of its central role in addressing the interlinked challenges of poverty, inequality, conflict and displacement, the health workforce has for too long been perceived as a lesser priority rather than a key contributor to early recovery. Conversely, a health workforce discourse is starting to emerge on fostering synergies with other sectors. Trends relating to health workforce feminisation are also apparent in Syria, opening an opportunity to examine health workforce investment as a driver of gender empowerment. A comprehensive and coherent approach to fostering resilience will be pursued especially in North-eastern Syria, where strong potential exists to concurrently address issues of reintegration of camp residents and detainees in communities. Links between the health and education agendas, as well as livelihoods, will continue to be explored in this context, alongside crosscutting impacts on peace building, returns and socio-economic development.

B. Ensuring the capacities of Syrians to enforce their housing, land and property rights

HLP-related grievances, which are systematically exacerbated and manipulated by the Syrian regime, are among the contributing factors of the Syrian crisis. Their effective resolution in a systemic manner will contribute to stability in the long term. HLP issues are becoming increasingly prominent in the recovery and resilience response in Syria, particularly on aspects related to protection, shelter, food security/agriculture, early recovery, mine action and water and sanitation (WASH). HLP also remains key for approaches which properly take into account ‘conflict-sensitivity’ and ‘do no harm’ principles. In addition, civil documentation and registration matters have been identified as a source of major protection concerns for Syrians that prevent them from accessing basic services and asserting their rights, such as the right to an education. A lack of civil documentation can also deny individuals their legal standing and ability to give evidence before the statutory justice system. As civil documentation is often a prerequisite for asserting HLP rights, the two issues may well become major barriers to return to places of origin and to the recovery of housing assets.

Building on the achievements made by previous EU-funded programmes on HLP and civic documentation, further support is required for addressing HLP needs and demands of affected individuals and communities in order to provide transformative solutions that address both historical and current grievances. Through

proper assistance, affected populations should be able to recover lost/damaged HLP documents as well as strengthen their capacity to resolve HLP-related disputes. Addressing HLP issues is relevant to the whole spectrum of durable solutions for refugees and IDPs, whether they decide to return, remain in displacement or resettle elsewhere. Recent analytical work conducted under EU-supported programmes identified the following aspects that need to be tackled in a systematic manner: (i) advocacy and community mobilisation for proper identification and resolution of HLP issues, in particular with a view to returns; (ii) multiple displacement and insecurity of tenure, especially of women; (iii) information, awareness-raising and counselling on civil and HLP documentation and the importance of documenting HLP rights where the integrity of registries is jeopardized; (iv) local communities' lack of capacity to carry out small-scale rehabilitation of damaged housing, businesses, neighbourhood infrastructure and agricultural asset; (v) access to land for livelihoods (debris removal, Explosive Remnants of War/ mine/ Improvised Explosive Device (IED) contamination); (vi) surveys of IDP and refugee intentions, where HLP issues represent a consistent barrier to return; (vii) mass destruction of HLP facilities and land registries; (viii) an outdated and not fit-for-purpose land administration system; (ix) low security of tenure in informal settlements; (x) new policy proposals on housing and informality that may pose risks to HLP rights, especially for the most vulnerable groups.

Without continued funding, the capacity of international actors to address HLP issues in the immediate and longer term will be greatly diminished. Additionally, further work is required on sensitive HLP-related themes that have emerged during the Joint Programme HLP first phase, especially on land administration and management, as well as localised responses at the community level, while maintaining the capacity of HLP actors in Syria to respond and advocate on HLP issues.

C. Strengthened capacity of the Syrian civil society to lead justice and accountability processes

While it is currently difficult to define precisely the number of missing persons caused by the war in Syria, 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. Both 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.

It is in this context that the Brussels V Conference on Supporting the Future of Syria and the Region (30 March 2021) recalled the European Union's commitment to transitional justice and accountability and that accounting for the missing constitutes a pivotal element of the future of Syria. Consultation with Syrian civil society organisations (CSOs) underlined the importance of supporting both capacity-building efforts for CSOs to lead justice and accountability processes and the need to provide direct, tailored and comprehensive support to the families of the missing.

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 (CRSV), in forms such as rape, forced and early marriages, trafficking for the purposes of sexual exploitation and abuse, and honour killings. The violations they faced should not obscure the role they played in the popular uprising, nor their activism in resisting violence and enhancing their participation in negotiation and peace-building processes. Men and boys in Syria are also subject to sexual violence by multiple parties to the conflict, particularly in detention.

In the Syrian context, women continue to enjoy fewer protections than men under the current legal system (Personal Status Law, Penal Code) and greater social pressure confines them to their homes, limiting access to the public sphere. Women have to deal with prevailing social norms, which define acceptable female behaviour as well as threats or acts of violence from all parties of the war.

In regime controlled areas: Women face harassment, arbitrary detention, enforced disappearances and abduction, sexual violence against detained women related to men from the opposition as a means to attack husbands and families. Women suspected of being connected with terrorist groups were detained or confined in camps by the regime facing inhuman conditions and Sexual and Gender Based Violence (SGBV);

In addition to some of the issues identified in regime-held areas, which are common to all regions of Syria, areas under the control of other armed groups face the following gender-specific challenges:

- Internally displaced: Early marriage of girls, already a phenomenon in Syria before the war, is now increasing. With the dire social and economic situation, families are resorting to negative coping strategies such as child marriage and prostitution.

- In areas controlled by militias: Women have shrinking access to public space.

- In Daesh controlled areas: Access to public spaces is denied. Women captured and detained by terrorist group were married, exchanged between fighters and raped, if they were not executed. Women belonging to religious minorities faced violence as Daesh systematically perpetrated sectarian violence.

The lack of knowledge and skills on how to tackle violence against women and girls (VAWG) at community level, the resulting absence of preventive measures tackling social norms and the scarcity of bundled services to survivors continue to hinder women's participation to decision-making processes at community level. As highlighted by Syrian CSOs during the consultations, VAWG, and women's rights more broadly, need to be tackled with a holistic approach addressing the different dimensions, and interventions need to be tailored to the different geographic and social contexts.

Brussels V put a special emphasis on Syrian women and girls, as well as on youth, recognising their importance in efforts to bring sustainable peace to Syria and restore the country's social fabric. It also recalled the importance of continuity of services to all people in need and to further scale up humanitarian assistance and protection on the basis of needs, with a particular attention to women and girls and other vulnerable groups, including from SGBV.

The main stakeholders for the intervention areas described above include the following: Syrian communities and rights holders, including those communities with a significant number of IDPs or returnees and Syrian Non State Actors. International NGOs, UN Agencies, EU Member States Agencies and other international organisations having advisory, consultative and implementing roles.

3 DESCRIPTION OF THE ACTION

3.1 Objectives and Expected Outputs

The Overall Objective (Impact) of this action is to address early recovery, resilience and self-reliance needs of Syrian communities and local agents for change in Syria in a manner that promotes inclusive and active citizenship, preserves the social fabric, protects fundamental rights, is environmentally sustainable and ultimately creates conditions for stability and peace.

The Specific Objectives (Outcomes) of this action are to

1. To improve access to health services
2. To improve livelihood opportunities of Syrian communities affected by chronic instability
3. To address housing, land and property rights violations
4. To strengthen justice and accountability processes

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

- 1.1 contributing to Outcome 1- 1) Improved Health System Resilience and Health Workforce Development through pre- and in-service training of Syrian Health Care Workers (HCWs) from Syria and the diaspora, as well as through monitoring and facilitation of returns by qualified health personnel where possible;
- 2.1 contributing to Outcome 2 - 1) Improved Resilience, Food Security and Livelihoods for vulnerable groups with a particular focus on the North-East of Syria (NES)
- 3.1 contributing to Outcome 3 - 1) Improved capacities and possibilities of Syrians in enforcing their housing, land and property rights
- 4.1 contributing to Outcome 4 – 1) Strengthened capacity of the Syrian civil society to lead justice and accountability processes.

3.2 Indicative Activities

Activities related to **Output 1.1: Improved Health System Resilience and Health Workforce Development** through pre- and in-service training of Syrian Health Care Workers (HCWs) from Syria and the diaspora, as well as through monitoring and facilitation of returns of qualified health personnel where possible.

Activities may include but are not limited to:

- A1.1 Improved access and quality of health services for vulnerable individuals and communities through partnerships with parameter-compliant health facilities
- A1.2 Health workforce development through pre- and in-service training of Syrian HCWs from Syria and the diaspora

Activities related to **Output 2.1: Improved Resilience, Food Security and Livelihoods (RFSL)** through access to viable livelihood opportunities addressing to the extent possible the impact of the Covid-19 pandemic and financial crisis on vulnerable individuals, households and communities, enhancing the Humanitarian-Development Nexus, and promoting sustainable growth.

Activities may include but are not limited to:

- A2.1 Resilience building of smallholders' crop and livestock production through climate-proofing, resilience building, prevention and preparedness, targeted investments in key value chains, technical training and distribution of agricultural inputs and services, and complementary rehabilitation of communal agricultural assets and infrastructure. Where necessary and relevant, non-technical and technical surveys and de-mining activities may be carried out with a view to enabling the expansion of livelihood opportunities.
- A2.2 Improved resilience and reduced negative coping strategies for urban poor and rural entrepreneurs, vulnerable individuals, households and communities through Technical and Vocational Training (TVET), business start-ups and business support services, applying the vision of the European Green Deal towards a carbon neutral, climate resilient and environmentally friendly development. The above initiatives will be coupled with entrepreneurship training and access to credit in the form of micro-grants. Provision or strengthening of safety nets through a multi-stakeholder approach focused on building community social capital and promotion of inter-sectoral action on food security and nutrition with the overall aim of strengthening both individual and collective self-reliance.
- A2.3 A comprehensive package of activities targeting North-eastern Syria will address the need to strengthen overall resilience at community level. If and where conditions allow, particular attention will be placed on locations and host communities receiving a large influx of returnees be they previously displaced individuals, refugees, former camp residents or detainees. Support will

be provided through a range of activities including in the livelihoods and informal education sectors.

Activities related to **Output 3.1: Improved enforcement of Housing Land and Property Rights**

Activities may include but are not limited to:

A3.1 Support advocacy and community mobilisation for proper identification and resolution of HLP issues, in particular with a view to returns; Awareness raising and dissemination of relevant information on civil documentation and HLP targeting all stakeholders, including implementing partners when engaging with national and local authorities.

A3.2 Analyse the regular updates to the national HLP framework and provide technical support, guidance and expert advice on HLP matters to national and international actors in Syria; Periodic situational updates on HLP issues can be produced with light analysis of the most prominent issues, in an objective and easy-to-read language to inform refugees / IDPs.

A3.3 Identify operational entry points between HLP and mine action, such as HLP awareness raising, capacity building, knowledge creation and land adjudication in the land inspection and demining activities, in particular with a view to returns. Additional activities could include mine risk education and non-technical surveys.

A3.4 Improve the provision of access to civil documentation and HLP services (awareness raising and capacity building on legal aspects, building permits, damage assessments, cadastral documents, installation of temporary/mobile access points to civil and HLP services in locations with acute need, etc.)

A3.5 Support a participatory, inclusive and rights-based approach to replacement of the lost/damaged HLP documents. This may include developing and experimenting innovative tools, supporting HLP claims and providing dispute resolution mechanisms to people in need.

A3.6 Improve security of tenure for informal rights-holders, including the development of tools to register these rights, and regional level awareness-raising and documentation of tenure rights of refugees, to complement efforts inside Syria.

Activities related to **Output 4.1: Strengthened capacity of the Syrian civil society to lead justice and accountability processes** around the issues of missing persons, Violence against Women and Girls (VAWG) and Conflict-Related Sexual Violence (CRSV).

Activities may include but are not limited to:

A4.1 Building capacity of Syrian families and CSOs engaged in the “missing file” to advocate and to lead a coordinated process around the file

A4.2 Provide direct, tailored and comprehensive support to families of the missing.

A4.3 Design and implement prevention and protection initiatives against VAWG and CRSV and promote women’s participation in decision-making and peacebuilding.

A4.4 Strengthen advocacy efforts on survivor-led accountability for gendered crimes committed in Syria.

3.3 Mainstreaming

Environmental Protection, Climate Change and Biodiversity

The environmental and climate change risk screenings carried out in the design stage concluded that key environmental and climate-related aspects need be addressed during design.

Based on the Environment Impact Assessment (EIA) carried out during design phase, the action was classified as Category B (not requiring an EIA, but for which environment aspects will be addressed during design. No Climate Risk Assessment (CRA) was carried out.

Environmental sustainability and carbon neutrality are relevant aspects of the European Green Deal. Special attention will be paid to the potential of designing a fair, healthy and environmentally-friendly food system and food value chain, able to contribute to achieving a circular economy. The programme will support innovation in bringing green solutions and a more optimal use of energy and resources and reducing environmental impacts.

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 and in particular, but not exclusively, in interventions addressing the consequences of SGBV and other forms of conflict-related violence. Parties to the conflict resort to sexual violence as a tool to instil fear, humiliate and punish or, in the case of terrorist groups, as part of their enforced social order. While the immense suffering induced by these practices impacts Syrians from all backgrounds, women and girls have been disproportionately affected, victimised on multiple grounds, irrespective of perpetrator or geographical area. Government forces and associated militias have perpetrated rape and sexual abuse of women and girls and occasionally men in detention centres, during ground operations, house raids to arrest protestors and perceived opposition supporters, and at checkpoints. Women and girls in Syria are disadvantaged by patriarchal biases in existing legislation more generally, as well as by social norms, which limit the role, which women and girls can play in the public domain and large parts of society.

The Gender Profile for Syria 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 that PWDs will explicitly be supported by this action.

Democracy

Support to Civil Society: 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 Brussels IV Conference on the Future of Syria, the EU has created a “virtual space”, where participants from all geographies inside Syria participated in an active exchange on the eight building blocks of the conference. This civic space has been maintained and will be further developed in the future with a view to a) supporting a continued dialogue with civil society and within civil society inside Syria, and b) improving the targeting and transparency of EU support. Eventually the process may serve as a vehicle for the capacitation and empowerment of civil society actors at all levels to enable them to enhance resilience in their communities and build bridges between different constituencies, thereby sowing the seeds of peacebuilding.

The virtual space provides a unique opportunity to engage with actors who have previously been beyond reach. The aim in future will be to further improve the inclusiveness and diversity of stakeholders.

Preventing and Countering Violent Extremism: Although the level of violence in Syria has generally decreased in recent years, there is still considerable potential both for the resurgence of existing extremist

movements, as well as for the radicalisation of vulnerable populations, such as those currently detained without any clear prospect of release in camps such as Al-Hol. The potential for radicalisation in the camps is great, as radical and non-radical elements mix freely and children are largely deprived of educational opportunities, which could provide a route out of this situation. Beyond a set of possible interventions targeting Northeast Syria, all interventions under the measure will address issues of equitable access to services and socio-economic opportunities, thereby supporting social cohesion in return communities and mitigating the risks of radicalisation.

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 minimizes risks of aggravating conflict dynamics. Syria faces unique circumstances that have limited the spread 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 occupation in non-regime held 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.

Disaster Risk Reduction

This action does not tackle disaster risk reduction.

3.4 Risks and Lessons Learned

Category	Risks	Likelihood (High/ Medium/ Low)	Impact (High/ Medium/ Low)	Mitigating measures
1	Deterioration of the security situation. A military solution to the conflict prevails in the short-term resulting in an uptick of violent conflict thus directly affecting operational partners.	M	H	Implementing Partners undertake periodic assessments of operational context in order to respond to changes. Flexibility is built into project design to allow for necessary adaptation.
1	Increased control on operational and/or political space and resources by the Syrian regime and other parties to the conflict.	M	H	Assistance is specifically designed to counter such dynamics by empowering CSOs to withstand pressure exerted by unwarranted parties. Political opportunity costs of non-engagement are weighted. It may prove exceedingly difficult to re-engage once space is lost. Communities advocate for sufficient operating space and are willing to take calculated risks.

				<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	UNSCR 250852021 already limiting cross-border operations is not renewed after 6 months.	H	M	<p>Advocacy for alternatives is stepped-up.</p> <p>E-learning, digital and/or IT-enabled support are leveraged.</p>
1	Implementation difficulties due to increased spread of Covid-19	M	M	Flexible approach adopted to project management, from both the administrative and methodological points of view
1	Significant shift in displacement trends are observed, including an uptick in spontaneous return movements.	M	H	<p>Monitoring of the push/pull factors for displacement are in place, partnerships and dialogue with key ‘returns’ actors are established.</p> <p>Programmes can be re-steered to address emerging return-related needs more specifically.</p> <p>Maintain close dialogue with MS and ECHO.</p>
2	Remote management increases risks of aid diversion.	M	M	<p>Implementation partners (IPs) have robust compliance systems and well established internal monitoring and management capacity.</p> <p>Due diligence checks, supervision and frequent reporting are already contractual requirements.</p> <p>TPM and other analytical resources are regularly leveraged.</p>
2	Activities aimed at promoting dialogue between potential agents of change across geographical areas carries protection or reputational risks	M	M	<p>Dialogue is organised in neutral environment.</p> <p>TPM and other analytical resources are leveraged to provide detailed analysis, and identify risks.</p>

	for participating stakeholders.			
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Lessons Learned:

If one considers the scale of the crisis and levels of violence witnessed, humanitarian assistance alone will not be able to solve the 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.

The EU has concrete lessons learned and clear achievements where supporting grassroots initiatives and locally-generated solutions have borne fruit, and often with multiplier effects. Successes have shown that: a) community development processes must be Syrian-led, defined with the assistance of beneficiaries and that appropriate solutions and strategies must leverage local assets as much as possible; b) sustainable results are achieved when time is available to allow processes to unfold and take on their own self-determined Syrian rhythm, and when resources are invested in a sustained manner; c) parallel capacity building of NSAs and civic actors in negotiation techniques and dialogue processes are critical; and, d) smaller projects frequently produce a disproportionately higher impact. For instance, it is widely recognised that tensions between IDPs, and to some extent returnees, and their host communities often undermine community social cohesion. In Kafr Takharim in the Northwest, community members, supported by a small EU grant, came together to improve conditions in five local public schools. The experience of working together in Parent Councils to support their children is a potentially sustainable mechanism to solve other community issues.

Concrete project achievements are emerging; 2021 will require a particular effort in order to scale up such local-level support without compromising its early results. There is a need to diversify and spread support across a wider spectrum of partners to create a critical mass of stakeholders less vulnerable to pressures and restrictions. Investing in technical capacity and competences offers key opportunities to facilitate and promote the application of locally-based solutions to local problems. At the same time, there is a need to work on a more conceptual level: Syrian activists have repeatedly raised the need for civil society to develop a common vision for the future of Syria and how civil society could contribute to its achievement. Common dialogue spaces can play a useful part in this process, but capacity-building and mentoring of local organisations as they build their experience continues to be required. This is all the more the case because of the inherent uncertainty of the Syrian context. 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 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. Last but not least, monitoring should also ensure that gender commitments are maintained also in the implementation phase, in line with the EU Gender Profile & Audit for Syria.

In the health sector, several lessons learned have been identified by an assessment launched in early 2020, including DG NEAR complementarity and distinct added value in addressing long-term needs that fall short of humanitarian mandates - such as Human Resources for Health (HRH) - opportunities to leverage the private health sector, and the need for close oversight of Mental Health and Psychosocial Support (MHPSS) interventions in as far as quality, returns and relevance are concerned. In the Resilience, Food Security and Livelihoods sector (RFSL), an exercise was launched in late 2020 to conduct a comparative

review of EU-funded interventions with a view to synthesise best practices and lessons learned focusing in particular - but not exclusively- on value for money, targeting criteria and risk management practices. However, what is already apparent is that as the crisis is protracted the entire sector will benefit from an explicit engagement strategy and vision for the sector as a whole.

3.5 The Intervention Logic

The underlying intervention logic for this action is that bottom-up and community-driven interventions are prioritised wherever operationally feasible, in order to nurture self-reliance and accountability within 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. Support will focus on efforts to support local communities in the face of severe socio-economic deterioration and the onslaught of the Covid-19 pandemic.

The intermediate outcome of the intervention will be the maintenance of Syrians' rights to live in a peaceful and prosperous society. Thus, socio-economic rights and the right to lead a dignified life will be emphasised through actions which ensure the availability of decent work and access to essential services, including health services. The ongoing struggle of Syrians to defend their rights to housing, land and property will receive further assistance through the continued support and expansion of EU efforts in this sphere. 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 protection with the long-term aim of ensuring safe and secure conditions for return and a normal life.

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 maintained, thereby sowing the seeds for possible 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.

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	<i>To address early recovery, resilience and self-reliance needs of Syrian communities and local agents for change in Syria in a manner that promotes inclusive and active citizenship, preserves the social fabric, protects fundamental rights, is environmentally sustainable and ultimately creates conditions for stability and peace.</i>	<p><i>Proportion of beneficiaries reporting improved access to healthcare services (selected target areas)</i></p> <p><i>Proportion of beneficiaries living in poverty according to UN standards (selected target areas)</i></p> <p><i>Extent to which the capacities of civil society actors to support target groups in navigating the justice system and enforcing accountability for conflict-related crimes are enhanced</i></p>	<p>70% (2020)</p> <p>90% (2020)</p> <p>Low</p>	<p>90% (2024)</p> <p>45% (2024)</p>	<p>WHO data</p> <p>UN Human Development Index</p> <p>Human Rights Reports</p>	<i>Not applicable</i>
Outcome 1	<i>Improved access to health services and livelihood opportunities of Syrian communities affected by chronic instability.</i>	<p><i>Births attended by skilled health personnel</i></p> <p><i>Physicians density per 1,000 population</i></p> <p><i>Nursing and midwifery personnel density per 1,000 population</i></p>	<p>96% (2009)</p> <p>1.546 (2014)</p> <p>2.302 (2014)</p>	<p>96% (2024)</p> <p>1.700 (2024)</p> <p>2.500 (2024)</p>	<p>WHO data and/or project reports</p>	<p>Broader peace and security conditions do not hinder implementation</p> <p>There is space for implementing partners to work without endangering their lives/freedom</p>
Outcome 2	<i>Improved Resilience, Food Security and Livelihoods</i>	<i>Number of smallholders adopting improved technologies and innovation (improved varieties/processing techniques etc.), disaggregated by location</i>	<p>20,000 smallholders (2020)</p>	<p>50,000 smallholders (2024)</p>	<p>UN data and/or project reports</p>	

		<i>Number of Households (HHs) reporting new income sources, disaggregated by source</i>		5,000 (HHs)		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 under the umbrella of this programme (e.g. by influencing the selection of target locations, beneficiaries or modes of implementation)
Outcome 3	<i>Progress in addressing housing, land and property rights violations</i>	<p><i>Percentage of the population in possession of legal identity and other civil documentation (disaggregated by sex)</i></p> <p><i>Degree of inclusion of community and civil society voices in local recovery processes</i></p> <p><i>Levels of intra-community trust</i></p> <p><i>Degree of victim participation in justice and accountability processes</i></p> <p><i>Degree of community participation in decision-making bringing divided people together and addressing community needs (disaggregated as above)</i></p>			<p>UN reports</p> <p>Analytical context reports</p> <p>Surveys</p> <p>Reports from relevant CSOs</p> <p>Surveys</p>	Assistance is geared towards empowering local communities, NSAs and civilians
Outcome 4	<i>Justice and accountability processes are strengthened</i>	<i>Number of NSAs and NSA networks demonstrating enhanced capacities in support of victims of conflict-related</i>	0	50	<p>Project reports</p> <p>Surveys</p> <p>Project reports</p>	

		<p><i>violence dialogue or training activities</i></p> <p><i>Percentage of families and survivors satisfied with the tailored support provided through the Actions</i></p> <p><i>Number of CSO's / CSOs networks demonstrating / successfully leading justice and accountability initiatives within their communities</i></p> <p><i>Number cases closed positively (subject located or fate established)</i></p>	<p>0%</p> <p>0</p> <p>0</p>	<p>100%</p> <p>50</p> <p>10</p>	<p>Reports of relevant international organisations</p>	
Output 1 related to Outcome 1	<p><i>Improved Health System Resilience and Health Workforce Development through pre- and in-service training of Syrian Health Care Workers (HCWs) from Syria and the diaspora, as well as through monitoring and facilitation of returns by qualified health personnel where possible</i></p>	<p><i>Number of communities, HHs and individuals reporting access to basic healthcare</i></p> <p><i>Number of medical/health staff reporting improved skills and knowledge</i></p>				<p>Stakeholders share a common understanding of priorities</p> <p>Implementation is adequately sequenced and proceeds at a reasonable pace</p>
Output 1 related to Outcome 2	<p><i>Improved Resilience, Food Security and Livelihoods for vulnerable groups</i></p>	<p><i>Number of individuals benefitting from jobs creation and livelihoods activities</i></p>			<p>Project reports UN OCHA data</p>	<p>Expectations are adequately managed</p>

		<p><i>(disaggregated by gender, age, status and disability)</i></p> <p><i>Number of individuals receiving inputs and assets (e.g. livestock, seeds, tools, etc.) with EU funding, (disaggregated by gender, age, status and disability, value and type of input)</i></p> <p><i>Number of people who have benefited from TVET/skills development programmes with EU support, (disaggregated by gender, age, status and disability and ethnicity when relevant)</i></p> <p><i>Number of individuals provided with trainings on vocational and life skills development, on-job trainings, thanks the support of the Action, disaggregated by gender, age, status, disability and 'at risk' group</i></p> <p><i>Number of CSO representatives trained by this Action on climate change/youth inclusion/irregular migration/forced displacement/addressing and/or mitigating risks and vulnerabilities in fragile and</i></p>				<p>Local ownership principles are honoured through processes of validation by a wide cross-section of stakeholders</p> <p>Blueprint approaches are avoided</p> <p>Plans and proposals are realistic and feasible and the 'politics of implementation' is duly taken into account</p> <p>The safety of EU partners remains a key pre-condition when performing critical quality control/monitoring activities</p>
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		<i>conflict affected countries (disaggregated by sex)</i>				
Output 1 related to Outcome 3	<i>Improved capacities and possibilities of Syrians in enforcing their housing, land and property rights</i>	<i>Number of beneficiaries who obtained civil registration documents with support of the action (disaggregated by sex, age and type of document)</i>				
Output 1 related to Outcome 4	<i>Strengthened capacity of the Syrian civil society to lead justice and accountability processes</i>	<i>Number of civil society and media institution representatives trained by the EU intervention on advocacy (disaggregated by sex)</i> <i>Number of people whose awareness and engagement of P/CVE issues was strengthened by CSOs thanks to funding they received from the EU (disaggregated by sex and age)</i> <i>Number persons affected by conflict-related violence informed about their rights and assisted to access justice mechanism</i>				

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 applicable for Project modality

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 measures¹.

4.3.1 Direct Management (Grants)

a) Purpose of the grant(s)

The grants shall contribute to achieving specific objectives 1, 2, 3 and 4

b) Type of applicants targeted

In order to be eligible for a grant, the applicants must:

- be a legal entity; and
- be non-profit-making; and
- be a specific type of organisation such as: a non-governmental organisation, a foundation or a public sector operator (including a development agency of a Member State of the European Union) or an international organisation as defined by Article 156 of the EU Financial Regulation

(c) Justification of a direct grant

Under the responsibility of the Commission's authorising officer responsible, the grant may be awarded without a call for proposals to an organisation which meets the requirements set out in point (b) above selected using the following criteria:

- demonstrate relevant expertise of the thematic area of the intervention
- demonstrate requisite operational capacity
- demonstrate adequate financial capacity

Under the responsibility of the Commission's authorising officer responsible, the recourse to an award of a grant without a call for proposals is justified by the fact that the country is in a crisis situation referred to in Article 195 FR (a).

(d) Exception to the non-retroactivity of costs

The Commission authorises that the costs incurred may be recognised as eligible as of 1 May 2021 in view of the political urgency of addressing the socio-economic needs of the Syrian population and in addition in the light of the Covid-19 pandemic.

¹ www.sanctionsmap.eu Please note that the sanctions map is an IT tool for identifying the sanctions regimes. The source of the sanctions stems from legal acts published in the Official Journal (OJ). In case of discrepancy between the published legal acts and the updates on the website it is the OJ version that prevails.

4.3.2 Indirect Management with a Member State Organisation or an international organisation

A part of this Action may be implemented in indirect management with an entity, which will be selected by the Commission's services using the following criteria:

- Financial and operational capacity;
- Previous experience in any of the fields relevant for the three results areas concerned (community development, resilience, service delivery);
- Demonstrated capacity to deliver project results in a conflict and gender-sensitive manner.

The selected entity has to be pillar-assessed at the latest at the time of the signature of the contribution agreement. The implementation by this entity entails to achieve part of the activities foreseen under specific objectives 1, 2 and 3.

Exception to the non-retroactivity of costs

The Commission authorises that the costs incurred may be recognised as eligible as of 1 May 2021 in view of the political urgency of addressing the needs of Syrian communities and NSAs, as outlined above.

4.3.3 Changes from indirect to direct management (and vice versa) mode due to exceptional circumstances (one alternative second option)

In case the parts of the Action identified under section 4.3.2 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. The types of entities targeted and the selection criteria to be applied in the respective situations have been specified in the abovementioned sections.

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).

4.5 Indicative Budget

Indicative Budget components	EU contribution (amount in EUR)	Third-party contribution, in currency identified
Outcome 1. Improved Health System Resilience and Health Workforce Development	12 000 000	
Implementation modalities – Grants (direct management – 4.3.1)	10 000 000	
Indirect management with entrusted entities - 4.3.2	2 000 000	
Outcome 2. Improved Resilience, Food Security and Livelihoods (RFSL)	18 000 000	
Grants (direct management – 4.3.1)	10 000 000	
Indirect management with entrusted entities - 4.3.2	8 000 000	
Outcome 3. Improved enforcement of Housing Land and Property Rights	7 000 000	
Grants (direct management – 4.3.1)	2 500 000	
Indirect management with entrusted entities - 4.3.2	4 500 000	
Outcome 4. Strengthened capacity of the Syrian civil society to lead justice and accountability processes	4 000 000	
Grants (direct management – 4.3.1)	4 000 000	
Grants – total envelope under section 4.3.1	26 500 000	
Evaluation – cf. section 5.2 Audit – cf. section 5.3	N.A.	
Totals	41 000 000	

4.6 Organisational Set-up and Responsibilities

Considering the political sensitivity of any action in Syria, the EU Delegation will maintain close steering and monitoring of all projects, regardless of management modalities. The EU Delegation to Syria will provide oversight on projects implementation through the establishment of steering committees for specific interventions foreseen under the action and through regular monitoring and evaluation.

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 NSAs 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.

4.7 Pre-conditions (Only for project modality)

Security conditions: Security conditions should remain relatively stable and be at least equal to current levels of stability. This applies to beneficiaries of the interventions as well as to staff of implementers as they go about their work.

Implementation capacities: Grass-roots organisations must be able to demonstrate a clear connection with their communities and constituencies. They must be able to ensure engagement of their beneficiaries in project interventions. For international partners, access levels to the country and to partners must be maintained at current levels, at least, including the possibility to safely and efficiently transfer funds to local partners. Both local and international partners must strengthen their ability to ensure compliance with restrictive measures and to withstand political pressure from local power brokers.

Conducive Context: Local institutions and communities, must remain open to external project interventions that alleviate the conditions in which the civilian population lives. Equipment and supplies necessary for implementation of specific activities are available in the market.

The status of the above-listed conditions can and should be regularly monitored through monitoring and analysis available to the Delegation through relevant contracts for both political economy, as well as in terms of the efficiency and effectiveness of project interventions through third party monitoring arrangements.

5 PERFORMANCE MEASUREMENT

5.1 Monitoring and Reporting

Roles and responsibilities for data collection, analysis and monitoring:

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 results (outputs and direct outcomes) as measured by corresponding indicators, using as reference the log-frame matrix (for project modality). Reporting foresees the possibility to review and update the results matrix and log-frame for each project and, consequently, for the action document log-frame.

Reports shall be laid out in such a way as to allow monitoring of the means envisaged and employed and of the budget details for the action. The final report, narrative and financial, will cover the entire period of the action implementation.

The Commission may undertake additional project monitoring visits both through its own staff and through independent consultants recruited directly by the Commission for independent monitoring reviews (or recruited by the responsible agent contracted by the Commission for implementing such reviews), where this is feasible. A comprehensive Third Party Monitoring contract funded under the Special Measure 2019 is already in place for Syria, which foresees monitoring of projects, vetting of partners and analysis of political context and local political economy, allowing for a flexible and adaptable programme and project implementation.

5.2 Evaluation

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

It will be carried out for accountability and learning purposes at various levels (including for policy revision) taking into account in particular the fact that the 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 month in advance of the dates envisaged for the evaluation 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.

Wherever possible, the evaluation reports shall be shared with key stakeholders following the best practice of evaluation dissemination². The implementing partner and the Commission shall analyse the conclusions and recommendations of the evaluations and, where appropriate, in agreement with the partner country, jointly decide on the follow-up actions to be taken and any adjustments necessary, including, if indicated, the reorientation of the project.

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 COMMUNICATION AND VISIBILITY

Communication and visibility is a contractual obligation for all entities implementing EU-funded external actions to advertise the European Union's support for their work to the relevant audiences.

To that end they must comply with the instructions given in the [Communication and Visibility Requirements of 2018](#) (or any successor document), notably with regard to the use of the EU emblem and the elaboration of a dedicated communication and visibility plan, to be completed for every action at the start of implementation.

These obligations apply equally, regardless of whether the actions concerned are implemented by the Commission, the partner country (for instance, concerning the reforms supported through budget support), contractors, grant beneficiaries or entrusted entities. 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.

Communication and visibility measures may be funded from the amounts 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.

Implementing partners shall keep the Commission and concerned EU Delegation/Office fully informed of the planning and implementation of specific visibility and communication activities before work starts. 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.

For communicating on Team Europe Initiatives, the EU and its Member States can rely on the specific guidance on the Team Europe visual identity.

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 framework contract.

² See best [practice of evaluation dissemination](#)