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<u>THIS ACTION IS FUNDED BY THE EUROPEAN UNION</u>

<u>ANNEX V</u>

to Commission Implementing Decision on the financing of the multiannual action plan for the Human Rights and Democracy thematic programme for 2025 to 2027

Action Document for Supporting Information Integrity

MULTIANNUAL PLAN
This document constitutes the multiannual work programme within the meaning of Article 110(2) of the Financial Regulation, within the meaning of Article 23 of the NDICI-Global Europe Regulation.

1 SYNOPSIS

1.1 Action Summary Table

1. Title **CRIS/OPSYS** **business reference** **Basic Act**	Supporting Information Integrity OPSYS reference: ACT-62895/JAD.1605090 Financed under the Neighbourhood, Development and International Cooperation Instrument (Global Europe)
2. Team Europe Initiative	No
3. Zone benefiting from the action	The action shall be carried out worldwide
4. Programming document	Multi-Annual Indicative Programme for the Human Rights and Democracy thematic programme 2021-2027
5. Link with relevant MIP(s) objectives / expected results	The overall objective of MIP Priority 4 is to create and maintain an environment conducive to the full exercise of all fundamental freedoms, online and offline.
PRIORITY AREAS AND SECTOR INFORMATION	
6. Priority Area(s), sectors	Priority 4 of the MIP: Safeguarding fundamental freedoms, including harnessing the opportunities and addressing the challenges of new technologies
7. Sustainable Development Goals (SDGs)	Main SDG: 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 Other significant SDGs: SDG 5 - Achieve gender equality and empower all women and girls SDG 17 - Strengthen the means of implementation and revitalise the Global Partnership

	for Sustainable Development SDG 10 - Reduce inequality within and among countries			
8 a) DAC code(s)	Main DAC code : 15153 – Media and free flow of information Sub-code 1 : 22040 – Information and communication technology (ICT) Sub-code 2 : 15160 – Human rights			
8 b) Main Delivery Channel	21000: International NGOs			
9. Targets	☐ Migration ☐ Climate ☒ Social inclusion and Human Development ☒ Gender ☐ Biodiversity ☐ Education ☒ Human Rights, Democracy and Governance			

10. Markers **(from DAC form)**	**General policy objective @**	**Not targeted**	**Significant objective**	**Principal objective**
	Participation development/good governance	☐	☐	☒
	Aid to environment @	☒	☐	☐
	Gender equality and women's and girl's empowerment	☐	☒	☐
	Reproductive, maternal, new-born and child health	☒	☐	☐
	Disaster Risk Reduction @	☒	☐	☐
	Inclusion of persons with Disabilities @	☒	☐	☐
	Nutrition @	☒	☐	☐
	RIO Convention markers	**Not targeted**	**Significant objective**	**Principal objective**
	Biological diversity @	☒	☐	☐
	Combat desertification @	☒	☐	☐
	Climate change mitigation @	☒	☐	☐
	Climate change adaptation @	☒	☐	☐

11. Internal markers and Tags:	**Policy objectives**	**Not targeted**	**Significant objective**	**Principal objective**
	Digitalisation @	☐	☐	☒
		YES	NO	
	digital connectivity	☐	☒	
	digital governance	☒	☐	
	digital entrepreneurship	☒	☐	
	digital skills/literacy	☒	☐	
	digital services	☐	☒	
	Connectivity @	☒	☐	☐

		YES	NO	
	digital connectivity energy transport health education and research	☐ ☐ ☐ ☐	☒ ☒ ☒ ☒	
	Migration @	☒	☐	☐
	Reduction of Inequalities1 @	☒	☐	☐
	Covid-19	☒	☐	☐

<table>
<tr><td colspan="2" align="center">BUDGET INFORMATION</td></tr>
<tr><td>12. Amounts concerned</td><td>Budget line(s) (article, item): 14.020211

Total estimated cost: EUR 8 000 000

Total amount of EU budget contribution EUR 8 000 000

The contribution is for an amount of EUR 8 000 000 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</td></tr>
<tr><td colspan="2" align="center">MANAGEMENT AND IMPLEMENTATION</td></tr>
<tr><td>13. Type of financing[2]</td><td>Direct management through:
 - Grants</td></tr>
</table>

1.2 Summary of the Action

Freedom of expression and information is a cornerstone of open and fair societies, allowing citizens to make informed choices, access justice, and exercise their human rights. Yet the information environment has significantly degraded over the past decade, jeopardising the enjoyment of human rights and undermining the cohesion of societies. Independent media have lost revenues, face **existential threats** and growing violence both online and offline. Amid a rise of authoritarianism across the world, access to reliable information is increasingly at risk. Information pollution, in turn, erodes public trust in democratic processes and institutions, exacerbates inequalities, weakens social cohesion, and endangers lives. Digital transformation, while offering a host of new opportunities, is accelerating the degradation of the information environment, in particular on digital platforms.

This global action will seek to **protect and reinforce information integrity**, which the UN defines as the basis for an information environment "where freedom of expression is fully enjoyed and where accurate, reliable information, free from discrimination and hate, is available to all in an open, inclusive, safe and secure information environment."

The action will focus on increasing the **resilience of independent media** that operate in difficult legal, economic and political contexts and consolidating efforts to safeguard people's **access to reliable and factual information**.

The action is in line with the priorities of the EU Action Plan on Human Rights and Democracy (2020-2027)[34] and the political guidelines of the new Commission (2024-2029)[5]. It contributes to a 360° approach to Global Gateway.

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1 For more information, please consult: The European Commission inequality marker and Inequality Marker – Complementary Guidelines Application of the I-Marker to SSC fiches and Action Documents | Capacity4dev (europa.eu)

[2] Article 27 of the NDICI-Global Europe Regulation.

[3] EU Action Plan on Human Rights and Democracy 2020-2024

[4] Council Conclusions on the alignment of the EU Action Plan on Human Rights and Democracy 2020-2024 with the Multiannual Financial Framework 2021-2027

1.3 Zone benefitting from the Action

The action shall be carried out primarily in countries included in the list of OECD recipients published by the ECD Development Assistance Committee. Some activities may be carried out in other countries faced with human rights violations, in line with the overall objective of the thematic programme to promote and protect human rights and fundamental freedoms, democracy and the rule of law worldwide.

2 RATIONALE

2.1 Context

Freedom of expression and information is enshrined in the EU Charter of Fundamental Rights and in international treaties, including Article 10 of the European Convention on Human Rights and Article 19 of the Universal Declaration of Human Rights. The latter states that "Everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontier."

Freedom of expression and information guarantees, among other rights, unfettered a**ccess to information**, a **necessary condition** for well-governed, fair, and peaceful societies. "Independent, free and pluralistic media" is one of the five pillars of the UN Global Principles for Information Integrity – along with societal trust and resilience, healthy incentives, public empowerment, and transparency and research.

However, the integrity of our information environment -- the ecosystems in which we look for, receive, and share information -- has seen a **significant erosion** over the past decade. The severe crisis faced by independent media, combined with growing authoritarianism worldwide and the rapid digital transformation of our societies, all pose a serious threat to freedom of expression and information, information integrity, and ultimately to democracy itself.

Media freedom has been declining sharply on a global scale, with as many as 85% of people[6] currently living in countries where media freedom has worsened in the past five years. Journalism is also becoming an increasingly dangerous profession, with 99 journalists and media workers killed worldwide in 2023 – the highest death toll since 2015.[7] As many as 320 journalists around the world are estimated to be in prison for their work, also a near-record high.[8] According to Freedom House, "the erosion of press freedom is both a symptom of and a contributor to the breakdown of other democratic institutions and principles, a fact that makes it especially alarming."[9]

Digital technologies, while offering new opportunities for connecting people and advancing human rights, can also endanger freedom of expression and information. Unlawful digital surveillance is on the rise, along with cyberattacks, the deployment of malware and spyware, the banning of independent information sources, and content takedowns. A growing number of governments resort to internet shutdowns as a tactic to curtail social unrest and prevent the documentation of human rights violations. In 2023, Access Now and the #KeepItOn coalition documented as many as 283 shutdowns in 39 countries, a 41% increase from 2022 and the highest annual figure since shutdown monitoring began in 2016.

On **digital platforms**, which directly compete with professional media for consumers' attention, the volume of available content is increasing exponentially each year, with limited moderation by big tech companies, if at all. Users are flooded with content produced without the journalistic principles of reliability and fact-checking. Misleading, **harmful *or illegal* content** is pervasive and users, including youths, often lack the necessary media literacy skills to protect themselves. The rapid, largely uncontrolled development of artificial intelligence is only exacerbating this trend. The production of increasingly indiscernible deep fakes is further blurring the lines between true and false, deepening inequalities, and fuelling the polarisation of our societies. The **Digital Service Act** (DSA) came into force in 2024, introducing binding regulation of digital platforms in the EU. Outside EU

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[5] Political Guidelines 2024-2029
[6] Journalism is a public good: world trends in freedom of expression and media development: global report 2021/2022; Highlights - UNESCO Digital Library
[7] Committee to Protect Journalists, Database of Journalists Killed.
[8] Committee to Protect Journalists, Database of Journalists Imprisoned.
[9] Media Freedom: A Downward Spiral | Freedom House

borders, the UN released **Guidelines for the Governance of Digital platforms** to guide national and regional efforts to regulate platforms.

The **EU Action Plan on Democracy and Human Rights 2020-2027**[10] states that "supporting independent and pluralistic media and the safety of journalists, fighting disinformation and contributing to a digital sphere that safeguards human rights and democracy, remain central in the EU's external action." It calls for action to "protect and promote freedom of expression, media freedom and pluralism, online and offline, and access to information" and to "contribute to the safety and protection of journalists and media workers, including by working on an enabling environment for freedom of expression and by condemning attacks and other forms of harassment and intimidation both online and offline, and address specific threats faced by women journalists."

EU commitments to protecting information integrity in third countries closely reflect priorities for the European Union.

The **'political guidelines for the next Commission** (2024-2029)'[11] reiterate the EU's "enduring commitment to preserving and promoting free speech" and include work to "counter foreign information manipulation and interference online" and "address the ever-more realistic deepfakes that have impacted elections across Europe."

Protecting media freedom and countering disinformation are both strong priorities in the **European Democracy Action Plan** (EDAP)[12]. Besides the 2021 recommendation on the protection, safety and empowerment of journalists and other media professionals in the European Union[13], the EU put in place under the European Media Freedom Act a set of new rules to protect media pluralism and independence in the EU, including for public service media[14]. In addition, the EU adopted a recommendation and legislation to protect journalists and human rights defenders from abusive lawsuits against public participation (SLAPPs) equipping them with the tools to fight back against abusive court proceedings[15]. This approach is complemented by support measures coined under the "NEWS Initiative" in the 2020 **Media and Audiovisual Action Plan**[16] earmarking financing from the Creative Europe programme in form of project grants. Supporting online platforms and industry to meet their commitments under the **2022 EU Code of Practice on Disinformation**, as well as the independent community of fact-checkers and media literacy experts through the **European Digital Media Observatory** (EDMO), also feeds into the EU's efforts for a more transparent, safe and trustworthy online environment.

All in all, the EU is one of the biggest media donors and has also been leading the regulatory response to the challenges posed by digital technologies, including through legislation such as the General Data Protection Regulation (GDPR), the Digital Services Act (DSA), the Digital Markets Act (DMA), the Regulation on transparency and targeting of political advertisingand the AI Act.

As a result, the EU is well positioned to consolidate its actions in support of information integrity on a global level.

2.2   Problem analysis

Analysts are painting a bleak picture of the global information environment, with accelerating digital transformation and the rise of artificial intelligence set to intensify **threats** against the integrity of our information ecosystems. The independent media sector is on the frontline, facing an unprecedented confluence of social, political, and technological challenges that are endangering journalism as a profession and information as a public good. In this context, media also face major financial challenges, with advertising revenues shifting primarily to online intermediaries and plaforms with dominating online consumption habits.

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[10] EU Action Plan on Human Rights and Democracy.
[11] 'Political guidelines for the new European Commission 2024-2029, e6cd4328-673c-4e7a-8683-f63ffb2cf648_en (europa.eu)
[12] Communication on the European democracy action plan | European Commission (europa.eu)
[13] C(2021) 6650 final
[14] Regulation (EU) 2024/1083 of the European Parliament and of the Council of 11 April 2024 establishing a common framework for media services in the internal market and amending Directive 2010/13/EU (European Media Freedom Act), ELI: http://data.europa.eu/eli/reg/2024/1083/oj.
[15] Protecting journalists and human rights defenders from strategic lawsuits against public participation (SLAPPs) - European Commission (europa.eu)
[16] The 'News Initiative' | Shaping Europe's digital future

In addition to an upsurge in violence against media workers both online and offline, **public trust** in journalism is plummeting -- a trend caused chiefly by the pollution of information ecosystems compounded by governments' increasingly hostile discourse against independent media. State capture of media interests is on the rise globally, and digital transformation has led to a collapse of traditional business models that is forcing independent media outlets to entirely rethink their monetisation strategies or shut down. Mounting authoritarianism is also increasingly pushing journalists into exile, creating new challenges and needs for the growing community of media actors serving their audiences from abroad. Despite the central role of independent media for democracy and the existential threats facing the sector, international aid remains woefully inadequate: only 0,3% of total official development aid is committed to supporting media freedom and pluralism.[17]

This action **supports independent media outlets and journalists** in tackling these multiple challenges, increasing their overall resilience, and ultimately consolidating their work to bring a plurality of views to an otherwise shrinking space. Women media workers and those operating in difficult contexts are prioritised as particularly vulnerable. The action helps independent media take greater advantage of digital technologies, while reinforcing their skills to better protect themselves from digital threats. It creates new learning and development opportunities for media workers in the Global South, many of whom have limited access to resources for professional growth, especially in countries under authoritarian rule or involved in conflict.

Although **digital transformation** is impacting the information environment in many ways, legislative and regulatory processes aimed at safeguarding information integrity in the digital sphere are in their early days and still concern a limited number of countries. Information pollution, accelerated by the rapid development of artificial intelligence, is spreading largely unchecked. At the same time, illiberal governments are increasingly adopting new laws and regulations clamping down on independent media and access to information under the pretence of protecting national security – or, in the case of events like the COVID-19 pandemic, of protecting public health and safety. Civil society and media actors therefore play a key role in engaging with authorities and other relevant stakeholders to safeguard independent media and public access to reliable, factual information.

The action seeks to further strengthen information integrity by supporting efforts to **push back against the spread of false, misleading, manipulated and otherwise harmful information**. It strengthens the **media literacy and fact-checking skills and capacity** of media workers, with the goal of stemming the spread of non-factual content to the wider public and increasing audiences' own resilience to harmful information, such as misinformation and disinformation. The action addresses some of the other obstacles undermining citizens' **access to reliable information**, including restrictive legislation or other imposed constraints, and reinforces initiatives working towards stronger human-rights due diligence in the regulation, production, and dissemination of information. The action also seeks to help the media sector become more innovative, **competitive**, and drive more revenues, which is a key avenue to support its independence and sustainability.

The action also contributes to **raising global awareness** of the need for a more enabling environment for independent media and the importance of a healthy information environment for societies and communities across the world.

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

Rights-holders

Media workers (journalists, employees of media organisations with non-editorial profiles, bloggers and other relevant content producers) at local, national, and regional level in relevant geographic areas. They play a crucial role in conveying independent, reliable information to audiences. Their work, despite a crisis in public trust, is a cornerstone of open, fair, and peaceful societies.

Civil society organisations and NGOs raise awareness of threats to information integrity, monitor violations to freedom of expression and information, hold authorities to account, provide policy and donor recommendations, build the capacities of relevant groups, and help build trust and ownership among stakeholders.

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[17] Data provided by the Center for International Media Assistance in its publication "Are Donors Taking the Journalism Crisis Seriously? An Analysis of Official Aid to Media 2010–2019", 7 February 2024.

Journalism associations and unions, media councils play an essential role in safeguarding media freedom and pluralism and advocating for a more enabling environment for independent media. They monitor and raise awareness of violations committed against media outlets and individual journalists, and engage with relevant authorities to ensure that legislation allows media workers to operate in an open and safe environment.

All citizens across the world have the right to seek, receive, and share information through any channel and regardless of borders, as stipulated in international law. In a growing number of countries, this right is either partially or entirely denied to citizens, hurting their ability to shape informed opinions, communicate with others, and access various opportunities and services. The spread of hate speech and non-factual content further exacerbates this trend.

Duty-bearers

Government institutions, including media and digital regulators, at local, national and regional levels play an important role in shaping and enacting legislation aimed at protecting information integrity, and providing access to remedies.

3 DESCRIPTION OF THE ACTION

3.1 Objectives and Expected Outputs

The **Overall Objective** (Impact) of this action is to promote information integrity and safeguard freedom of expression and information across the world, thereby contributing to greater enjoyment of human rights by all citizens.

The **Specific Objective** (outcome) of this action are to:

1. Strengthen the resilience of the independent media sector, in particular media outlets and media workers operating in difficult contexts, with particular focus on women
2. Counter the spread of false, misleading, manipulated and otherwise harmful information; and *s*afeguard citizens' access to reliable information

The **outputs** to be delivered by this action contributing to the Specific Objectives (Outcomes) are:

1.1. Strengthened capacities of media outlets and journalists at risk to respond to challenges facing the sector, and achieve greater access to professional development and learning opportunities

1.2. Strengthened capacity of media actors and civil society for global advocacy on fostering a more enabling environment for independent media and restoring public trust in journalism

2.1. Strengthened capacity media actors and civil society utilise in countering the spread of false, misleading, manipulated and otherwise harmful information

2.2. Strengthened capacity of media actors and civil society in addressing threats to citizens' access to reliable information

3.2 Indicative Activities

Activities related to **Output 1.1:**
- Support for consolidating infrastructure, developing new business models, harnessing new technologies, and increasing the digital safety of media outlets and media workers;
- learning and professional development exchange for journalists and media workers, including media workers operate in a hostile context;
- Support for building and maintaining networks of at-risk journalists and media actors to train and work on cross-country investigations, fact-checking, etc.;

- Medium-term support to journalists and media actors at risk, exiled or displaced, including financial and legal support (in full complementarity with other EU mechanisms, including Protect.Defenders.eu);

Activities related to **Output 1.2**:
- Advocacy, lobbying and development of strategies by civil society and media actors to achieve more enabling legislation for independent media and greater recognition of the value of journalism as a public good;
- Engagement of civil society and media actors with governments and other stakeholders to mitigate the impact of repressive legislation on the independent media sector or support the development of enabling frameworks;
- Reinforcing the participation of independent media from the Global South, including at local level, in international policy and donor dialogues on supporting the independent media sector and safeguarding the integrity of the information environment;

Activities related to **Output 2.1**:
- Reinforcing media literacy and fact-checking among media workers and other relevant content producers, particularly those operating in repressive environments;
- Supporting closer collaboration between civil society and media actors to counter the spread of false, misleading, manipulated and otherwise harmful information;

Activities related to **Output 2.2**:
- Advocacy, capacity-building, and development of strategies by CSOs and/or media actors to address obstacles undermining citizens' access to reliable information*;*
- Engagement by CSOs and/or media actors with governments, media and digital regulatory authorities, tech companies, and other relevant stakeholders to ensure their alignment with freedom of expression and information.

3.3 Mainstreaming

Environmental Protection & Climate Change

Outcomes of the EIA (Environmental Impact Assessment) screening (relevant for projects and/or specific interventions within a project*)*
The EIA (Environment Impact Assessment) screening classified the action as Category C (no need for further assessment). Finally, in the framework of the European Green Deal and the Guidelines for integrating the environment and climate change, the action will aim to help protect the environment and combat climate change by fighting off disinformation and misinformation around these issues.

Outcome of the CRA (Climate Risk Assessment) screening (relevant for projects and/or specific interventions within a project)
The Climate Risk Assessment (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 this action will place special emphasis on protecting women journalists and supporting their professional development, as well as advancing women's right to enjoy an information environment that is open and safe from harmful information.

The Action will be implemented in respect of gender mainstreaming and will contribute to the EU Gender Action Plan (GAP III) which stresses the need for an equal participation and enjoyment of all human rights and fundamental freedoms, the achievement of gender equality and the empowerment of women and girls.

Human rights

A human rights-based approach will be ensured in all the phases of the different activities by promoting inclusion and participation, non-discrimination, equality and equity, transparency and accountability.

Disability

As per OECD Disability DAC codes identified in section 1.1, this action is labelled as D0. This implies that although persons with disabilities are not the specific target population of this Action, they will be among the beneficiaries if they belong to a group targeted under this action.

Reduction of inequalities

As per Inequality marker, this action is I-1. By improving the quality and efficiency of implementation of the Human rights and Democracy thematic programme and ensuring the participation of CSO in human rights dialogues, the action contributes to the reduction of inequalities.

Democracy

This action will ensure the participation of media actors and civil society organisations representing, and reporting about, excluded and discriminated individuals and groups, e.g. women, journalists at risk, journalists reporting from news deserts, journalists with limited access to professional development, human rights defenders, and LGBTI persons.

Conflict sensitivity, peace and resilience

The action will also duly consider and mainstream conflict sensitivity and will contribute towards building peaceful and resilient societies. It will apply the "do-no-harm" and "leave no one behind" principles.

Disaster Risk Reduction

N/A

Other considerations if relevant

N/A

3.4 Risks and lessons learnt

Category	Risks	Likelihood (High/ Medium/ Low)	Impact (High/ Medium/ Low)	Mitigating measures
External environment	Shrinking civic space will not allow programme activities in some of the most challenging contexts	**Medium**	**High**	Creating a global programme that relies on virtual networks and that encourages peer-to-peer knowledge-sharing can sidestep some of the limitations brought by shrinking civic space
External environment	Increase in digital and physical threats against media workers, CSOs, and project staff	**High**	**Medium**	Increase the resilience of independent media and civil society to digital and physical threats. Conduct security assessments and mainstream operational security across the intervention. In the most challenging contexts, confidentiality is crucial to reduce risks against beneficiaries

Political	National or regional political instability	**Medium**	**High**	The programme is designed to be conducted in areas of instability. Built-in flexibility and strong engagement with local partners lower the risks of disruption of activities
Political	Activities are perceived as motivated to promote EU political agenda, including among media actors and CSOs	**Medium**	**Medium**	Focus on inclusivity, local partnerships, and local ownership is expected to outweigh the risks. Highlighting the values-based approach of the intervention in visibility actions and engagement with local partners. Monitoring of country-level sentiment by the implementing partners
Political	Potential challenge to establish a meaningful dialogue between media, civil society and tech companies, especially with respect to non-strategic markets in the Global South	**Medium**	**Medium**	Facilitation of dialogue at EU and other donor level. Learning from existing examples
Planning, processes, and systems	Risk of overlapping activities and duplication with existing projects and initiatives	**Medium**	**Low**	Close coordination with relevant donors, implementing partners, EU Delegations, and ProtectDefenders.eu will significantly reduce the risk of overlap
Planning, processes and systems	Difficulty to provide financial support due to foreign funding bans/restrictions; freezing or interception of funds; potential misuse of funding and fraud; impediments on funding delivery channels	**Medium**	**Low**	Implementing partners have experience providing funding in most countries safely and discreetly, regularly assessing ways to channel funding in restrictive environments. Strict due diligence is conducted when selecting beneficiaries. Implementing partners collect relevant information and documentation before, during, and after transfer of funds. Precautionary measures and mitigating measures are in place to prevent fraud and misuse of funds
Planning, processes and systems	Women and marginalised group benefit from the programme to a lesser extent due to more limited access to digital technologies and other resources	**Medium**	**Low**	Prioritisation of marginalised groups and adequate inclusion of women, youth, and persons with disabilities in intervention activities

Communication and information	Security and political risks related to the provision of direct support	**Medium**	**High**	This will be mitigated by confidentiality policy, including the use of encrypted means of communication and management of the Action at the level of Headquarter
Political and financial	Double-financing with other EU funding programmes	**Medium**	**High**	This can be mitigated by liaising with the responsible agencies (e.g. EACEA) and tracking beneficiaries presenting such risks. The TED Working Group on Information Integrity, along with other coordination formats, increases donor coordination and reduce the risks of duplication.

Lessons learnt:

Due to the complexity of threats against information integrity, a holistic approach based on strong **partnerships** is key to supporting media freedom and pluralism and tackling challenges facing the information environment. Previous projects have shown that participative approaches and strong local ownership are central to the impact and sustainability of interventions. Stronger collaboration between media actors, civil society, authorities, tech companies, and other relevant stakeholders is necessary to reverse the negative trends affecting information ecosystems.

The needs of independent media and the broader challenges to information integrity are increasingly global in nature, making coordination with other relevant EU programmes particularly relevant.

The design of this action draws lessons from the European Commission's (DG INTPA) previous media-support programme, Media4Democracy, which supported EU Delegations in the implementation of the EU Guidelines on Freedom of Expression Online and Offline. The intervention also increased the number of actions in support of media developed by EU Delegations.

The OECD Principles for Relevant and Effective Support to Media, adopted in 2024, offer a comprehensive, up-to-date set of recommendations for donors in order "to ensure that the international response to the crisis in the media sector fits better in a rapidly changing environment." They constitute a valuable tool in the development of interventions aimed at supporting independent media.

3.5   The intervention logic

To protect information integrity and safeguard freedom of expression and information, independent media must be able to operate in a **safe and enabling environment**. Effective legal frameworks and due diligence to human rights must also be in place to ensure unhindered access to information while countering the spread of harmful information. Selected consortia of media development NGOs, as well as organisations with demonstrated experience with information integrity issues, have the necessary capacity and networks to make significant contributions to these objectives.

This action will support independent media outlets and media workers, particularly women journalists and those at risk, in building their capacities to respond to the combination of challenges facing the sector – from government crackdowns to the erosion of public trust, state capture, digital and physical threats, the need to transform their business models, and the unique difficulties linked to conducting journalism from exile. The action will consolidate peer-to-peer networks, information-sharing and solidarity, contributing to a more **resilient, united media community**. The advocacy component will increase global awareness of the vital role of media pluralism for free and fair societies and will help foster a more enabling environment for independent media.

If these assumptions hold true, independent media will be in a stronger position to continue providing reliable, factual information to audiences across the world, in safer and more sustainable conditions. Citizens, in turn, will have increased access to a variety of content produced by qualified media professionals, enabling them to make informed choices and exercise their rights.

The action will strengthen the capacities of civil society and media actors to monitor, raise awareness of, and **propose remedies** to attempts at restricting citizens' access to information, for instance in cases of restrictive legislation, censorship, overly restrictive moderation, or internet shutdowns. Civil society and media actors will also be supported in their work to counter hate speech and the spread of false, misleading, manipulated and otherwise harmful information.

Duty-bearers, notably governmental institutions, will have increased access to knowledge and tools to safeguard media pluralism and unrestricted access to information. They will also have greater opportunities to engage and **collaborate with civil society** and other stakeholders towards these goals.

If these assumptions hold true, a greater number of citizens will enjoy unrestricted access to information while being less exposed to harmful content, both online and offline.

Eventually, if the action makes demonstrated contributions to both specific objectives, global information integrity will be reinforced and freedom of expression and information will be better protected.

3.6   Logical Framework Matrix

This indicative logframe constitutes the basis for the monitoring, reporting and evaluation of the intervention.

On the basis of this logframe matrix, a more detailed logframe (or several) may be developed at contracting stage. In case baselines and targets are not available for the action, they should be informed for each indicator at signature of the contract(s) linked to this AD, or in the first progress report at the latest. New columns may be added to set intermediary targets (milestones) for the Output and Outcome indicators whenever it is relevant.
-   At inception, the first progress report should include the complete logframe (e.g. including baselines/targets).
-   Progress reports should provide an updated logframe with current values for each indicator.
-   The final report should enclose the logframe with baseline and final values for each indicator.

The indicative logical framework matrix may evolve during the lifetime of the action depending on the different implementation modalities of this action.

The activities, the expected Outputs and related indicators, targets and baselines included in the logframe matrix may be updated during the implementation of the action, no amendment being required to the Financing Decision.

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

Results	Main expected results	Indicators	Baselines	Targets	Data sources	Assumptions
Impact	Promote information integrity and safeguard freedom of expression and information across the world, thereby contributing to greater enjoyment of human rights by all citizens	1 Number of non-EU countries improving their country situation score under the World Press Freedom Index* 2 Number of non-EU countries improving their country situation score under the Freedom House Index on Freedom of the Net*	1. TBD 2. TBD	1. TBD 2. TBD	1 & 2. Worldwide Governance Indicator, Voice and Accountability dimension. World Press Freedom Index as reported by Reporters without Borders Freedom House Index Freedom of the Net Index	*Not applicable*

Outcome 1	Strengthen the resilience of the independent media sector, in particular media outlets and media workers operating in difficult contexts	1.1. Number of journalists, bloggers and other media workers that received concrete assistance from the EU (physical protection, legal counselling, emergency sheltering, relocation and return plans, among others), disaggregated by sex*	1.1 TBD	1.1 TBD	1.1 Progress reports of the EU-funded intervention	x
		1.2. Number of government policies developed or revised with civil society organisations' (particularly journalists associations and federations) participation through EU support (GERF 2.29)	1.2 TBD	1.2 TBD	1.2 Progress reports of the EU-funded intervention	
Outcome 2	Counter the spread of false, misleading, manipulated and otherwise harmful information; safeguard citizen's access to reliable information	2.1. % of CSOs and/or media actors that received capacity building from the EU funded action that increased their resilience to false, misleading, manipulated and otherwise harmful information	2.1 TBD	2.1 TBD	2.1 Progress reports of the EU-funded intervention	
		2.2. % of CSOs and/or media actors that received capacity building from the EU funded action that increased their capacity to maintain access to reliable information in cases of restriction to information access.	2.2 TBD	2.2 TBD	2.2 Progress reports of the EU-funded intervention	

Output 1 related to Outcome 1	Strengthened capacities of media outlets and journalists at risk to respond to challenges facing the sector, greater access to professional development and learning opportunities, increased digital skills and safety, consolidated peer-to-peer networks and knowledge-sharing	1.1.1 Number of media outlets or journalists that benefited from EU-funded capacity-building, training, professional development opportunities, peer-to-peer networking and knowledge sharing or individual assistance, disaggregated by sex 1.1.2 Number of media outlets or journalists that benefited from EU-funded capacity-building, training, professional development opportunities, or individual assistance	1	1.1.1	1.1.1	
Output 2 related to Outcome 1	Strengthened global advocacy by media actors and civil society to promote media freedom and pluralism, foster a more enabling environment for independent media, raise awareness of the existential threats facing the independent media sector, and help restore public trust in journalism	1.2.1 Number of advocacy and capacity-building actions by CSOs and/or media actors to foster a more enabling environment for independent media 1.2.2 Number of reports and studies on media freedom and pluralism produced or supported by the EU-funded intervention				

Output 1 related to Outcome 2	Strengthened role of media actors and civil society in countering the spread of false, misleading, manipulated and otherwise harmful information	2.1.1 Number of media workers, content producers and CSOs who received capacity building to increase their resilience to false, misleading, manipulated and otherwise harmful information through the EU-funded intervention, disaggregated by sex 2.1.2 Number of capacity-building and advocacy actions by CSOs and/or media actors to counter the spread of false, misleading, manipulated and otherwise harmful information				
Output 2 related to Outcome 2	Strengthened role of media actors and civil society in addressing threats to citizen's access to reliable information	2.2.1 Number of capacity-building and advocacy actions by CSOs and/or media actors to counter threats to citizens' access to reliable information 2.2.2 Number of members of the general public reached by advocacy activities to raise awareness of threats to access to information, disaggregated by sex			2.2.1 2.2.2 Pre- and post- training test reports	

4 IMPLEMENTATION ARRANGEMENTS

4.1 Financing Agreement

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

4.2 Indicative implementation period

The indicative operational implementation period of this action, during which the activities described in section 3 will be carried out and the corresponding contracts and agreements implemented, is **78 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 rules and procedures for providing financing to third parties are respected, including review procedures, where appropriate, and compliance of the action with EU restrictive measures[18].

4.3.1 Direct Management (Grants)

Grants: (direct management)

(a) Purpose of the grant(s)

The grants will contribute to achieving the specific objectives under this action.

Financial Framework Partnership Agreements (FFPAs) are in place with global civil society partners, illustrating the commitment of the European Commission to support CSOs not only as providers of aid but also as pivotal actors of governance. These FFPAs allow for further alignment of CSO initiatives and European Union's policy priorities through partnerships underpinned by mutual interest and common shared objectives. FFPAs allow this action to engage different kinds of actors than those best placed to compete in a call for proposals.

(b) Type of applicants targeted

FFPA partners are the main applicants targeted. Other CSOs, for-profit organisations, and/or public and private entities whose mandate or main purpose is international media development could also be further targeted.

(c) Justification of a direct grant

Under the responsibility of the Commission's authorising officer responsible, grant(s) can also be awarded without a call for proposals to organisations selected using the following criteria:

(i) global remit to defend freedom of expression and access to information in the digital sphere;
(ii) track record and capacity to bring together relevant networks and/or build partnerships of grassroots organisations active in promoting freedom of expression and access to information in the digital sphere;
(iii) proven expertise and experience in the field of promoting freedom of expression and access to information in the digital sphere;
(iv) capacity to combine the academic (knowledge and research), policy (advocacy) and practitioner (operations) aspects of work in this field.

Under the responsibility of the Commission's authorising officer responsible, the resort to an award of a grant

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[18] Please note that the sanctions map (www.sanctionsmap.eu) 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.

without a call for proposals is justified because, by fulfilling the criteria above, the beneficiay will comply with Art. 198 c) *to bodies with a de jure or de facto monopoly* ; or f) *for activities with specific characteristics that require a particular type of body on account of its technical competence, its high degree of specialisation or its administrative powers, on condition that the activities concerned do not fall within the scope of a call for proposals* of the Financial Regulation.

The part of the action under the budgetary envelope reserved for grants may, partially or totally and including where an entity is designated for receiving a grant without a call for proposals, be implemented in indirect management with an entity, which will be selected by the Commission's services using the criteria referred to in section 4.3.2 below.

4.3.2   Changes from indirect to direct management mode (and vice versa) due to exceptional circumstances (one alternative second option)

If implementation through direct management with grants is not possible, in exceptional and duly justified cases required by the local in-country context and the nature of the action, activities at country level may be implemented by indirect management with a pillar assessed international organisation and/or an EU Member State organisation. This international organisation and/or EU Member State organisation will be selected based on the following criteria: (i) its competence and expertise in the required field; (ii) its capacity to work with local civil society; (iii) its added value; and (iv) its operational capacity.

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.

4.5   Indicative Budget

Indicative Budget components	EU contribution (amount in EUR) 2025	EU contribution (amount in EUR) 2026	EU contribution (amount in EUR) 2027
Implementation modalities – cf. section 4.3			
Specific Objectives 1 & 2 composed of			
Grants (direct management) – cf. section 4.3.1.		8 000 000	
Grants – total envelope under section 4.3.1		8 000 000	
Evaluation – cf. section 5.2 **Audit** – cf. section 5.3		will be covered by another Decision	
Totals		**8 000 000**	

4.6   Organisational Set-up and Responsibilities

European Commission Headquarters will carry out the contracting and management of the grants.

A regular dialogue with the EU will take place in the framework of the Financial Framework Partnership Agreements governing the grants to provide strategic guidance and review overall implementation.

For non-FFPA grants, the EU will also engage closely with the partner(s) to provide strategic guidance and

review overall implementation.

As part of its prerogative of budget implementation and to safeguard the financial interests of the Union, the Commission may participate in governance structures set up for governing the implementation of the action and may sign or enter into joint declarations or statements, for the purpose of enhancing the visibility of the EU and its contribution to this action and ensuring effective coordination.

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).

5.2 Evaluation

Having regard to the nature of the action, mid-term and/ or final evaluation(s) may be carried out for this action or its components via independent consultants contracted by the Commission and/ or via an implementing partner. Any mid-term evaluation will be carried out for problem solving, accountability and learning purposes at various levels (including for policy revision).

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

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

The evaluation reports shall be shared with the implementing partners and other key stakeholders following the best practice of evaluation dissemination[19]. The implementing partner and the Commission shall analyse the conclusions and recommendations of the evaluations and, where appropriate, in agreement with the partner country, jointly decide on the follow-up actions to be taken and any adjustments necessary, including, if indicated, the reorientation of the project.

The financing of the evaluation(s) contracted by the Commission 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.

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[19] See some practical examples of creative communications for evaluation dissemination.

6 STRATEGIC COMMUNICATION AND PUBLIC DIPLOMACY

The 2021-2027 programming cycle will adopt a new approach to pooling, programming and deploying strategic communication and public diplomacy resources.

In line with the 2022 Guidance for External Actions "Communicating and Raising EU Visibility", it will remain a contractual obligation for all entities implementing EU-funded external actions 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. This obligation will continue to apply equally, regardless of whether the actions concerned are implemented by the Commission, partner countries, service providers, grant beneficiaries or entrusted or delegated entities such as UN agencies, international financial institutions and agencies of EU Member States.

However, action documents for specific sector programmes are in principle no longer required to include a provision for communication and visibility actions promoting the programmes concerned. These resources will instead be consolidated in Cooperation Facilities established by support measure action documents, allowing Delegations to plan and execute multiannual strategic communication and public diplomacy actions with sufficient critical mass to be effective on a national scale.