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ANNEX I

to the Commission Implementing Decision on the financing of the multiannual action plan part I in favour of the Regional South Neighbourhood for 2024-2026

Action Document for the Good Governance and Security Package

MULTIANNUAL ACTION PLAN

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

1. SYNOPSIS

1.1. Action Summary Table

1. Title OPSYS Basic Act	Good Governance and Security Package Multiannual action plan part I in favour of the Regional South Neighbourhood for 2024-2026 OPSYS business reference: ACT-62464 ABAC Commitment level 1 number: JAD.1398830/JAD.1414568/JAD.1414569 Financed under the Neighbourhood, Development and International Cooperation Instrument (NDICI-Global Europe)
2. Economic and Investment Plan (EIP)	Yes
EIP Flagship	FLAGSHIP 2 – Human rights, the rule of law, and modern, effective administrations, governance and accountability
3. Team Europe Initiative	No
4. Beneficiary(y)/(ies) of the action	The action shall be carried out in the Southern Neighbourhood countries: Algeria, Egypt, Israel ¹ , Jordan, Lebanon, Libya, Morocco, Palestine *, Syria ² and Tunisia. As per Article 43(1) of NDICI-Global Europe Regulation, for reasons of efficiency and effectiveness, and upon explicit justified request, some activities may be extended to countries from the Union for the Mediterranean (Albania, Bosnia and Herzegovina,

¹ See Guidelines on the eligibility of Israeli entities and their activities in the territories occupied by Israel since June 1967 for grants, prizes and financial instruments funded by the EU from 2014 onwards on http://eurlex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.C_.2013.205.01.0009.01.ENG.

* This designation shall not be construed as recognition of a State of Palestine and is without prejudice to the individual positions of the Member States on this issue. Implementation of the present action will integrate the recommendations of the Communication to the Commission on the review of ongoing financial assistance for Palestine C (2023) 8300, 21.11.2023.

² Co-operation with the Government of Syria suspended since 2011.

	<p>Mauritania, Montenegro, North Macedonia, and Türkiye) and six countries neighbouring the Southern Neighbourhood (Chad, Mali, Niger, Saudi Arabia, Sudan and Iraq).</p> <p>This is justified because the action intervenes in fields which have transboundary characteristics, such as the trafficking of cultural goods, where some neighbouring countries are both countries of origin and transit of these illicitly traded goods, and with whom cross-regional cooperation could be enhanced. It is in line with the multi-annual indicative programme for the Southern Neighbourhood for 2021-2027, which makes reference, under priority 5 (specific objective 2) to the importance of cross regional cooperation.</p>
5. Programming document	Multi-annual indicative programme for the Southern Neighbourhood (2021-2027) ³
6. Link with relevant MIP(s) objectives/expected results	<p><i>Priority Area 1: “Human development, good governance, and rule of law” (SO1: To promote democracy, fundamental rights, good governance and transparency)</i></p> <p><i>Expected results:</i></p> <ul style="list-style-type: none"> • Human rights defenders, democracy activists and pro-democracy movements are reinforced • Enhanced professional capacity of journalists, media outlets and media institutions to exercise the right to freedom of expression, access to information and to strengthen pluralism. <p><i>Priority Area 3: “Peace and Security”</i></p> <p><i>Expected results:</i></p> <ul style="list-style-type: none"> • Strengthen cooperation to fight organised crime and terrorism between partner countries and with EU Member States
PRIORITY AREAS AND SECTOR INFORMATION	
7. Priority Area(s), sectors	<p>150 Government and Civil Society</p> <p>151 Media And free flow of information</p> <p>152 Conflict, Peace and Security</p>
8. Sustainable Development Goals (SDGs)	<p>Main SDG: 16. Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels</p> <p>SDG 5: Achieve gender equality and empower all women and girls</p> <p>SDG 11: Make cities inclusive, safe, resilient and sustainable</p>
9. DAC code(s)	<p>15130 - Legal and judicial development 20%</p> <p>15131 – Justice, law and order policy, planning and administration</p> <p>15160 - Human Rights 30%</p> <p>15150 - Democratic participation and civil society 20%</p> <p>15153 - Media and free flow of information 30%</p>
10. Main Delivery Channel	50000 Other

³ Commission Implementing Decision C(2021)9399 of 16.12.2021 on a Multi-Annual Indicative Programme for the Southern Neighbourhood.

11. Targets	<input 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"/>		
	Gender equality and women's and girl's empowerment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
	Reproductive, maternal, new-born and child health	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	Disaster Risk Reduction	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	Inclusion of persons with Disabilities	<input checked="" type="checkbox"/>	<input 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"/>		
	13. Internal markers and Tags	Policy objectives	Not targeted	Significant objective	Principal objective	
		EIP	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
		EIP Flagship	YES <input checked="" type="checkbox"/>		NO <input 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 type="checkbox"/>	<input checked="" type="checkbox"/>
human development (incl. human capital and youth)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
health resilience	<input type="checkbox"/>	<input checked="" type="checkbox"/>
migration and mobility	<input type="checkbox"/>	<input checked="" type="checkbox"/>
agriculture, food security and rural development	<input type="checkbox"/>	<input checked="" type="checkbox"/>
rule of law, governance and public administration reform	<input type="checkbox"/>	<input checked="" type="checkbox"/>
other	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Digitalisation	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>
education and research	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Migration	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Reduction of Inequalities	<input checked="" type="checkbox"/>	<input type="checkbox"/>
COVID-19	<input checked="" type="checkbox"/>	<input type="checkbox"/>

BUDGET INFORMATION

14. Amounts concerned	<p>Budget line(s) (article, item): 14.020110 Southern Neighbourhood</p> <p>Total estimated cost: EUR 26 333 330</p> <p>Total amount of EU budget contribution: EUR 24 500 000</p> <p>Component 1: EUR 13 000 000</p> <p>Component 2: EUR 7 500 000</p> <p>Component 3: EUR 4 000 000</p>
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	The contribution for component 2 is for an amount of EUR 2 500 000 from the general budget of the European Union for 2024 and for an amount of EUR 2 500 000 from the general budget of the European Union for 2025 and for an amount of EUR 2 500 000 from the general budget of the European Union for 2026, 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.
MANAGEMENT AND IMPLEMENTATION	
15. Implementation modalities (management mode and delivery methods)	Direct management (components 1 and 2) through: - Grants Indirect management (component 3) with the entity to be selected in accordance with the criteria set out in section 4.3.2

1.2. Summary of the Action

Components 1 and 2

Civil society organisations and public interest media⁴ play a vital role in the EU's Neighbourhood South as they collectively contribute to the development, stability and democratic progress of societies. However, the space for civil society activity and public interest content has been progressively reduced in the region due to growing authoritarianism, human rights violation and abuses, and disinformation and Foreign Information Manipulation and Interference (FIMI) that is often actively fostered by actors hostile to the EU and its principles. To overcome these challenges, this action aims to:

- Reinforce public interest media in the Neighbourhood South. To do this, the action proposes core funding for these outlets as well as support for networking activities at the regional level to facilitate resource- and knowledge-sharing and coordination between media outlets, factchecking organisations, media development agencies and donors.
- Contribute to consolidating democracy and to the social and economic development of partner countries by enabling the functioning and activities of the European Endowment for Democracy as a catalyst for democratisation in countries in political transition.

Component 3:

The overall objective of this third component is to contribute to the protection of cultural heritage, by strengthening the capacities of South Partner Countries to effectively fight the trafficking of cultural goods, including related crimes such as money laundering and terrorism financing. Trafficking in cultural property, together with the destruction of cultural heritage, has been recognized as a threat to international peace and security, as well as an impediment to the enjoyment of cultural heritage as a human right guaranteed by international law, and to the achievement of the 2030 Agenda for Sustainable Development, in particular Sustainable Development Goals 16 (peace, justice and strong institutions) and 11 (target 11.4 calls for protecting and safeguarding the world's cultural and natural heritage). The Southern Neighbourhood is particularly exposed to cultural goods trafficking. The recent and on-going conflicts across the region have resulted in much looting of cultural goods, especially from archaeological sites and museums; and the volatility of parts of the region facilitates cross-border trafficking. To address this issue, the current action aims to improve the prevention and detection of crimes by market participants, cultural heritage institutions and academia through better registration of collections and reporting of cultural property crimes. The action

⁴ Public interest media should be taken to mean independent media outlets that are free from business and political interests as well as public or private media capable of creating content that serves the public interest (including educational and socially responsible programming).

aims also at strengthening the capabilities of law enforcement and at boosting regional and cross-regional cooperation to effectively address cultural goods trafficking and related financial crimes. This action will aim at dismantling the operations of organised crime networks. It will promote a multi-stakeholder approach and inter-agency cooperation.

1.3. Beneficiar(y)/(ies) of the action

The action shall mainly be carried out in the Southern Neighbourhood countries: Algeria, Egypt, Israel, Jordan, Lebanon, Libya, Morocco, Palestine, Syria and Tunisia, out of which only Israel is not included in the list of ODA (Official Development Assistance) recipients.

2. RATIONALE

2.1. Context

Components 1 and 2: support to public interest media and to civil society activists

Democracy and human rights are core values of the European Union (EU) and vital elements for ensuring long-term stability both inside and outside its borders. Democracy support is a pivotal element of EU's external policies, with support for democratisation processes in non-EU states traditionally channelled through instruments like the Neighbourhood Development, and International Cooperation Instrument (NDICI) – Global Europe, and the Thematic Programme for Human Rights and Democracy, the Instrument for Stability, and the European Neighbourhood Instrument (ENI). In addition, the European Commission adopted the European Media Freedom Act⁵, a novel set of rules to protect media pluralism and independence in the EU. Finally, among the European Union actions, the directive: Protecting journalists and human rights defenders from strategic lawsuits against public participation (SLAPPs)⁶, and its recommendations represents an important initiative to uphold freedom of expression/media freedom in the EU.

The Multi-Annual Indicative Programme for the Southern Neighbourhood (MIP 2021-2027) states that “the democratic governance and human rights in the region have deteriorated since the COVID-19 pandemic with some governments limiting political rights and civil liberties and silencing critics and the press”.

As highlighted in the MIP and New Agenda for the Mediterranean⁷, good governance, gender equality, respect and protection of human rights, as well as an effective, functional and impartial Rule of Law system are beneficial to human development and key for the development of sustainable, peaceful and stable democratic societies. The MIP underscores the EU's commitment to supporting public interest media in their production of verified high-quality information that can help reverse these negative trends. It suggests this support may take various forms such as enhancing the professional capacity of journalists, media outlets and media institutions as well as providing “core and bridge funding” to help public interest media to survive in an increasingly unforgiving environment.

The action will contribute to consolidate democratisation processes of partner countries by supporting pro-democracy actors and the media sector. To this end, the action will also contribute efforts to counter disinformation/FIMI. The action will work across the Southern Mediterranean countries, bringing added value to bilateral projects by offering a regional dimension. Its focus on supporting media and civil society will help to build accountable institutions and to fight against hate speech, both of which are core ambitions of the New Agenda.

⁵ <https://data.consilium.europa.eu/doc/document/PE-4-2024-INIT/en/pdf>

⁶ https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202401069

⁷ [Southern Neighbourhood: EU proposes new Agenda for the Mediterranean - European Commission \(europa.eu\)](#)

The proposed action is in line with the EU Action Plan on Human Rights and Democracy (2020-2027) particularly under overarching priorities 1 (“Protecting and empowering individuals”) and 2 (“Building resilient, inclusive and democratic societies”) ". This initiative is also in line with the EU Gender Action Plan⁸ (GAP) III adopted in December 2020, which establishes gender equality and women empowerment (GEWE) as an essential means for achieving peace and security, human rights and sustainable development.

Media-related activities will offer opportunities to other donors active in the region to better understand the wider media development landscape and target their own efforts accordingly. These include EU Member States such as Germany, France, the Netherlands and Denmark; other donors such as the United Kingdom and the United States through USAID and the State Department; and numerous foundations such as the Open Societies Foundations and the National Endowment for Democracy.

The action will adopt a human rights-based approach (HRBA), ensuring that associated outputs are fully inclusive and reach the most marginalised segments of national populations. The HRBA recognises that people are key actors in their own development rather than passive recipients of support or services. This means that the action needs to be both empowering and locally owned, seeking opportunities, wherever possible, for involving beneficiaries in project design and evaluation.

The action will support the running of the secretariat of European Endowment for Democracy (EED) established at the end of 2012 with the support of the European Parliament, the European Commission, the High Representative of the Union for Foreign Affairs and Security Policy and the EU Member States.

Component 3: support to the fight against the trafficking of cultural goods

Over the past decades, waves of protracted conflicts in the Southern Neighbourhood have had significant security, economic, social, humanitarian, environmental and cultural impacts, the latter aggravated by the looting of archaeological sites and museums by groups, sometimes directly involved in the conflict or in corruption. Illicit trafficking of cultural goods continues to take place and the problematic state of democracy and rule of law in countries of the region impedes the protection of cultural heritage.⁹ Such phenomenon puts at risk the collective memory and identities of peoples. It is also a source of financing for terrorism and other criminal activities which impact¹⁰ the region. Beyond organised criminal and terrorist networks, looting and theft also take place as individuals seek financial gains in contexts of economic hardship.

The Southern Neighbourhood is a particular case regarding to the trafficking of cultural property, as its countries are both countries of origin and transit of these illicitly traded goods. The EU, on the other hand, is one of the main destinations for these assets, often traded in arts markets where they gain value and where the culture of privacy and discretion concerning the identities of sellers and buyers represents a challenge for countering illegal activities and therefore an advantage for criminals.¹¹

The 1954 *Hague Convention on the Protection of Cultural Property in the Event of Armed Conflict*, under the auspices of UNESCO, focuses on the protection of cultural property in times of peace as well as during an

⁸ JOINT (2020) 17 final of 25.11.2020. 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.

⁹ “*The protection of cultural heritage and fight against illicit trade of cultural goods: case studies (Egypt, Jordan and Lebanon) and recommendations*”, Prof. S. BARAKAT, El-Hiwar II

¹⁰ As recognised by the United Nations Security Council in its Resolution 2347(2017).

¹¹ Money Laundering and Terrorist Financing in the Art and Antiquities Market, FATF Report, February 2023, p.11, <https://www.fatf-gafi.org/content/dam/fatf-gafi/reports/Money-Laundering-Terrorist-Financing-Art-Antiquities-Market.pdf.coredownload.pdf>

armed conflict. The UNESCO 1970 *Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property* considers theft, looting and illicit trade of cultural items a crime depriving people of their history and culture and that weakens social cohesion in the long term. The Council of Europe's *Convention on Offences related to Cultural Property*, adopted in 2017, specifically focuses on the criminalisation of the illicit trafficking of cultural goods and establishes criminal offences including theft; unlawful excavation, importation and exportation; and illegal acquisition and placing on the market.

In the framework of the *EU Security Union Strategy 2020-2025*¹², which calls for the improvement of the online and offline traceability of cultural goods in the internal market and cooperation with third countries where cultural goods are looted, and as part of the *EU Strategy to Tackle Organised Crime 2021-2025*¹³, the European Commission adopted on 13 December 2022 an *Action Plan Against Trafficking in Cultural Goods*¹⁴ to disrupt criminal activities and protect cultural heritage from criminal harm. The EU, through the Agency for Law Enforcement Cooperation (EUROPOL), had included "illegal trade in cultural goods" into its serious and organised crime threat assessment¹⁵ and partakes in the fight against trafficking of cultural property, notably through the European Multidisciplinary Platform Against Criminal Threats (EMPACT) for 2022-2025. EUROPOL co-leads 'Operation Pandora' together with law enforcement authorities, to perform additional and in-depth checks and controls at border crossing points, as well as in auction houses, museums and private premises; focus was also placed on monitoring of online markets.

In complementary manner, the *EU Concept on the Protection of Cultural heritage in Conflicts and Crises*¹⁶ (2021) stresses that protecting and enhancing cultural heritage in conflicts and crises contributes to the development of peace, reconciliation and mutual understanding, intercultural dialogue, international solidarity, and inclusive and sustainable development. This was endorsed through the Foreign Affairs Council (FAC)'s *Conclusions on EU Approach to Cultural Heritage in conflicts and crises*.

The MIP emphasises the need to fight organised crime and terrorism as a key objective under the peace and security priority. Through its Global Facility on Anti-Money Laundering and Countering the Financing of Terrorism, the EU addresses the trafficking of cultural goods, but there are currently no such specific projects in the Southern Neighbourhood. The project "Transparency Now: Strengthening Anti-Corruption Efforts in the EU's Southern Neighbourhood", implemented by UNICRI, focuses on improving the prevention, reporting and prosecution of acts of corruption, as well as the seizure and confiscation of assets linked to such corruption, which may include cultural goods. Other EU projects address money laundering and combating the financing of terrorism in the region.

The EU has included the protection of cultural goods against trafficking in bilateral cooperation agreements, such as in the Partnership Priorities with Egypt and a project is in place, aimed at building Libya's national capacity to prevent and combat corruption and money laundering. Supported by UNICRI and UNODC, this initiative includes some elements to identify, trace and recover cultural assets in foreign jurisdictions.

The new regional action on the fight against trafficking of cultural goods will also complement EU's bilateral financial support for the protection of cultural heritage in Egypt, Israel, Jordan, Lebanon, Libya, Palestine and Tunisia.

¹² COM/2020/605 final

¹³ COM/2021/170 final

¹⁴ COM/2022/800 final

¹⁵ European Union Serious and Organised Crime Threat Assessment 2021, p. 88, https://www.europol.europa.eu/cms/sites/default/files/documents/socta2021_1.pdf

¹⁶

2.2. Problem Analysis

Component 1: support to media serving public interest

Public service media in the Southern Neighbourhood countries operate in a market where advertising contracts are hostage to political patronage and where, increasingly, advertisers are migrating to social media platforms. Typically, outlets cover less than a third of their running costs from advertising, crowdfunding or subscriptions. They are also vulnerable to restrictive legislation limiting media freedom and politically motivated attacks which range from online harassment to physical violence and from vexatious lawsuits to the use of legal cudgels. This situation is exacerbated during times of conflict. Since the start of the crisis in Gaza, an estimated 84 journalists have been killed, including at least 20 in the course of their journalistic work or in connection with it, according to Reporters Without Borders.

Media often lack effective mechanisms for tracking audience needs and interests. The ongoing Regional Assessment suggests that many of the outlets traditionally supported by the international donor community appeal primarily to young, educated audiences and have limited reach into other demographic groups. Other sectors of the population remain dependent on national media or social media-based communities for their news and information.

Professional skills in the sector have improved in recent years and, as a rule, public interest media have robust editorial policies. However, they are still vulnerable to coordinated disinformation/FIMI campaigns since they may lack the resources to establish dedicated factchecking teams or to assimilate new technical tools. Conversely, a constellation of factchecking agencies has grown up across the region but most are disconnected from the media sector and rely mainly on social media for dissemination purposes. As a result, the majority of these platforms have very small audiences.

The emergence of professional networks has provided new opportunities for exchanging knowledge and experience as well as for collaborating on content-related initiatives. The best-known is Arab Reporters for Investigative Journalism (ARIJ) which, in 2020, launched the Arab Factchecking Network which now brings together nearly 40 different platforms. Other players include Sahafa Med which is responsible for the annual Assises du Journalisme in Tunis. These networks rely on donor funding to stage regional events.

Despite the existence of some national-level media coordination groups (notably in Tunisia and Palestine), there are widespread concerns about the level of coordination between donors and implementing agencies. According to a 2023 report by the Global Forum for Media Development (GFMD), “Decisions made by donors are often not based on up-to-date intelligence and there is a sense that they do not engage in meaningful consultation with beneficiaries”.

Furthermore, local actors complain that the media development market is still dominated by organisations based in Europe which offer limited roles to their local implementation partners and draw down the bulk of the available funding. Conversely, donors argue that local partners lack the financial systems and the necessary experience to manage large grants.

Component 2: support to civil society activists

Most of the countries in the EU’s Neighbourhood have a restrictive environment for civic engagement and this hampers even the support of the EU to the civil society organisations and independent media at bilateral level. Significant challenges remain in such contexts, with pressure on fundamental freedoms mounting, corruption being often endemic, weak institutions and governance, and a lack of democratic accountability as well as many barriers to civic engagement and political participation. Civil society and independent media are essential watchdogs and play an important role in encouraging citizens’ participation in democratic processes,

in fighting corruption, and in many cases even provide essential services for local populations. In many Neighbourhood countries restrictions to civic space attempt to curtail the legitimate operations of civil society actors. These include growing restrictions on access to resources for CSOs, including foreign funding. Disinformation continues to be a tool used to undermine democratic values and discredit those who stand up for them, which has augmented in the times of the COVID-19 pandemic.

The European Commission has co-founded the EED to provide flexible and demand-driven support to pro-democracy activists, complementing other EU and member state democracy support programmes. EED specialises in cases where the space for civil society is shrinking due to administrative, legal, social and political barriers and accepts significant political and operational risks as part of its operations. Furthermore, EED, by engaging with beneficiaries directly, has established deep ties to grassroots CSOs and local media and pro-democracy actors. Importantly, it has a proven track record of operating in highly restricted contexts as well as tested methods to securely channel financial support and, when necessary, protect identities of the beneficiaries.

Supporting pro-democracy activists in conflict environments – such as Libya and Syria - brings particular challenges, as the lack of political stability and security can make it particularly difficult to operate safely. These can also be difficult environments for most donors and EED is committed to supporting democratic actors in conditions of war and instability when at all possible.

Component 3: support to the fight against the trafficking of cultural goods

Southern Neighbourhood countries are home to rich cultural heritage. However, the fate of the Ancient city of Palmyra, captured and stormed by ISIS in 2013, reminded the world of the dramatic impact of conflict on cultural heritage and of the importance to protect it. The volatility of parts of the region also challenges border and law enforcement authorities. According to EUROPOL Serious and Organised Crime Threat Assessment (SOCTA) 2021, Egypt, Israel, Lebanon, Libya, Palestine, and Syria are among the main countries involved in illegal trade in cultural goods.¹⁷ Due to its position in the region, Jordan is also a source and transit country for items coming from neighbouring countries. The recent and on-going conflicts across the region have resulted in much looting of cultural goods, especially from archaeological sites and museums. The crisis in Gaza also represents a risk factor for cultural heritage sites and goods, in and around the Gaza Strip and in the West Bank.¹⁸

The three main illegal activities associated with trafficking in cultural goods are (1) theft and robbery, (2) looting (the illicit removal of ancient relics from archaeological sites, buildings of monuments) and (3) forgery of cultural goods. Some related crimes include fraud, disposal of stolen goods (fencing), smuggling, asset laundering or corruption. Beyond trafficking, criminals and groups can abuse even legally acquired goods, for money laundering purposes, sanctions evasion, tax evasion and terrorism financing.

Crisis and conflict zones in the Middle East (Syria and Yemen) and North Africa (Libya and Egypt) are particularly likely to be affected by these criminal trends. Beyond ISIS, whose activity has weakened in Syria and Iraq, a number of actors could be involved in the illicit trade of cultural goods from the Mesopotamia and Sinai, with little concrete information about the size and tracking of this illicit trade. The demand for these illicitly trafficked goods is spanning from Europe and North America to emerging markets in Iran, Türkiye, the Persian Gulf states, China and Japan.

¹⁷ EUROPOL SOCTA 2021 Pag. 89

¹⁸ UNESCO calls for the protection of cultural heritage, Gaza Strip: Damage assessment | UNESCO

Thus, strengthening cooperation in the Southern Neighbourhood on the detection, investigation and prosecution of cultural goods is of paramount importance for the partner countries in the region and for the EU. Countering the illicit trafficking of cultural goods is not only a matter of fighting transnational organised crime, it is also key to safeguard cultural heritage and withhold the potential to rebuild cohesion and common identities in societies in contexts of conflict and post-conflict reconstruction and reconciliation in the Southern Neighbourhood.

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

Component 1

Public interest media will be the main beneficiaries of the action, and the buy-in and involvement of media support organisations will be an essential factor in its success. Acting as an interface between media and other stakeholders, including governments, these organisations should be closely involved in needs assessment and coordination efforts. Furthermore, media support organisations are important interlocutors for networking activities since they tend to enjoy high levels of credibility among their constituents. The wider international community – particularly those that actively support public interest media– are also key stakeholders. They will be asked to participate in coordination meetings and mapping exercises. They will also benefit from the ambition to provide relevant insights into current sectoral priorities which should help to shape and inform their own development programmes. Finally, fact-checking organizations will be involved in the action as they can offer their expertise on countering disinformation/FIMI to public service media outlets.

In addition, certain state-funded institutions, particularly regulators, public broadcasters and educators may be interested in benefiting from networking activities. Similarly, the civil society sector may take advantage of the opportunity to forge closer links with media organisations and, thereby, improve the coverage of vulnerable and marginalised groups, including women and young girls.

The action recognises that all interventions can have an impact (either positive or negative) on conflict-related issues and existing divisions in local societies. Thus, it will be crucial to ensure that expected outputs are accessible to a wide range of beneficiary groups, particularly those which are often excluded from national programmes. The action will promote inclusive approaches, whereby a diverse range of stakeholders take part in decision-making and are encouraged to act as agents of change. These approaches will play an important role in ensuring that interventions do no harm.

Component 2

The direct beneficiary of this action is the European Endowment for Democracy as the action will support its operating costs and the final beneficiaries are civil society activists. The EED's main purpose is direct grant-making to pro-democracy activist and/or organisations struggling for democratic transition in the European Neighbourhood and beyond, through specific flexible procedures. Since its inception and by March 2021, EED has provided over 1,400 grants totalling over EUR 100 million and has evolved into a vibrant, innovative and respected member of the democracy support community.

Component 3

The prevention, detection, tracing, investigation, and prosecution of acts of trafficking in cultural goods requires the full involvement of public authorities in partner countries, as well as a good cooperation among them within and across borders. They need a sufficient level of understanding of risks and vulnerabilities in the cultural goods sector so that they can act accordingly by identifying, assessing, and understanding the risks of cultural goods trafficking, money-laundering and terrorism financing related to it. Beyond the public sector,

risk awareness and guidance shall also target the private sector. It has indeed the obligation to exercise due diligence, especially in provenance research, and to abide to the provisions of anti-money laundering and combating financing of terrorism policies. The cooperation of actors from the private sector from the art industry, antiquities market and the financial sector with the competent authorities should be enhanced. Furthermore, civil society at large shall benefit from better awareness of the phenomenon, as it also has a role in the protection of cultural heritage and goods.

2.3. Lessons Learned

Component 1

The action draws on the findings of multiple studies including the Sahafa Med assessment entitled “Tomorrow’s Journalism in the Southern Mediterranean Countries”. Other useful input comes from the ROM review of the IMS-led “Core Support to Independent Media in the Southern Neighbourhood” as well as recent reports on media development funding published by the Global Forum for Media Development (GFMD). Feedback suggests that there is significant disenchantment with the modalities for funding currently used to support independent media, in particular the perceived insistence on covering donor-led themes that do not necessarily resonate with audiences. The Sahafa Med report references “specific criticisms levelled at media development programmes, whose themes and objectives are sometimes accused of being imposed from above.”

Similarly, beneficiaries across the region have voiced concerns around the rigidity that is common to many donor-funded projects. A 2023 report by GFMD on media development funding concluded, “[Donors] have displayed little desire to address systemic problems or grant-giving policies” and called for greater flexibility and shorter lead-times in sub-granting programmes. The GFMD 2022 report entitled “Coordinating Media Assistance and Journalism Support Efforts” concluded that proper coordination was essential to meeting the recommendations of the 2005 Paris Declaration for Aid Effectiveness which calls on donor countries to “coordinate, simplify procedures and share information to avoid duplication”.

Ultimately, the action should be implemented in complementarity with projects funded bilaterally. To do so, the implementing partners should strengthen the coordination with the Delegations of the EU in the partner countries.

Component 2

Working conditions of civil society have been declining and in many countries the usual funding instruments of the EU are not able to efficiently support the grassroots organisations and new civic movements occurring in the volatile environments. This is why EED has been a crucial partner for support to the independent civic activists and media which other Commission instruments are not able to reach.

EED established itself as a functioning democracy support organisation and it has provided grants in all countries of its mandate. EED’s flexible funding mechanism has proved especially useful during the outbreak of COVID-19 pandemic that has affected the state of democracy all around the world and put civic activists and journalists under additional pressure for various reasons, ranging from additional needs for reporting that places greater strain on existing capacities, to plummeting revenues, to clampdowns on media freedom, among others.

EED adds value compared to other donors particularly in relation to the direct support, learning, and development. Within the operations and management of the EED there is a significant component of non-grant support provided to prospective grantees and its current beneficiaries. It provides pre-award and post-

award coaching and trainings on subjects such as financial management, strategic planning or application to EU grants.

In the recent evaluation of EED by independent experts it was noted that against a backdrop of democratic backsliding, the EED has filled gaps in democracy support left by more traditional donors, strengthened the readiness of pro-democracy actors to contribute to locally led and locally shaped political and civic process in line with ambitions and reasonable expectations, and contributed to the sustainability of pro-democracy actors. This was achieved without wasting resources.

Component 3

Trafficking of cultural goods in the Southern Neighbourhood is often treated as secondary priority compared to the fight against other forms of trafficking (drugs, weapons, or human trafficking).

An inter-agency and a multi-stakeholder approach is lacking in the region, which hampers the adequate response to the complex issue of cultural goods trafficking. Cultural goods market participants, collectors, cultural heritage institutions and academia often lack awareness about the applicable legislation and other non-legislative tools to prevent and detect cultural property crimes. Border and law enforcement agencies, for their part, often lack expertise/familiarity with cultural goods and could benefit from the expertise of art historians, archaeologists, or other cultural heritage experts, to identify suspicious cultural objects, determine their authenticity, or quantify the possible damage occurred at sites. An inherent, underlying outcome of this initiative will therefore be to facilitate and incentivise inter-agency and inter-institutional cooperation among entities charged with preventing, investigating and prosecuting such criminal acts. The civil society could also be associated to this action. Ensuring wide-scale awareness of the value and importance of cultural heritage is a prerequisite to effectively address the trafficking of cultural goods.

As the issue of trafficking cultural goods is particularly complex and vast, synergies should be sought with other EU-funded programmes in the field of judiciary and law enforcement, such as EUROMED POLICE, EUROMED JUSTICE, Momentum, Transparency Now or the Global Facility on Anti-Money Laundering and Countering the Financing of Terrorism. That way, the efforts will be better distributed, and duplications will be avoided.

So far, the fight against the trafficking of cultural goods has not been properly engrained in the law enforcement and political priorities of the targeted countries. The lack of specialised units within law enforcement is an obstacle to effectively address the trafficking of cultural goods. Moreover, the high frequency of staff rotation as part of anti-corruption practices, hampers a sustainable and long-term prioritisation and operational capacities development in this field. In a similar manner as for other criminal issues, continuity in the training of staff shall be ensured and staff abilities to train colleagues should be enhanced through structured systems (demonstrations, document sharing, etc.). An in-depth training needs assessment would be necessary to secure stakeholders commitment and buy-in to establish specialised units and build comprehensive training packages for different career levels and staff responsibilities, including gender mainstreaming, to ensure better present and future staff capacities.

Finally, as the trafficking of cultural goods is by its nature a cross-border phenomenon, this action shall seek to foster the participation of beneficiary countries in formal and informal networks tackling illicit trafficking of cultural goods and organised crime at large.

3. DESCRIPTION OF THE ACTION

3.1. Objectives and Expected Outputs

The Overall Objective (Impact) of this action is enhanced democratisation and social and economic development by supporting pro-democracy activists and, public service media, and by fighting against the trafficking of cultural goods.

The **Specific Objectives** (Outcomes) of this action are to:

1. Media serving the public interest are strengthened as institutions, they are capable of adapting to market conditions and the coordination between media outlet, donors and implementers is reinforced.
2. Support the functioning of the European Endowment for Democracy as an implementor fostering democratisation, respect of human rights and fundamental freedoms and political transition in societies struggling for democratisation.
3. Contribute to the protection of cultural heritage, by strengthening the South Partner Countries capacities to effectively fight the trafficking of cultural goods.

Indicative Outputs contributing to Specific objective 1 are the following:

- 1.1 EU-supported media outlets continue to serve the public interest and act as a credible counterbalance to disinformation/FIMI and hate speech.
- 1.2 Regional media networking mechanisms are supported to facilitate resource and knowledge-sharing as well as coalition-building and cross-border collaboration.
- 1.3 Effective coordination of media development efforts on a regional level is supported and draws on the result of regular need assessments.

Indicative Output contributing to specific objective 2 are the following:

- 2.1 Support is provided to strengthen the EED mechanism of financial support (direct grant support to beneficiaries).
- 2.2 Support is provided to other activities performed by EED as part of its mandate: seminars, studies, conferences, publications, networking events, workshops, training and visibility activities, capacity building for beneficiaries etc.

Indicative Output contributing to specific objective 3 are the following:

- 3.1. The prevention and detection of crimes by market participants, cultural heritage institutions and academia is improved.
- 3.2. Law enforcement and judiciary capabilities are strengthened to effectively fight the trafficking of cultural goods;
- 3.3. Regional and cross-regional cooperation is boosted.

3.2 Indicative Activities

Components 1:

- Financial support to third parties that offers core funding to public interest media as well as support in institutional development with the following focus:
 - Production of high-quality content, including piloting new formats and launching multi-platform initiatives.
 - Other innovations including the introduction of new technical solutions to streamline costs or to enhance the efficiency of business operations (including software or equipment, if necessary and duly justified).

- Emergency funding to cover relocation costs or legal fees incurred by media professionals in relations to their activities. These costs could also include measures to improve digital security or protect journalists operating in conflict zones.
- Experience and resource-sharing among public interest media actors from across the region channelled through existing networks rather than seeking to establish new ones. In addition, networking opportunities can take place in the margins of existing industry events and can include online as well as hybrid formats.
- Networking events/activities including cross-border investigations or factchecking initiatives
- Donors and implementing agencies coordination
- Regular needs assessments of the media landscape across the region

Component 2:

- Every day running of the EED secretariat
- Seminars, studies, conferences, publications, networking events, workshops, training and visibility activities, capacity building for beneficiaries etc.

Under Component 2 the direct support to target groups through grants which is the main purpose of the EED is not funded through the present financial contribution: the funding of this direct support originates from the voluntary contributions received from EU Member States, other stakeholders, as well as separate action grants of the Commission (covered under different decisions).

Component 3:

- Support a gap analysis of legislation in the beneficiary countries to compare the current legal and regulatory framework with international standards/requirements and laws, to result in a legal framework which can effectively protect cultural heritage, provide a framework for the prosecution of criminals and success in achieving the restitution of identified illegally trafficked cultural goods.
- Support exchange of information between cultural heritage professionals, including private sector and civil society, academia and relevant (law-enforcement and judiciary) authorities through a series of workshops and peer-learning activities.
- Share experiences and lessons learnt by beneficiary countries on the management and use of inventory databases, including recording and monitoring damage to and the looting of archaeological sites.
- Foster a consistent registration of both, public and private collections, and ensure duly report of cultural property crime and excavation cases to law enforcement, with help from internationally agreed standards and tools (such as the Object ID standard and/or Interpol's Stolen Works of Art Database)
- Support the creation of specialised units at national level exclusively dedicated to countering crime against cultural heritage, as stipulated by the UNESCO 1970 Convention, and/or enhance existing ones.
- Provide guidance for the improvement of national databases of stolen/looted/trafficked cultural goods¹⁹ and, when possible, work towards cross-national integrated databases for inter-agency use.
- Carry out a training needs and capacities assessment to design a training package for the specialised units while ensuring the buy-in and ownership of beneficiaries. A train-the-trainers approach should be promoted.
- Support intra- and inter-agency cooperation at national level.

¹⁹ A major impediment to gathering a comprehensive intelligence picture is that there is neither a uniform data collection methodology, nor a uniform categorisation of cultural goods related crimes. To facilitate uniform categorisation, the comprehensive catalogue of cultural property crimes set out in the Council of Europe's Convention on Offences relating to cultural property ("Nicosia Convention") contains guidance on categories of crimes that authorities can use.

- Develop comprehensive standard operating procedures and other instructions for all staff involved in the protection of cultural heritage and control of illicit trading and trafficking, so as to formalise the efforts at national level.²⁰
- Support the establishment of procedures for better exchanges of intelligence and data between national authorities.
- Establish a network of contact points for the trafficking of cultural goods in South Partner Countries.
- When relevant and appropriate, seek cooperation of these contact points with Europol as well as existing platforms at EU level such as the European Multidisciplinary Platform against Criminal Threats (EMPACT) or EU CULTNET²¹.

3.3. Mainstreaming

Environmental Protection, Climate Change and Biodiversity

Outcomes of the Strategic Environmental Assessment (SEA) screening (relevant for budget support and strategic-level interventions)

The SEA screening concluded that no further action was required.

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 C (no need for further assessment).

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 building sustainable democracy also means ensuring gender equality and increasing the participation of women in political and economic life. This action will mainstream gender equality and youth issues and seek to integrate, and capitalise on existing thematic, regional and bilateral programmes that are already implemented with CSOs active in the fields of gender equality and support for youth, as well as women's CSOs (WCSOs) active in other fields of intervention within this action.

In this respect, this action contributes to the implementation of the GAP III and the advancement of EU gender equality objectives, in dialogue with the Renewed Partnership with the Southern Neighbourhood, by strengthening women's rights organisations and social movements as key strategic partners for good governance and human rights protection in the region, and in cooperation with the EU. In so doing, this action will meaningfully involve WCSOs as sub-grantees but also in other activities, seminars, consultations and any other action planned to achieve the expected results. Considering that WCSOs are mostly absent from decision-making processes and arenas, specific attention will be paid to ensuring a gender balance in participation at output level, i.e. ensuring women's and men's equal participation in events, forums, structured dialogues etc. Gender equality data will be collected in order to track progress and identify potential triggers hubs for unconscious gender bias.

²⁰ Instructions to access expertise from art historians, archaeologists or other cultural goods experts, to identify seized cultural goods, determine their authenticity, or quantify the possible damage occurred at sites that have been or risk being looted

²¹ An informal network of law enforcement authorities and expertise competent in the field of cultural goods

Human Rights

The action's main target groups comprise pro-democracy activists and public interest media which include organisations and individuals working to promote and protect human rights. The fight against organised crime in the field of trafficking of cultural goods has a strong capacity building component, which involves a wide range of stakeholders including staff from security and law enforcement agencies. Therefore, there should be a particular focus on incorporating safeguards in this action in relation to human rights, data protection and good governance, in line with the EU Strategic Framework and Action Plan on Human Rights and Democracy 2020 - 2027.

Disability

As per OECD Disability DAC codes identified in Section 1.1, this action is labelled as D0.

Democracy

This action will primarily contribute to the democratisation and to the social and economic development of partner countries by supporting pro-democracy activists and supporting the rule of law.

Conflict sensitivity, peace and resilience

As part of the contextual analysis, due attention will also be paid to conflict sensitivity and economic and social standards. The EED operates in a diverse range of countries across the European Neighbourhood and beyond, and each jurisdiction has its particular socio-political and economic environment. Contexts range from transitional, restrictive, or repressive to full-conflict environments and consequently activities are tailored to such these different realities.

3.4. Risks and Assumptions

Category	Risks	Likelihood	Impact	Mitigating measures
Environmental	Major shifts in the operating environment caused by political upheaval, civil unrest or a health crisis.	High	High	Implementers should monitor the political, social and economic context on a rolling basis, thereby receiving advanced warning of events that could derail project activities.
	Rising crackdown on civil society and increased hostilities against them	High	High	The EED is specifically designed to work in difficult environments and has solid expertise in supporting CSOs under pressure. It continuously monitors the situation in the region and looks for ways to support.
	A significant reduction in donor funding for the region that forces donor-dependent media to downscale	Low	High	Networking activities and consultancy will promote effective ways of bringing down operating costs while the coordination component will serve to highlight key needs and priorities. Complementarities

	or terminate their operations.			between concurrent programmes will be explored.
	Lack of sufficient political prioritisation of the issue of the trafficking of cultural goods in beneficiary countries	Medium	High	Continuous awareness-raising, at all political and decision-making levels, including through the planned activities and the involvement of all relevant stakeholders.
Programmatic	EU-supported media have only limited audiences and do not appeal to a broad cross-section of the population.	Medium	Medium	Beneficiaries will be encouraged to invest in researching and measuring their audiences, thereby improving their understanding of needs and interests. Consultancy and networking will help to develop formats that resonate with different demographic groups.
Organisational	Operating across a broad geographical region means that resources are spread thinly and that, as a result, overall impact is muted.	Medium	Medium	Interventions will benefit from existing regional structures and resources, thereby minimising this risk. The focus will be on supporting beneficiaries who respond well to the opportunities offered rather than ensuring even geographical coverage.
	High turnover of staff related to the fight against the trafficking of cultural goods and benefiting from the action in the partner countries	High	High	The action should include a “training of trainers” and mentorship approach at national level in order to ensure the sustainability, as well as the design of capacity retention measures.
Communications and visibility	Acknowledgement of EU funding causes reputational damage for media or prompts a backlash from audiences.	Low	Medium	The need to acknowledge the funding source will be negotiated on a case-by-case basis and there will be no requirement to credit the source if it is clear that this could cause problems for the recipient.

External Assumptions

- Progress on reaching an enduring ceasefire in Gaza and, thus, the negative impact of the crisis on the wider region is contained.
- Partner countries do not suffer excessive economic shocks or crises and, as a result, media markets remain relatively stable.

- A resurgence of the COVID-19 pandemic or another health crisis does not lead to restrictions in travel and in-person engagement.
- Media in the region are prepared to accept EU funding and see a value in engaging with their peers.
- Independent media are able to extend their audience footprint to attract other demographic groups.
- Stakeholders at country and regional levels are willing to protect cultural heritage and tackle illicit trafficking of cultural property.
- There is political will at bilateral, regional and international levels to cooperate.
- Donors and implementing agencies are motivated to share information and explore synergies.

3.5. Intervention Logic

Component 1

IF core funding and capacity-building can be provided to public interest media in the Southern Mediterranean AND these beneficiaries continue to enjoy multilateral support from a broad cohort of donors, THEN they will be able to continue producing content that serves the public interest, mainstreams gender equality and acts as a credible counterbalance to state-sponsored propaganda, disinformation/FIMI and hate speech.

IF media take part in networking events and knowledge-sharing initiatives AND these events are not derailed by security concerns or health crises and can identify themes of common interest, THEN practitioners will be better able to learn from the experience of their peers, share resources and engage in joint activities, including cross-border collaboration.

IF the international community meets regularly to share insights and ideas based on regular needs assessments AND the findings of these meetings can be captured and broadly disseminated, THEN media development efforts will be better coordinated and there is a greater likelihood that donor-funded programmes will properly reflect actual needs and priorities.

IF public interest media are strengthened as institutions AND if they can benefit from robust support networks that are better coordinated and more responsive to professional needs, THEN audiences will have sustained access to independent platforms that reflect their interests and priorities and that promote inclusive, democratic debate.

This is BECAUSE the presence of a resilient media sector in the Southern Mediterranean will ensure that the news cycle is not dominated by political or commercial interests or contaminated by agenda-driven narratives, thereby giving audiences the chance to make informed decisions based on a consideration of diverse sources. Furthermore, funding instruments will be better attuned to the constraints of grantees and combined programmes will offer holistic support.

Component 2

The underlying intervention logic for this component is that the action will allow for functioning of European Endowment for Democracy and mainly its mechanism for financial support to third parties focused on human rights and political activists, pro-democratic movements, civil society organisations, emerging leaders, independent media and journalists. By supporting them financially and with capacity building – and if the environment for civic engagement does not deteriorate – they will achieve greater freedom of action for human rights activities and increased space for civil society activity reported by EU Delegations, UN organisations and Human Rights NGOS. This shall contribute to the democratisation and to the social and economic development of partner countries.

Component 3

Criminal groups and individuals involved in this illicit trade of transnational nature adapt very quickly and thrive on opacity of arts and antiquities markets and the low efficiency of tracking systems. The response must be agile and coordinated among all the agencies and relevant stakeholders at country and regional levels. Tackling the trafficking of cultural goods requires that regional cooperation mechanisms be strengthened, including in the fight against organised crime as well as financial crime.

According to the underlying intervention logic for this action, the following correlations hold true:

IF cultural heritage professionals, academia and relevant (law-enforcement) authorities are brought to the same table through the organisations of peer-learning activities, they will be able to identify entry points for cooperation. Cultural heritage professionals will be able to share experience about the management and use of inventory databases and law enforcement authorities will share experience about the reporting of cultural property crimes. Best practices could be brought to the attention of national authorities, which could then foster a consistent registration of both, public and private collections, and ensure duly report of cultural property crime and excavation cases to law enforcement. These efforts could then support a multi-stakeholder, inter-agency approach to the prevention and detection of cultural goods trafficking.

IF based on an in-depth assessment of the needs, advice and support are provided for the establishment of specialised units, the improvement of inter-agency operational capacities and the delivery of appropriate training packages AND if national authorities have the political will and financial means to implement the advice, THEN the capabilities of law enforcement to fight cultural goods trafficking will be strengthened.

IF points of contact are established at national level AND if South Partner Countries are willing to engage in networks of practitioners, THEN the cooperation at regional level is boosted.

IF the abovementioned outputs are delivered, THEN the capacities of South Partner Countries to fight against the trafficking of cultural goods will be strengthened AND the action will contribute to the protection of cultural heritage.

Finally, IF the fight against the trafficking of cultural goods in the Southern Neighbourhood is reinforced, THEN the action will contribute to reinforcing security of the EU and of the Southern Neighbourhood countries by limiting illicit financing of criminal and terror organisations through trade of cultural goods.

3.6. Indicative Logical Framework Matrix

Results	Results chain: Main expected results	Indicators	Baselines (values and years)	Targets (values and years)	Sources of data	Assumptions
Impact	Contribute to democratisation and social and economic development by supporting pro-democracy activists, public interest media and the fight against the illegal trafficking of cultural goods.	TBD	TBD	TBD	TBD	<i>Not applicable</i>
Outcome 1	Public interest media are strengthened as institutions, they are capable of adapting to market conditions and the coordination between media outlets, donors and implementers is reinforced.	<u>Outcome 1, indicator 1 (OPSYS)</u> # (%) of listeners / Internet users (and # media partners) who trust the provided information	To be determined in a baseline survey	<u>For example:</u> 40% of audience say they trust information produced by public interest media	Findings of opinion polls Analysis of findings	Progress on reaching an enduring ceasefire in Gaza and, thus, the negative impact of the crisis on the wider region is contained. Partner countries do not suffer excessive economic shocks
		<u>Outcome 1, indicator 2 (OPSYS)</u> # people who have been exposed to media produced content (radio, web / social networks, via mobile phones)	To be determined through analysis of website metrics of participating media	<u>For example:</u> EU-supported media report an average of 200,000 unique page visits per month	Google analytics or equivalent Analysis of findings	

Results	Results chain: Main expected results	Indicators	Baselines (values and years)	Targets (values and years)	Sources of data	Assumptions
		<u>Outcome 1, indicator 3 (OPSYS)</u> % improvement in the target media journalists' skills for rumour management and factchecking	To be determined through needs assessment of direct beneficiaries	<u>For example:</u> 70% of journalists involved in factchecking initiatives say they have applied new skills to practice	Findings of needs assessments and follow-up interviews	<p>or crises and, as a result, media markets remain relatively stable.</p> <p>A resurgence of the Covid-19 pandemic or another health crisis does not lead to restrictions in travel and in-person engagement.</p> <p>Media in the region are prepared to accept EU funding and see a value in engaging with their peers.</p> <p>Public interest media are able to extend their audience footprint to attract other demographic groups</p>
		<u>Outcome 1, indicator 4 (OPSYS)</u> Percentage of participants who report having benefitted from an event	0	<u>For example:</u> At least 70% of participants say that they have benefitted from networking events	Findings of exit polls held after networking events	
		<u>Outcome 1, indicator 5 (OPSYS)</u> Percentage of participants targeted by outreach and advocacy events who acknowledge having engaged further on the topic on their own initiative as a result of their exposure to the events	0	<u>For example:</u> At least 40% of participants who agree that they have engaged further on target topics following networking events	Findings of key informant interviews or online surveys conducted at least three months after the event	
Outcome 2	The European Endowment for Democracy is able to provide flexible funding to independent civil society and media to foster	CSO Sustainability Index for MENA	CSO Sustainability Index for MENA - Median score of Overall CSO Sustainability across SN in 2021	CSO Sustainability Index for MENA - Median score of Overall CSO Sustainability across SN unchanged or improved	CSO Sustainability Index for MENA ²²	

²² [CSO Sustainability Index Explorer \(csosi.org\)](https://csosi.org)

Results	Results chain: Main expected results	Indicators	Baselines (values and years)	Targets (values and years)	Sources of data	Assumptions
	democratisation and sustainable development in Southern Neighbourhood countries					Donors and implementing agencies are motivated to share information and explore synergies
Outcome 3	Contribute to the protection of cultural heritage, by strengthening the South Partner Countries capacities to effectively fight the trafficking of cultural goods.	SDG: 11.4 efforts to protect and safeguard the world's cultural and natural heritage strengthened. GERF 2.23: Number of state institutions and non-state actors supported by the EU on security, border management, countering violent extremism, conflict prevention, protection of civilian population and human rights.	TBD	TBD	TBD	EED, supported by the European Parliament and European Commission, leads sustained advocacy actions addressed towards EU Member States and other potential donors in order to secure regular funding
Output 1 related to Outcome 1	1.1 EU-supported media continue to serve the public interest and act as a credible counterbalance to disinformation /FIMI and hate speech	<u>Output 1.1, indicator 1 (OPSYS)</u> Number of organizations/individuals benefitting from EU-funded sub-grants projects (disaggregated by sex and age)	0	At least 100 grants are awarded	Records of project implementation team	

Results	Results chain: Main expected results	Indicators	Baselines (values and years)	Targets (values and years)	Sources of data	Assumptions
		<u>Output 1.1, indicator 2 (OPSYS)</u> Number of media equipped by the EU-funded intervention with tools to collect/record information	To be determined through capacity assessments of sub-grantees	At least seven media outlets introduce improved factchecking or newsgathering systems as a result of EU support	Findings of needs assessments Records of project implementation team	
		<u>Output 1.1, indicator 3 (OPSYS)</u> Extent to which local and national media challenge discriminatory social norms and gender stereotypes about women's and girls' participation and leadership	To be determined through needs assessment of direct beneficiaries	Evidence of TV, radio, online or print content that challenges gender stereotypes	Broadcast schedules Copies of print publications Links to content published online	
		<u>Output 1.1, indicator 4 (OPSYS)</u> Level of engagement online and on social media	To be determined through analysis of social media metrics	EU-supported media outlets have an average engagement rate of 3.5% on social media	Social media metrics Data analysis and comparison	
Output 2 related to Outcome 1	1.2 Regional networking mechanisms facilitate resource- and knowledge-sharing as well as and coalition-building and cross-border collaboration	<u>Output 2.1, indicator 1 (OPSYS)</u> Number of people trained by the EU-funded intervention who increased their knowledge and/or skills (disaggregated by sex and age)	0	200 individuals from participating media outlets gain new knowledge and skills as a result of networking activities	Attendance lists at networking events Transcripts of key informant interviews	

Results	Results chain: Main expected results	Indicators	Baselines (values and years)	Targets (values and years)	Sources of data	Assumptions
		<u>Output 2.1, indicator 2 (OPSYS)</u> Number of participants in awareness raising and outreach events/initiatives, including media training	0	500 media professionals take part in networking events	Attendance lists at networking events Transcripts of key informant interviews	
		<u>Output 2.1, indicator 3 (OPSYS)</u> # of tools commonly used as methods for rumour identification and for fact-checking	To be determined through capacity assessments of sub-grantees	10 new factchecking tools are Arabised and adopted by participating newsrooms or editorial teams	Findings of needs assessments Records of project implementation team	
		<u>Output 2.1, indicator 4 (OPSYS)</u> Number of knowledge-based products (reports, surveys, analysis, implementation plans, SOPs, research papers etc.) produced, disseminated and/or adopted (as applicable)	0	At least 50 reports, surveys and research papers are disseminated at knowledge-sharing events	Links to online versions of reports, surveys and research papers Activity reports from networking events	
Output 3 related to Outcome 1	1.3 Effective coordination of media development efforts is enacted on a regional level	<u>Output 2.2, indicator 1 (OPSYS)</u> Number of consultations, coordination meetings and joint actions with other institutions realised.	0	One in-person regional coordination meeting and two online thematic meetings are held each year	Minutes of meetings Recordings of online meetings	

Results	Results chain: Main expected results	Indicators	Baselines (values and years)	Targets (values and years)	Sources of data	Assumptions
					Action plans or resolutions	
Output 1 related to Outcome 2	2.1 Strengthened and efficient EED mechanism of financial support (direct grant support to beneficiaries)	Volume of funding provided to civil society organisations and independent media actors	0	At least 15 M EUR in FSTP provided to MENA countries from additional sources	Official communication and reports from the EED.	Financial contributions from Member States are sufficient in complementing to this operating grant.
Output 2 related to Outcome 2	2.2 Other activities performed by EED as part of its mandate: seminars, studies, conferences, publications, networking events, workshops, training and visibility activities, capacity building for beneficiaries etc.	Number of other activities performed: seminars, studies, publications etc.	0	25	EED annual workplans. Official communication and reports from the EED.	Awareness-raising and support at MS level of need for EED to be able to assist human rights defenders across all geographical fields of activity.
Output 1 related to Outcome 3	3.1. The prevention and detection of crimes by market participants, cultural heritage institutions and academia is improved.	3.1.1. Number of draft policies/guidelines adopted with respect to the registration of collections 3.1.2. Number of draft policies/guidelines adopted with respect to the reporting of cultural property crimes	3.1.1. Baseline to be determined during the inception phase 3.1.2. Baseline to be determined during the inception phase	3.1.1. To be determined during the inception phase 3.1.2. To be determined during the inception phase	TBD	Willingness of governmental institutions (legislative and/or executive branches) to adopt policies/guidelines aimed at improving the registration of

Results	Results chain: Main expected results	Indicators	Baselines (values and years)	Targets (values and years)	Sources of data	Assumptions
		<p>3.1.3. The level of registration of both, public and private collections has increased at national level (from 1 to 10)</p> <p>3.1.4. Increased number of cultural property crime and excavation cases duly reported to national FIUs or law enforcement authorities.</p>	<p>3.1.3. Baseline to be determined during the inception phase</p> <p>3.1.4. Baseline to be determined during the inception phase</p>	<p>3.1.3. To be determined during the inception phase</p> <p>3.1.4. To be determined during the inception phase</p>		<p>collections and the reporting of cultural property crimes.</p> <p>Willingness of private owners to register their possessions.</p>
Output 2 related to Outcome 3	3.2 Law enforcement and judiciary capabilities are strengthened to effectively fight the trafficking of cultural goods;	<p>3.2.1. Number of specialised units at national level exclusively dedicated to countering crime against cultural heritage, including breakdown of staff.</p> <p>3.2.2. A national database of stolen/looted/trafficked cultural goods exist and functions at national level.</p> <p>3.2.3. A training package for the specialised units and other relevant actors in the law enforcement and justice sectors is endorsed at national level.</p>	<p>3.2.1. 0</p> <p>3.2.2 Baseline to be determined during the inception phase</p> <p>3.2.3 Baseline to be determined during the inception phase</p>	<p>3.2.1. 1 in each country benefitting from the action.</p> <p>3.2.2. To be determined during the inception phase</p> <p>3.2.3. To be determined during the inception phase</p>	TBD	<p>National authorities have the political will to establish dedicated specialised units to counter crimes against cultural heritage</p> <p>National authorities are willing to sustain the new capabilities; sufficient financial and human resources are available</p>

Results	Results chain: Main expected results	Indicators	Baselines (values and years)	Targets (values and years)	Sources of data	Assumptions
		<p>3.2.4. Intra- and inter-agency cooperation at national level is established through comprehensive standard operating procedures and/or other instructions</p> <p>3.2.5. Number of investigations opened for illicit trafficking and associated crimes (e.g. money laundering) increased.</p> <p>3.2.6. Number of looted items repatriated to the country of origin following training on the preparation of dossiers for repatriation.</p>	<p>3.2.4. Baseline to be determined during the inception phase</p> <p>-</p> <p>3.2.5. Baseline to be determined during the inception phase</p> <p>3.2.6 Baseline to be determined during the inception phase</p>	<p>3.2.4. To be determined during the inception phase</p> <p>3.2.5. To be determined during the inception phase</p> <p>3.2.6. To be determined during the inception phase</p>		<p>The staff turnover in beneficiary countries remain limited and trained staff remain in the posts for the duration of the project</p>
Output 3 related to Outcome 3	3.3. Regional and cross-regional cooperation is boosted.	<p>3.3.1. Procedures facilitating the exchanges of intelligence and data exist between national authorities</p> <p>3.3.2. Existence of a regional network of contact points for the trafficking of cultural goods.</p>	<p>3.3.1. Baseline to be determined during the inception phase</p> <p>3.3.2: 0</p>	<p>3.3.1. To be determined during the inception phase</p> <p>3.3.2: 1</p>		<p>Willingness of beneficiary countries to engage at regional level and with EU Member States.</p>

Results	Results chain: Main expected results	Indicators	Baselines (values and years)	Targets (values and years)	Sources of data	Assumptions
		3.3.3. Number of exchanges with EU Member States facilitated by this action component.	3.3.3. 0	3.3.3: To be determined during the inception phase		

4. IMPLEMENTATION ARRANGEMENTS

4.1. Financing Agreement

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

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 EU restrictive measures²³.

4.3.1. Direct Management (Grants)

Component 1

a) Purpose of the grant(s)

The grant(s) will contribute to achieve Outcome 1: Public interest media are strengthened as institutions, they are capable of adapting to market conditions and the coordination between media outlets, donors and implementers is reinforced.

b) Type of applicants targeted

The applicants targeted will include legal entities such as international organisations, NGOs and media support organisations.

The grants will be awarded to beneficiaries/consortiums responding to the following criteria:

- Regional coverage, both Maghreb and Mashreq
- Experience in media support
- Impartiality and credibility
- One of the beneficiaries should have an expertise in disinformation/FIMI

Component 2

a) Purpose of the grant(s)

The grants will contribute to the Outcome 2: The European Endowment for Democracy is able to provide flexible funding to independent civil society and media to foster democratisation and sustainable development in Southern Neighbourhood countries.

²³ [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.

The action will be implemented under direct management through the award of three successive operating grants to the EED respectively awarded for the following periods: 1st January-31st December 2025, 1st January-31st December 2026, and 1st January-31st December 2027. Each successive award will be subject to (i) the submission by the grant beneficiary and approval by the Commission of a work programme and a budget; and (ii) the satisfactory implementation and performance, including in its financial aspects, of the predecessor grant(s) (including the current operating grant).

Satisfactory implementation may be assessed by the Commission through different means, which include: narrative and financial progress and final report(s); evaluation(s) including external evaluation; expenditure verification report(s); financial and/or system audit(s) including external audit(s); financial verification mission(s). Before the award of each successive operating grant, the Commission will recourse to some of these tools, choice of which will depend on previous year(s) assessment results and on specific risk assessments. In case of poor performance, the Commission may reduce the amount of a successor operating grant or not award it.

b) Justification of a direct grant

Under the responsibility of the Commission's authorising officer responsible and in accordance with Article 198 of the Financial Regulation, the recourse to an award of a grant without a call for proposals is justified because the EED provides financial support in the Neighbourhood region to activists who cannot benefit from financial support from the donors community through traditional funding due to their size, legal status (e.g. non-registered entities or individuals), geopolitical context (e.g. civil war) etc. The specificity and sensitivity of this particular type of intervention requires a body with appropriate technical competence, high degree of specialisation and mandate. In this respect, the EED offers trustful credibility and reliability thanks to its particular institutional set-up, being steered by representatives of the European Parliament, of the EU Member States, of the European External Action Service and of the civil society of the Neighbourhood countries. This unique position, combined with a good track-record with efficient award procedures (that are nevertheless compliant with the general principles applicable to the use of public funds) and with a standing good reputation, makes of EED an adequate organisation for providing financial support to local beneficiaries at a micro- or mini-scale which cannot be reached by other EU instruments.

4.3.2. Indirect Management with a pillar-assessed entity

Component 3 may be implemented in indirect management with a pillar-assessed entity, which will be selected by the Commission's services using the following criteria: Member State or international organisation with proven track-record of engagement in the Southern Neighbourhood region, technical expertise and mobilizable resources to manage and implement, necessary management capacities through previous actions in the sector. In case of a consortium, each entity would need to fulfil the above-mentioned criteria.

The implementation by this entity entails carrying out the activities identified in section 3, related specifically to component 3 and the overall objective of the action.

4.3.3. Changes from indirect to direct management mode due to exceptional circumstances

If the implementation modality under indirect management as defined in section 4.3.2. 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 criteria mentioned under section 4.3.2.

4.4. Scope of geographical eligibility for procurement and grants

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

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

4.5. Indicative Budget

Indicative Budget components	EU contribution (amount in EUR)	Third-party contribution, (amount in EUR)
Implementation modalities – cf. section 4.3		
Component 1 / Outcome 1		
Grants (direct management) – cf. section 4.3.1	13 000 000	1 000 000
Component 2/ Outcome 2		
Grants (direct management) – cf. section 4.3.1	7 500 000	833 330
Component 3/ Outcome 2		
Indirect management with a pillar-assessed entity– cf. section 4.3.2.	4 000 000	N.A.
Evaluation – cf. section 5.2 Audit – cf. section 5.3	may be covered by another Decision	N.A.
Strategic communication and Public diplomacy – cf. section 6	will be covered by another Decision	N.A.
Contingencies	N.A.	N.A.
Totals	24 500 000	1 833 330

4.6. Organisational Set-up and Responsibilities

This action will be managed by the Commission services and, where relevant in close collaboration with other relevant EU institutional stakeholders (European Parliament, EEAS, EU Member States).

For each component, in the cases where a steering committee is created, the participation as observer of relevant Commission services is foreseen.

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 partners' responsibilities. To this aim, each 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 logframe 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:

- Yearly reports on the annual yearly operating grants

5.2. Evaluation

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

The final or ex post evaluation will be carried out for accountability and learning purposes at various levels (including for policy revision).

The Commission shall form a Reference Group (RG) composed by representatives from the main stakeholders at both EU and national (representatives from the government, from civil society organisations (private sector, NGOs, etc.), etc.) levels. If deemed necessary, other donors will be invited to join.

The Commission shall inform the implementing partners at least 2 weeks in advance of the dates foreseen for the evaluation exercise and missions. The implementing partners 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 where relevant and following the best practice of evaluation dissemination²⁴. The implementing partners and the Commission shall analyse the conclusions and recommendations of the evaluation and, where appropriate, jointly decide on the follow-up actions to be taken and any adjustments necessary, including, if indicated, the reorientation of the project.

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

5.3. Audit and Verifications

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

²⁴ See best [practice of evaluation dissemination](#)

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 contribution agreements.

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

Implementing partners shall keep the Commission and 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 actions as well as the results of the overall action to the relevant monitoring committees.

Security issues or local political sensitivities may make it preferable or necessary to limit communication and visibility activities. In such cases, the target audience and the visibility tools, products and channels to be used in promoting a given action will be determined on a case-by-case basis, in consultation and agreement with the Commission.