



Brussels, 6.8.2020
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COMMISSION IMPLEMENTING DECISION

of 6.8.2020

on the special measure in favour of the Syrian population for 2020

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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) No 236/2014 of the European Parliament and of the Council of 11 March 2014 laying down common rules and procedures for the implementation of the Union's instruments for financing external action², and in particular Article 2(1) thereof,

Whereas:

- (1) In order to ensure the implementation of the special measure in favour of the Syrian population for 2020 it is necessary to adopt an annual financing Decision, which constitutes the annual work programme, for 2020. Article 110 of Regulation (EU, Euratom) 2018/1046 establishes detailed rules on financing Decisions.
- (2) The envisaged assistance is deemed to follow 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 and in the neighbouring countries however has been maintained under the European Neighbourhood Instrument⁴ (“ENI”) 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 2019 and will be valid until June 2020. This

¹ OJ L 193, 30.7.2018, p.1.

² OJ L 77, 15.3.2014, p. 95.

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.

⁴ Regulation (EU) No 232/2014 of the European Parliament and of the Council of 11 March 2014 establishing a European Neighbourhood Instrument (OJ L 77, 15.3.2014, p. 27).

special measure falls under the Joint Communication to the European Parliament and the Council ‘Elements for an EU strategy for Syria’⁵.

- (4) The action entitled “Preserving Diverse, Inclusive and Empowered Communities inside Syria” aims at preserving social and human capital of syrian communities affected by chronic instability through improved access to basic services and livelihoods opportunities, as well as building the capacity of Non State Actors. The special measure will pursue the achievement of the main objective by adressing early recovery, resilience and self-reliance needs of comminities and local agents for change in Syria in manner that promotes inclusive and active citizenship, preserves social fabric and ultimately ceates the conditions for stability and peace.
- (5) The Commission should authorise the eligibility of costs as of a date preceding that of submission of a grant application, which is prior to the date of adoption of this Decision, for reasons of extreme urgency in crisis management aid or in other exceptional and duly substantiated emergencies, whereby an early engagement by the Union would be of major importance.
- (6) The Commission should authorise the launch of a call for proposals and for tenders by means of a suspensive clause before the adoption of this Decision.
- (7) Pursuant to Article 4(7) of Regulation (EU) No 236/2014, indirect management is to be used for the implementation of the programme.
- (8) 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.

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 European Neighbourhood Instrument Committee established under Article 15 of the financing instrument referred to in recital 4.

⁵ 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.

HAS DECIDED AS FOLLOWS:

Article 1
The measure

The Commission Implementing Decision on the special measure in favour of the Syrian population for 2020, as set out in the Annex, is adopted.

The measure shall include the following action:

Annex: “Preserving Diverse, Inclusive and Empowered Communities inside Syria”

Article 2
Union contribution

The maximum Union contribution for the implementation of the measure for 2020 is set at EUR 36,100,000, and shall be financed from the appropriations entered in the budget line 22.040103 of the general budget of the Union.

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 point 5 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, and which do not cause the total contribution to exceed EUR 10 million, or cumulated changes to the allocations of specific actions 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. Those changes shall be applied in accordance with the principles of sound financial management and proportionality.

Article 5
Grants and Procurement

The eligibility of costs prior to the submission of grants and tender applications and which is prior to the date of adoption of this Decision shall be authorised as of the date set out in the Annex.

Launching a call for proposals and tender under a suspensive clause before the adoption of this Decision shall be authorised as of the date set out in point 5 of the Annex.

Done at Brussels, 6.8.2020

For the Commission
Olivér VÁRHELYI
Member of the Commission





ANNEX

of the Commission Implementing Decision on the special measure
in favour of the Syrian population for 2020

Action Document for Preserving Diverse, Inclusive and Empowered Communities inside Syria

ANNUAL PROGRAMME/MEASURE

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

1. Title/basic act/ CRIS number	Special measure for Syria 2020 – Preserving Diverse, Inclusive and Empowered Communities inside Syria CRIS Number: 2020/042-586 financed under the European Neighbourhood Instrument	
2. Zone benefiting from the action/location	Syria The action shall be carried out at the following location: Syria with some activities taking place in neighbouring countries (Turkey, Iraq, Jordan and Lebanon)	
3. Programming document	N/A	
4. Sustainable Development Goals (SDGs)	SDG 1 “No Poverty”, SDG 10 “Reduced Inequalities” while also contributing to SDG 3 “Good Health and Well-being”, SDG 4 “Quality Education”, SDG 5 “Achieve Gender Equality and Empower All Women and Girls, SDG 8 “Decent Work and Economic Growth” and SDG 13 “Climate Action”	
5. Sector of intervention/ thematic area	Community development and Non State Actors (NSA) support	DEV. Assistance: YES
6. Amounts concerned	Total estimated cost: EUR 36.1 million Total amount of European Union (EU) contribution EUR 36.1 million	
7. Aid modality(ies) and implementation modality(ies)	Project Modality Direct management through grants and procurement. Indirect management with the entrusted entity(ies) to be selected in accordance with the criteria set out in section 5.4.4	
8 a) DAC code(s)	15220 Civilian Peace-Building, Conflict Prevention and Resolution 15150 Democratic Participation and Civil Society 16050 Multisector Aid for Basic Social Services	

	16020 Employment Creation 16010 Social Protection			
b) Main Delivery Channel	Non-Governmental Organisations (NGOs) and Civil Society (DAC Channel Code 20,000) Multilateral Organisations (DAC Channel Code 40,000) University, college or other teaching institution, research institute or think tank (DAC Channel Code 51,000) Private Sector Institution (DAC Channel Code 60,000)			
9. Markers (from CRIS DAC form)	General Policy Objective	Not Targeted	Significant Objective	Principal Objective
	Participation Development/Good Governance	<input type="checkbox"/>	<input type="checkbox"/>	X
	Aid To Environment	<input type="checkbox"/>	X	<input type="checkbox"/>
	Gender Equality and Women's and Girl's Empowerment	<input type="checkbox"/>	X	<input type="checkbox"/>
	Trade Development	X	<input type="checkbox"/>	<input type="checkbox"/>
	Reproductive, Maternal, New Born and Child Health	<input type="checkbox"/>	X	<input type="checkbox"/>
	RIO Convention Markers	Not Targeted	Significant Objective	Principal Objective
	Biological Diversity	X	<input type="checkbox"/>	<input type="checkbox"/>
	Combat Desertification	X	<input type="checkbox"/>	<input type="checkbox"/>
	Climate Change Mitigation	X	<input type="checkbox"/>	<input type="checkbox"/>
	Climate Change Adaptation	X	<input type="checkbox"/>	<input type="checkbox"/>
10. Global Public Goods and Challenges (GPGC) thematic flagship	Not Applicable			

SUMMARY

Syria is on a trajectory of protracted instability. Nine years of conflict have profoundly damaged the country's social fabric. Communities have faced ruthless violence, social dislocation and socio-economic exclusion. While the Syrian regime has continued to expand its military control over key areas,, it shows neither the ability nor the willingness to implement meaningful reforms that would allow Syria to restart on a basis acknowledging the traumas and the lessons of the last decade. The trend is rather for Damascus to seek to assert an even tougher approach to economic and social control.. This sets a trend for heightened instability, radicalisation and proliferation of armed groups and potentially new waves of migration.

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. This is where development assistance can be demonstrably differentiated, both in being leveraged to reinforce humanitarian efforts and in assuring stronger political conditionality. The logic is to provide medium-term support to the Syrians themselves, as communities, non-state actors or individual agents of change at the grassroots level.

Correspondingly, this action prioritises bottom-up and community-driven interventions that promote endogenous processes and generate local demand for inclusion, participation and service delivery – on the one hand building community capacity for future recovery and return, and on the other nurturing civic space through capacity building and by promoting space for civic engagement. In this spirit, and in line with EU Council Conclusions of 16 April 2018 and the outcomes of the Brussels III Conference on the Future of Syria and the Region (March 2019), the Overall Objective of the action is to address early recovery, resilience and self-reliance needs of communities in Syria and local agents for change in manner that promotes inclusive and active citizenship, preserves the social fabric and ultimately creates conditions for stability and peace.

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 are. 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 if:

- 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 NSAs whilst avoiding to contribute to further fragmentation and/or demographic engineering;
- access and capacity to (remotely) monitor are maintained;
- full compliance with EU Restrictive Measures is ensured.

1 CONTEXT ANALYSIS

1.1 Context Description

Over the course of 2019, the Syrian regime has continued to expand its military control over key areas, whilst the geographic space occupied by the ‘opposition’ and other actors has been reduced. Violent escalations have continued, systematically pursued by the Syrian regime and its allies, as well as by violent extremist groups and other conflict actors.

In north-west Syria (NWS), the United Nations (UN) listed terrorist group Hay'at Tahrir Al Sham (HTS) consolidated its positions in January 2019, allowing its affiliated Syrian Salvation Government (SSG) to expand control over local administration structures in the province of Idlib. The area witnessed a new wave of military escalation starting in late April 2019 at the initiative of the Syrian regime and its allies. Continued bombardment caused a massive humanitarian crisis marked by the largest wave of displacement in Syria since the beginning of the conflict. In north east Syria (NES) Turkey’s military operation in October 2019 exacerbated civilian suffering and provoked further displacements, thus undermining the stability of the whole region and providing fertile ground for the resurgence of Da’esh which remains a significant threat to regional, international and European security.

Security in southern Syria remains precarious. The end of 2019 witnessed a dramatic escalation of security incidents in Dara’a, Sweida and Rural Damascus, largely targeting reconciled oppositions supporters and security services. Popular protests have increased, voicing discontent with the fragile security and socio-economic situation.

The Syrian economy has been severely affected by the conflict itself, but also by the ongoing economic and financial crisis in neighbouring Lebanon. Inside Syria, 83% of the population lives below the poverty line and one in three is food insecure. Gross Domestic Product (GDP) contracted by 63% between 2010 and 2016 and economic and human development achievements have been reversed by two generations. The war economy and regime patronage structures have had far reaching consequences on vulnerable groups, notably due to disruption of community networks, essential services and safety nets. The value of the Syrian Pound (SYP) has steadily decreased since 2011 and plummeted even further in the last quarter of 2019. The SYP's fall has resulted in rising import costs for basic commodities, widespread currency speculation, a foreign exchange crisis and a further deterioration in living conditions. At household level, coping strategies have been exhausted, forcing vulnerable households to resort to unsustainable and unsafe coping mechanisms, including forced, early and/or temporary marriage, child labour, child recruitment and survival sex.

Additionally, the economic and financial crisis in neighbouring Lebanon is an important element that needs to be taken into consideration as it continues to hit

Syria. Lebanon's crisis remains unresolved and the banks continue to impose informal capital controls, especially on withdrawals in dollars, feeding fears of a financial collapse. Lebanon has long been Syria's economic and financial gateway to the world and its importance has grown during the war. Individuals and businessmen alike have deposited money in Lebanese banks, shielding their assets from the volatile Syrian economy and the restrictive measures imposed on the banking system. Syrian deposits in Lebanese banks are reported to amount to USD 30 billion, comparing with an estimated USD 10 billion before the war. Most of these deposits are now effectively frozen in Lebanon. Lebanese banks continue to impose capital controls especially on transfers and withdrawals in dollars. Syrian 'shell companies' in Lebanon which de facto import goods to Syria through Lebanon are directly hit by the capital controls. This results in more expensive and reduced amounts of imported goods going to Syria. Due to a longstanding shortage of dollars in Syria, Syrian traders were used to obtaining dollars in Lebanon. They are now forced to indebt themselves to acquire dollars at expensive rates on the black market in Lebanon or Syria – or to shut down.

The human rights situation in Syria is considered egregiously poor. In 2019, regime forces continued to use a combination of unlawful tactics, deliberate attacks on civilian infrastructure, restrictions on humanitarian aid, arbitrary detention, abduction and enforced disappearances, sexual and gender-based violence, and restrictions on property rights and freedom of movement, resulting in civilian casualties, grievances and mass displacement. Human rights violations and abuses were also observed in areas controlled by other actors, some of them UN-registered terrorist organisations.

According to the UN Humanitarian Needs Overview (HNO) 2020, Syria continues to require a sustained response by humanitarian actors. The most severe needs are concentrated in areas of ongoing conflict or communities hosting a large number of internally displaced persons (IDPs) and returnees. Protection interventions are required countrywide. In early 2020, response capacity has been hindered by access constraints, inflation, increased fuel prices and fuel shortages, the volatile security situation and the reduced scope of cross border operations following approval of UN Security Council (UNSC) Resolution 2504 of 10 January 2020.

All in all, the unwillingness and inability of the Syrian regime to engage in a comprehensive and meaningful political process are bound to cause more instability in the medium to long-term. Discontent is growing amongst large sections of the population previously supportive of the regime due to the worsening socio-economic conditions and the depletion of community and state assets.

There is also an evident and ever evolving regional dimension to the Syrian crisis that must not be underestimated. Recently, Iraq has experienced the highest level of unrest it has seen in many years. Lebanon's current crisis has a major impact on Syria and has further crippled the country's economy, especially as regards currency stability. As a result of growing hardship in neighbouring countries and growing hostility against Syrian refugees, the end of 2019 saw increased numbers of spontaneous, self-organised returns from Lebanon. Whilst it is unclear if the trend will be sustained in 2020, the entire region is facing a new cycle of instability which may trigger new and sizable waves of population movement.

1.2 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 ultimate objective of the EU. 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 documents¹ and is framed in the spirit of the Grand Bargain². It also takes into account EU commitments to engage in nexus programming in crisis contexts. EU policy as regards reconstruction remains firmly in place. 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 be demonstrably differentiated, both in being leveraged to reinforce humanitarian efforts and in assuring stronger political conditionality. Given the forthcoming phase of 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.

1.3 Public Policy Analysis of the Partner Country/Region

On 23 May 2011, the EU suspended its co-operation 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,

¹ Co-chairs' Declaration from the Third Brussels Conference "Supporting the Future of Syria and the Region" which took place on 12-14 March 2019; the New European Consensus on Development - "Our World, Our Dignity, Our Future"; Commission Communication "Agenda for Change" - COM(2011/637) of 13 October 2011; the Global Strategy for the EU's Foreign and Security Policy - "Shared Vision, Common Action: A Stronger Europe" June 2016; the OECD/DAC Principles of Good International Engagement in Fragile States; the Joint Communication "A Strategic Approach to Resilience in the EU's External Action" of 7 June 2017, & the Action Plan for Resilience in Crisis Prone Countries 2013-2020 of 15 June 2013; The renewed 2018 EU Global Approach for UNSCRs 1325 & 1820; the EU Comprehensive Approach To External Conflicts and Crises (JOIN(2013)30 of 11.12.2013); the Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions "Lives in Dignity: from Aid-dependence to Self-reliance" (2016); Article 1.2 of the Communication on the participation of Non-State Actors in development policy as well as Article 24.2 of the Development Co-operation Instrument (DCI) and Article 10 of the European Instrument for Democracy and Human Rights (EIDHR); the EU Gender Profile & Audit for Syria including the Gender Action Plan II.

² See for reference: <https://www.agendaforhumanity.org/initiatives/3861>

the EU will not assist in reconstruction efforts until a comprehensive, genuine and inclusive political transition is firmly under way.

1.4 Stakeholder Analysis

Identified actors that could have a stake in the action:

Stakeholders	Level of Engagement with the Action
<p>Syrian communities and rights holders with due regard for vulnerability markers including communities with a significant number of IDPs or returnees</p> <p>Palestine refugees in Syria (PRS)</p>	<p>Primary reference/target group. Extensive involvement foreseen in participatory consultations and project design, prioritisation of interventions, implementation and - where feasible- monitoring and evaluation</p>
<p>Syrian Non State Actors (chiefly community-based Organisations, grassroots organisations, civil society and diaspora organisations, women's groups, youth groups, civic actors, non-formal networks of professionals, elders, religious leaders, local NGOs, and other agents of change).</p>	<p>Primary reference/target group to be further defined at inception phase through a dedicated mapping and identification exercise. Extensive involvement foreseen in participatory project design, implementation and - where feasible- monitoring and evaluation</p>
<p>International NGOs, UN Agencies, EU Member States Agencies and other international organisations</p>	<p>Primary role in formulation, implementation, monitoring and evaluation, field-level co-ordination, and -where feasible- peer review</p>

1.5 Problem Analysis/Priority Areas for Support

There is overwhelming agreement on the importance to maintain and nurture civic space and ensure that community-based and civilian-led actors receive adequate and sustainable support to increase prospects for an inclusive peace and prevent a return to a *status quo ex ante*. This has been confirmed at the three Brussels Conferences, lastly in March 2019 with a day of dialogue with Syrian NSAs.

Nine years of conflict have profoundly damaged Syria's social fabric and subjected Syrian communities to a situation of protracted instability. For almost a decade, an entire generation has been partly or wholly deprived of quality education, and many of the country's more educated young people have left the country. Those who remained experienced ruthless violence, social dislocation and socio-economic exclusion, destitution, political disempowerment, polarisation and sectarianism, while most Syrian refugees abroad have had to endure dramatic living conditions along with growing intolerance from host communities. Against this backdrop, and with spontaneous, self-organised return trends unlikely to abate, one of the specific objectives of this Action is to assist communities that have gone through loss, trauma, displacement and destruction with the aim of strengthening their resilience, thereby preventing further destabilisation and attempting to restore the social fabric. Nurturing civic space also requires sizeable investments in support to nascent NSA platforms, networks, grassroots and professional associations, with a view to

increasing capacities and promoting space for civic engagement, empowering actors and leaders with an independent mind-set rooted in principles of participation, leadership and inclusion.

The Action is further articulated around four Result Areas and a short problem analysis is provided for each one:

A. Community-driven development through bottom-up approaches with a focus on preventing further destabilisation, restoring the social fabric and strengthening community resilience for potential returns

The impact of the crisis on social cohesion and local level coping capacities has been dramatic, stretching resourcefulness to its absolute limits; at household level, the engagement in high risk and exploitative activities has increased, exposing in particular children, youth and women. With limited individual and household ability to withstand shocks, the role of communities and civic actors in restoring and/or preserving the social fabric becomes increasingly critical. The role of health, education, livelihoods, employment and upward mobility in the promotion of social cohesion and prevention of violent extremism is evidenced by extensive literature and it is a prerequisite for durable solutions and returns that are safe, voluntary, and dignified. The EU has considerable experience in supporting interventions drawing youth and vulnerable groups away from marginalisation and exclusion in order to prevent further upsurges of violent conflict and extremism. Given the country's downward spiral in such vital spheres as livelihoods and provision of basic services, further investments are necessary to consolidate the gains of previous interventions.

The crisis has also impacted the Palestine refugees. The high vulnerability and lack of resources and services put them at risk of further displacement, migration and radicalisation. This can be mitigated by dedicating specific focus and assistance to this population in particular those who self-organise their returns to Syria after displacement in neighbouring countries. This support could focus on newly accessible camps or on areas where the influx of returnees is higher.

B. Community-based holistic approach to non-formal education and TVET (Technical and Vocational Education and Training)

Access to education is a basic right of the child and a fundamental element in building social cohesion, ultimately providing hope and opportunities to the young population. The education sector in Syria is in a dire state, with more than two million children that are out of school and one in three schools that have been damaged or destroyed during the conflict. In regime-held areas, children who have missed one or more years of school formally have the possibility to reintegrate into the education system through the completion of an accelerated curriculum. However, the school capacities and the resources allocated are inadequate as compared to the needs. Children that have graduated in opposition-managed schools are discriminated against by the regime and denied recognition of diplomas.

Throughout the crisis, children have been affected by psychological trauma, neglect and abuse, widespread child labour, underage recruitment into armed groups and early marriage. The response to these complex and interrelated needs should encompass child protection and non-formal education and should also tackle socio-

economic root causes for abuse. Children among the Palestine refugees population are also particularly at risk.

Adolescents and youth are also a vulnerable category, suffering from a lack of opportunities and being at risk of radicalisation. With half of the population being formally unemployed, youth is particularly affected by the lack of employment opportunities. Young people that could not complete primary education lack chances of adult basic education. Enrolment in secondary schools has dropped dramatically during the conflict years, going from 85% to 25% of secondary school age students. TVET secondary schools, attracting more than 30% of the students before the crisis, have been severely depleted and are practically non-operational in some areas of the country like the North-East.

International aid programmes have only marginally invested in TVET, often offering soft skills short-term courses, which do not have the necessary impact on the productivity and employability of the trainees. In this context, it is important to focus on youth as specific target group and to provide diversified assistance in view of integrating vulnerable adolescents and young adults into the economic and social life of their communities and offer them meaningful opportunities for their future. Programmes should combine catch-up and remedial education, medium-term TVET courses, livelihood opportunities and support to employment, PSS, and community activities.

C. Support to Non State Health Actors (NSHAs) - Strengthening their roles as catalysts for positive change

The Syrian regime and its allies have systematically targeted health facilities and health workers as part of a wider strategy of war aimed at breaking civilian populations and forcing them into submission. In its targeted assault on health, the regime blatantly disregarded special protection afforded to medical personnel under international humanitarian law and branded health workers as enemies of the state. The Syrian regime's deliberate withholding of the salaries of government health staff employed in rebel-held areas - a distinctive practice that has not been applied to other public sector workers - is telling of the antagonistic stance taken towards Human Resources for Health (HRH). Discriminatory practices have continued also after regime takeovers in different parts of the country with the dismissal of many health workers previously supported through donor-funded interventions. Preliminary evidence from an independent assessment confirms that those dismissed from public employment have been permitted to open private clinics and that the footprint of the private health sector is in fact quite large, providing scope for partnering with the private health sector if adequately mapped and vetted. Additional stakeholders operate outside of the Syrian regime's health system in NWS where they continue playing a critical role as a safeguard against the resurgence of violent extremism.

Many Syrian health workers have participated actively in advocacy and peace-building processes and most continue to provide health care to all regardless of political affiliation. Health professionals are strategically placed to be agents of change across Syria. They have a transformative role to play in Syrian society by virtue of their status, leadership, credibility, perceived neutrality, and extensive experience in advocacy, negotiation and mediation, whilst servicing the needs of

their respective communities. They often have intimate knowledge of patient needs, which intersects with their role as patient advocates at individual and societal level and leverage to demand or influence change. They are bound by a universal code of ethics, which uniquely transcends conflict and other fault-lines. They possess unique skills that lend significant credibility to the investigation and documentation of human rights abuses and are often the first port of call for victims of torture and Gender-Based Violence (GBV). In short, they are critical for both the health and the human rights of Syrian communities.

From community to specialist levels, HRH are also critically needed to assist the attainment of humanitarian and stabilisation objectives alike - without health workers there is no meaningful health care response. However, medium-term investments in HRH transcend the mandate of humanitarian and stabilisation actors and investments in capacity building have often been piecemeal and limited. Access to health services upon return is also a key consideration influencing refugees and IDPs decisions to return, but if crucial HRH bottlenecks are not addressed it will not be possible to guarantee minimum health service benchmarks and prevent inequality, competition, social exclusion and future instability. In neighbouring countries, refugee health workers often stand idle and no attempt has been made to address barriers to practice and return. Inside Syria, the private sector and the health sector represent potential partners if adequately mapped and vetted. Outside of Syria, diaspora and refugee networks include health care workers that may be considering a return to Syria if opportunities are availed to them. For all these reasons, special attention will be paid to capacity development of NSHAs through this Action.

D. Non State Actors and their role in producing robust diagnose and monitoring of stakeholders, trends and interventions in Syria, especially as independent actors that can capitalise on their networks and access to communities to collect, observe and verify trends linked to social dynamics as well as programme interventions (e.g.: return-related themes such as protection assurances, arrest and detention, HLP and civil documentation, etc., as well as on gender sensitive programming). With the EU's ability to assure monitoring and field presence in Syria unlikely to improve over the course of 2020-2021, assuring a diversity of actors in the important role of both third party monitoring, people-centred analysis and research cannot be understated.

2 RISKS AND ASSUMPTIONS

Risks	Risk Level H/M/L	Mitigating Measures
<p>Deterioration of the security situation</p> <p>A military solution to the conflict prevails in the short-term resulting in an uptick of violent conflict thus directly impacting operational partners</p>	H	<p>International Partners (IPs) undertake periodic assessments of operational context in order to respond to changes</p> <p>Flexibility is built into project design to allow for necessary adaptation</p>
<p>Increased control on operational and/or political space and resources by</p>	H	<p>EU assistance is specifically designed to counter such dynamics by</p>

<p>the Syrian regime and other parties to the conflict.</p>		<p>empowering Civil Society Organisations (CSOs) to withstand the pressure exerted by unwarranted parties.</p> <p>Political opportunity costs of non-engagement are weighted. It may prove exceedingly difficult to re-engage once space is lost</p> <p>Communities and NSAs advocate that for sufficient operating space and are willing to take a calculated risk</p> <p>Partnerships are sufficiently strong to raise ‘red flags’ whereby the EU can reassess and adjust activities/timing/location/partner.</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 may partially/ fully suspend activities, or terminate them in justified cases.</p> <p>Third Party Monitoring (TPM) and other analytical resources can be leveraged to minimise risks</p>
<p>UNSCR 2504/2020 already limiting cross-border operations, is not renewed after 6 months</p>	<p>H</p>	<p>Advocacy for alternatives is stepped-up</p> <p>E-learning, digital and/or IT-enabled support are leveraged</p>
<p>Significant shift in displacement trends are observed, including an uptick in spontaneous return movements</p>	<p>M</p>	<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>Close dialogue with EUMS and ECHO is to be maintained</p>
<p>Remote management increases risks of aid diversion</p>	<p>M</p>	<p>IPs have robust compliance systems and well established internal monitoring and management capacity</p>

		Due diligence checks, supervision and frequent reporting are already contractual requirements TPM and other analytical resources are regularly leveraged
Activities aimed at promoting dialogue between potential agents of change across geographical areas carries protection or reputational risks for participating stakeholders	M	Dialogue is organised in a neutral environment in order to reduce risks TPM and other analytical resources are leveraged to provide detailed analysis, and identify risks
<p>Assumptions Security conditions allow movement of staff and beneficiaries; Local institutions, community, and armed groups remain open to external project interventions that alleviate the conditions in which the civilian population lives; Reliable local partners can be identified and secure ways to channel funds established; Equipment and supplies necessary for implementation are available in the market. Self-organised, spontaneous returns of Syrian IDPs and refugees will continue.</p>		

The proposed action recognises that Syria remains an extremely difficult working environment for all actors. Mobilising development assistance instruments in a highly political conflict context is always a high-risk undertaking. A residual risk will always remain. Because of this, the EU’s political parameters as set out in the Council Conclusions are clearly articulated to all partners at every stage, and extensive control and mitigation measures have been put in place to identify and manage political and operational risks as appropriate. These include robust diagnostics and analysis, allowing for informed and time-sensitive decisions making, reinforcement of political context and conflict sensitive analysis, location and risks awareness, location and entity checks, as well as overall conflict and thematic analyses across geographies. Robust third party monitoring mechanisms will accompany programme implementation.

3 LESSONS LEARNT AND COMPLEMENTARITY

3.1 Lessons Learnt

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 Syrian society is currently facing as it is heading towards a failed state. This is in neither the region’s nor Europe’s interest as this could trigger new refugee flows across the region and into Europe, while renewed chaos and conflicts could facilitate the eruption of new radical movements. In case Europe wants to avoid situations similar to those experienced by other countries in the region (Iraq, Libya, Yemen, Palestine), a new vision and approach to Syria – and the region overall – is warranted. With community stability at the base of the action’s intervention logic, the action places mending social fabric, reducing triggers for a re-emergence of violent conflict, stemming displacement, and restraining space for radicalisation, at the heart of the EU’s medium term interest in Syria – building on best practice wherever possible.

The EU has concrete lessons learned and clear achievements where supporting NSA and civic space has borne fruits, and often with multiplier effects. Successes have shown that a) NSA dialogue and community development processes must be Syrian-led, self-identified and self-solved leveraging local assets as much as possible b) sustainable results are achieved when time is lent to allow processes to unfold and take on their own self-determined Syrian rhythm, and when sustained resources are put forward, and c) parallel capacity building of NSAs and civic actors in negotiation techniques and dialogue processes are critical. Concrete project achievements are emerging; 2020 will require a particular effort in order to scale up such local-level support without compromising its early results.

The EU's development instruments are well-placed as investments in the 'long-game' in Syria. Indeed some programmatic evidence has emerged showing that where **investments in civic actors and communities** have been sustained, these actors have been able to articulate their rights and needs and express their grievances more assertively. For example, communities in NWS have shown strong signs of political resistance against the HTS takeover. Voices of discontent continue growing in regime-held areas, often reflecting correlating in where previous investments in NSA support, extended also to livelihoods and service delivery. Preserving that space and leveraging local demand for change is critical. Close dialogue and a long-term perspective are essential.

EU development assistance has long been dependent on territorial control by the opposition and rested on the assumption that the regime would eventually be militarily defeated. In turn, the notion of "opposition" was largely correlated with specific geographies and withdrawal of EU support has often been implemented once these geographies came under regime control. In reality, opposition to the regime takes various forms and is more nuanced than a simple binary approach. To avoid missed opportunities, it is critical to act at grassroots level, anywhere inside Syria where the conditions allow, and in line with the Council Conclusions³.

Moving forward, **EU support to Syrian NSAs and diaspora networks** can be further refined if informed by in depth assessments exploring the scope and potential for action in new areas, notably that of professional associations. This is all the more important in a context in which the international community has been relying on a network of few partners with an overt political agenda, with the risk of unduly exposing and over-burdening them in terms of absorption and implementation capacity. Hence, there is a need to diversify and spread support across a wider spectrum 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 a space for dialogue and participation at all levels.

The Syrian context is inherently uncertain. Through several cycles of implementation, it has become all the more apparent that interventions must be easily adapted to changing political and contextual circumstances. Since 2017, **Monitoring and Evaluation (M&E)** is for the most part done remotely and information is regularly triangulated using a multitude of reliable sources, including TPM

³

Cf <http://data.consilium.europa.eu/doc/document/ST-7956-2018-INIT/en/pdf>
<https://www.consilium.europa.eu/en/press/press-releases/2017/04/03/fac-conclusions-syria/>

and

contractors. The EU can now draw on a variety of resources including a dedicated service contract, which provides invaluable insight with regards to 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 maintained also in the implementation phase, in line with the EU Gender Profile & Audit for Syria.

3.2 Complementarity, Synergy and Donor Co-ordination

The EU aims to ensure complementarity between humanitarian, stabilisation and development assistance through regular meetings with the relevant services at local (Beirut), regional and HQs levels. Regular interaction with the Commission services in charge of the Instrument contributing to Stability and Peace (IcSP) and the EU Regional Trust Fund in Response to the Syrian Crisis takes place in Beirut. The action builds on lessons learned in the implementation of projects under the European Instrument for Democracy and Human Rights (EIDHR), the Thematic Programme for Civil Society Organisations and Local Authorities' (CSA-LA), and PRO-Resilience Action (PROACT) financed under the Development Co-operation Instrument (DCI). Synergies are also increasingly being sought with the IcSP-funded Syria Peace Process Support Initiative (SPI).

This action builds upon the pillars of work foreseen under the 2019 Special Measure in Support to the Syrian People, further reinforcing support to civic space and capitalising on NSA partnerships already in fruition. Concrete project achievements are emerging from previous commitments and 2020 will require a particular effort in order to scale up such local-level support without compromising its early results. The emphasis on nurturing social cohesion and community stability, whilst promoting the prospects for an inclusive post-conflict Syria, is a *file-rouge* across both 2019 and 2020 support packages.

The projects will also co-ordinate and seek complementarity with multilaterally funded actions, such as education programmes funded by Education Cannot Wait and the Global Partnership for Education.

More in general, donor co-ordination meetings at field level are driven and organised by the EU Delegation to Syria in Lebanon, Jordan and Turkey. Regular meetings offer an opportunity to exchange views with EU Member States and donors on operational priorities, lessons learned and challenges faced, including how create synergies among donor-funded interventions inside Syria from a thematic and (increasingly less) geographic perspective. In view of the volatile and highly politicised environment, no Joint Programming efforts have been undertaken so far.

4 DESCRIPTION OF THE ACTION

4.1 Overall Objective, Specific Objective(s), Expected Outputs and Indicative Activities

The **Overall Objective** of the action is to address resilience and self-reliance needs of communities and local agents for change in Syria in manner that promotes inclusive and active citizenship, preserves social fabric and ultimately creates conditions for stability and peace.

The Action's **Specific Objectives** are:

SO1. Preserving social and human capital of communities inside Syria affected by chronic instability through improved access to basic services and livelihood opportunities.

SO2. Building the capacity of NSAs through technical assistance, capacity development and financial support of existing and/or new networks drawing strength—where relevant— from organised diaspora networks and new technologies.

With a view to the Covid-19 crisis that will affect Syria (a WHO-declared high risk country) heavily, a response to the crisis may be included in all of the following result areas in addition to the mentioned activities, where appropriate and possible.

Result Area 1 - Community-driven development through bottom-up approaches with a focus on the restoration of social fabric, the fostering of local-level stability and strengthening community capacity for returns

Activities may include but are not limited to:

- Continued support to incubate and nurture grassroots and other civic initiatives involving NSAs, with a particular view to strengthen their networking capacities across the country. This includes also support to community cohesion; where appropriate such support can also take the form of media content creation.
- Inclusive community engagement and empowerment including protection of the civic space and local level accountability.

Areas of programmatic focus may include multi-sector responses to appropriately and ethically respond to the needs of communities, including support to Palestine refugees.

Result Area 2 – Community-based holistic approach, with a particular focus on non-formal education and TVET

- Activities may include but are not limited to: improved access and quality of non-formal education for children and youth, early childhood education, child protection and psychosocial support services including basic literacy and numeracy, remedial and catch up classes, school health activities, referral mechanisms and potential other subsectors.
- Equitable and inclusive basic education with a particular focus on vulnerable children and children with disabilities, also focusing on Palestine refugees.

- Investments in human and social capital through non-formal Technical and Vocational Education and Training, continued learning, micro-entrepreneurship, income-generating activities, mentoring to employment, cash interventions, value chain development and other investments with multiplier effects and peace dividends.
- Identify child protection abuses, provide specific assistance to the children, and, when appropriate, support the families with PSS, cash, cash for work, and livelihoods opportunities.
- Train teachers engaged in non-formal education.
- Offer recreational and volunteering activities to children and the youth.
- Design and roll out of a package of services to address the specific needs of persons with disabilities including awareness raising to combat stigma and discrimination, Mine-Risk Education, MHPSS and livelihood initiatives.

Areas of programmatic focus may include multi-sector responses to appropriately and ethically respond to the needs of communities.

Result Area 3 - Support to Non State Health Actors (NSHAs) and their role as catalysts of positive change

Activities may include but are not limited to:

- Capacity building of NSHAs including - where practical and suitable - informal networks of health practitioners from inside Syria, the diaspora and/or Syrian refugee communities through technical assistance, mentoring, pre-/in-service training, peer-to-peer exchanges, leveraging where possible the use of provision of and training on new technologies, digital platforms, informal cross-border or cross-line networks, training to private health sector and/or communities of practice in neighbouring countries

Result Area 4 - Robust diagnoses and monitoring of interventions, stakeholders, conflict drivers, spoilers, needs, risks and opportunities timely produced to assist programmatic and operational decision making.

Activities may include but are not limited to:

- Independent analysis and people-centred research to enhance collective understandings of in-country dynamics (e.g. returns, protection thresholds, housing land and property rights, etc.), conflict drivers and spoilers, to inform targeted protection measures, safe returns, alternatives and effective responses.
- Continued support to TPM and location/partner/activity assessments, risk analysis and other diagnostic reports including support to results-based monitoring of stakeholders, on-going interventions leveraging the skills and know-how of various partners active in this field

With the aim of ensuring coherence and effectiveness of EU financing, the Commission decides to extend the eligibility of this action to neighbouring countries including but not exclusive to Turkey, Jordan, Lebanon and Iraq where required.

4.2 Intervention Logic

In an operational context characterised by a high degree of complexity and uncertainty, and in view of a likely military scenario that sees the regime and its allies gain near- total military control across Syria, the EU must focus on the Syrians, as well as on Palestine refugees, to uphold their ability to recover from prolonged conflict, displacement and fragility, as communities. The biggest assets the EU must capitalise upon are the Syrians themselves, as well as Palestine refugees, and their relentless resilience as individuals, as actors of change, as communities, as cities, as a people - and 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 between and across Syrians. Grassroots NSAs initiatives that promote endogenous processes and generate a local demand for inclusion, participation and service delivery, also offer the promise of multiplier effects in the medium to longer term – on the one hand building community capacity for future recovery and on the other, sowing the seeds for a possible social and political transformation across Syria. This approach should be non-punitive and instead be nurtured nation-wide, irrespective of spheres of political control, with the intention to re-establish and re-link Syrian citizens, networks, communities, cities and regions, notably across ongoing and historic conflict lines. With the risk of complete collapse of state services across Syria, rendering it a potential failed state at the periphery of Europe, the EU interest must lay in preserving at a minimum, the Syrian social fabric that remains.

Emphasis will be placed particularly on local level community empowerment and functionality, whilst also including defined areas of work that aim to address grievances, protect rights and empower women, youth and marginalised groups affected by the conflict.

The conditions are not in place for safe, voluntary and dignified return of refugees and IDPs and the EU has made clear that any attempt of demographic change would be unacceptable and has therefore refused to provide stabilisation or development assistance in areas where the rights of local populations are not assured. This applies equally to NES and to Syrian territory under Turkish military control. While maintaining this principled position, this action will aim to support the resilience and social cohesion in communities where in fact refugees are already returning to, in order to prevent further destabilisation inside Syria.

Poverty prevails among Syrians everywhere and poverty constrains the ability to return. For example, the data shows that Syrian refugees who have access to an extra meal per day are 15 percent more likely to return to Syria. However, those who returned with a meagre asset profile struggled most to secure the minimum needs for survival. Their vulnerability was exacerbated as a consequence of their return. Yet, it is important to note that in some cases poverty may also be a driver of return.

Local level and area-based diagnostic and conflict sensitive analysis, coupled with third party risk mitigation analysis, will lay the basis 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, and (2) to communities where significant numbers of returnees are.

The action is in line with the Joint Communication on Elements for an EU Strategy for Syria and aims at translating the strategy into a conflict-sensitive, politically relevant and operationally sound assistance programme.

4.3 Mainstreaming

Syria faces unique circumstances of war, whereby the principles of ‘do no harm’ and conflict sensitivity are critically important to apply, 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 NWS and NES, diasporic versus local identities, and the population’s alienation from their leadership and institutions). Particular attention will be paid to conflict sensitivity at project level, ensuring that EU assistance minimises risks of aggravating conflict dynamics.

A rights-based approach is mainstreamed throughout the action, explicitly supports rights holders with a particular focus on conflict-affected, marginalised and/or disempowered individuals and communities.

According to the gender audit carried out in 2019, all programs aim to be gender sensitive and will develop gender sensitive related components ensuring that women and man benefit equally from the foreseen interventions, in particular the ones addressing the grievances of conflict-affected, marginalised and/or disempowered individuals and communities and preventing and countering violence and trauma. Programs will also include sex-disaggregated data, analysis of gender-based differences, gender indicators, affirmative actions or specific interventions to address gender gaps and inequalities identified through a thorough gender analysis. In addition, a specific budget can be allocated to gender-sensitive activities and gender specialists should be assigned to them.

4.4 Contribution to Sustainable Development Goals (SDGs)

This intervention is relevant for the UN 2030 Agenda for Sustainable Development. It contributes primarily to the progressive achievement of SDG 1 “No Poverty” and SDG 10 “Reduced Inequalities” while also contributing to SDG 3 “Good Health and Well-being”, SDG 4 “Quality Education”, SDG 5 “Achieve Gender Equality and Empower All Women and Girls”, SDG 8 “Decent Work and Economic Growth” and SDG 13 “Climate Action”.

5 IMPLEMENTATION

5.1 Financing Agreement

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

5.2 Indicative Implementation Period

The indicative operational implementation period of this action, during which the activities described in section 4 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 Decision and the relevant contracts and agreements.

5.3 Implementation Modalities

The Commission will ensure that the EU appropriate rules and procedures for providing financing to third parties are respected, including review procedures, where appropriate, and compliance of the action with EU restrictive measures⁴.

5.3.1 Grants: (Direct Management)

a) Purpose of the grant(s)

The grants shall contribute to achieving Result Areas 1, 2, and 3. In case of award through an expression of interest or a call for proposals under a suspensive clause prior to the adoption of this Decision, the call for proposals may be launched as from 1 March 2020. This is justified because of the crisis declaration valid for Syria and the political urgency of addressing the needs of Syrian communities contributing - where conditions allow for it- to foster conditions for community stability, self-organised return and socio-economic reintegration, empowering individuals and NSAs to act as catalysts for positive through meaningful capacity building, and/or produce timely analysis, as outlined in this action document.

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) Exception to the non-retroactivity of costs

The Commission authorises that the costs incurred may be recognised as eligible as of 1 May 2020 in view of the political urgency of addressing the needs of Syrian communities and NSAs, as outlined above.

⁴

See for reference 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.

5.3.2 Procurement (Direct Management)

The purpose of the procurement is to contribute to achieving Result Area 4. In case of award through a call for tenders under a suspensive clause prior to the adoption of this Decision, the call may be launched as from 1 March 2020. This is justified to allow the use of two different sources of funding drawn from two financial envelopes (Special Measures 2019 and 2020).

5.3.3 Indirect Management with Entrusted Entities

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 implementation by this entity entails to achieve part of the activities foreseen under Result Areas 1, 2, 3 and 4.

Exception to the Non-Retroactivity of Costs:

The Commission authorises that the costs incurred may be recognised as eligible as of 1 May 2020 in view of the political urgency of addressing the needs of Syrian communities and NSAs, as outlined above.

5.3.4 Changes from indirect to direct management mode due to exceptional circumstances

In case the parts of the Action identified under section 5.3.3 cannot be implemented in indirect management, due to circumstances outside of the Commission's control, the alternative implementation modality in direct management as described under section 5.3.1. shall be applied.

5.4 Scope of Geographical Eligibility for Procurement and Grants

The geographical eligibility in terms of place of establishment for participating in procurement and grant award procedures and in terms of origin of supplies purchased as established in the basic act and set out in the relevant contractual documents shall apply 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 products and services in the markets of the countries concerned, or in other duly substantiated cases where the eligibility rules would make the realisation of this action impossible or exceedingly difficult.

5.5 Indicative Budget

Component	EU contribution (million EUR)	Indicative third party contribution (million EUR)
5.3 Result Area 1 Community-driven development through bottom-up approaches with a focus on the restoration of social fabric, the fostering of local-level stability and strengthening community capacity for returns	12	N/A
• Grants in direct management, cf. section 5.3.1	8	
• Indirect management, cf. section 5.3.3	4	
5.3 Result Area 2 Community-based holistic approach, with a particular focus on non-formal education and TVET	15	
• Grants in direct management, cf. section 5.3.1	10	
• Indirect management, cf. section 5.3.3	5	
5.3 Result Area 3 Support to Non State Health Actors (NSHAs) and their role as catalysts of positive change	7	N/A
• Grants, cf. section 5.3.1	5	
• Indirect Management, cf. section 5.3.1 and 5.3.3	2	
5.3 Result Area 4 - Robust diagnoses and monitoring (Direct Management)	2.1	N/A
• Procurement, cf. section 5.3.2	0.5	
• Grants, cf. section 5.3.1	0.2	
• Indirect management, cf. section 5.3.3	1.4	
Evaluation (cf. section 5.8) Audit/ Expenditure verification (cf. section 5.9)	covered by another Decision	N/A
Communication and Visibility (cf. section 5.11)	0	N/A
Contingencies	0	N/A
Total	36.1	N/A

5.6 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.

5.7 Performance and Results Monitoring and Reporting

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

SDGs indicators and, if applicable, any jointly agreed indicators as for instance per Joint Programming document should be taken into account.

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).

5.8 Evaluation

Having regard to the nature of the action, an evaluation will be carried out for this Action or its components via independent consultants.

The evaluation reports shall be shared with the key stakeholder(s). 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.

5.9 Audit

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

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

5.10 Communication and Visibility

Communication and visibility of the EU is a legal obligation for all external actions funded by the EU.

This action shall contain communication and visibility measures which shall be based on a specific Communication and Visibility Plan of the Action, to be elaborated at the start of implementation.

In terms of legal obligations on communication and visibility, the measures shall be implemented by the Commission, the partner country (for instance, concerning the reforms supported through budget support), contractors, grant beneficiaries and/or entrusted entities. Appropriate contractual obligations shall be included in, respectively, the financing agreement, procurement and grant contracts, and delegation agreements.

The Communication and Visibility Requirements for European Union External Action (or any succeeding document) shall be used to establish the Communication and Visibility Plan of the Action and the appropriate contractual obligations.

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 in compliance with the 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.

APPENDIX - INDICATIVE LOGFRAME MATRIX

	Results chain: Main expected results (maximum 10)	Indicators (at least one indicator per expected result)	Sources of data	Assumptions
Impact (Overall Objective)	The Overall Objective of the action is to address and self-reliance needs of communities and local agents for change in Syria in manner that promotes inclusive and active citizenship, preserves social fabric and ultimately creates conditions for stability and peace.	<p>Trends and distribution patterns of household (HH) expenditure and per capita income in communities targeted through the action (disaggregated by gender, age, disability (GAD), ethnicity, religion, socioeconomic and displacement/returnee/refugee status)</p> <p>Proportion of HHs and individuals living below 50 per cent of median income in communities targeted (disaggregated as above)</p> <p>Degree of inclusion of community and civil society voices in local recovery processes measured through surveys</p> <p>Degree of community participation in decision-making bringing divided people together and addressing community needs (disaggregated as above)</p> <p>Improvements in intra-community trust measured through surveys</p>	International statistics, project-specific reports and surveys, HNO Syria	<i>Not Applicable</i>
Outcome(s) (Specific Objective(s))	<p>SO1. Preserving social and human capital of communities inside Syria affected by chronic instability through improved access to basic services and livelihood opportunities.</p> <p>SO2. Building the capacity of NSAs through technical assistance, capacity development and financial support of existing and/or new networks drawing strength —where relevant— from organised diaspora networks and new technologies.</p>	<p># of communities, HHs and individuals serviced with response programmes that promote inclusive and locally-led processes (disaggregated as above)</p> <p>Proportion of the target individuals and HHs below the international poverty line (disaggregated as above)</p> <p>Reduced illiteracy, maternal and infant mortality rates, and premature mortality from non-communicable diseases (including mental health) in targeted communities (disaggregated as above)</p> <p>Evidence of meaningful and structured participation by NSAs in a variety of processes (dialogue, planning, implementation, monitoring) building stronger governance and accountability at all levels</p>	As above	<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> <p>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)</p>
Outputs	R1 Community-driven development through bottom-up approaches with a focus on the restoration of social fabric, the fostering of local-level stability and strengthening	% of HHs and individuals benefitting from training, cash and livelihoods interventions in gainful employment and/or reporting having abandoned negative coping strategies six-	As above	Stakeholders share a common understanding of priorities

	<p>community capacity for returns.</p> <p>R2 Community- based holistic approach, with a particular focus on to non-formal education and TVET.</p> <p>R4 Support to Non State Health Actors (NSHAs) and their role as catalysts of positive change.</p>	<p>months after the intervention (disaggregated as above)</p> <p>% of HHs and individuals targeted reporting improved access to quality social services (health, education, protection) (disaggregated as above)</p> <p>% of HHs and individuals who report more exposure or participation in civic initiatives at local level (disaggregated as above)</p> <p># NSAs improving their internal governance standards, transparency and accountability towards their own constituencies</p> <p># of individual NSAs and NSA networks or platforms with demonstrable management, leadership, advocacy, negotiation capacity</p> <p># persons affected by displacement informed about conditions for eventual return</p> <p>% of children enrolled and retained in education services</p> <p>% increase of children with special needs included in basic education</p> <p># of people enrolled in TVET training</p> <p># of people benefitting from jobs creation and livelihoods activities</p> <p>% of people in targeted community who experience an improvement in their livelihoods</p> <p># of youth reintegrated into targeted communities and abandoning negative coping strategies</p> <p># of NSAs involved in cross-border/cross-line dialogue or training activities</p> <p># of people-centred analysis and reports produced and leveraged</p>		<p>Implementation is adequately sequenced and proceeds at a reasonable pace</p> <p>Expectations are adequately managed</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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	R5 Robust diagnoses and monitoring of stakeholders and interventions timely produced.	# of TPM analyses and reports timely produced		
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