



ANNEX 1

of the Commission Implementing Decision on the ENI East Regional Action programme
2020 part 2
Action Document for “EU4Independent media”

ANNUAL PROGRAMME

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	EU4Independent media CRIS number: ENI/2020/042-599 financed under the European Neighbourhood Instrument	
2. Zone benefiting from the action/location	Eastern Partnership (EaP) countries: Armenia, Azerbaijan, Belarus, Georgia, the Republic of Moldova and Ukraine. The action shall be carried out at the following location: Eastern Neighbourhood countries.	
3. Programming document	Programming of the European Neighbourhood East Instrument (ENI) – 2014-2020 – Regional East Strategy Paper (2014-2020) and Multiannual Indicative Programme (2017-2020)	
4. Sustainable Development Goals (SDGs)	16. Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels.	
5. Sector of intervention/ thematic area	Media	Dev. Assistance: Yes
6. Amounts concerned	Total estimated cost: EUR 11 000 000 Total amount of European Union (EU) contribution EUR 11 000 000	
7. Aid modality(ies) and implementation modality(ies)	Project Modality Direct management through: - Grants (direct award) - Procurement	
8 a) DAC code(s)	15153 Media and free flow of information	
b) Main Delivery	Direct management – 60000 Service contract	

Channel	Indirect management with 40000 - Multilateral Organisation			
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	X	<input type="checkbox"/>	<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	X	<input type="checkbox"/>	<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 flagships	N/A			

SUMMARY

The overall objective of the action is to contribute to democratisation and empower citizens in the Eastern Neighbourhood. This is in line with the objectives set in the Joint Communication of 18 March 2020 “Eastern Partnership policy beyond 2020 - *Reinforcing Resilience - an Eastern Partnership that delivers for all*” and directly contributes to achieving the 2020 targets as laid out in deliverable three (strategic, communication and media) of the 20 Deliverables for 2020.

Independent, professional journalists need financially viable outlets and media outlets across this region face tremendous challenges. Some of these are due to global sectorial trends and others are region-specific. This intervention aims to take a comprehensive approach to provide tailor-made support to improve the immediate and long-term financial viability of independent media outlets. This will likely include trainings to enhance management and marketing skills as well as support to develop new revenue streams and make necessary technological investments. Furthermore, this intervention also targets the immediate financial needs of independent outlets in financial distress and supports content production and investigative journalism.

1. CONTEXT ANALYSIS

1.1 Context Description

Eastern Neighbourhood countries face similar challenges when it comes to domestic governance systems and freedom of expression in the countries. While progress naturally differs from country to country, the consolidation of deep and sustainable democracy, respect

for the rule of law and responsive public administrations need continued support across the region.

Media outlets represent in this perspective a key ally in the comprehensive implementation of the rule of law. The media is also fundamental to the choices that citizens make about the future of their country.

Freedom of expression and the political environment shaping and framing the work of media have not improved noticeably in recent years. Political will continues to be the key factor determining the development of sustainable democracy in Eastern Neighbourhood countries, and in maintaining and deepening cooperation with the EU.

Moreover, access to fact-based information during the COVID19 global pandemic is crucial to prevent misinformation from spreading amongst the population. The crisis has exacerbated deepened existing challenges and create new ones. The effects include tightened state interventions, collapsing advertising markets and falling revenues.

The common challenges faced by independent media in the Eastern Partnership region are complex and often intertwined. Broadly speaking, they include:

- the risk of excessive control by the state administration or judiciary which may affect both the independence and the resilience of local media, especially small scale ones
- the limited diversification and in some cases the concentration of media ownership, which may undermine media pluralism and hinder objective and factual reporting of national and international news
- the need to increase the variety of media sources, which can enable different voices to be heard by the general public
- the need to ensure public service broadcasters' financial self-sufficiency and sustainability and decrease their reliance on state support
- the lack of professional opportunities to promote skills development and learning and to improve professional standards and a professional environment of mainstream media
- distorted advertising markets favouring incumbents and politically favoured outlets
- the risk of self-censorship on sensitive subjects by media itself and
- finding of new sources of public or private funding to retain and increase quality journalism, notably analytical reporting and investigative journalism.

1.2 Policy Framework (Global, EU)

The European Neighbourhood Policy (ENP) provides a framework for closer relations between the European Union and its neighbouring countries, which since 2009 has been further developed through the Eastern Partnership, a joint initiative between the European Union and Armenia, Azerbaijan, Belarus, Georgia, the Republic of Moldova¹ and Ukraine.

¹ Hereinafter Moldova.

The European Neighbourhood Policy Review introduced differentiation among the countries, in accordance with their ambitions in the relationship with the European Union, while maintaining the inclusivity of all six partners in the Eastern Partnership policy framework. It also recognises that European Union engagement in the Eastern Partnership should help promote independent, reliable and credible local media, as well as accurate information on the policies of the European Union in the countries concerned.

The Joint Staff Working document "Eastern Partnership – Focusing on key priorities and deliverables"² identified a list of 20 deliverables for 2020. The 20 Deliverables for 2020 include cross-cutting Deliverable three on strategic communication and media. In detail, it recognises that a well-functioning media environment, based on the principle of plurality and independence, are one of the pre-requisites for democratic, stable, prosperous and resilient communities and nations.

The Joint Communication "Eastern Partnership policy beyond 2020 - *Reinforcing Resilience - an Eastern Partnership that delivers for all*"³ also recognizes the importance of independent media and access to fact-based information to empower people to participate actively in the democratic process (in section "4.5.3 Independent media and fact-based information" of the communication). It notes, that "The EU will support independent media outlets that produce high quality and diverse content".

The Regional East Strategy Paper for the use of European Neighbourhood Instrument (ENI) funding for the period 2014-2020⁴ includes freedom of expression and freedom of the media as priorities in the area of accelerating political association.

The present action responds to these objectives by contributing to the improvement of the media environment, information literacy and the diversification of the sources of information in a context of political and socioeconomic transformation.

1.3 Public Policy Analysis of the partner country/region

Free and pluralistic media is closely interlinked with freedom of expression. Eastern Neighbourhood governments continue to declare their commitment to promote freedom of expression. The 2017 Eastern Partnership Summit Declaration – endorsed by all EU and Eastern Neighbourhood governments – underlined the importance a well-functioning media environment and the freedom of speech play in a democratic, resilient and prosperous society.

In terms of press freedom, the 2019 World Press Freedom Index from the international NGO Reporters without Borders attributes a mixed picture with Armenia (#61), Azerbaijan (#166), Belarus (#153), Georgia (#60), Moldova (#91), and Ukraine (#102), ranking no country fully independent. Threats and violence against journalists persist to varying degrees in the region. Restrictive legislation and state limitations on press freedom can be noted.

The picture of media sustainability varies across the region but overall remains below sustainable levels. According to the IREX media sustainability index from 2019⁵, Armenia

² Commission Joint Staff Working Document SWD(2017) 300 final of 09.09.2017 "Eastern Partnership - 20 Deliverables for 2020 Focusing on key priorities and tangible results".

³ Joint Communication JOIN(2020) 7 final of 18.03.2020 Eastern Partnership policy beyond 2020 "Reinforcing Resilience - an Eastern Partnership that delivers for all"

⁴ Commission Implementing Decision C(2014)5200 of 28.7.2014 adopting a Strategy Paper 2014-2020 and Multiannual Indicative Programme 2014-2017 for Regional East.

has an overall score of 2.60⁶, Azerbaijan 0.94, Belarus 1.46, Georgian 2.25, Moldova 2.31, Ukraine 2.09. Particularly business management is consistently among the weakest indicators across the region: Armenia (2.04), Azerbaijan (0.77), Belarus (1.26), Georgia (1.57), Moldova (1.77), Ukraine (1.48), where no case is categorised as sustainable.

The ongoing and planned bilateral EU-funded programmes address some of these issues. In detail, in Moldova there is a primary focus on strategic communications, EU-visibility, content production, business skills training and improving the regulatory environment with a particular focus on local and sub-national regions. In Armenia, the EU has launched a larger media facility, support which targets regional outlets and will strengthening the sustainability, professionalism, plurality and inclusiveness of Armenian media voices with a strong focus on outlets operating outside of Yerevan. In Ukraine, the bilateral programme support focuses on approximation of Ukrainian audio-visual media legislation with the EU acquis, substantial support to the Public Service Broadcaster, improving media literacy and countering disinformation. Support in Georgia primarily focuses on strategic communications, visibility and countering disinformation. In Belarus, the EU supports a programme focusing on content quality and long-term sustainability of Belarusian non-state media by helping them harness the latest technologies and providing professional mentorship. In Azerbaijan, the focus is on strategic communications and strengthening the visibility of EU funded projects.

1.4 Stakeholder analysis

The direct beneficiaries of this action include inter alia:

- Independent media outlets⁷ and media initiatives based in Eastern Neighbourhood countries. These outlets can be print and/or audio-visual media, offline or online, targeting audience in these countries;
- Independent print or audio-visual media outlets, both online and offline, based in European Union Member States, targeting audience in Eastern Partnership countries.

Independent journalists, including bloggers and social media activists, based in the Eastern Neighbourhood countries or in the European Union and targeting audiences in Eastern Neighbourhood countries. It is also important to differentiate between different types of media that require different types of support. Targeted outlets may range from independent media with a public service mission (“mission media”) to independent commercial media covering topics of public interest (e.g. quality news, investigations, European and foreign policy issues, etc.).

The indirect beneficiaries will be societies and citizens at large benefitting from a strengthened independent media sector.

⁵ IREX Media Sustainability Index 2019.

⁶ SCORE KEY Unsustainable, Anti-Free Press (0–1), Unsustainable Mixed System (1–2), Near Sustainability (2–3), Sustainable (3–4).

⁷ Independent media is defined as follows: Media free from political or corporate influence, which implement an editorial policy based on clear ethical principles and journalistic standards driven by quality of content.

1.5 Problem analysis/priority areas for support

In virtually all countries in the Neighbourhood East, the global issue of unsustainable business models has resulted in increased pressure on editorial staff, which current levels of international donor funding are not in a position to address in its entirety. In this situation, remedial measures are required on a regional level to improve editorial and production processes in a cost-efficient way. The elaboration and provision of online editorial tools would be of great help to many of the local and regional media outlets, some of which do not qualify for financial donor support or lack the expertise to apply for such funding.

The financial strains on independent media outlets producing quality content remain high. Short to medium term funding gaps persist exacerbating the working conditions for journalists and media professionals. There continues to be a strong need for bridge and emergency funding.

Training and capacity-building for both journalists and media outlets are needed. Combining local expertise and knowledge of the national context with international experience is considered to be an effective way of structuring and delivering training. A major finding of the 2019 EU-funded Needs Assessment of Independent Media in the Neighbourhood is to focus on training and capacity-building approaches with a greater emphasis on training and mentoring linked to content production or management training that is enacted in the workplace. Embedded and long-term approaches are also recommended. The Baltic Centre of Media Excellence also echoes this finding in its research.⁸

According to the Baltic Centre of Media Excellence, media managers need support to develop their companies as viable businesses, engage in strategic planning, compete for audiences by improving quality and are developing new business models and format. However, this frequently requires capital investments and specialised training that are costly.

In most countries in the Eastern Neighbourhood, investigative journalism is practised by specialist publications rather than by mainstream outlets. There is little motivation amongst private, commercial media for committing the resources required for long-term investigations since the general perception is that the audience for such programming is limited. As a result, almost all forms of investigative journalism are grant-funded, most of it produced by individual journalists or by small teams. Sub-grants and content production have worked well in this context and can offer practitioners the time, space and resources to invest in long-running investigations, which would not be possible against the backdrop of their usual workload. However, effective investigative journalism requires a wider ecosystem which is not available or which is poorly developed in most of the partner countries.

2. RISKS AND ASSUMPTIONS

Risks	Risk level (H/M/L)	Mitigating measures
Shrinking space for media and	Medium/	Throughout the implementation of the

⁸ Baltic Centre for Media Excellence, “Gap Analysis of independent media skills and needs in the Eastern Partnership – 2019 Update”.

<p>journalists' operations in some of the targeted countries.</p>	<p>High</p>	<p>programme, the situation of media will be regularly monitored, in order to be able to adapt to changing circumstances.</p>
<p>Safety and security concerns affecting media freedom and independence.</p>	<p>Medium/ High</p>	<p>Financial instruments will be adapted to respond quickly to risky circumstances or events to avoid interruption of funding or activities. Other global human rights financial instruments like EIDHR will be promoted as necessary.</p>
<p>Systemic challenges around declining advertising revenues and changing consumption patters in the media sector are likely to persist beyond this action.</p>	<p>High</p>	<p>Beneficiaries made aware of the need to look for funding from other sources and possibly supported in this search. The development of business models for increased sustainability is targeted as a primary objective in this action.</p>
<p>Direct support may interfere fragile economic competitive positions of comparable independent media organisations.</p>	<p>Low</p>	<p>This programme offers various funding mechanisms under its specific objectives, which aim at improving certain aspects of the media environment. Award under one does not necessarily translate into awards in others, which minimises any potential advantage gained under one award.</p>
<p>Support to media outlets, emerging media, journalists and bloggers is a sensitive issue.</p>	<p>Medium</p>	<p>Commission and EEAS Headquarters and Delegations are systematically informed by the European Endowment for Democracy (EED) of its actions, and are alerted when EED action may raise concerns of partner country authorities, so that the European Union can respond in an appropriate way.</p>
<p>Assumptions</p>		
<p>The political and legislative context as well as internet access does not change and media continues to operate in the same or improved environment.</p>		

3. LESSONS LEARNT AND COMPLEMENTARITY

3.1 Lessons learnt

The European Endowment for Democracy produced a non-paper reflecting on the last six years of media and democracy support and offers recommendations for the wider donor community. Key findings include the need for a longer-term approach to media support as an essential component of democratisation, recognising the high cost of quality media and the difficulties media has of surviving in increasingly distorted markets and restrictive environments. The EED also recommends focusing further on local content, improving greater donor coherence and the need to support the development of hybrid business models to increase and diversify revenue of media outlets while recognising the probable ongoing need for donor support.

The 2019 EU-funded Needs Assessment of Independent Media in the Neighbourhood found that in general, local stakeholders share a belief that funding instruments were fragmented and atomised, and that they were too closely tied to civil society or democratisation projects rather than to media programmes in their own right. The assessment also documented a concern that funding tools and instruments were administered by individuals who had limited experience of the media and, therefore, were unaware of its needs and priorities.

Direct support to media outlets may risk upsetting fragile competitive positions of comparable profile independent media organisations and could undermine editorial credibility. While direct support continues to be a necessity across the region, clearer and more transparent criteria and processes should be developed to select outlets.

The European Endowment for Democracy's approach has incorporated a high degree of flexibility in order to be able to respond to new opportunities, including programme production. Their selection process provides applicants with helpful feedback that makes the procedure more transparent. This has fostered trust across the region.

Furthermore, the European Commission in cooperation with the European External Action Service organised an Eastern Partnership Media Conference: Business & Sustainability on 13, 14 November in Riga Latvia. The Conference brought together a variety of media professionals and independent journalists from the region as well as international donors to discuss and coordinate programming. The chair's recommendations from the conference summarizing the discussions suggest a variety of concrete actions including more long-term training approaches, trainings on business and managerial skills and different types of grants to help companies diversify their revenue streams.

3.2 Complementarity, synergy and donor co-ordination

Synergies shall be sought by the different projects under this action amongst them and with other ongoing and upcoming EU regional initiatives when relevant and bilateral programmes in e.g. Armenia, Belarus, Moldova, Georgia and Ukraine. The proposed action "EU4IndependentMedia" will ensure complementarity with bilateral programmes and provide cross-country added value. Thematically, bilateral EU-funded programmes in the Eastern Partnership region cover for example the fields of media literacy, public service broadcasters, regulatory environment, countering disinformation and strategic communications. A clear strategy seeking synergies and reaching out to EU Delegations will be developed during the inception phase of the proposed programme.

With its multi-country approach tailored to regional and individual needs and priorities, particular attention will be paid to finding synergies with the ongoing ENI-funded programmes supporting civil society like the Civil Society Facility.

Ensuring co-ordination with other donors, especially projects carried out by EU Member States, and actors on the ground is vital for the success of the programme.

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 contribute to democratisation and empower citizens in the Eastern Neighbourhood.

The activities listed below (indicative) will seek to involve relevant EU agencies, existing EU cooperation networks and EU Member States where possible.

Specific Objective 1: Maintained plurality and quality of independent mission media.

- Output 1.1 Targeted independent mission media continues its activity, producing reliable, fact-based and timely news and analysis without gaps in capacity.
- Output 1.2 Targeted media outlets are enabled to continue their activity in case of emergency situations.
- Output 1.3 New media outlets are operational and new media content products have been developed.

Specific Objective 2: Improved offer of fact-based, good quality media content with additional, more diverse content.

- Output 2.1 Targeted journalists have better journalistic skills including on EU policy priority topics.
- Output 2.2 Reinforced network of Eastern Neighbourhood journalists that is actively used.
- Output 2.3 Strengthened investigative journalism.
- Output 2.4 More quality and diverse content has been produced.

Specific Objective 3: Improved financial sustainability of independent, commercial media across the Eastern Neighbourhood.

- Output 3.1 Media outlets have strengthened management skills.
- Output 3.2 Media outlets and independent journalists have developed new business or revenue generating models and products.

Main activities

Indicative activities related to Specific Objective 1: Maintained plurality and quality of independent mission media.

Output 1.1 Targeted independent mission media is able to continue its activity, continuously produce reliable, fact-based and timely news and analysis without gaps in capacity.

- Activity 1.1.1 EED to continue its medium to long-term term sub-granting scheme and to provide core support or bridge funding for media to continue its production of unbiased qualitative content.
 - This activity contributes to all the entirety of Output 1 (1.1, 1.2, 1.3)
- Activity 1.1.2 Support to journalists and media organisations to enable them to continue their activity in a politically sensitive environment.
 - This activity contributes to Output 1.1 and 1.2.

Output 1.2 Targeted media outlets are enabled to continue their activity in case of emergency situations.

- Activity 1.2.1 EED to enable an emergency based sub-granting system providing demand-driven support to independent media or journalists in case of emergency situations.

Output 1.3 New media outlets are operational and new media content products have been developed.

- Activity 1.3.1 EED to provide demand-driven support to newly established media initiatives.
- Activity 1.3.2 Support to new formats, new types of media activities, including social media and digital projects.

Indicative activities related to Specific Objective 2: Improved offer of fact-based, good quality media content with additional, more diverse content.

Output 2.1 Targeted journalists have better journalistic skills.

- Activity 2.1.1 Provide tailor-made trainings on subjects like journalist standards, investigative journalism, newsroom and business skills as well as on major EU policy priorities.
- Activity 2.2.2. Organise production workshops on different forms of journalism (e.g. TV, video, radio).

Output 2.2 Reinforced network of Neighbourhood journalists that is actively used.

- Activity 2.2.1 Establish a peer-to-peer exchange programme and network.
- Activity 2.2.2 Foster a community of practitioners by organising networking conferences.

Output 2.3 Strengthened investigative journalism.

- Activity 2.3.1 Financial support to investigative journalist outlets and groups.

Output 2.4 More quality and diverse content has been produced.

- Activity 2.4.1 Launch open, transparent thematic content-production calls around political, economic and social issues as well as leisure and entertainment. Themes should fill gaps in local programming mix.

Indicative activities related to Specific Objective 3: Improved financial sustainability of independent, commercial media across the Eastern Neighbourhood.

Output 3.1 Media outlets have strengthened management skills.

- Activity 3.1.1 Improve long-term financial sustainability by providing tailored, embedded, long-term training on business and newsroom skills.
- Activity 3.1.2 Support through trainings on management and marketing skills, audience measurement, strategic planning etc.

Output 3.2 Media outlets and independent journalists have developed new business or revenue generating models.

- Activity 3.2.1 Core support to select outlets based on transparent and clearly defined criteria.
- Activity 3.2.2 Procurement of technological investments such as upgraded IT infrastructure, introducing an online paywall or audience measurement software tools.
- Activity 3.2.3 Support to establish new production formats.
- Activity 3.2.4 Explore possibilities for targeted media outlets to gain access to financial instruments.

4.2 Intervention Logic

The overall objective of the action is to contribute to democratisation and empower citizens in the Eastern Neighbourhood.

The three Specific Objectives tackle three major issues that have persisted in the region: short-term financial survival, quality of content and long-term financial sustainability. In detail, this intervention proposes to take a comprehensive approach to provide tailor-made support to improve the immediate and long-term financial viability of outlets.

The first Specific Objective will mainly be achieved through re-granting to third parties - independent media organisations and media activists in the Eastern Neighbourhood countries and the European Union that target local, national and regional audiences in all Eastern

Neighbourhood countries. This includes medium-term sub-grants that can include core support, short-term quick response sub-grants in cases of emergency and seed money to support new formats and types of media. These activities shall be implemented in the most flexible and effective manner in order to reflect the situation, the operating environment and the needs of its beneficiaries. All the activities shall be carried out on a not for profit basis and they shall be implemented in a spirit of transparency, pluralism and in a non-partisan way.

Specific Objective 2 aims at improving the quality and diversity of information by financing content production, journalist trainings and regional networking. Producing quality content is costly and requires adequate financing. Particular attention will be paid to fill gaps in the local programming mix including but not limited to minority languages, children's programming, investigative journalism, gender-sensitive investigative journalism, societal and social issues. It also allocates resources to finance investigative journalism.

Specific Objective 3 takes a comprehensive approach to provide tailor-made support to improve the immediate and long-term financial viability of outlets. This component intends to support managers of independent, commercial and mission media outlets in their transition to develop their organisations as viable businesses, to the extent possible. It combines core support, embedded training with the supply of necessary equipment like for instance IT upgrades.

4.3 Mainstreaming

The activities will have a positive influence on gender equality, which will be taken into consideration in the design of activities. Specific Objective 2 will include specific targets to include a certain number of female journalists for trainings and regional networking opportunities. Concrete ways to establish realistic and ambitious targets to promote gender equality and youth involvement among media managers will be explored in the inception phase of Specific Objectives 2 and 3. Moreover, the content production themes under Specific Objective 2 will fill gaps in local programming where a particular attention will be placed on vulnerable groups, minority languages and youth.

Wherever possible, reports on results and impact achieved should have data disaggregated by sex. Achieving gender equality is not only a goal in itself – as confirmed by the EU Gender Action Plan II and the 2020 Deliverables - but essential for sustainable democracy, economic development and the respect for the rule of law, which the implementing partners will be working towards in the years to come (2019-2021).

The actions will be implemented following a **right-based approach**, encompassing all human rights, which will be particularly relevant for people in vulnerable and disadvantaged situations and those living in rural areas. The five working principles below will be applied at all stages of implementation: legality, universality and indivisibility of human rights; participation and access to decision-making processes; non-discrimination and equal access; accountability and access to the rule of law; transparency and access to information. The Steering Committees co-chaired by the European Commission and the implementing partners will ensure that this approach is taken across all projects implemented throughout the different policy areas identified. Efforts will be made to promote accessibility, equality, environmental sustainability and climate change adaptation as well as to identify opportunities for change in these areas.

Co-creation processes involving **civil society** through consultation and close cooperation is a core element of components 1 and 2, and critical to ensuring inclusive and responsive processes and sustainable results on the ground particularly in the areas of rule of law/anti-corruption, justice and public sector reform.

4.4 Contribution to Sustainable Development Goals (SDGs)

This intervention is relevant for the United Nations 2030 Agenda for Sustainable Development. It contributes primarily to the progressive achievement of Sustainable Development Goal 16, "Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels".

5. IMPLEMENTATION

5.1 Financing agreement

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

5.2 Indicative implementation period

The indicative operational implementation period of this action, during which the activities described in section 4 will be carried out and the corresponding contracts and agreements implemented, is 72 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 measures⁹.

5.3.1 Grants: (direct management)

(a) Purpose of the grant(s)

The grant will contribute to the results to be achieved under Specific Objective 1: Maintained plurality and quality of independent mission media.

(b) Type of applicants targeted

The grant contract will be awarded to the European Endowment for Democracy. The main purpose of the Action shall be to manage a sub-granting scheme (financial support to third parties) to independent media outlets in the Eastern Neighbourhood countries as described in section 4 above.

⁹ 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.

In this context, EED will be responsible for receiving, evaluating and selecting requests for financial support and awarding the financial support to the selected beneficiaries. It will also be responsible for the management of the respective sub-grants.

(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 the European Endowment for Democracy because of its unique mandate and specific technical expertise to execute the tasks of the project.

Article 195 of the Financial Regulation Commission authorises that grants be awarded without a call for proposals for actions with specific characteristics that require a particular type of body on account of its technical competence, its high degree of specialisation, on condition that the actions concerned do not fall within the scope of a call for proposals.

There continues to be a need for small grants in the case of media organisations in these countries, which often do not have the capacity or necessary legal status for applying for big multiannual contracts. The EU is not able to provide these types of small grants. The European Endowment for Democracy (EED) is currently filling that gap.

The recourse to an award of a grant without a call for proposals is justified because of EED's competence, high degree of specialisation, strong proven experience in the field, and its unique methodology of an interactive, streamlined application process.

In addition, the EED has a unique mandate, as an independent foundation supported by the European Union and its Member States. It assists independent media organisations regardless of their size or formal status, provided that all the beneficiaries adhere to core democratic values and human rights. EED has a special focus on the European Neighbourhood and thus a specific sub-grant management experience in local contexts. Operationally it has focal points in each of the Eastern Neighbourhood countries who engage with potential beneficiaries directly.

5.3.2. Procurement (direct management)

The procurement will contribute to achieving Specific Objective 2 and Specific Objective detailed in section 4.1.

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 realization of this action impossible or exceedingly difficult.

5.5 Indicative budget

	EU contribution (amount in EUR)	Indicative third party contribution, in currency identified
Specific Objective 1 composed of Grants – cf section 5.3.1	3 000 000	n/a
Specific Objective 2 composed of Procurement – cf section 5.3.2	3 000 000	n/a
Specific Objective 3 composed of Procurement – cf section 5.3.2	5 000 000	n/a
Total	11 000 000	n/a

5.6 Organisational set-up and responsibilities

This action will be managed by Commission Services (Directorate-General for Neighbourhood and Enlargement Negotiations) and, where relevant, in close collaboration with other relevant EU institutional stakeholders (European Parliament, EEAS, EU Member States).

In order to review progress and provide strategic guidance, a Steering Committee meeting, chaired by DG NEAR, will be organised once a year for the contract on the basis of activity reports presented by the implementing entity in relation to objective 1. The Steering Committee for the contract related to objectives 2 and 3 will meet three times in the first year of implementation and twice a year thereafter and shall include the European External Action Service and EU Delegations. One of the tasks of the Steering Committee will be to agree on the selection criteria taking particular notice of media beneficial ownership. The Steering Committees shall decide on the annual activities at the outset of the year and for the monitoring of the implementation at the end of the year. In the meantime, regular video conferences at working level shall be set up to ensure coordination at technical level. The Steering Committee including EU Delegations shall approve and implement the communication and visibility plan.

The service provider as well as EED will provide the Secretariat of the Steering Committee with activity reports and planning for their respective components.

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 (for project modality) or the partner's strategy, policy or reform action plan list (for budget support).

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, a mid-term and a final evaluation will be carried out for this action or its components via independent consultants contracted by the Commission.

The mid-term evaluation will be carried out for problem solving purposes, in particular with respect to possible needs to re-adjust the programme in line with the political developments in the region.

The final evaluation will be carried out for accountability and learning purposes at various levels (including for policy revision), taking into account in particular the fact that a possible second phase can be programmed on the basis of the lessons learned.

The Commission shall inform the implementing partner at least 30 days in advance of the dates foreseen 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.

The evaluation reports shall be shared with the partner country and other key stakeholders. 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, and approved by the Steering Committee. The action plan should include measures to improve visibility of the programme as well as proactively communicate its objectives and results.

In terms of legal obligations on communication and visibility, the measures shall be implemented by the Commission, 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. Contractors shall cooperate closely with EU Delegations to amplify outreach.

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.

However, in view of the sensitive nature of the subject, and in particular the risks for those who benefit from the grant support and its other activities towards target groups and individuals, visibility may, where or when relevant, be reduced vis-à-vis media and political decision makers or adapted in the light of specific situations.

[APPENDIX - INDICATIVE LOGFRAME MATRIX (FOR PROJECT MODALITY)]

On the basis of this indicative logframe matrix, a more detailed logframe(s) might be developed at contracting stage linked to this AD. The indicative logframe matrix will evolve during the lifetime of the Intervention. The activities, the expected outputs and related indicators are indicative and may be updated during the implementation of the Intervention as agreed by the parties (the European Commission and the implementing partner/s).

	Results chain: Main expected results (maximum 10)	Indicators (at least one indicator per expected result)	Baselines (incl. reference year)	Targets (incl. reference year)	Sources of data	Assumptions
Impact (Overall Objective)	The overall objective of the action is to contribute to democratisation and empower citizens in the Eastern Neighbourhood.				<ul style="list-style-type: none"> Monitoring reports of international experts Public surveys and international indexes on perception levels regarding gender equality. National stakeholder reports, including from civil society 	<i>Not applicable</i>
Outcome Specific Objective 1	Maintained plurality and quality of independent mission media.	Number of supported media actors that have managed to continue their operations.	0	To be determined during inception phase.	<ul style="list-style-type: none"> EED Reports and Evaluations Grant Reports and Evaluations Monitoring Reports of Grant Implementation Media products (news stories, articles, blog entries, etc.) produced by EED Grantees. Feedback provided by country 	The political and legislative context as well as internet access does not change and media continues to operate in the same or improved environment
Output 1.1	Targeted independent mission media is able to continue its activity, continuously produce reliable, fact-based and timely news and analysis without gaps in capacity.	Number of news and analysis produced by the supported media (excluding emergency situations)	Number of stories produced at the moment of support request.	Same number of stories produced as before		Idem as above.

Output 1.2	Enable targeted media outlets to continue their activity in case of emergency situations.	Number of media supported in emergency situation	0	At least 5 outlets	consultants and partners in the region.	Idem as above.
Output 1.3	New media outlets are operational and new media content products have been developed.	Number of newly established media initiatives Number of media outlets with new media content products developed	0	To be determined during inception phase,	<ul style="list-style-type: none"> • Google analytics data • Relevant internationally recognised reports including the IREX Media Sustainability Index, World Freedom Index from Reporters without Borders 	Idem as above.
Outcome Specific Objective 2	Improved offer of fact-based, good quality media content with additional, more diverse content.	Number of additional content such as news reports, features, and interviews, analytical pieces, and online content produced.	0	To be determined during inception phase.	Evaluations, reporting from implementer(s)	Idem as above.
Output 2.1	Targeted journalists have better journalistic skills.	Number of people participating in trainings Nature and scope of trainings to be determined during inception phase.	0	At least 100 journalist have been trained To be determined during inception phase.	Reporting from implementer(s) Relevant internationally recognised reports including the IREX Media Sustainability Index, World Freedom Index from Reporters without Borders	Idem as above.
Output 2.2	Reinforced network of Neighbourhood journalists that is actively used.	Number of journalists who have taken part in networking exercise.	0	At least 150.	Reporting from implementer(s) Relevant internationally recognised reports	Idem as above.

		Number of people participating in trainings	0	At least 100 journalist have been trained	including the IREX Media Sustainability Index, World Freedom Index from Reporters without Borders	
		Precise nature and scope of trainings to be determined during inception phase.	0	To be determined during inception phase.		
Output 2.3	Strengthened investigative journalism.	Number of sub-grants given to investigative journalist outlets.	0	To be determined during inception phase.	Reporting from implementer(s) Relevant internationally recognised reports including the IREX Media Sustainability Index, World Freedom Index from Reporters without Borders	Idem as above.
Output 2.4	More quality and diverse content has been produced.	Number of stories produced	0	To be determined during inception phase.	Reporting from implementer(s) Relevant internationally recognised reports including the IREX Media Sustainability Index, World Freedom Index from Reporters without Borders	Idem as above.
Outcome / Specific Objective 3	Improved financial sustainability of independent, commercial media across the Eastern Neighbourhood.	Percentage change of revenue	0	To be determined during inception phase.		Idem as above.
Output 3.1	Media outlets have strengthened management skills	Number of outlets and individuals trained. New qualitative indicator after needs assessment during implementation phase.	0	At least 2 outlets per country have benefitted from in-house training. To be determined during inception	Reports from EU Delegations, CSOs and implementer(s). Reporting from implementer(s).	Idem as above.

				phase.	Relevant internationally recognised reports including the IREX Media Sustainability Index, World Freedom Index from Reporters without Borders	
Output 3.2	Media outlets and independent journalists have developed new business or revenue generating models.	Number of new business models developed.	0	At least 2 outlets per country have developed a new business or revenue generating model	Reports from EU Delegations, CSOs and implementer(s). Reporting from implementer(s). Relevant internationally recognised reports including the IREX Media Sustainability Index, World Freedom Index from Reporters without Borders	Idem as above.