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ANNEX II

to Commission Implementing Decision on the financing of the multi-country and civil society facility and media multiannual action plan in favour of the Western Balkans and Türkiye for 2025-2027

Action Document for EU Civil Society Facility and Media Programme for the Western Balkans and Türkiye 2026-2027

1. SYNOPSIS

1.1 Action Summary Table

Title OPSYS Basic Act	EU Civil Society Facility and Media Programme for the Western Balkans and Türkiye 2026-2027 Commission Implementing Decision on the financing of the multi-country and civil society facility and media multiannual action plan in favour of the Western Balkans and Türkiye for 2025-2027 OPSYS business reference: FD-2811 Commitment level 1 number: JAG.SUM.1848072 for financial year 2026, JAG.SUM.1848117 for financial year 2027 Financed under the Instrument for Pre-Accession Assistance (IPA III).
Beneficiaries of the action	The action shall be carried out in the Western Balkans (Republic of Albania, Bosnia and Herzegovina, Kosovo*, Montenegro, Republic of North Macedonia, Republic of Serbia) and Republic of Türkiye.
Programming document	IPA III Programming Framework
Link with relevant strategic programming documents	Window 1. Rule of law, fundamental rights and democracy
BUDGET INFORMATION	
Amounts concerned	Total estimated cost: EUR 126 235 500 Total amount of EU budget contribution: EUR 120 900 000, out of which EUR 42 000 000 in 2026 and EUR 78 900 000 in 2027

* This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

	<p>Budget line(s) (article, item):</p> <p>15 02 01 01.01</p> <ul style="list-style-type: none"> - For 2026 – EUR 42 000 000; - For 2027 - EUR 78 900 000. <p>The contribution from the general budget of the European Union is subject to the availability of appropriations for the respective financial years following the adoption of the relevant annual budget, or as provided for in the system of provisional twelfths.</p> <p>This action is co-financed in joint co-financing by:</p> <ul style="list-style-type: none"> - Implementing partners/grant beneficiaries for an amount of EUR 5 335 500.
MANAGEMENT AND IMPLEMENTATION	
Implementation modalities (management mode and delivery methods)	<p>Direct management through:</p> <ul style="list-style-type: none"> - Grants - Procurement <p>Indirect management with the entity(ies) to be selected in accordance with the criteria set out in section 4.3.3.</p>
Final date for concluding / legal commitments¹	<p>At the latest by 31 December 2027 for year 2026 allocation</p> <p>At the latest by 31 December 2028 for year 2027 allocation</p>

1.2. Summary of the Action

The Civil Society Facility and Media Programme offers a single window of support to civil society and media freedom, bringing together EU support at bilateral and regional level. The present action intends to strengthen participatory democracies and the EU approximation and integration process in the Western Balkans and Türkiye (overall objective). In particular, the action aims at achieving the following specific objectives/outcomes:

1. Enhanced role of civil society in support of the areas covered by the EU accession agenda.
2. Improved independence, integrity and pluralism of media.

To this end, the action includes a multi-faceted and integrated set of activities, providing different and complementary modalities of support to Civil Society Organisations (CSOs) and media actors. Among these, the action includes regional action grants to CSOs and other activities at the bilateral level fostering civil society participation in policy development and dialogue. Extensive use of the Financial Support to Third Parties' (FSTP) support modality - both via the regional programme as well as the bilateral allocations - is foreseen. FSTP has proven to be a useful tool to reach grassroots organisations that cannot engage directly with the EU due to capacity issues (administrative, financial, staff related etc).

¹ Article 114 of the Regulation (EU, Euratom) 2024/2509 of the European Parliament and of the Council of 23 September 2024 on the financial rules applicable to the general budget of the Union, OJ L, 2024/2509, 26.09.2024 - ELI: <http://data.europa.eu/eli/reg/2024/2509/oj>.

The action is in line with the IPA III Programming Framework² - thematic window (1) Rule of law, fundamental rights and democracy, with some cross-cutting impact in other windows: (2) Good governance, EU *acquis* alignment, good neighbourly relations and strategic communication and (3) Green agenda and sustainable connectivity. It is also in line with the objectives and priorities of the Economic and Investment Plan (EIP) for the Western Balkans³, the Growth Plan for the Western Balkans⁴ and its Reform and Growth Facility⁵. It is also aligned with the “*DG NEAR Guidelines for EU Support to Civil Society in the enlargement region 2021-2027*”⁶ and aims to contribute to the alignment to EU *acquis* in the media sector (European Media Freedom Act, Digital Service Act, Anti-SLAPP directive, etc).

1.3. Beneficiaries of the action

The action shall be carried out in the Western Balkans (Albania, Bosnia and Herzegovina, Kosovo, Montenegro, North Macedonia, and Serbia) and Türkiye.

2. PURPOSE OF THE ACTION (WHY)

2.1. Overall rationale

The enlargement process gained momentum in 2024. Following the December 2023 European Council decision to open negotiations with Ukraine and Republic of Moldova, the first intergovernmental conferences opening the negotiations with both countries were held on 25 June 2024. Montenegro received a positive assessment on the rule of law interim benchmarks and laid down its ambitious agenda for reaching the closing benchmarks of the EU accession negotiations. The screening sessions were completed with both Albania and North Macedonia at the end of 2023. The fundamentals cluster was opened with Albania in October 2024. In March 2024, the European Council decided to open accession negotiations with Bosnia and Herzegovina. In December 2022, Kosovo applied for EU membership, whereas visa liberalisation for Kosovo started as of 1 January 2024. In December 2024, the Council conclusions on Enlargement confirmed that Türkiye remains a candidate country and a key partner in many areas of joint interest.

Russia’s war of aggression against Ukraine has reconfirmed the importance of EU enlargement as a key driver for security, peace, stability and prosperity in Europe.

The rule of law, fundamental rights, the functioning of democratic institutions, public administration reform and the economic criteria constitute the “fundamentals” of the EU accession process. Achieving results in these areas is crucial for enlargement countries to move forward on their EU accession.

The civil society and media are expected to play an even more significant role in the EU negotiation process, including promoting confidence building and good neighbourly relations in the coming years. An active civil society is a critical component of any democratic system and should be empowered to play an important role in reform processes in the Western Balkans and Türkiye. CSOs can contribute to addressing many societal

² Commission Implementing Decision of 10.12.2021 adopting the Instrument for Pre-Accession Assistance (IPA III) Programming Framework for the period 2021-2027, 10.12.2021, COM(2021) 8914 final.

³ Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions “An Economic and Investment Plan for the Western Balkans”, 6.10.2020, COM(2020) 641 final.

⁴ Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions “New growth plan for the Western Balkans”, 8.11.2023, COM(2023) 691 final.

⁵ Regulation (EU) 2024/1449 of the European Parliament and of the Council of 14 May 2024 on establishing the Reform and Growth Facility for the Western Balkans.

⁶ [DG NEAR Guidelines for EU Support to Civil Society in the Enlargement Region 2021-2027 \(europa.eu\)](#)

challenges, from good governance to accountability, from environmental/climate change to fighting Foreign Information Manipulation and Interference (FIMI), including disinformation, by engaging in policy debates, proposing innovative, sustainable and inclusive solutions and monitoring the results of reform processes at beneficiary, regional and local level. A free and pluralistic media serves to reveal the multifaceted nature of society and promotes dialogue and tolerance. Critical scrutiny by media of the political processes plays a key role in promoting transparency and accountability and ensures that governments adhere to predictable policies – free from the interests of narrow pressure groups. Media helps raise public awareness and contributes to advocacy efforts of CSOs on important matters that impact everyone’s lives such as climate change and health risks as witnessed during the COVID-19 pandemic. Media facilitate and shape an open and inclusive public discourse and equip citizens with the knowledge to take informed political and economic decisions.

The IPA III Programming Framework considers the support to civil society and media as one of the priorities to improve democracy and the rule of law. It calls, *inter alia*, for “*particular focus (...) to safeguard the freedom of expression and independence of media as pillars of democracy.*” The Action will primarily contribute to Window 1: Rule of law, fundamental rights and democracy, and more specifically Thematic Priority 5: Fundamental rights (with reference to media- freedom of expression) and Thematic Priority 7: Civil Society, with gender mainstreaming relevant across all the windows of the IPA III framework.

Following the Communication on the Growth Plan for the Western Balkans, the EU has established the Reform and Growth Facility for the Western Balkans, as a new instrument complementing the support provided through IPA III. The Facility aims, among other objectives, at creating an enabling environment for civil society and ensuring access to information, public scrutiny and the involvement of civil society in decision-making processes. Furthermore, the importance of a meaningful involvement of civil society during the design and implementation of programmes and the related monitoring processes is confirmed in the regulation establishing the Facility.

While the Economic Investment Plan (EIP) is mainly about large-scale investments, it asserts that the respect for fundamental rights (like the freedom of expression) is vital for economic recovery and resilience in the region. Similarly, the “*Guidelines for the Implementation of the Green Agenda for the Western Balkans*”⁷ affirm that the involvement of civil society in environmental assessments and in the wider environmental governance framework is essential.

The proposed action plan also takes due account of and promotes complementarity with the relevant macro-regional and sea basin strategies (EU Strategy for the Adriatic-Ionian Region and EU Strategy for the Danube Region) and Interreg IPA programmes and will contribute to their purposes.

The EU support to civil society is programmed in line with the “*DG NEAR Guidelines for EU Support to Civil Society in the enlargement region 2021-2027*”, published in June 2022. The Guidelines outline the results towards which EU support to civil society will aspire in the period 2021 – 2027, which are identified by three main areas of support:

1. A conducive environment for civil society to carry out its activities;
2. Strengthened cooperation and partnership between CSOs and public institutions;
3. Reinforced CSO capacity and resilience to carry out their activities effectively.

⁷ SWD (2020) 223 final. COMMISSION STAFF WORKING DOCUMENT “Guidelines for the Implementation of the Green Agenda for the Western Balkans Accompanying the Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions – An Economic and Investment Plan for the Western Balkans”, Brussels, 6.10.2020

These guidelines are anchored in a solid set of standards. These are based on the EU's rule of law *acquis* (as set out in Chapters 23 “Judiciary and fundamental rights” and 24 “Justice, freedom and security”) and other relevant international and European standards. They are furthermore aligned with recommendations, opinions and guidelines adopted by international organisations and inter-governmental fora. They also refer to the Global Standards for CSO Accountability.

In the EU, the media sector has been subject to several important policy and regulatory initiatives in the past five years, which aimed to address global political and economic dynamics and associated trends impacting media. The EU updated its Audiovisual Media Services Directive (AVMSD)⁸ in 2018 and later complemented it by the Digital Services Act⁹, the 2022 Strengthened Code of Practice on Disinformation¹⁰, the European Media Freedom Act (EMFA)¹¹ and the Regulation on transparency and targeting of political advertising¹² - key actions for further consolidating democracy and building resilient societies in the context of the European Democracy Action Plan (EDAP)¹³. These comprehensive package of initiatives aims at strengthening the independence and pluralism of media, including their transparency and accountability. It also aims to safeguard the protection of human and fundamental rights of consumers and journalists in response to digital transformation of the media space and the wave of malign tactics (FIMI, disinformation, hate speech, attacks against journalists, etc). In parallel, the EU adopted a Recommendation and a Directive on 'strategic lawsuits against public participation'¹⁴, commonly known as 'SLAPPs', to further protect journalists and civil society. In this line, various stakeholders in the media sector in the Western Balkans and Türkiye need further assistance to keep abreast with the latest policy and regulatory developments in the context of the enlargement process.

2.2. Context and problem analysis

The enlargement process is merit-based and depends on the objective progress made by each of the partners as assessed by the EU competent institutions. This requires determination to implement irreversible reforms in all EU policy areas under the EU *acquis*, with special emphasis on the fundamentals, which will continue to be the cornerstones of the EU's enlargement policy.

Area of support 1: Civil society

Short problem analysis

In its 2024 Communication on EU Enlargement Policy¹⁵, the European Commission notes that, despite the progress achieved by several IPA beneficiaries in the areas of the 'fundamentals', many challenges still persist,

⁸ Directive (EU) 2018/1808 of the European Parliament and of the Council of 14 November 2018 amending Directive 2010/13/EU on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the provision of audiovisual media services (Audiovisual Media Services Directive) in view of changing market realities

⁹ Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC (Digital Services Act)

¹⁰ <https://digital-strategy.ec.europa.eu/en/library/2022-strengthened-code-practice-disinformation>

¹¹ Regulation (EU) 2024/1083 of the European Parliament and of the Council of 11 April 2024 establishing a common framework for media services in the internal market and amending Directive 2010/13/EU (European Media Freedom Act)

¹² Regulation (EU) 2024/900 of the European Parliament and of the Council of 13 March 2024 on the transparency and targeting of political advertising, OJ L, 2024/900, 20.3.2024.

¹³ Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions “On the European democracy action plan”, 3.12.2020, COM(2020) 790 final.

¹⁴ Directive (EU) 2024/1069 of the European Parliament and of the Council of 11 April 2024 on protecting persons who engage in public participation from manifestly unfounded claims or abusive court proceedings ('Strategic lawsuits against public participation')

¹⁵ https://neighbourhood-enlargement.ec.europa.eu/2024-communication-eu-enlargement-policy_en

particularly in areas such as freedom of expression, media freedom, gender equality, non-discrimination, hate crime and hate speech. The environment for civil society in the region, with few exceptions like Kosovo, Montenegro, and to a certain extent North Macedonia, still shows evident shortcomings. Registration procedures remain cumbersome, access to state funding is limited and not transparent, there is little progress in terms of promoting access to funding and tax incentives that would support CSOs' financial sustainability. Activists dealing with issues perceived as sensitive (such as anti-corruption, women's rights, rights of LGBTIQ persons, migrants, environmental protection, climate action) continue to be subject to threats and attacks. Cooperation between civil society and governments is often limited, which often prevent CSOs from participating in policy-making processes in a meaningful and effective way. As described in the Assessment Report for 2023 of the "DG NEAR Guidelines for EU Support to Civil Society in the enlargement region 2021-2027"¹⁶, effective participation of CSOs in public decision- and policy-making continued to be marred by significant obstacles across the region, although most IPA Beneficiaries adopted laws regulating public participation in law- and policy-making. In addition, CSOs' perception of the attitude of public officials toward civil society remained largely negative and viewed as not supportive.

The inclusion of some enlargement countries in the Rule of Law Report as of 2024 (Albania, Montenegro, North Macedonia and Serbia)¹⁷ supports the findings of the annual enlargement package, in particular the need for countries to enhance their efforts to reform the justice systems, anti-corruption frameworks, media pluralism and freedom, and checks and balances.

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

- **Civil Society Organisations (CSOs)**¹⁸, whose main organisational/capacity issues are: i) shrinking civic space, limiting the actual implementation of freedom of association, expression and peaceful assembly and obstacles to defending key values and norms such as gender equality, ii) limited capacities and opportunities to engage in policy dialogue and policy making processes, in the implementation of the Reform and Growth Facility and related Reform Agendas (and with regard to the topics addressed by those agendas), iii) weak financial and organisational sustainability. They will be extensively involved as implementing partners and target groups of the activities funded under this action.
- **IPA beneficiaries policy- and decision-makers**, who have limited opportunities to and capacities in setting up effective and mutually beneficial cooperation and dialogue mechanisms with CSOs. They will be mainly involved as target groups of the activities funded under this action.

¹⁶ [DG-NEAR-Guidelines_2023-WEB-Copy.pdf](#)

¹⁷ [2024 Rule of law report - Communication and country chapters - European Commission \(europa.eu\)](#)

¹⁸ Civil society is highly heterogeneous and encompasses a wide range of actors and aims. The EU considers CSOs to embrace a wide range of actors with multiple roles and mandates which includes all non-State, not-for-profit, independent and non-violent structures, through which people organise to pursue shared objectives and ideals, whether political, cultural, religious, environmental, social or economic or related to health [...] They include, but are not limited to: Nongovernmental organisations, organisations representing indigenous peoples, women's and youth organisations, diaspora organisations, migrants' organisations, local traders' associations and citizens' groups, cooperatives, employers' associations and trade unions (social partners), organisations representing economic and social interests, organisations fighting corruption and fraud and promoting good governance, civil rights organisations and organisations combating discrimination, local organisations (including networks) involved in decentralised regional cooperation and integration, consumer organisations, environmental, teaching, cultural, research and scientific organisations, universities, churches and religious associations and communities, philosophical and non-confessional organisations, the not-for-profit media and any non-governmental associations and independent foundations, including independent political foundations. This definition is established in the Neighbourhood, Development and International Cooperation Instrument (NDICI) Thematic Programme for Civil Society Organisations - Multi Annual Indicative Programme 2021-2027.

Area of support 2: Media

Short problem analysis

The Western Balkans as well as Türkiye continue to face significant challenges in terms of media independence and ensuring freedom of expression. In this regard, the 2024 Communication on EU Enlargement Policy¹⁹ highlights only a limited progress in the past years. The fragile pluralism of media across the region is counterbalanced by relative dependence of journalism in terms of capture by interconnected business and political interests, non-transparent or unbalanced funding to public and private media, poor protection of safety and labour rights of journalists, especially women journalists. This leads to self-censorship, neglect of self-regulation and ethical norms, and eventual vulnerability of the citizens to disinformation. More efforts are deemed necessary to ensure the independence of media regulators and public broadcasters, as well as to provide for sustainable financial models for the effective functioning of independent self-regulatory bodies and the public service media. Local newspapers and television stations owned and subsidised by the public budgets of municipalities/local governments, serving often local political purposes, dominate the media landscape, making it difficult for independent media to operate on commercial terms thus limiting the freedom and diversity of information. Additionally, the information environment in the Western Balkans and Türkiye ripe with disinformation narratives stemming from foreign state and non-state actors, which further undermine the already fragile democratic processes in the region. More effort is also needed here to build societal resilience, notably enhancing medial literacy among young people, and improve quality content production and fact-checking

Equally, the development of quality professional journalism remains hampered by precarious working conditions for journalists, mainly young and women journalists. The work of media actors, e.g. investigative journalists and fact-checkers is further hindered by limited access to public information due to the public authorities' lack of transparency and accountability. The alternative voice of fringe media (e.g. non-registered entities or individuals) mostly lacks financial support and market-based conditions for sustainability due to their size.

The 2024 Communication on EU Enlargement Policy noted very similar issues in Türkiye, where no progress was made and serious concerns remain in the freedom of expression. Media in Türkiye face high levels of legal, administrative and operational restrictions. A set of prohibitive and restrictive laws diverge from ECtHR case law, thus leaving journalists unprotected and exposed to a large array of threats and abuse of power by law enforcement, judiciary and other state authorities. The new Media Law of 2022 also holds the potential to further reinforce self-censorship and stifle public debate. There is high concentration of ownership of the Turkish media outlets, linked to political and economic circles close to the government. The process of distribution of public advertisement is also biased. Journalism in Türkiye remains a risky low-paid profession, with almost no job security. All these aspects undermine pluralism, independence and the quality of journalism and lead to polarisation.²⁰

Overall, all enlargement countries are called upon to ensure a safe and pluralist environment that enables the media to carry out their work independently and without fear of reprisals or dismissals.

¹⁹ https://neighbourhood-enlargement.ec.europa.eu/2024-communication-eu-enlargement-policy_en
https://neighbourhood-enlargement.ec.europa.eu/turkiye-report-2024_en

²⁰ https://neighbourhood-enlargement.ec.europa.eu/turkiye-report-2024_en

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

- **Media actors in the region (rights holders)**, whose main organisational/capacity issues are among others: 1) lack sufficient capacities and knowledge to abide to highest professional and ethical standards or to understand audiences; 2) lack resources (both qualified human and financial) and infrastructure to cope with market competition against captured media actors and biased advertisement market; 3) need to fully adapt to the overwhelming technological and digital changes, such as the impact of big tech, social media, and AI on media operations, their relations to audiences, and content production; 4) need to still ensure better mechanisms for self-regulation, including fact-checking, countering information manipulation and acquiring further knowledge of digital rights violations (e.g. hate speech, unlawful removal of content, etc); 5) suffer from low level of trust, notably traditional mainstream media, where local media plays increasing role for communities; 6) certain level of foreign donor dependence in the lack of other financial incentives of viable economic models for sustainability.

- **State institutions (duty bearers)**, whose main organisational/capacity issues are among others: 1) lack of knowledge of/willingness to apply international and EU standards in the area of freedom of expression and media; 2) capture of state institutions (notably law enforcement) which are utilised to silence media actors in case of certain political and economic interest being affected (SLAPPs); 3) window dressing in terms of provision of financial support to independent media, notably as such funding and state advertising being directed on to government controlled media in some countries; 4) lack of swift action by law enforcement and judicial authorities in case of threats and physical attacks against journalists.

2.3. Lessons learned

Civil Society

The Civil Society Facility (CSF) and Media Programme offers a single window of support to civil society and media freedom, bringing together EU support at bilateral and regional level. Under IPA II, a mid-term evaluation of the Civil Society Facility²¹ was conducted in 2017. It found that the CSF effectively contributes to addressing the needs and priorities of civil society in the region. However, it also indicated that real cooperation between the public authorities at central level and civil society remains weak and that the creation of an enabling environment is one of the critical areas that has to be improved.

Coordination between regional and bilateral level support activities is crucial and can best be ensured through the CSF single programming exercise, and through regular exchanges between the relevant stakeholders. Cooperation and coordination between the Headquarters and the EU Delegations/Offices of the region has been further enhanced through the “de-concentration” practice²² concerning several regional contracts implemented by CSOs and CSO networks since 2022. This new approach has, so far, proved to be an effective way to ensure better monitoring and technical support to the implementation of the project activities.

²¹ “Mid-term Evaluation of the Civil Society Facility for the Western Balkans and Turkey”, Contract N°2016/380154/1. FWC BENEFICIARIES 2013 – LOT 7: GOVERNANCE AND HOME AFFAIRS EuropeAid/132633/C/SER/multi

²² This “de-concentration” practice has been applied, for the first time, to some of the regional contracts resulting from the 2022 call for proposals ref. EuropeAid/174154/DH/ACT/Multi, replicating the already established “de-concentration” approach concerning the Kosovo – Serbia contracts resulting from the activity “Support to small scale projects in support of good neighbourly relations between Serbia and Kosovo”.

Importantly, efforts continue to be made to complement the financial support to CSO and media actors with direct EU engagement with civil society, through mainstreaming, yearly monitoring meetings and consultations at regional and country levels.

The Action will benefit from the conclusions and recommendations emerging from recent evaluations of key initiatives supporting the sector, such as “*Technical Assistance to Civil Society Organisations in the Western Balkans and Türkiye– TACSO programme*” and “*Regional Programme on Local Democracy in the Western Balkans (ReLOaD)*”. Although not directly applicable to the activities proposed in the current action, some of the conclusions and recommendations can provide useful insights concerning effective practices for capacity-building and for enhancing cooperation between CSOs and governments at national and local levels. .

In addition, direct and indirect consultations carried out at the country levels with civil society and international partners, commissioned programme evaluations and result oriented monitoring (ROM) of various contracts revealed the below lessons learned and recommendations:

- Support to civil society actors requires an efficient mix of funding modalities based on the real needs and absorption capacity of diverse beneficiary organisations, as well as on their management resources to address those needs;
- The support should be balanced between providing financial support to small and large CSOs and networks;
- The experience of providing Financial Support to Third Parties (FTSP), operating grants for institutional support to CSOs, and the EU Civil Resilience Mechanism proved to be efficient support for small and grassroots organisations - important for strengthening societal resilience and increasing citizens’ understanding of the accession process and the practical benefits of EU membership;
- FTSP should be coupled with capacity building and mentorship support and used to reach more CSOs and grassroots organisations, also through supporting actors that can act as multipliers;
- The use and the size of core funding in sub-grants should be expanded;
- Supporting projects that have a proven track-record of success and impact should continue;
- The diversification of funding mechanisms should be stimulated;
- Creative synergies between civil society and media to ensure effective communication, particularly to young women and men regarding the European perspective, gender equality, social inclusion, inter-cultural dialogue and green transition should be encouraged and strengthened;
- In consideration of civil society’s reliance on donor funding, public subsidies and short-term, project-based support, coordination with donors and CSOs will ensure the calls for proposals respond to uncovered or partially covered needs, complement ongoing actions and foment sustainable interventions.
- The specific role CSOs - in particular women CSOs – play in promoting the gender equality agenda in enlargement related and country policies is recognised. Yet, considering that there is still much room for improvement throughout the region, they should continue being supported in their work.

The action document at hand integrates these lessons learned and recommendations. The EU will continue to provide lifeline support to increase the resilience of CSOs with these insights in mind.

Media

The EU provided limited assistance to the media sector in the Western Balkans and Türkiye under IPA I. For IPA II, however, the EU organised wide consultations with stakeholders, such as the Speak-up! and EU – Western Balkans Media Days Conferences to set out the policy vision for support on media in the enlargement context, freedom of expression being an important part of fundamentals. The European Commission developed a long-term strategic approach for EU assistance to media freedom in the region: the Guidelines for EU support to media freedom and media integrity in enlargement countries (2014-2020)²³. The guidelines structured the EU assistance architecture for the IPA II period, which consisted of primarily holistic regional programmes for the Western Balkans and Türkiye to support various aspects of freedom of expression and media. In the context of the Instrument for Pre-Accession (IPA III), the acceleration of the enlargement process warrants gradual de-concentration of EU assistance to bilateral assistance. Whereas peer-to-peer learning, peer pressure for reform, regional collaboration approaches, among others, still hold added value in case of regional projects, the implementation of the often politically sensitive media programmes require closer and more regular political and operational engagement on the ground.

The most optimal formula for EU assistance is the holistic approach of supporting key stakeholder groups - duty-bearers (state authorities, regulators, etc) and rights holders (media outlets, journalists and citizens). Media outlets themselves need to explore alternative sources of revenue including collaboration with domestic and international partners and tech companies (e.g. cooperation between mainstream media and fact-checkers) or investment opportunities. Additionally, there is a need to further foster indigenous support networks and resource-pooling practices among media outlets, be it mainstream or local, which allow for survival of independent media in context of absent alternative funding.

In the past years, donor support has been largely allotted to mainstream independent media. The EU continues to reach to wider groups of potential beneficiaries in order to avoid concentration of assistance in a limited group of organizations. The current action will address these aspects through further exploring possibilities of support to local media, which has proven to be much more trusted by the citizens. Additionally, financial support to third parties will be fortified in order to further diversify the list of grantees of the EU assistance. A rights-based approach to journalism, including also environmental/climate change journalism, will be at the centre of EU's assistance to media.

Since its inception in 2018, the assistance to the Western Balkans and Türkiye through the European Endowment for Democracy (EED) remains one of the principal channels to provide access to finance to generally smaller civic actors and media, including fringe media, unregistered actors and individuals. The EED approach is demand-driven and flexible to respond to local realities. A 2023 ROM report reconfirmed the high relevance of the assistance, as additionally tested during the Covid pandemic restrictions and the economic crisis in the context of the war in Ukraine. This approach and good outreach of EED is largely appreciated by various stakeholders. However, lessons learned include the risk for donor dependence of supported actors that still experience difficulties to find their economic model. As suggested by the ROM report, EED should provide further targeted and tailor-made support in the form of mentoring and coaching on fund-raising and business development models. EED should further operationalise cooperation with EU Delegations of the ground and

²³ https://neighbourhood-enlargement.ec.europa.eu/guidelines-eu-support-media-freedom-and-media-integrity-enlargement-countries-2014-2020_en

other regional projects in order to exchange information and seek opportunities for synergies, including on the tackling the issue of sustainability.

3. DESCRIPTION OF THE ACTION (WHAT)

3.1. Intervention Logic

The Overall Objective/(Impact) of this action is “*Strengthened participatory democracies and the EU approximation and integration process in the Western Balkans and Türkiye*”.

1. Civil Society

The Specific Objective (Outcome) is “*Enhanced role of civil society in support of the areas covered by the EU accession agenda*”.

The outputs are (this is not an exhaustive list)

- More effective contribution from CSOs to policy development, decision-making processes and political dialogue at EU and countries level across various thematic areas
- Strengthened cooperation and partnership between CSOs and public institutions
- Reinforced capacity and resilience of CSOs to carry out their activities effectively

Indicative list of activities:

- Technical and organisational capacity building activities for CSOs, including training, mentoring, workshops, study visits.
- Provision of expertise for the creation of knowledge products, research, studies, legislative input.
- Networking and coalition building, and experience/knowledge sharing activities
- Promotion, advocacy, outreach and engagement with local communities and constituencies.

2. Media

The Specific Objective (Outcome) is “*Improved independence, integrity and pluralism of media*”.

The outputs are (this is not an exhaustive list)

- Enhanced technical and financial capacity of journalists and media outlets to deliver high quality content to shape the public discourse on the EU integration process in the Western Balkans and Türkiye, including the Growth Plan for the Western Balkans
- Sustained pluralism of voices and media actors, notably in restrictive environments
- Improved systemic conditions for Media Information Literacy, media integrity, and co-regulation of online media platforms

Indicative list of activities:

- Provision of expertise and capacity building activities for local and independent media outlets and media development organisations, including training, mentoring, workshops,
- Monitoring, creation of knowledge products (content production), research, studies, legislative input.
- Networking, coalition building, and experience/knowledge sharing
- Promotion, advocacy, outreach and engagement with audience.

Gender equality will be supported during the implementation of both civil society and media actions. Moreover, sex disaggregated data will be collected for outputs/activities wherever relevant.

3.2 Contribution to horizontal priorities and mainstreaming

Environmental Protection, Climate Change and Biodiversity

The action does not require a Strategic Environmental Assessment (SEA), an Environmental Impact Assessment (EIA), nor a Climate Risk Assessment (CRA) prior to implementation. Specific focus on environment- and climate-related topics will be ensured in all the calls for proposals that will be launched, including in the framework of financial support to third parties' activities. In addition, specific technical assistance and mentoring activities to CSOs focusing on green transition and green practices will be also foreseen. Environmental and climate change topic are frequent in journalism in the Western Balkans, which will be supported again through the action, including through sector-specific training and capacity development. Climate change-related disinformation narratives are also an emerging trend amongst beneficiaries which will continue to be supported. There is growing prevalence of online media as opposed to printed editions, which contributes to the reduced use of paper. Along with the process of digitalisation, programme beneficiaries have adopted more environmentally friendly patterns of implementing of activities (reduced use of paper, electronic materials and reports, online meetings as opposed to polluting air travelling, among others). Additionally, all programme's activities will be environmentally friendly and sensitive to specific challenges that communities face in terms of environment protection.

Gender equality and empowerment of women and girls

As per OECD Gender DAC codes identified in section 1.1, this action is labelled as G1²⁴. This implies that gender equality, in particular women's and girls' safety and socio-economic empowerment will be supported under all the foreseen outputs in line with the approach outlined in the successor of the Gender equality Strategy 2020-2025 and the EU Gender Action Plan (GAP III) 2021-2025 (extended until 2027)²⁵. Gender analysis and disaggregated indicators at programme and contract levels would be also foreseen, so as to measure the effects of the Action with regard to gender equality and women's and girls' empowerment. Calls for proposals, or negotiation of direct grant contracts will also include specific requirements on or inclusion of gender as a topic, e.g. safety of women journalists, in line with the above.

Human Rights

This action will be implemented in a non-discriminatory manner and according to equal opportunities principles that guarantee that no distinctions will be made based on race, ethnicity, religion, sexuality, ability or other possible grounds in any aspect²⁶. It will also adopt a human-rights based approach, taking into consideration special individual needs of different groups, and make sure that all the foreseen activities are sufficiently inclusive. In this regard, all civil society and media activities will put an emphasis on engaging, representing

²⁴ Significant objective

²⁵ "The Gender Action Plan III is a Joint communication by the Commission and the High Representative of the Union for Foreign Affairs and Security Policy which was welcomed through EU Presidency Conclusions of 16 December 2020. Drafting was led by European Commission in close consultation with EU Member States, EEAS, civil society organisations, partner governments, and international organisations (UN entities, International Finance Institutions among others). The different parties contributed to the drafting of the document through meetings and through responses to a survey conducted during the process".

²⁶ As per art 22 of the EU Charter of Fundamental Rights <https://fra.europa.eu/en/eu-charter/article/21-non-discrimination>

and reporting on the rights of most vulnerable groups, including people living in poverty, vulnerable women, children, persons with mental and/or physical disabilities, Roma, Ashkali and Egyptian communities as well as other minority groups. The Action will contribute to improve the social inclusion of the above-mentioned vulnerable groups, fight racism and various forms of discrimination, including antigypsyism. At project level, the Rights Based Approach will be included in the design of the Guidelines for individual calls and requested for the project applications. The action will target freedom of expression and freedom of association, which are core human rights. It is acknowledged that the action is subject to certain limitation due to fact that it does not target primarily state institutions and duty bearers.

Democracy

As per overall objective/impact, this action aims at strengthening participatory democracies in the Western Balkans and Türkiye, through an enhanced contribution by civil society and media. It will also promote principles of good governance, rule of law, active citizenship, and freedom of expression and media freedom.

3.3 External assumptions and risks

External assumptions

The most significant conditions for implementation of the action are the enabling environment for civil society and media to perform their core mandate and implement programme activities. Legal frameworks ensuring that the exercise of the freedom of association and expression is formally guaranteed in all IPA III beneficiaries, although their implementation varies. Thus, the assumption is that the situation as regards the exercise of fundamental rights and freedoms will not further deteriorate.

Another assumption is that IPA beneficiary institutions share the common interest of succeeding with various reforms and advance in the enlargement process and will thus be receptive to the constructive inputs of the civil society and objective reporting of the media and are willing to develop and maintain a constructive dialogue/cooperation with CSOs. The same assumption is true for CSOs and media: they share common values and goals and are willing to create networks and cooperate in constructive manner with good quality projects. Further, CSOs and media actors benefiting from activities should be willing to apply the acquired knowledge and skills in their work.

Category	Risks	Likelihood (High/ Medium/ Low)	Impact (High/ Medium/ Low)	Mitigating measures
1 (external environment)	<u>Risk 1</u> Political instability/lack of political will	M	M	<ul style="list-style-type: none"> - Regular inclusive and evidence-based regional political dialogue with the parties concerned; - Continuous monitoring of progress achieved; - Steering Committees to be set up.
1 (external environment)	<u>Risk 2</u>	L	M	<ul style="list-style-type: none"> - Adoption of flexible approaches;

	Emerging of new disruptive emergencies/crisis in the region			- Capitalise on resilience/sustainability elements when building capacities of partners and beneficiaries.
3 (people and organisations)	<u>Risk 3</u> Lack of cooperation between CSOs/media and Institutions	L	L	- Through political dialogue, advocate with governments the need for inclusion of CSOs in the policy formulation and implementation. Work on regular inclusive and evidence-based regional policy dialogue with the parties concerned.
1 (external environment)	<u>Risk 4</u> Restrictive environments/ lack of safety of journalists	M	M	- Closely monitor the situation with other partners; - take additional protection measures for the beneficiaries, if needed; - Deepen dialogue with governments.
3 (people and organisations)	<u>Risk 5</u> Insufficient quality/quantity of applications received for sub-granting.	L	M	- Wide promotion campaigns; - Implementers engage in capacity building/information sessions.

4. IMPLEMENTATION ARRANGEMENTS

4.1. Financing agreement

No Financing Agreement is foreseen to be concluded for implementing this action.

4.2. Indicative implementation period

The indicative operational implementation period of this action, during which the activities will be carried out and the corresponding contracts and agreements implemented, is 84 months for budget 2026 and 96 months for budget 2027 from the date of adoption of this Financing Decision by the Commission.

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

4.3. Implementation modalities

The Commission will ensure that the EU appropriate rules and procedures for providing financing to third parties are respected, including review procedures, where appropriate, and compliance of the action plan with EU restrictive measures.²⁷

²⁷ See [EU Sanctions Map](#). Please note that the sanctions map is an IT tool for identifying the sanctions regimes. The source of the sanctions stems from legal acts published in the Official Journal (OJ). In case of discrepancy between the published legal acts and the updates on the website it is the OJ version that prevails.

4.3.1. Direct management (grants)

4.3.1.1. Grants

a) Purpose of the grant(s)

The grants will contribute to achieving part of the outcomes 1 (Civil Society) and 2 (Media).

b) Type of applicants targeted

- be a legal person and
- be non-profit-making and
- be a civil society organisation²⁸, or a consortium of civil society organisations, and/or
- be an inter-governmental or public law body

4.3.1.2. European Endowment for Democracy Operating Grants for years 2028 and 2029

a) Purpose of the grants:

The grants will contribute to achieving part of the outcome 1 (Civil Society) and outcome 2 (Media) of the Action, by covering parts of the EED's operating costs in 2028 and 2029 respectively. The operating grants will be combined with resources drawn from Neighbourhood, Development and International Cooperation Instrument. The operating costs correspond to the functioning of the foundation and to the implementation of the other (beyond financial support to third parties) activities that the EED performs as part of its mandate: seminars, studies, conferences, publications, networking events, workshops, training and visibility activities, capacity building for beneficiaries, etc.

b) Justification of a direct grant:

Under the responsibility of the Commission's Authorising office responsible, the grants may be awarded without a call for proposals to the European Endowment for Democracy, aiming to build on its respective mandate, strengths and expertise in the area of financial support to grass-root, community-based organisations, small scale media outlets, bloggers, independent media, activists and emerging actors. The direct grants are in accordance with Article 198, point (f) of the Regulation (EU, Euratom) 2024/2509 of the European Parliament and of the Council of 23 September 2024 on the financial rules applicable to the general budget of the Union, i.e. "for activities with specific characteristics that require a particular type of body on account of its technical competence, its high degree of specialisation or its administrative powers, on condition that the activities concerned do not fall within the scope of a call for proposals".

Under the responsibility of the Commission's authorising officer responsible, the recourse to the award of a grant without a call for proposals is justified because EED is a body uniquely positioned to respond to the highly specific characteristics of this activity. EED was set up specifically to provide financial support to pro-

²⁸ As per definition in footnote 16 on page 6.

democratic movements and other pro-democratic actors in favour of a pluralistic multiparty system on democratic ground; social movements and actors; CSOs; young leaders; independent media and journalists (including bloggers, social media activists, etc), non-governmental institutions, including foundations and educational institutions functioning also in exile; provided that all the beneficiaries adhere to core democratic values, and human rights as well as subscribe to principles of non-violence.

The EED is specialised in supporting those among the above stakeholders that have difficulties benefitting from assistance through traditional funding channels due to their size, legal status (e.g. non-registered entities or individuals), geopolitical context (e.g. civil war situation), and particular needs etc. Furthermore, EED offers a unique credibility when carrying out these activities, due to the formal backing it enjoys from a broad European constituency. Launched through a Council Declaration, EED has a distinctive institutional set-up, being steered and monitored by representatives of the European Parliament, the EU Member States, the European External Action Service and the civil society of the region. The specific nature of the proposed activities under Output 2.3, which involves sensitive work with media outlets, civil society actors and democracy activists, places it outside the scope of a call for proposals, as it would need to rely on the unique *modus operandi* used by EED based on the mechanisms and reasons described above.

This, along with its experience and already established network in the region, allows EED to deliver the needed support to the target beneficiaries, including in sensitive situations, and justifies the direct award. This unique position was recognised by the European Commission in its Action Plan in Support of the Transformation of the Western Balkans and in the Joint Communication of the Commission and High Representative on tackling FIMI, including disinformation. EED's good track-record, also confirmed during a 2023 ROM report, with efficient award procedures (that are compliant with the general principles applicable to the use of public funds) and with a standing good reputation, makes it an adequate vehicle for providing financial support to local beneficiaries at a micro- or mini-scale, allowing beneficiaries such as non-registered associations, political movements, individual activists, bloggers etc. to benefit from the donors community funding where this would not be possible through more traditional funding channels.

4.3.1.3. Operating Grants (Framework Partnership Agreements) – Kosovo

a) Purpose of the grant(s)

The grants will contribute to achieving part of the outcome 1 (Civil Society). Operating grants will support the annual work programmes of up to 9 organisations that have signed the Framework Partnership Agreements (FPAs) in 2024 for the period 2024-2027, as a result of a Call for proposal launched in 2023.

b) Type of applicants targeted

The targeted applicants are non-profit civil society organisation with legal personality.

4.3.1.4. Direct award to the National Convention on European Union – Serbia

a) Purpose of the grant(s)

The grants will contribute to achieving part of outcome 1 (Civil Society).

(b) 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 National Convention on European Union (NCEU). 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 in line with Article 198, point (f) of the Financial Regulation because its implementation requires a particular type of body on account of its technical competence, its administrative powers and its high degree of specialisation for the tasks to be performed as a consultation mechanism with civil society on positions regarding negotiating chapters. The National Convention on European Union is mandated specifically as a consultative body of CSOs for the positions of the Serbian government on enlargement and its activities cannot be subject of a Call for Proposals. The NCEU has been awarded various direct grants until now including one that is on-going till the end of 2026.

The NCEU represents a collaborative network of civil society organisations (CSOs) established in 2014 when Serbia officially started the negotiations for EU accessions. The NCEU is the institutionalized permanent consultative mechanism for participation of CSOs in Serbia's EU negotiation process and has regular meetings with the Government of Serbia. It is part of the obligatory procedure on adoption of Negotiating Positions.

In this respect, the NCEU is part of regular procedures in the most important aspects of the EU accession process. The procedures enforced by the Government of the Republic of Serbia and the National Assembly, guarantee that National Convention is included in evaluating and assessing the quality of the negotiation positions for each negotiation chapter.

4.3.1.5. Direct award to the Press Council – Serbia

a) Purpose of the grant(s)

The grants will contribute to achieving part of the outcome 2 (Media).

(b) 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 Press Council. 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 in line with Article 198, point (f) of the Financial Regulation because of the unique role of the organisation, as the only available institutionalized mechanism for watching over compliance with the standards of ethical journalism and thus the only self-regulatory body in this respect. The foreseen activities have specific characteristics that require a particular type of body on account of its technical competence, its high degree of specialisation or its administrative powers, which do not fall within the scope of a call for proposals. The recourse to an award of a grant without a call for proposals is justified because, in accordance with Article 198(f) of the Financial Regulation (EU, EURATOM) 2024/2509, the Press Council fully meets the above in terms of having the technical competence and high degree of specialisation for the tasks to be performed. It is the only available

institutionalised mechanism that is watching over compliance with the standards of ethical journalism and thus the only self-regulatory body in this respect. The activities will support the capacities of the self-regulating media body and therefore the activities concerned fall out of scope of competition.

4.3.1.6. Direct award (Resource centre for CSOs in Türkiye) – Türkiye

a) Purpose of the grant(s)

The grants will contribute to achieving part of the outcome 1 (Civil Society).

(b) Justification of a direct grant

Under the responsibility of the Commission's authorising officer responsible, and in line with Article 198, point (f) of the Financial Regulation, the grant may be awarded without a call for proposals to a civil society organisation to be selected based on the following criteria: high degree of specialisation and experience in providing capacity building to CSOs in Türkiye; competence to provide a variety of services to CSOs, such as information provision, one-to-one consulting, organisational capacity assessment, and organisational design, legal advice, budget and financial management assistance, networking and effective communication management and more. The purpose of the grant is to ensure uninterrupted capacity building and a variety of services to the civil society through the Resource Centre for CSOs.

4.3.1.7. Direct award (Democracy, Media Freedom and support to CSOs and independent media) – Türkiye

a) Purpose of the grant(s)

The grants will contribute to achieving part of the outcome 2 (Media).

(b) Justification of a direct grant

Under the responsibility of the Commission's authorising officer responsible, and in line with Article 198, point (f) of the Financial Regulation, the grant may be awarded without a call for proposals to a civil society organisation to be selected based on the following criteria: grant giving organisations, with extensive experience in the distribution of financial support to third parties in a flexible and rapid way. The entity must have extensive experience and a high degree of specialisation in working in sensitive areas and have the institutional, technical and human capacity to put in place a flexible Financial Support to Third Parties - FSTP mechanism, able to reach out to small as well as large organisations in a variety of theme and in a way to ensure safe and secure operations. The entity must have knowledge of the democracy and media landscape in Türkiye. The entity must have extensive experience and a high degree of specialisation in working in sensitive areas and have the institutional, technical and human capacity to put in place a flexible FSTP mechanism, able to reach out to small as well as large organisations in a variety of theme and in a way to ensure safe and secure operations. The entity must have knowledge of the democracy and media landscape in Türkiye. The purpose of the grants is to redistribute funds in a flexible and rapid way to CSOs and media that have limited experience or the capacity to apply to EU call for proposals.

4.3.1.8. Direct award (Support to rights-based civil society organisations) – Türkiye

a) Purpose of the grant(s)

The grants will contribute to achieving part of the outcome 1 (Civil Society).

(b) Justification of a direct grant

Under the responsibility of the Commission's authorising officer responsible, and in line with Article 198, point (f) of the Financial Regulation, the grant may be awarded without a call for proposals to a civil society organisation to be selected based on the following criteria: i) the entity's statutes must explicitly include a mandate for donation-giving and grant-making; ii) a demonstrated track record in effectively bridging the gap between private donor priorities and the needs of CSOs; and iii) proven experience in mobilising at least EUR 2 million in private funding for the benefit of grassroots CSOs and in carrying out specialised capacity building activities in the specific area of donations and philanthropy. Considering these criteria and the highly specialised nature of the foreseen activities, the recourse to an award of a grant without a call for proposals is justified. The pre-identified organisation will stand out as best positioned due to its specialised expertise, operational capacity, and project management experience in this field. Supporting income diversification for rights-based CSOs requires a deep understanding of the local philanthropic landscape, including corporate and individual donors. A local organisation is best positioned to lead this effort, thanks to its established partnerships, contextual knowledge, and the trust it has built over time. An internal mapping exercise confirmed that a local organisation is best suited to provide this type of support. Unlike UN or Member State agencies active in the country, which do not prioritise income diversification in their mandates, the identified local actor is equipped to address this gap.

4.3.2. Direct Management (Procurement)

Procurement services will contribute to achieving part of the outcome 1 (Civil Society). In particular, the recourse to external consultancy services is considered necessary for the provision of technical assistance to the relevant EU services to support the establishment of a structured policy dialogue and engagement with CSOs. Furthermore, external consultancy services will support governments to better include CSOs into the decision and policymaking and improve/develop their strategic documents defining cooperation with CSOs and social partners (employees, employers, governments) in an inclusive, evidence-based process. Procurement services will target the issues of weak cooperation and dialogue between governments and civil society in several beneficiaries, as well as the limited participation of CSOs in EU policy development and political dialogue activities.

4.3.3. Indirect Management with a pillar-assessed entity

A part of this action plan may be implemented in indirect management with a pillar-assessed entity, which will be selected by the Commission's services using the following criteria:

Multi-country

- Financial instruments for support to media outlets: a pillar assessed organization with extensive technical experience in managing financial instruments such as technical assistance and investments in micro, small and medium enterprises, notably those delivering services of public interest.
- media pluralism monitoring: a pillar assessed international organization with proven track record in science/research-based monitoring of media pluralism in the EU, the Western Balkans and Türkiye.

Türkiye

- Mandate of the organisation(s) in the areas of gender equality, gender-based violence, protection and promotion of the rights of women and LGBTIQ people;
- Extensive experience in the country;
- Previous experience in managing EU grants for CSOs and FSTP mechanism;
- Experience with other vulnerable groups, such as refugees, migrants and others.

The implementation by these entities entails management and implementation of all aspects of the actions, including budget implementation tasks (procurement and grant award procedures) as relevant.

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

If the implementation modality under direct management as defined in section ‘4.3.1.(grants)’ and/or ‘4.3.2 (procurements)’ cannot be implemented due to circumstances beyond the control of the Commission, the modality of implementation by indirect management with a pillar-assessed entity would be used. The Commission’s services will select the body using the following criteria:

- relevant extensive technical experience in working with CSOs and/or media organisations and in supporting and monitoring the civil society and/or media sectors;
- demonstrated operational capacity to manage projects of similar size.

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 section 4.3.1.1

4.4. Scope of geographical eligibility for procurement and grants

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

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

4.5. Indicative Budget

Indicative Budget	EU contribution 2026 (EUR)	EU contribution 2027 (EUR)	Total EU contribution 2026-27 (EUR)	Third-party contribution, in currency identified for 2026-2027
	Implementation modalities			
Methods of implementation – cf. Section 4.3	42 000 000	78 900 000	120 900 000	5 335 500
Grants – (direct management) cf. section 4.3.1	30 580 000	65 800 000	96 380 000	5 335 500
Procurement (direct management– under section 4.3.2)	10 920 000	3 400 000	14 320 000	N.A.
Indirect management with pillar-assessed entities – cf. section 4.3.3	500 000	9 700 000	10 200 000	N.A.
Evaluation – cf. section 5.2	may be covered by another Decision	may be covered by another Decision	may be covered by another Decision	N.A.
Audit and verification– cf. section 6				
Strategic communication and Public diplomacy – cf. section 7	will be covered by another Decision	will be covered by another Decision	may be covered by another Decision	N.A.
Totals	42 000 000	78 900 000	120 900 000	5 335 500

5. PERFORMANCE MEASUREMENT

5.1 Monitoring and reporting

Monitoring activities carried out for this action will aim to identify successes, problems and/or potential risks so that corrective measures are adopted in a timely fashion. Both types of internal monitoring will be undertaken in an inclusive way, involving key stakeholders.

Internal monitoring

The day-to-day technical and financial monitoring of the implementation of this action or parts of the action will be a continuous process and part of both the implementing partners' and Commission responsibilities.

External monitoring

In line with the Commission rules and procedures, the Commission may undertake additional monitoring through independent external consultants recruited by the Commission. External monitoring is supported by both types of internal monitoring described above.

5.2 Evaluation

The Commission may carry out a mid-term, final or ex post evaluation for this action or parts of the action. In case a mid-term or final evaluation is not foreseen, the Commission may, during implementation, decide to undertake such an evaluation for duly justified reasons either on its own decision or on the initiative of the IPA III beneficiaries. As recalled by the Better Regulation guidelines²⁹ evaluations may be identified as a result of new strategic decisions or significant (negative) feedback on performance (e.g. implementation problems, findings from monitoring results, complaints or infringements, audit reports).

In line with the spirit of partnership, Commission services and IPA III beneficiaries and other key stakeholders may also carry out joint evaluations.

The IPA III beneficiaries and other key stakeholders shall contribute to and provide the necessary information for the different evaluation exercises. Following agreement among the parties, evaluation reports could be made public to allow the relevant stakeholders, including civil society representatives, to express their views so as to contribute to the accountability function of evaluation.

As a result of an evaluation, and where appropriate, in agreement with the IPA III beneficiaries, the Commission and the implementing partner jointly decide on the follow-up actions to be taken and any adjustments necessary, including, if indicated, the reorientation of the relevant components.

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

6. AUDIT AND VERIFICATIONS

Without prejudice to the obligations applicable to contracts concluded for the implementation of interventions under this action, the Commission may, on the basis of a risk assessment, contract independent audit or verification assignments for one or several contracts or agreements concluded for interventions or their parts deriving from this action.

7. STRATEGIC COMMUNICATION AND PUBLIC DIPLOMACY

All entities implementing EU-funded external interventions 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 interventions 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 concerned interventions are implemented by the Commission, the partner country, service providers, grant beneficiaries or entrusted or delegated entities such

²⁹ Better Regulation Guidelines, SWD(2021) 305 final.

as UN agencies, international financial institutions and agencies of EU Member States. In each case, a reference to the relevant contractual obligations must be included in the respective financing agreement, procurement and grant contracts, and contribution agreements.

For the purpose of enhancing the visibility of the EU and its contribution to this action or parts of this action, the Commission may sign or enter into joint declarations or statements, as part of its prerogative of budget implementation and to safeguard the financial interests of the Union. Visibility and communication measures should also promote transparency and accountability on the use of funds. Effectiveness of communication activities on awareness about the intervention and its objectives as well as on EU funding of the intervention should be measured.

Implementing partners shall keep the Commission and the EU Delegation/Office fully informed of the planning and implementation of specific visibility and communication activities before the implementation. Implementing partners will ensure adequate visibility of EU financing and will report on visibility and communication activities as well as the results to the relevant monitoring committees.

Any actions related to communication and visibility will be coordinated with the strategic communication actions of the EU Delegations, to ensure coherence of narrative and message, as well as horizontal strategic communication.