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ANNEX

to the Commission Implementing Decision on the financing of the special measure in favour of Syria for 2024

Action Document for 2024 Special Measure in support of the Syrian people

SPECIAL MEASURE

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

1. SYNOPSIS

1.1. Action Summary Table

1. Title OPSYS Basic Act	special measure in favour of Syria for 2024 OPSYS business reference: NDICI-GEO-NEAR/ACT-62610 ABAC Commitment level 1 number: JAD.1414167 Financed under the Neighbourhood, Development and International Cooperation Instrument (NDICI-Global Europe).
2. Economic and Investment Plan (EIP)	No
EIP Flagship	No
3. Team Europe Initiative	No
4. Beneficiar(y)/(ies) of the action	The action shall be carried out in Syria, and also in neighbouring countries (Iraq, Jordan, Lebanon and Türkiye) ¹ .
5. Programming document	Not applicable
6. Link with relevant MIP(s) objectives/expected results	Not applicable
PRIORITY AREAS AND SECTOR INFORMATION	
7. Priority Area(s), sectors	Education -110 Health – 120

¹ Considering 1) the need for some of the activities to reach out the diaspora in addition to the population “within Syria” population; 2) the localisation of some of the implementing partners in the neighbouring countries.

	Government and Civil Society – 150 Conflict, Peace and Security – 152			
8. Sustainable Development Goals (SDGs)	Main SDG: SDG 16 Peace, Justice and Strong Institutions Other significant: SDG 1 No Poverty, SDG 2 Zero Hunger, SDG 3 Good Health and Well-Being, SDG 4 Quality Education, SDG 05 Gender Equality, SDG 8 Decent Work and Economic Growth, SDG 10 Reduced Inequalities, SDG 11 Sustainable Cities, SDG 17 Partnerships for the Goals.			
9. DAC code(s)	11220 – Primary Education – 4.4% 11260 – Lower Secondary Education – 4.4% 11320 – Upper Secondary Education – 4.4% 11330 – Vocational Training – 4.4% 12110 – Health policy and administrative management – 5.25% 12181 – Medical education/training – 5.25% 12196 – Health statistics and data – 5.25% 12220 – Basic health care – 5.25% 12281 – Health personnel development – 5.25% 15150 – Democratic Participation and Civil Society – 7.10% 15160 – Human rights – 12.35% 15170 – Women’s rights movements and institutions – 4% 15220 – Civilian peacebuilding, conflict prevention and resolution – 7.10% 32168 – Pharmaceutical production – 5.25% 43032 – Urban development – 20.35%			
10. Main Delivery Channel	Non-Governmental Organisations (NGOs) and Civil Society NGOs – 20000 International NGOs – 21000 UN entities – 41000 Private Sector Institutions – 60000			
11. Targets	<input checked="" type="checkbox"/> Migration <input type="checkbox"/> Climate <input checked="" type="checkbox"/> Social inclusion and Human Development <input checked="" type="checkbox"/> Gender <input type="checkbox"/> Biodiversity <input checked="" type="checkbox"/> Human Rights, Democracy and Governance			
12. Markers (from DAC form)	General policy objective	Not targeted	Significant objective	Principal objective
	Participation development/good governance	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Aid to environment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

13. Internal markers and Tags

Gender equality and women's and girl's empowerment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Reproductive, maternal, newborn and child health	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Disaster Risk Reduction	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Inclusion of persons with Disabilities	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Nutrition	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
RIO Convention markers	Not targeted	Significant objective	Principal objective
Biological diversity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Combat desertification	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Climate change mitigation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Climate change adaptation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Policy objectives	Not targeted	Significant objective	Principal objective
EIP	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
EIP Flagship	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>	
Tags	YES	NO	
Transport	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Energy	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Environment, climate resilience	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Digital	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
economic development (incl. private sector, trade and macroeconomic support)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
human development (incl. human capital and youth)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
health resilience	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
migration and mobility	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
agriculture, food security and rural development	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
rule of law, governance and public administration reform	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Other	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Digitalisation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

BUDGET INFORMATION

14. Amounts concerned	Budget line(s) (article, item): 14.020110 Southern Neighbourhood Total estimated cost: EUR 36 000 000 Total amount of EU budget contribution: EUR 36 000 000.
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MANAGEMENT AND IMPLEMENTATION

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

Now in its thirteenth year, the multifaceted Syria crisis following the uprising in 2011 continues to inflict a massive toll on Syria's population through the violence generated, the abuse of human rights as well as the deep economic and social crisis that the country is facing, made even worse by the impact of the devastating earthquake of 6 February 2023.

The conditions today for the Syrian people are direr than ever before. In 2024, 16.7 million people are assessed in need of humanitarian assistance across Syria, up from 15.3 million in 2023². Syria still has the largest number of Internally Displaced Persons (IDPs) in the world, standing at 5.5 million in 2024³. As of 2023, 90%

² OCHA, [Syrian Arab Republic: 2024 Humanitarian Needs Overview \(December 2023\)](#) | OCHA (unocha.org)

³ UNHCR, [Operational Data Portal](#) (last update September 2024)

of the Syrian population lives below the poverty line⁴, with between 60% and 65% living in extreme poverty⁵, resulting in reduced or lower quality food intake, deferment of needed medical care as well as school dropout among others. Marked by an increased regional instability and deteriorating living conditions for all, the situation of the Syrian refugees in neighbouring countries is also becoming even more precarious. The ongoing escalation of hostilities in Lebanon resulting in an influx of Lebanese nationals and Syrian refugees at the Syrian borders will also likely have short- and longer-term repercussions on the Syria crisis.

The implementation of this Action (Special Measure 2024) must be read against this very challenging context and will be ensured in line with the basic tenets of EU policy: no normalisation, no lifting of sanctions and no reconstruction until the Syrian regime engages in a political transition in the framework of the UNSC resolution (UNSCR) 2254. It will be also done in full compliance with the political parameters for engagement of non-humanitarian assistance in Syria as set out in the Council Conclusions adopted on 3 April 2017 which endorsed the EU Strategy on Syria and remains the guiding framework for engagement in Syria. They were then confirmed through the Council Conclusions adopted on 16 April 2018.

The Action will give priority to **early recovery interventions** using a ‘Whole of Syria’ approach, if the operational context allows, and targeting localities where the needs of the locally established communities are the most acute and including where significant numbers of returnees (refugees and/or Internally Displaced Persons (IDPs)) are coming back or are likely to come back. This is in line with UNSCR 2254 and with the European Council Conclusions of April 2024, which underscores the critical need to achieve conditions for the safe, voluntary and dignified return of refugees and Internally Displaced Persons.

Against this backdrop and in order to stand firm in EU’s commitment for the Syrian people, this Action with a budget of EUR 36 million will seek to enhance peace and resilience efforts in Syria, including helping to create a conducive environment for the safe, voluntary and dignified return of Syrian refugees and Internally Displaced Persons (IDPs). It therefore foresees several core areas of intervention where the most pressing needs have been identified: **Resilience, Health, Education, Civil Documentation and Housing, Land and Property Rights, Support to Civil Society** as well as **Justice and accountability. Third- Party Monitoring and analysis** will be another area of intervention to ensure robust risk monitoring and mitigation measures as the backbone of the support under the Action.

Overall, this Action aims to:

- benefit and support the resilience of the Syrian people and avoid benefits accruing to the Syrian regime that would legitimise its national and local governance;
- work to improve the situation on the ground by avoiding the collapse of structures providing basic services;
- adopt a focused and integrated approach to early recovery to ensure both.

Due attention to cross-cutting issues, especially gender equality and support for vulnerable community members will lead to contributions towards SDG5 on achieving gender equality as well as SDG10 on reducing inequalities for all. Together, the interventions under this Action will contribute towards the overarching goal of promoting peaceful and inclusive societies for sustainable development, provide access to justice for all.

Close coordination will be ensured between activities foreseen to be funded under the present Special Measure in support of the Syrian people (especially those related to Integrated area-based support and to access to civil documentation) and the Special Measure on “EU support for vulnerable Lebanese and Refugees from Syria and for durable solutions for refugees from Syria 2024 and 2025”. The latter includes an Action Document entitled “EU support to improve resilience for vulnerable Lebanese and refugees from Syria and for durable

⁴ OCHA, The Cost of Inaction, October 2023.

⁵ UN Syria, Common Country Analysis, unpublished.

solutions for refugees from Syria, including safe, voluntary and dignified returns”, which will contribute to facilitate the access to documentation for Syrian refugees. It is essential that actions of support to improve the return conditions of those returnees from Lebanon, Jordan and Türkiye prior to their departure to Syria are fully coordinated with the support action post return. Coordination will also be ensured with rapid response actions funded by the Service for Foreign Policy Instruments, which have focused, inter alia, on facilitating social cohesion and the reintegration of returnees, rehabilitation and reintegration of vulnerable individuals through protection, mental health and psychosocial support, recreational activities and social cohesion, life skills and vocational training.

1.3. Beneficiaries of the action

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

2. RATIONALE

2.1. Context

The multifaceted Syrian crisis remains one of the most complex humanitarian crises in the world, imposing a massive toll on Syria’s population. It is also the largest displacement crisis in the world, with 5.5 million Internally Displaced persons and with over 5 million registered refugees in neighbouring countries.

While large-scale military offensives have subsided, localised violence has persisted throughout 2023 and 2024 and the effects of the conflict continue to be widely felt in all parts of the country. No area is considered safe. Human Rights are blatantly violated, and protests arise frequently in the tense social context.

The current context of the escalations in the Middle East, is further destabilising the country and the region. The situation in Lebanon especially is of concern, with thousands of Syrian refugees but also of Lebanese nationals fleeing to Syria since the aggravation of hostilities with Israel in late September 2024.

The country also faces a deep economic and social crisis, high inflation rate and currency depreciation. In January 2023, Syria reported an annual inflation rate of 89.7 % for consumer prices⁶. The Syrian pound (SYP) has lost about half of its value against the US dollar (US\$) from February to November 2023, averaging around SYP 14,200/US\$ in the parallel foreign exchange market in November 2023⁷. Record food and fuel prices have further rocketed following the war in Ukraine, taking an additional toll on Syria’s population.

Basic services are under severe pressure. It leads, in the water and sanitation and public health sectors, to an increase in mortality and morbidity.

Compounding the above, the earthquake of 6 February 2023 resulted in almost 5,900 deaths and more than 12,800 people injured in Syria, mainly in Aleppo, Hama, Idleb, and Latakia Governorates. An estimated 8.8 million people live in areas affected by the earthquake that severely damaged infrastructures already impacted by the conflict⁸.

⁶ Monthly bulleting SCPOR: <https://scpr-syria.org/monthly-bulletin-for-consumer-price-index-and-inflation-in-syria-issue-1-january-2023>

⁷ OCHA, Syrian Arab Republic: 2024 Humanitarian Needs Overview (December 2023) | OCHA (unocha.org)

⁸ OCHA, Syrian Arab Republic: 2024 Humanitarian Needs Overview (December 2023) | OCHA (unocha.org)

Syrian's population also face the added catastrophic consequences of climate change, with serious drought and flooding creating new uncertainties and aggravating food insecurity in the country.

With the Syrian population's needs being greater now than at any point in the crisis and pending progress on the political resolution of the conflict, the current context calls for an increased effort in early recovery to maximise impact on the ground and improve the living conditions in Syria in a sustainable way. Such increased effort will contribute to the Syrian population's aspiration for a dignified life and build an environment conducive to the safe, voluntary and dignified return of internal displaced Syrians as well as Syrian refugees.

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

Bilateral co-operation with the Syrian government remains suspended since 2011 and the European Commission assistance is deployed through Special Measures since then. This action (Special Measure 2024), like previous Special Measures, is framed by the 2012 Geneva Communiqué, United Nations Security Council resolution 2254 adopted on 18 December 2015 and by the Council Conclusions adopted on 3 April 2017, which endorsed the EU Strategy on Syria and remains the guiding framework for engagement in Syria. It also addresses the need highlighted by the European Council Conclusions of 17-18 April 2024 to achieve conditions for safe, voluntary and dignified returns of Syrian refugees, as defined by UNHCR, as well as to enhance the effectiveness of EU assistance to Syrian refugees and displaced persons in Syria and in the region. As confirmed in the European Council Conclusions of 17-18 April 2024, a lasting peace in Syria is the EU's ultimate objective.

2.2. Problem Analysis

The conflict in Syria has inflicted an almost unimaginable degree of devastation and loss on the Syrian people and their economy. More specifically, for the six core areas of intervention under this Action (setting aside Third-Party Monitoring and analysis), the problem analysis is as follows:

- **Integrated area-based support**: the protracted nature of the conflict in Syria is undermining the longer-term recovery of critical public service sectors such as health and education (as illustrated below), as well as other equally critical public goods such as water, electricity and solid waste management. Safe and continued access to food, water and shelter is a daily struggle for the Syrian population. The crisis is also eroding the development of sustainable and diversified livelihoods with employment and economic opportunities becoming increasingly limited.
- **Health**: The Syrian health system has been severely impaired by a serious deterioration in socio-economic conditions and high attrition rates of Health Care Workers (70% have left the country). The double disease burden of communicable and non-communicable Diseases (NCDs), climate change, the devastating earthquake of 6 February 2023 and attacks of health facilities over the course of the conflict continued to impact health service access, quality, affordability and sustainability, highlighting the inherent fragility of the health system.

- **Education**: the conflict in Syria has had devastating effects on the country's education with close to 7 million people in need of educational assistance, around 97% of whom are children. Over the course of the conflict, around 40% of schools have either been damaged or destroyed, and overcrowding of available classrooms has continued to rise with the national average being 54 children per classroom. In addition, the education system has lost around 150 000 teachers of the last few years due to displacement, injuries, or death.
- **Civil Society**: despite some achievements over the past 13 years, Syrian civil society remains subject to the same divisions as beset the country in general; these exist not necessarily only along geographical lines, but also along political lines, between organisations inside and outside Syria, between registered and unregistered, and between those with access to regular funding and those without. As each organisation struggles to survive and make its voice heard, valuable tools for increasing civil society's relevance and its ability to genuinely address Syrian priorities remain untapped, thereby undermining popular perceptions of civil society and delaying recovery and the development of community resilience.
- **Justice and accountability**: Syrian crisis has triggered some of the most severe violations and abuses of international humanitarian law and human rights law from all parties. Human rights abuses in Syria are widespread and systematic: from extrajudicial arrests, detentions, disappearances and assassinations to torture, unfair trials, indiscriminate violence against civilians, violation of housing, land and property rights and targeting of civilian infrastructure. It affects millions of refugees, internally displaced persons, political detainees, the missing persons, and their family members.
- **Civil documentation and Housing, Land and Property Rights (HLP)**: with Syria being the largest displacement crisis in the world, the legal identity issues faced by most Syrian refugees mean they are unable to obtain, replace or update documentation. It has major protection implications, preventing them from accessing basic services and asserting their civil, political and social rights notably their freedom of movement. Documentation is also critical to prevent individuals from exposure to abuse, violence and exploitation, regardless of the status of the person. The challenges faced to claim their HLP rights and accessing civil documentation have also been identified as one of the main obstacles for Syrians to return to their place of origin or resettle elsewhere. Violations that have occurred throughout the conflict have implied, among other, confiscation of property or forced evictions, preventing Syrians from returning to their property. This has been aggravated by high levels of destruction.

2.3. Lessons Learned

Humanitarian assistance alone cannot solve protracted instability in Syria. The only way to stop the constant rise of the humanitarian caseload is to address root causes of the crisis while aiming to achieve medium-term aims.

Also, programmatic evidence shows 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.

More specifically, as regards to the areas of intervention under this Action the lessons learned are the following:

- **Integrated area-based support**: applying a multi-sectoral, integrated and area-based approach has proven key in strengthening resilience of the Syrian population and in building sustainable conditions on the ground, in complementarity to the humanitarian support. Such effort, with the help of implementing partners having the ability to operate without interference from the Syrian regime, should be increased to

address the scale of the needs. Selection of areas should be based on strict conflict sensitivity assessment and consideration with a view to ensure that support is not instrumentalised, do not benefit specific groups of people/population and do not condone and/or indirectly support discriminatory policies and practices, including demographic engineering.

- **Health:** in Syria, the Health sector is overwhelmingly focused on direct service delivery, and this diverts attention away from structural issues such as lack of human resources to deliver core health services, lack of access / unaffordability of health services, design and implementation of health financing interventions bearing high costs and contributing to further fragmentation. Whilst such services are provided for free, this modus operandi leaves limited margin for localisation, efficiency and sustainability. Moving forward, it is critical to address core structural issues, continue pursuing investments in the Syrian workforce, implement retention strategies and better understand and leverage the role of the private sector and the Syrian medical diaspora.
- **Education:** support to greater access and a qualitative Education sector can contribute to increase student retention in schools and a broader protective environment for children. In addition, the Technical and Vocational Education and Training (TVET) activities help foster community resilience by providing people with employable skills that increase their chances of creating livelihoods for themselves.
- **Civil Society:** EU sustained support to Syrian-led CSOs is beginning to have some impact through networks of organisations that are increasingly successfully addressing some of the key elements for Syria's future, such as prioritisation of community demands and participation, youth empowerment and attention to social cohesion and peacebuilding. Going forward, the EU must further refine this support by re-orienting the focus of its interventions from input-led to outcome-led processes which strengthen local organisations and leverage community resources, thereby fully engaging local communities in their own recovery and development, including activities that reinforce social cohesion and peacebuilding.
- **Justice and accountability:** programmatic evidence and engagement with civil society in this field showed that current and future international justice processes will continue to rely heavily on information collected in Syria on human rights violation and that this will require regular monitoring by human rights defenders inside the country. Nonetheless, it remains crucial to support justice processes that still take place inside Syria by focusing on preventing human rights violation of the most vulnerable groups.
- **Civil documentation and Housing, Land and Property Rights (HLP):** ensuring the capacities of Syrians to enforce their HLP rights and improving their access to civil documentation is contributing to the stability in the long term. If unaddressed, the issues faced by Syrians will negatively affect recovery efforts and the safe, voluntary and dignified return of refugees and IDPs. Their resolution is a prerequisite to a sustainable future in the country.
- **Third-Party Monitoring and analysis:** implementation of DG NEAR assistance shows that in such an inherently uncertain environment as in Syria the EU needs to continue to draw on a continuous and robust Third-Party Monitoring and wide range of analysis to provide invaluable insights with regards to parameters for engagement, stakeholders, activities and outcomes.
- **Regional coordination:** There is a growing need to coordinate actions of support to the Syrians in Lebanon Jordan and Türkiye and the actions of support in Syria itself. **This will be particularly important to ensure that the conditions for safe, voluntary and dignified return of refugees are improved.**

3. DESCRIPTION OF THE ACTION

3.1. Objectives and Expected Outputs

The Overall Objective /Impact of this action is enhancing peace and resilience efforts in Syria, including to help creating a conducive environment for the safe, voluntary and dignified return of Syrian refugees and Internally Displaced Persons (IDPs).

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

1. Creating prospect of living a life in dignity in Syria.
2. Promoting positive change for a just and equal Syrian society.

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

1.1 **Integrated area-based support**: Upon conflict sensitivity analysis and assessment, basic social and productive infrastructure is rehabilitated, and livelihood opportunities are created in targeted neighbourhoods, giving priorities to locations where significant numbers of internally displaced persons or returnees are or could decide to relocate.

1.2 **Health**: Access, management, affordability, and quality of health services are improved, and health systems resilience is strengthened.

1.3 **Education**: Provision of education and vocational education and training services for children and youth is improved, particularly those in marginalised and vulnerable situations, such as girls and young women, IDPs, refugees – including Palestine refugees -, out-of-school children, children enrolled in schools but at risk of dropping out, and people with disabilities.

2.1 **Civil Society**: Syrian civil society's capacity to achieve positive change by fostering greater community resilience and social cohesion is increased.

2.2 **Justice and accountability**: The capacity of Syrian civil society to ensure justice, accountability and due processes of law is increased.

2.3 **Civil documentation and HLP rights**: Access to civil documentation for persons affected by conflict and displacement in Syria is increased. Capacities of Syrians in enforcing their housing, land and property rights are improved.

2.4 **Third-Party Monitoring and analysis**: Robust diagnoses and monitoring of stakeholders and interventions is produced in a timely manner.

3.2. Indicative Activities

Any activity foreseen under the present Special Measure 2024 will be implemented in full respect of Council Conclusions adopted by the Foreign Affairs Council (FAC) on 3 April 2017, which endorsed the EU Strategy on Syria and remains the guiding framework for engagement in Syria, as confirmed in the Council Conclusions adopted by the Foreign Affairs Council (FAC) of 16 April 2018. As overarching principle for this Special Measure, the below mentioned activities must be read considering the Council Conclusions. This means that EU support will only be maintained under the following conditions:

- There is space for implementing partners to work without endangering their lives/freedom;
- Assistance can be provided without unwarranted interference by the regime, armed factions or regional actors that may aim to steer or change the focus of interventions by influencing the selection of target locations, beneficiaries or modes of implementation;
- Assistance is geared towards empowering local communities whilst avoiding contributing to further fragmentation and/or demographic engineering;
- Conflict sensitivity assessment and consideration, with a view to ensuring that support is not instrumentalised, do not benefit specific groups of people/population and do not condone and/or indirectly support discriminatory policies and practices;
- Access and capacity to (remotely) monitor are maintained;
- Full compliance with EU Restrictive Measures is ensured.

Integrated area-based support:

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

- Training and capacity building for community stakeholders on participatory evidence-based planning, prioritisation of activities, conflict sensitivity and the monitoring of neighbourhood commitments.
- Rehabilitation of shared services and public goods (e.g.: water, sewage, waste), economic and public spaces. Restore basic functionality of infrastructure in damaged neighbourhoods to enable voluntary returns (liveable neighbourhoods).
- Income generating activities and selected value chains support in selected locations, with a focus on women's economic empowerment.

Health:

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

- Pre-and in-service training of Syrian health workers from Syria and complementary capacity building of health professionals' associations and Non-State Actors leveraging where possible diaspora engagement to retain or generate the necessary human resources to deliver core health services;
- Design and implementation of health financing interventions, cost effectiveness analyses, revenue generation activities creating efficiencies in the use of resources, promoting transparency and accountability and ensuring access to essential health services, medical products and technologies while striving towards affordable and accessible health coverage;
- Partnerships with Syrian Non-State Actors to improve access, equity, sustainability and affordability of health services and essential medicines supporting alternative and flexible approaches to deliver quality health care services along with evidence-based selection, procurement and supply management and rational use;
- Investments in surveillance and health information systems, disaster preparedness, contingency planning and operational research;
- Support to coordination, health care management, health system stewardship and capacity building, nurturing an organisational learning culture that is responsive and proactive to future shocks, deliberately forward looking, cost conscious and sustainable.

Education:

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

- Activities that will encourage children to return, stay or integrate into schools, or to provide alternative learning opportunities, such as: equitable and inclusive basic education (this includes remedial and catch-up classes), non-formal education, early childhood education, basic literacy and numeracy, mine-risk education, and life skills training;

- Technical and Vocational Education and Training (TVET) activities to provide youth with skills that increase their employment opportunities and livelihood capacities. In addition to TVET, activities such as micro-entrepreneurship, income generating activities, coaching and mentoring to employment, cash interventions, business start-up, support services, and other investment supporting skills that help development and employment/livelihood facilitation;
- Child protection and Mental Health and Psychosocial Support (MHPSS) services, establishment of referral mechanisms, recreational and volunteering activities, and other activities that can promote resilience, social cohesion, non-discrimination, and non-violence;
- Needs assessment for vulnerable groups including children, youth, and those with disabilities. The assessments will be used to tailor education and TVET activities to their needs;
- Building the capacity of education personnel in education, TVET, child protection, and MHPSS.

Civil society:

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

- Strengthening all aspects of the internal capacity of local organisations and increasing their capacity to meet due diligence requirements;
- Supporting civic actors in developing common spaces for dialogue;
- Supporting the development of formal and informal networks of common interest within civil society;
- Linking different peace initiatives and supporting them to increase the impact of their work on the ground;
- Supporting the creation and retention of knowledge within civil society;
- Strengthening support bases for women and youth leaders;
- Encouraging participative development processes at community level;
- Strengthening cross-community linkages and encourage different communities to work together and to create economies of scale.

Justice and accountability:

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

- Investigation of human rights violations and collection and analysis of information;
- Strategic litigation;
- Strengthen advocacy efforts on survivor-led accountability for crimes committed in Syria;
- Building capacity of Syrian CSOs and stakeholders engaged in the justice sector;
- Provide direct, tailored and comprehensive support to vulnerable groups in judicial areas.

Civil documentation and HLP rights:

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

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

- Support advocacy and community mobilisation for proper identification and resolution of HLP issues, in particular with a view to voluntary returns; awareness raising and dissemination of relevant information on civil documentation and HLP targeting all stakeholders, including implementing partners when engaging with national and local authorities.
- Analyse the regular updates to the national HLP framework and provide technical support, guidance and expert advice on HLP matters to national and international actors in Syria;

Third-Party monitoring:

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

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

Close coordination will be ensured between activities foreseen to be funded under the present Special Measure in support of the Syrian people (especially those related to Integrated area-based support and to access to civil documentation) and the Special Measure on “EU support for vulnerable Lebanese and Refugees from Syria and for durable solutions for refugees from Syria 2024 and 2025”.

The latter Special Measure indeed notably includes an Action Document entitled “EU support to improve resilience for vulnerable Lebanese and refugees from Syria and for durable solutions for refugees from Syria, including safe, voluntary and dignified returns”, which will contribute to facilitate the access to documentations for Syrian refugees.

3.3. Mainstreaming

Environmental Protection, Climate Change and Biodiversity

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

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

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

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

Gender equality and empowerment of women and girls

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

in the public and professional space. Alongside a patient-centred approach, a gender perspective will also be mainstreamed in curricula for training of health professionals where relevant, whilst investments in workforce development will pay particular attention towards ensuring equal access and opportunity.

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

Human Rights

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

Disability

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

Democracy

As part of the EU Strategy, the EU supports sustained consultation and dialogue with Syrian civil society in the political process and in the process of reconciliation and aims to ensure that civil society can play a prominent role in post-conflict Syria. In the preparation of the 8th Brussels Conference on Supporting the Future of Syria and the Region (Spring 2024), the EU utilised its “virtual space”, providing a forum where participants from all geographies inside Syria could engage in an active exchange on issues of concern at present and for the future. This civic space permanently supports dialogue with civil society and within civil society inside Syria and improves the targeting and transparency of EU support. For instance, the platform has been a successful tool to carry feed stakeholders’ inputs into the formulation of this Special Measure in support to the people of Syria.

Conflict sensitivity, peace and resilience

Particular attention will be paid to Fragile States Principles (FSPs) and especially the “Do No Harm” (DNH) approach and its operationalisation to ensure that EU assistance minimises risks of doing harm. Syria faces unique circumstances that have challenged the implementation of DNH, including fragmentation along different fault lines (socio-economic, religious, sectarian, tribal and class divides, rural-urban dynamics, intersections and juxtapositions between regime and non-regime controlled areas, specificities of Turkish controlled areas, diasporic versus local identities, and the general population’s alienation from their leadership and institutions) and logistical challenges arising from extreme insecurity. A DNH analytical framework of ‘dividers’ and ‘connectors’ will be developed to identify how EU assistance will not aggravate fragmentation along different fault lines. Fragmentation is reversible: joint values are still strong and Syrian NSAs are an important connector. A checklist of questions may be developed to ensure that interventions and partnerships truly embrace a DNH approach.

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

Disaster Risk Reduction

This action does not target disaster risk reduction.

Preventing and Countering Violent Extremism

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

3.4. Risks and Assumptions

Category ⁹	Risks	Likelihood (High/Medium/Low)	Impact (High/Medium/Low)	Mitigating Measures
1	Deterioration of the security situation, because of the Israel /Gaza war with destabilising attacks in Syria, as well as Turkish attacks in northeast Syria.	H	H	Implementing partners undertake periodic assessments of the operational context to respond to changes. Flexibility is built into project design to allow for necessary adaptation and re-orientation of activities if necessary.
1	Increased control on operational and/or political space and resources by the Syrian regime and other parties to the conflict.	M	H	Assistance is specifically designed to counter such dynamics by empowering Civil Society Organisations (CSOs) to withstand pressure exerted by unwarranted parties. Political opportunity vs costs of non-engagement are weighted. It may prove exceedingly difficult to re-engage once space is lost.

⁹ The risk (category) can be related 1-to the external environment; 2-to planning, processes and systems; 3-to people and the organisation; 4-to legality and regularity aspects; 5-to communication and information. See pp 44-48 of [Implementation Guide of the Risk management in the Commission](#). [\[EC internal link\]](#)

				<p>Communities advocate for sufficient operating space and are willing to take calculated risks.</p> <p>Partnerships are sufficiently strong to raise ‘red flags’ whereby the EU can reassess and adjust activities/timing/location/partner.</p> <p>Third-Party monitoring (TPM) and other analytical resources will be leveraged to monitor and minimise risks.</p> <p>Where interference persists, the reputational risk for the EU is deemed too high, and/or where the intervention logic is severely compromised, the EU will partially/ fully suspend activities, or terminate them in justified cases.</p>
1	Increased food insecurity due to rising food prices caused by reduced availability of commodities	H	H	<p>Coordination between DGs ECHO and NEAR to monitor coherence and effectiveness of interventions.</p> <p>Design of programmes to ensure promotion of community resilience to external food shocks</p>
1	Significant shift in displacement trends is observed, including an uptick in spontaneous or forced return movement or new waves of displacement.	L	H	<p>Monitoring of the push/pull factors for displacement is 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 or to address emerging protection concerns</p> <p>Maintain close dialogue with Member States and DG ECHO.</p>
2	Remote management increases risks of aid diversion.	M	M	<p>Implementation partners (IPs) have robust compliance systems and well-established internal monitoring and management capacity.</p> <p>Due diligence checks, supervision and frequent reporting are already contractual requirements.</p> <p>TPM and other analytical resources are regularly leveraged.</p>
2	Activities aimed at promoting dialogue between potential agents of change carries protection or reputational risks	M	M	<p>Dialogue is organised in neutral environment.</p> <p>TPM and other analytical resources are leveraged to provide detailed analysis and identify risks.</p>

	for participating stakeholders.			
2	Project activities have unintended negative consequences for stakeholder groups	L	M	All interventions will be designed using conflict sensitivity tools and taking a do no harm approach. Mitigating measures will include a thorough understanding of societal norms, while at the same time undertaking awareness-raising and advocacy for the rights of vulnerable groups such as women, youth and PWDs.
4	Implementing partners are not able/do not adhere to the EU Restrictive Measures	M	H	Regular communication with implementing partners and provision of access to relevant information in order to ensure compliance, also in accordance with the relevant contractual provisions.
4	Local partners lack capacity implement in accordance with EU rules and procedures	M	M	Regular communication with implementing partners and provision of access to training and relevant information.
1	Further worsening of socio-economic situation because of the environmental degradation and the climate change.	H	M/H	Relevant environmental and climate change aspects will be analysed and integrated in the supported activities.

External Assumptions

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

Promoting local actors' agency, human rights and justice and accountability efforts can successfully contribute to support peace building efforts and address early recovery needs of the Syrian population as long as:

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

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

3.5. Intervention Logic

The underlying intervention logic for this Action (Special Measure 2024) is that prioritising bottom-up and community-driven area-based early recovery interventions wherever operationally feasible, improving access to civil documentation and HLP rights, nurturing self-reliance and accountability within communities, working closely with the civil society, promoting human rights and justice and accountability will have the effect of strengthening the resilience of the Syrian population and in the longer run, contributes to improve the conditions on the ground that will allow Syrians to live in a peaceful and prosperous society and enable in a sustainable manner the, safe, dignified and voluntary return of Syrian refugees and of IDPs.

Any intervention foreseen under the present Action (Special Measure 2024) will be implemented in full respect of the Council Conclusions adopted by the Foreign Affairs Council (FAC) on 3 April 2017, which endorsed the EU Strategy on Syria and remains the guiding framework for engagement in Syria, as confirmed in the Council Conclusions adopted by the Foreign Affairs Council (FAC) of 16 April 2018. Whereas this is an overarching principle and therefore not repeated under the specific areas of intervention, for the intervention logic this means that EU support will only be maintained under the following conditions:

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

3.6. Indicative Logical Framework Matrix

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

Results	Results chain: Main expected results [maximum 10]	Indicators [it least one indicator per expected result]	Baselines (values and years)	Targets (values and years)	Sources of data	Assumptions
Impact	Enhanced peace and resilience efforts, including to help creating a conducive environment for the safe, voluntary and dignified return of Syrian refugees and Internally Displaced Persons (IDPs).	I. Country ranking according to the Global Peace Index	I. 161 (2023)	I. 145 (2028)	I. Global Peace index by Vision for Humanity	Assistance is geared towards empowering local communities whilst avoiding contributing to further fragmentation and/or demographic engineering
Outcome 1	Create the prospect of living a life in dignity	O.1 Country ranking according to the Human Development Index	O.1: 157 (2022)	O.1: 141 (2028)	O.2 UNDP Human Development Index	Assistance can be provided without unwarranted
Outcome 2	Promote positive change for a just and equal society	O.2 Extent to which the capacities of civil society actors to guide community change processes are enhanced	O.2: To Be Defined (TBD) at inception phase	O.2: To Be Defined (TBD) at inception phase	1.1 Peacebuilding and State-building Indicators (www.pbsbdialogue.org ; www.newdeal4peace.org) 2.2 EU Roadmap for engagement with civil society	interference by regime entities, armed factions or regional actors that may aim to steer or change the focus of interventions. Organisations have sufficient technical and absorption capacities to engage in programmes. Local ownership principles are honoured through processes of validation by a wide

						cross-section of stakeholders.
Output 1.1 related to Outcome 1	<u>Integrated area-based support:</u> basic social and productive infrastructure rehabilitated and livelihood opportunities created	1.1.1 Number of sites where packages are implemented aiming at improving the access to infrastructures and the resilience of the local communities, based on neighbourhoods' analysis and planning. 1.1.2 Number of jobs created with sector and gender equality (disaggregated by sex, age, and type of population)	1.1.1 0 (2024) 1.1.2 TBD at inception phase	1.1.1 3 (2028) 1.1.2 TBD at inception phase	Project reports and internal monitoring	Implementation sequencing is adequate and proceeds at a reasonable pace. Plans and proposals are realistic and feasible. Stakeholders share a common understanding of priorities. Risks are managed adequately by partner organisations.
Output 1.2 related to Outcome 1	<u>Health:</u> improved access, management, affordability and quality of health services	1.2.1 Number of beneficiaries reporting improved access and affordability of health services and essential medicines 1.2.2 Number of decisions informed by evidence and HIS	1.2.1 and 1.2.2 TBD at inception phase	1.2.1 TBD at inception phase	Think Tanks and International Organisations reports, Project reports, Surveys	EU partners have access to activities implemented inside Syria and can perform their tasks in full safety. The quality analyses produced allows the EU to tailor its approaches/actions, or adopt new ones, according to the changing environment.
Output 1.3 related to Outcome 1	<u>Education:</u> improved provision of education and vocational education	1.3.1 Number of students supported to access primary, secondary, and vocational education (disaggregated by	1.3.1 and 1.3.2 TBD at inception phase	1.3.1 and 1.3.2 TBD at inception phase	Project reports and internal monitoring	

	and training services for children and youth, particularly those in marginalised and vulnerable situations	sex, age, type of population, education level) 1.3.2 Number of teachers and/or trainers trained within the action (disaggregated by sex, age, and education level)				Coordination is ensured between different funding instruments in order to avoid overlaps and duplications, maximising the impact of the EU support.
Output 2.1 related to Outcome 2	<u>Civil Society:</u> increased Syrian civil society's capacity to achieve positive change by fostering greater community resilience and social cohesion	2.1.1 Share of project funding obtained from community resources 2.1.6 Number of networks contributing to political dialogue established 2.1.2 Number of dialogue spaces and initiatives implemented	TBD at inception phase	TBD at inception phase	EU Project reports, Roadmap updates, Think tanks and International Organisations reports, Surveys	
Output 2.2 related to Outcome 2	<u>Justice and accountability;</u> increased capacity of Syrian civil society to ensure justice, accountability and due processes of law	2.2.1 people whose awareness and engagement of transitional justice and accountability was strengthened by CSOs thanks to funding they received 2.2.2 Number persons affected by conflict-related violence informed about their rights and assisted to access justice mechanism	2.2.1 and 2.2.2 TBD at inception phase	2.2.1 and 2.2.2 TBD at inception phase	2.2.1 and 2.2.2 project reports and internal monitoring	

<p>Output 2.3 related to Outcome 2</p>	<p><u>Civil documentation and HLP rights:</u> increased access to civil documentation in Syria and improved capacities of Syrians in enforcing their housing, land and property rights.</p>	<p>2.4.1 Number of beneficiaries who obtained civil registration documents and number of beneficiaries who secured their property deeds with support of the action (disaggregated by sex, age and type of document)</p> <p>2.4.2 Number of duty-bearers, humanitarian partners, affected population and community leaders reporting increased knowledge and awareness about civil documentation and HLP rights</p>	<p>2.3.1 and 2.3.2 TBD at inception phase</p>	<p>2.3.1 and 2.3.2 TBD at inception phase</p>	<p>2.3.1 and 2.3.2 project reports and internal monitoring</p>	
<p>Output 2.4 related to Outcome 2</p>	<p><u>Third-Party Monitoring and analysis:</u> Robust diagnoses and monitoring of stakeholders and interventions are timely produced</p>	<p>2.4.1 Number of TPM analyses timely produced</p> <p>2.4.2 Number of analyses and research produced</p>	<p>2.4.1 and 2.4.2 TBD at inception phase</p>	<p>2.4.1 and 2.4.2 TBD at inception phase</p>	<p>2.4.1 and 2.4.2 project reports and internal monitoring</p>	

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

4. IMPLEMENTATION ARRANGEMENTS

4.1. Financing Agreement

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

4.2. Indicative Implementation Period

The indicative operational implementation period of this action, during which the activities described in section 3 will be carried out and the corresponding contracts and agreements implemented, is 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 Financing Decision and the relevant contracts and agreements.

4.3. Implementation Modalities

The Commission will ensure that the EU appropriate rules and procedures for providing financing to third parties are respected, including review procedures, where appropriate, and compliance of the action with the conditions and procedures set out by the restrictive measures adopted pursuant to Article 215 TFEU¹⁰.

4.3.1. Direct Management (Grants)

a) Purpose of the grant(s)

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

b) Type of applicants targeted

Civil society organisation, non-governmental organisation, member state's organisation, private entity with a public service mission, private legal entities, or an international (inter-governmental) organisation as defined by Article 156 of the EU Financial Regulation¹¹.

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 applicants referred to under section 4.3.1 b), selected using the following criteria:

- Operational capacity in the management and implementation of actions in relation to the relevant output
- Technical competence and expertise in relation to the relevant output.

Under the responsibility of the Commission's authorising officer responsible, the recourse to an award of a grant without a call for proposals is justified because the country is in a crisis situation referred to in Article 2(21) of the Financial Regulation at the date of the present Financing decision.

d) Exception to the non-retroactivity of costs

¹⁰ 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.

¹¹ In line with the April 2018 Council Conclusions, public sector operators and private entities with a public service mission from Syria are not eligible (www.consilium.europa.eu).

For outputs 1.2 (Education), the Commission authorises that the costs incurred may be recognised as eligible as of 1 July 2024. Retroactivity would allow to secure an efficient operational transition to the 2024-25 academic year (which starts early September) in Syria in the education sector, which requires prior preparatory activities for teachers and students during the summer.

4.3.2. Direct Management (Procurement)

The purpose of the procurement is to contribute to output 2.4.

4.3.3. Indirect Management with pillar-assessed entities¹²

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

- Integrated area-based support
- Health
- Education
- Civil documentation and HLP rights

by using the following criteria:

- Proven experience and operational capacity in the management and implementation of actions in relation to the output;
- Technical competence and expertise in relation to the output;
- Administrative capability and the experience to implement this type of intervention due to mandate of the entity (if any) and/or expertise;
- Extensive network of national and/or international partners, which can be drawn upon;
- Endorsement of the EU's non-humanitarian assistance parameters of engagement in Syria.

The implementation by this entity/these entities entails achievement of the activities foreseen under output 1.1, 1.2, 1.3, and 2.3.

Exception to the non-retroactivity of costs

For outputs 1.3 (Education), the Commission authorises that the costs incurred may be recognised as eligible as of 1 July 2024. Retroactivity would allow to secure an efficient operational transition to the 2024-25 academic year (which starts early September) in Syria in the education sector, which requires prior preparatory activities for teachers and students during the summer.

For output 1.1 (Integrated area-based support), the Commission authorises that the costs incurred may be recognised as eligible as of 1 July 2024. Retroactivity would allow to cover the work conducted before end of 2024 for the preparation of the contract which signature is foreseen in 2025.

For output 2.3 (Civil documentation and HLP rights), the Commission authorises that the costs incurred may be recognised as eligible as of 1 July 2024. Retroactivity would allow to cover the work conducted before end of 2024 for the preparation of the contract which signature is foreseen in 2025.

¹² The signature of a contribution agreement with the chosen entity is subject to the completion of the necessary pillar assessment.

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

If the implementation modality under indirect management as defined in section '4.3.3' cannot be implemented due to circumstances beyond the control of the Commission, the modality of implementation by grants under direct management would be used according to the following section '4.3.1.'

If the implementation modality under direct management defined in section '4.3.1.(grants)' cannot be implemented due to circumstances beyond the control of the Commission, the modality of implementation by indirect management via a pillar-assessed entity (or pillar assessed entities) would be used according to section '4.3.3'.

4.4. Scope of geographical eligibility for procurement and grants

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

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

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

4.5. Indicative Budget

Indicative Budget components	EU contribution (amount in EUR)	Third-party contribution, in currency identified
Implementation modalities cf. 4.3		
Output 1.1 Integrated area-based support composed of	7 000 000.00	
Indirect management with entrusted entities – cf. section 4.3.3	7 000 000.00	
Output 1.2 Health composed of	11 000 000.00	
Grants (direct management) – cf. section 4.3.1	N/A	N/A
Indirect management with entrusted entities – cf. section 4.3.3	1 000 000.00	
Output 1.3 Education composed of	6 000 000.00	
Grants (direct management) – cf. section 4.3.1	N/A	N/A
Indirect management with entrusted entities – cf. section 4.3.3	4 000 000.00	
Output 2.1 Civil society composed of	4 000 000.00	
Grants (direct management) – cf. section 4.3.1	N/A	N/A
Output 2.2 Justice and accountability composed of	3 000 000.00	
Grants (direct management) – cf. section 4.3.1	N/A	N/A
Output 2.3 Civil documentation and HLP rights composed of	3 000 000.00	
Indirect management with entrusted entities – cf. section 4.3.3	3 000 000.00	
Output 2.4 Third-Party monitoring composed of	2 000 000.00	
Procurement – total envelope under section 4.3.2	2 000 000.00	
Grants – total envelope under section 4.3.1	19 000 000.00	
Evaluation – cf. section 5.2	will be covered by another Decision	N/A
Audit – cf. section 5.3		
Communication and visibility – cf. section 6	will be covered by another Decision	N/A
Total	36 000 000.00	

4.6. Organisational Set-up and Responsibilities

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

In view of the suspension of bilateral co-operation, no role is foreseen for the Syrian authorities in the organisational set-up of the action. Instead, to pursue mutual accountability objectives, the EU Delegation to Syria will ensure adequate participation from Syrian civil society leveraging existing and new mechanisms,

including online/digital platforms and tools to engage a wide variety of Syrian actors in dialogue and review processes. Periodic consultations will increase transparency and promote an unbiased assessment on progress. As part of its prerogative of budget implementation and to safeguard the financial interests of the Union, the Commission may participate in the above governance structures set up for governing the implementation of the action.

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

5. PERFORMANCE MEASUREMENT

5.1. Monitoring and Reporting

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

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

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

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

The Commission may request for ad hoc reporting and undertake additional project monitoring visits both through its own staff and through independent consultants recruited directly by the Commission for independent monitoring reviews (or recruited by the responsible agent contracted by the Commission for implementing such reviews), where this is feasible. Comprehensive Third-Party Monitoring contracts funded under the Special Measure 2022 and Special Measure 2023 is already in place for Syria (but needs to be prolonged through this Action). They foresee monitoring of projects, vetting of partners and analysis of the political context and local political economy, allowing for a flexible and adaptable programme and project implementation. This possibility will be extended under a procurement contract funded under the current Special Measure.

5.2. Evaluation

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

They will be carried out for accountability and learning purposes at various levels (including for policy revision), considering the fact that the Syrian context is constantly undergoing changes. To reach the best policy decisions, it is important to evaluate the programmes to make necessary adjustments.

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

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

Evaluation services may be contracted under a framework contract.

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

5.3. Audit and Verifications

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

6. STRATEGIC COMMUNICATION AND PUBLIC DIPLOMACY

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

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

Appendix 1: IDENTIFICATION OF THE PRIMARY INTERVENTION LEVEL FOR REPORTING IN OPSYS

A Primary intervention (project/programme) is a coherent set of results structured in a logical framework aiming at delivering development change or progress. Identifying the level of the primary intervention will allow for:

- ✓ Differentiating these Actions or Contracts from those that do not produce direct reportable development results, defined as support entities (i.e. audits, evaluations);
- ✓ Articulating Actions and/or Contracts according to an expected common chain of results and therefore allowing them to ensure a more efficient and aggregated monitoring and reporting of performance;
- ✓ Having a complete and exhaustive mapping of all results-bearing Actions and Contracts.

The present Action identifies as;

Contract level		
<input checked="" type="checkbox"/>	Single Contract 1	Health Component Grants
<input checked="" type="checkbox"/>	Single Contract 2	Education Component Grants
<input checked="" type="checkbox"/>	Single Contract 3	Civil Society Grants
<input checked="" type="checkbox"/>	Single Contract 4	Justice and accountability Grants
<input checked="" type="checkbox"/>	Single Contract 5	Indirect Management Health
<input checked="" type="checkbox"/>	Single Contract 6	Indirect Management Education
<input checked="" type="checkbox"/>	Single Contract 7	Service contract Third-party Monitoring
<input checked="" type="checkbox"/>	Single Contract 8	Indirect Management Integrated Area Based Support
<input checked="" type="checkbox"/>	Single Contract 7	Indirect Management Civil documentation and HLP rights