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ANNEX 8

to the Commission Implementing Decision on the financing of the multiannual action plan in favour of Sub-Saharan Africa for 2023-2025

Action Document for ‘Fighting Illicit Financial Flows, Money Laundering and the Financing of Terrorism in Sub-Saharan Africa’

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	Fighting Illicit Financial Flows, Money Laundering and Financing of Terrorism in Sub-Saharan Africa OPSYS number: ACT-61919 Financed under the Neighbourhood, Development and International Cooperation Instrument (NDICI-Global Europe)
2. Team Europe Initiative	YES - Team Europe Initiative (TEI) to Support Africa in Combating Illicit Financial Flows and Transnational Organised Crime (continental).
3. Zone benefiting from the action	<p>The action shall be carried out in Sub-Saharan Africa, in the beneficiary countries of Eastern, Southern, Central and Western Africa indicated below based on their respective Financial Action Task Force (FATF)-Style Regional Body (FSRBs) membership:</p> <ul style="list-style-type: none">• Eastern and Southern Africa Anti Money Laundering Group (ESAAMLG) (19): Angola, Botswana, Eswatini, Eritrea, Ethiopia, Kenya, Lesotho, Madagascar, Malawi, Mauritius, Mozambique, Namibia, Rwanda, Seychelles, South Africa, South Sudan, Tanzania, Uganda; Zambia, Zimbabwe, as well as ESAAMLG observers (1): Burundi• Task Force on Money Laundering in Central Africa (GABAC) (7): Cameroon, Central African Republic, Chad, Republic of the Congo, Democratic Republic of the Congo (DRC), Equatorial Guinea, Gabon• Inter-Governmental Action Group against Money Laundering in West Africa (GIABA) (17): Benin, Burkina Faso, Cape Verde, Comoros, Côte d’Ivoire, The Gambia, Ghana, Guinea, Guinea Bissau, Liberia, Mali, Niger, Nigeria, São Tomé e Príncipe, Senegal, Sierra Leone, Togo• Middle East and North Africa Financial Action Task Force (MENAFATF) (4): Djibouti, Mauritania, Somalia, Sudan

4. Programming document	Sub-Saharan Africa Multi-Annual Indicative Programme 2021-2027			
5. Link with relevant MIP(s) objectives / expected results	<p>The action contributes to the Priority Area 2: Democratic Governance Peace and Security, and Culture</p> <p><i>Specific objective 2:</i> Reduce the incidence, duration and intensity of violent conflicts in Africa and contribute to effective prevention, protection against and response to transnational security threats, including organised crime, across the continent.</p> <p>-<i>Result 2.5:</i> Capacities of pertinent/specialised institutions and frameworks for the prevention of and combat against illicit financial flows, money laundering and the financing of terrorism are enhanced.</p> <p>-<i>Result 2.3:</i> African law enforcement agencies, judiciary institutions and relevant non-state actors are capacitated and able to carry out their tasks to effectively prevent, repress, counter and prosecute transnational threats in full respect of fundamental values, human rights and international humanitarian law.</p>			
PRIORITY AREAS AND SECTOR INFORMATION				
6. Priority Area(s), sectors	Priority area 2 – Democratic Governance Peace and Security, and Culture DAC Code 151 – Government & Civil Society - general			
7. Sustainable Development Goals (SDGs)	<p><u>Main SDG (1 only):</u> 16 Peace, Justice and Strong Institutions</p> <p><u>Specific targets:</u></p> <p>-16.4: to significantly reduce illicit financial and arms flows, strengthen the recovery and return of stolen assets and combat all forms of organised crime</p> <p>-16.6: develop effective, accountable and transparent institutions at all levels</p> <p>-16.a: to strengthen relevant national institutions, including through international cooperation, for building capacity at all levels, in particular in developing countries, to prevent violence and combat terrorism and crime.</p> <p><u>Other significant SDG:</u> 17 - Partnerships for the Goals</p> <p><u>Specific target:</u></p> <p>- 17.3 Mobilise additional financial resources for developing countries from multiple sources</p>			
8 a) DAC code(s)	15113 – Anti-corruption organisations and institutions – 40% 15130 – Legal and judicial development – 40% 43081 – Multisector education/training – 20%			
8 b) Main Delivery Channel	11000 – Other public entities in donor country			
9. Targets	<input type="checkbox"/> Migration <input type="checkbox"/> Climate <input type="checkbox"/> Social inclusion and Human Development <input type="checkbox"/> Gender <input type="checkbox"/> Biodiversity <input type="checkbox"/> Education <input checked="" type="checkbox"/> Human Rights, Democracy and Governance			
10. Markers (from DAC form)	General policy objective @	Not targeted	Significant objective	Principal objective
	Participation development/good governance	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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"/>
	11. Internal markers and Tags	Policy objectives	Not targeted	Significant objective
Digitalisation @		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
digital connectivity digital governance digital entrepreneurship digital skills/literacy digital services		YES <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	NO <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/>	
Connectivity @		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
digital connectivity energy transport health education and research		YES <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	NO <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/>	
Migration @		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reduction of Inequalities @		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Covid-19		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
BUDGET INFORMATION				
12. Amounts concerned	Budget line(s) (article, item): 14.020121 (East and Central Africa): EUR 14 000 000 14.020122 (Southern Africa): EUR 12 000 000 14.020120 (Western Africa): EUR 14 000 000			

	<p>Total estimated cost: EUR 46 500 000</p> <p>Total amount of EU budget contribution: EUR 40 000 000</p> <p>The contribution is for an amount of :</p> <p>EUR 25 000 000 from the general budget of the European Union for 2023 from budget lines: 14.020120 (West Africa) EUR 8 750 000, 14.020121 (Eastern and Central Africa) EUR 8 750 000 and 14.020122 (Southern Africa) EUR 7 500 000.</p> <p>EUR 15 000 000 from the general budget of the European Union for 2024 from budget lines: 14.020120 (West Africa) EUR 5 250 000, 14.020121 (Eastern and Central Africa) EUR 5 250 000 and (Southern Africa) EUR 4 500 000.</p> <p>subject to the availability of appropriations for the respective financial years following the adoption of the relevant annual budget, or as provided for in the system of provisional twelfths.</p> <p>This action is co-financed in joint co-financing by:</p> <ul style="list-style-type: none"> - the German Federal Ministry for Economic Cooperation and Development (BMZ) for an amount of EUR 4 000 000 (Outputs 2 and 3) - the French General Directorate of the Treasury for an amount of EUR 2 000 000 (Outputs 1 and 2) - The French Ministry for Europe and Foreign Affairs for an amount of EUR 500 000 EUR (output 3). <p>The Action will contribute to the TEI on Fighting Illicit Financial Flows and related Transnational Organised Crime (TEI IFF-TOC) in Africa (Germany, France, Sweden, FinlandDE). EU Member States' indicative contributions to be confirmed.</p>
MANAGEMENT AND IMPLEMENTATION	
13. Type of financing	Indirect management with Expertise France, GIZ and CIVIPOL.

1.2 Summary of the Action

In the last decade, illicit outflows of capital from Africa have reached a level almost equivalent to the combined total annual inflows of official development assistance (ODA) and foreign direct investment (FDI) received by African countries¹. This vast volume of capital generated and moved illegally not only jeopardises the integrity of financial systems and the continent's socio-economic development by stripping countries of much needed resources, but also has a devastating impact on countries' governance, the rule of law and collective security. Indeed, much of these illicit financial flows (IFFs) are laundered and/or used to fuel corruption, organised crime, terrorism, and related harmful activities. It is against this background that the present Action aims to tackle the nexus between illicit financial flows (IFFs) and transnational organised crime (TOC) in Sub-Saharan Africa, by emphasising the fight against money laundering and the financing of terrorism (AML/CFT). In doing so, it aims at contributing to increase resource mobilisation, stabilisation, and security on the continent.

¹ UNCTAD's *Economic Development in Africa Report 2020*, key findings accessible [here](#).

The Action will follow on two regional capacity-building projects on AML/CFT, both coming to an end in 2024 and covering Eastern, Central and Southern Africa²; and Western Africa³. Applying a ‘follow and recover the money approach’, it will be implemented at the national, regional and inter-regional level in Sub-Saharan Africa and build on a comprehensive multi-stakeholder engagement strategy to maximise and sustain the results across the continent. It will also promote cooperation, exchange of knowledge and good practices between European and African practitioners.

The Action will pursue three Specific Objectives:

1. Improve national capacities, including supervisory/regulatory, law enforcement and judicial capabilities to prevent and respond to illicit financial flows (IFFs) linked to transnational organised crime and the financing of terrorism in a FATF standards-compliant manner (SO1);
2. Strengthen regional, inter-regional and international cooperation and information exchange among key AML/CFT bodies/stakeholders (SO2);
3. Increase public awareness and civil society’s role against IFFs to promote greater transparency as well as hold States and relevant entities accountable to act against IFFs and organised crime (SO3).

The present Action is expected to be a substantial building block of the continental *Team Europe Initiative to support Africa in Combatting Illicit Financial Flows and related Transnational Organised Crime* (TEI IFF-TOC). It will contribute to all its three components and be implemented in due coordination with TEI Members’ parallel initiatives.

2 RATIONALE

2.1 Context

For several years, illicit outflows of capital from Africa have reached a level equivalent to the combined total annual inflows of official development assistance (ODA) and foreign direct investment (FDI) received by African countries, raising awareness among African and European stakeholders of the urgency to act against what has become one of the continent’s most pressing challenges. Africa’s vulnerability in this regard has become evident as numerous African countries have been included in the Financial Action Task Force (FATF) ‘grey’ list, as well as in the EU list of high-risk third-country jurisdictions (‘EU AML list’) and the EU list of Non-Cooperative Jurisdictions for tax purposes (‘EU tax list’). Those listing processes are necessary to protect EU/international financial systems integrity; at the same time, an IMF working paper⁴ on the impact of the FATF grey-listing found a large, significant negative effect of grey-listing on capital inflows, which may negatively impact fragile African countries’ economies, but also European economic and financial operators in Africa. Since 2015, the EU and several of its Member States have steadily increased their technical, material, and expert support to African partners to strengthen their capacities to respond to different categories of IFFs. However, despite progress in some areas, the lack of material and human resources adequately trained, as well as structural challenges linked to policy development and legislation, law enforcement and lack of cooperation, remain noticeable across the continent.

European countries are among the major recipients of IFFs from African countries. Fighting them, and in particular mitigating the risks related to money laundering and the financing of terrorism, are at the core of the EU external action and agenda, notably in the African continent. Furthermore, strengthening the stability and integrity of African financial institutions, as well as of the non-financial sector, through more robust AML/CFT regimes is a key enabling condition for EU’s Global Gateway’s offer, as these are essential prerequisites for foreign investments, international trade and socio-economic development to flourish. While focusing on IFFs linked to transnational organised crime and terrorism, this Action will contribute to a wider EU policy agenda encompassing tax-related aspects. This includes the flagship *EU Collect More-Spend Better* strategy, which supports EU-Africa

² “Anti-Money Laundering and Counter Financing of Terrorism in Eastern, Southern, Central Africa and Yemen” (AML-CFT ESCAY), funded under NDICI-GE (SSA regional MIP AAP 2022) with EUR 5M, implemented from 2022-2024 by CIVIPOL in 24 countries from Eastern, Southern, Central Africa plus Yemen.

³ “Organised Crime - West African Response to money laundering and the financing of terrorism” (OCWAR-M) project, funded under 11th ED with EUR 6,75M, implemented from 2019-2024 by Expertise France in 15 ECOWAS countries + Mauritania.

⁴ <https://www.imf.org/-/media/Files/Publications/WP/2021/English/wp1ea2021153-print-pdf.ashx>

cooperation and strengthened dialogue on domestic revenue mobilisation and international tax standards; the G20-OECD led-initiatives; and the Addis Tax Initiative.

The Action will contribute to delivering on the EU policy priorities set out in (1) the EU Security Union Strategy for 2020-2025 and its Counter Terrorism Agenda; (2) the 2020 EU Commission's Action Plan for a comprehensive policy on Preventing Money Laundering and Terrorist Financing; (3) the 2021-2025 EU Strategy to tackle Organised Crime; and (4) the conclusions adopted by the Council of the European Union in May 2021 setting the 2022-2025 EU priorities for the fight against serious and organised crime through the European multi-disciplinary platform against criminal threats (EMPACT). In addition, it will advance the priorities set out in the 2020 Comprehensive EU strategy with Africa and will also contribute to delivering on the Joint vision for 2030 adopted at the 2022 EU-AU Summit, which identifies the fight against IFFs as a high joint priority of both continents and calls for an increased cooperation in tax governance and domestic resource mobilisation matters.

The Action will further contribute to advance on several African and international policy agendas, such as the Addis Ababa Action Agenda and the African Union (AU) 2063 Agenda, both of which identify the fight against IFFs, money laundering and corruption as a main goal to achieving domestic resource mobilisation, inclusive and sustainable socio-economic development. It will further contribute to SDG 16 (Peace, Justice and Strong Institutions) and its objective of 'significantly reduce illicit financial flows and arms flows, strengthen the recovery and return of stolen assets and combat all forms of organised crime'.

In terms of international cooperation, the Action will adopt an approach that embeds EU AML/CFT Framework, relevant UN Security Council Resolutions⁵ as well as the Recommendations issued by the Financial Action Task Force (FATF)⁶ of which the European Commission is a founding member. The FATF is the policymaking body leading the global fight against ML/FT and setting applicable international norms and standards. In the 2000s, regional bodies have emerged in Africa to facilitate the process of adopting the FATF's 40 Recommendations. Currently, there are four such FATF-style regional bodies (FSRBs) in Sub-Saharan Africa: the Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG), the Inter-Governmental Action Group against Money Laundering in West Africa (GIABA), the Task Force on Money Laundering in Central Africa (GABAC), and the Middle East and North Africa Financial Action Task Force (MENAFATF). Most have adopted multi-annual strategic action plans. In addition, several African states have developed their own national strategies and action plans to combat ML/FT. However, due to limited training and operational capacities in a context of increasing challenges faced by African states and limited resources to address them, the implementation of the necessary reforms remains insufficient and uneven across the continent. Likewise, FSRBs face difficulties in fulfilling their core task of conducting high-quality assessments of their members.

The Action will build on the achievements and lessons learned from ongoing and passed EU-supported projects. It will capitalise on previous EU supports to (i) 33 countries of Eastern, Southern and Central Africa providing national and regional capacity building on AML/CFT⁷ and (ii) to the GIABA and 15 ECOWAS countries + Mauritania to improve and operationalise AML/CFT frameworks across the region⁸.

⁵ Key policy and regulatory frameworks include UN Security Council Resolutions 2331(2016) and 2388 (2017) that direct member states to enhance use of financial investigations and transpose into their legislation AML/CFT measures to tackle illicit financial flows from transnational organised crime. These UN resolutions encourage states to work together to develop that capacity, and further encourages relevant UN entities and other international and regional organisations to provide countries, upon their request, with the financial, material and technical assistance they may require to build this capacity. The two UN Conventions against Corruption (UNCAC) and Transnational Organised Crime (UNTOC) also set international guidelines and principles towards fighting IFFs and AML/CFT.

⁶ The FATF standards including the 40 recommendations, Immediate Outcomes and methodology are an internationally recognised, comprehensive framework that set the minimum standards for action so countries' regulatory systems and criminal justice are sufficiently equipped to fight money laundering and terrorist financing.

⁷ "Anti-Money Laundering and Countering the Financing of Terrorism in the Greater Horn of Africa" project (2015-2018 - Phase 1), the "Anti-Money Laundering/Trafficking of Human Being & Smuggling of Migrants in the Greater Horn of Africa" project (Phase 2 - 2019-2022), and the "Countering transnational organised crime and terrorist groups by targeting Illicit Financial Flows in East, Southern, Central Africa & Yemen" (AML/CFT ESCAY – phase 3, ongoing), all implemented by CIVIPOL.

⁸ "Organised Crime - West African Response to money laundering and the financing of terrorism" (OCWAR-M) project, funded under 11th ED with EUR 6,75M, implemented from 2019-2024 by Expertise France in 15 ECOWAS countries + Mauritania.

The Action will also be implemented in close coordination with other relevant EU and non-EU funded, regional/trans-regional programmes and it will take into consideration the work of programmes at national level, as well as bilateral initiatives promoted by EU Member States in Sub-Saharan Africa. In this regard, the Action will take advantage on the cooperation and coordination mechanisms put in place under the newly established TEI. In particular, the Action will ensure strategic complementarities and adequate distribution of efforts with the EU Global Facility on Anti-Money Laundering and Countering the Financing of terrorism⁹ (GF-AML/CFT), which provides short-term, demand-driven technical assistance to third countries based on the deficiencies in their AML/CFT regimes. Coordination will also be ensured with another EU financed programme that includes an AML/IFF component targeting Portuguese-speaking countries in view of their linguistic, legislative, and administrative specificities¹⁰. Promoting gender equality, inclusion, and a human rights-based approach will underpin the design of this Action and will be mainstreamed as crosscutting issues during implementation.

2.2 Problem Analysis

Short problem analysis:

Illicit Financial Flows (IFFs) are defined as ‘financial flows that are illicit in origin, transfer or use that reflect an exchange of value and cross country borders’ (UNCTAD/UNODC). IFFs can be classified from many angles: sources, channels, impacts, actors involved, etc. A commonly used typology¹¹ refers to the categories of activities that may generate IFFs: (i) Illicit tax and commercial IFFs, (ii) IFFs from corruption, (iii) IFFs from illegal markets, (iv) IFFs from exploitation-type activities and financing of crime and terrorism. Some forms of IFFs are therefore directly related to the international transfer and/or laundering of proceeds of transnational organised crime (TOC). Accordingly, IFFs of categories (ii), (iii) and (iv) will be the focus of the proposed Action.

Illicit financial flows pose great challenges to development, peace, security, and stability in Africa, being responsible for major delays in national and regional achievement of the Sustainable Development Goals (SDGs). According to UNCTAD estimates in 2020, the annual volume of capital flow from Africa linked to criminal activities reached US\$ 88.6 billion, which corresponds to 3.7% of the continent GDP and nearly as much as the combined amount of ODA and FDI the continent receives annually. The vast volume of capital generated and moved illegally not only jeopardises financial structures’ integrity, but strips countries of important resources, undermining their socio-economic development by limiting domestic resource mobilisation (DRM) and financing of public services. The 2020 UNCTAD report finds out that, in African countries with high IFFs, governments spend 25% less on health than countries with low IFFs, and 58% less on education. Further than hampering poverty reduction efforts, IFFs have a devastating impact on countries’ governance, the rule of law, and security. A significant part of IFFs fuels corruption, organised crime, terrorism, and other harmful activities. On the other hand, the magnitude and geographical extent of TOC have steadily increased over the last years with profits generated by criminal activities amounting to 800 billion US dollars globally each year (low estimation). This is money not invested in societies’ development and response to local and global challenges. Thus, many major crises on the globe, and particularly on the African continent, are influenced by a strong organised crime component that either causes, worsens, or prolongs conflicts.

Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT) is a key component of the fight against IFFs and organised crime. Money laundering is a process/method by which the proceeds of crime are placed, layered and integrated into the legitimate financial system. Tackling it would make profit-motivated crime much less attractive. A similar financial logic applies to the fight against terrorism, as violent extremist groups need money to sustain their activities and expand their reach. In other words, both organised criminal groups and terrorist groups thrive on IFFs. Pursuing a ‘follow and recover the money’ approach – as this Action proposes – is therefore an effective way to address together both TOC and terrorism in Africa, with the potential to tackle different dimensions of illicit activities through their pecuniary traces and make them less lucrative.

⁹ “EU Global Facility on Anti-Money Laundering and Countering the Financing of terrorism” (GF-AML/CFT), funded under the IcSP/NDICI with EUR 20M & managed by FPI, 2017-onwards (global coverage).

¹⁰ “PRO-JUST: Strengthening the criminal justice chain in PALOP-TL” Action 10 - AAP 2023

https://www.unodc.org/documents/data-and-analysis/statistics/IFF/IFF_Conceptual_Framework_FINAL.pdf

Tackling money laundering and illicit financial flows related to/fuelling organised crime and terrorism in Sub-Saharan Africa requires working simultaneously at national and transnational levels and applying a comprehensive multi-stakeholder engagement strategy to maximise/sustain the results across the continent (and beyond). If some countries are more affected than others by the scourge of illicit financial flows and transnational organised crime (as origin, transit or destination areas), no African country is immune and only a collective, coordinated response may prove effective. Hence the proposed action proposes a three-tiered approach to sustainably address the challenges:

- *National level (SO1)*: IFFs benefit from weak or partial governance and silo-built national systems that lack the capacity to prevent, detect, investigate, prosecute, and condemn perpetrators, as well as recover ill-gotten assets. The need for adequate frameworks and capacities, and to engage stakeholders from national institutions and public/private sectors, is the first key step to efficiently tackle ML/FT and IFFs linked to organised crime.
- *Regional level (SO2)*: IFFs being transnational by nature, the relative isolation of, and disparities in emerging national systems in Africa is a problem. Linking practitioners and promoting dialogue at regional and international levels will help reduce the gaps among countries' legal and operational frameworks and remove barriers on cooperation and information exchange that are both key components to advance the fight against IFFs and TOC.
- *Multi-stakeholder engagement including civil society (SO3)*: an efficient multi-stakeholder engagement strategy shall include and thrive on the crucial role that the civil society can play in combating IFFs (and related corruption) by sensitising and mobilising public awareness and thus pushing governments to take action. Of particular importance is the role of investigative journalists and whistle-blowers whose work and disclosures have proven more than efficient in the fight against financial crime worldwide.

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

At national level, key stakeholders include national institutions, and public/private organisations involved in the areas of intelligence, investigation, prosecution, conviction and asset recovery. These include FIUs; law enforcement, border control and asset recovery agencies; judges, clerks and prosecutors; ministries of finance, of the interior; national justice inspection services; tax and customs administrations; AML/CFT supervisors; financial institutions; and Designated Non-Financial Businesses and Professions (DNFBP); and duty bearers, regulators, anti-corruption agencies. Concerning the private sector, a specific focus could be on banking, forex, MVTSSs, VASPs, telecoms (mobile money service providers), extractive and real-estate sectors. Civil society actors, Non-Profit Organisations (NPOs) working on IFF-related topics, including rights-holders' representatives; and investigative journalists/the media are also crucial stakeholders of the Action at both the national and regional levels. They should be involved in design and delivery of certain activities.

At regional level, the FSRBs would constitute key stakeholders, as both duty bearers and implementation partners: GIABA, GABAC, ESAAMLG and MENAFATF. Other regional specialised organisations may include : Eastern Africa Police Chiefs Cooperation Organisation (EAPCCO), West African Police Chiefs Committee (WAPCCO) and the Central African Police Chiefs' Committee (CAPCCO/CCPAC), the Asset Recovery Inter-Agency Networks for East Africa (ARIN-EA), for West Africa (ARIN-WA) and for South Africa (ARIN-SA) as well as the WACAP (West African Network of Central Authorities and Prosecutors) and East African Prosecutors Association. Regional economic and organisations should also feature in this mapping. They include the Common Market for Eastern and Southern Africa (COMESA), the Community of Sahel-Saharan States (CEN-SAD), the East African Community (EAC), the Economic Community of Central African States (ECCAS), the Economic Community of West African States (ECOWAS), the Intergovernmental Authority on Development (IGAD), and the Southern African Development Community (SADC). Other regional actors, including practitioners' networks or civil society networks, might be identified during the inception phase.

At the continental level, key stakeholders/interlocutors are the AUC, the Coalition for Dialogue on Africa (CoDA), the Good Financial Governance network organisations (ATAF, AFROPAC, CABRI, AFROSAI), the African Union Advisory Board on Corruption (AUABC), AFRIPOL.

At the international level, key stakeholders would include: FATF, INTERPOL, EUROPOL, EUROJUST, UNODC, the World Bank, the IMF (incl. AFROTAC), MONEYVAL, the European Banking Authority, the AMON Network, CARIN Network, the EGMONT Group/ECOFEL, and the World Customs Organisation (WCO). Other key partners are the international Non-Profit Organisations (NPOs) working on IFF-related topics such as Transparency International, CENozo, PPLAAF, Global Witness, the Organised Crime and Corruption Reporting Project (OCCRP), the Mo Ibrahim Foundation or Front Line Defenders. Other important stakeholders are the OECD-Global Forum, UNCTAD, UNECA, etc.

3 DESCRIPTION OF THE ACTION

3.1 Objectives and Expected Outputs

The **Overall Objective** (Impact) of this action is **to contribute to the fight against illicit financial flows linked to transnational organised crime and financing of terrorism with the ultimate goal of increasing domestic resource mobilisation, stabilisation and security in Sub-Saharan Africa.**

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

1. National capacities, including law enforcement, supervision and judicial capabilities to prevent and respond to illicit financial flows (IFFs) linked to transnational organised crime and the financing of terrorism are strengthened and FATF-compliant;
2. Effective regional and inter-regional cooperation and information sharing in the fight against IFFs, money laundering and the financing of terrorism is enhanced;
3. Increased public awareness and civil society's role promote greater transparency and hold States and relevant entities accountable to take action against IFFs and organised crime.

The **Outputs** to be delivered by this Action contributing to the corresponding Specific Objectives (Outcomes) are:

- 1.1. National systems ensure technical compliance and adequate laws, governance and powers to detect, investigate, prosecute, adjudicate and recover assets/capital used to fund criminal activities
- 1.2. National stakeholders have the operational capacity to efficiently prevent and repress IFFs linked to TOC, ML/FT (FIUs, police, customs, intelligence, prosecutors, judges, asset recovery agencies, AML/CFT supervisors & NPOs)
- 1.3. National stakeholders work together in a coordinated 'whole-of-government' approach to fighting IFFs linked to TOC, ML/FT, guided by risk-based approach and supported by a comprehensive data management
- 2.1. Peer national institutions collaborate efficiently at the regional and international levels with AML/CFT actors
- 2.2. FSRBs are strengthened and have the capacity and skills to fulfil their mandate to oversee and support members states in the application of international standards
- 2.3. Countries collaborate efficiently with international and regional networks fighting IFFs & TOC (Egmont Group, Interpol, Europol, the AMON network, Eurojust, CARIN, UMEOA, CEDEAO, CEEAC, UNODC, etc.)
- 3.1. CSOs and investigative journalists are sensitised, trained, empowered and networked at regional and international levels to leverage their watchdog and advocacy role, including gender and human rights-based approach
- 3.2. Whistle blowers and investigative journalist receive adequate protection from state and non-state actors and carry out their activities contributing to detect corruption and others lucrative illicit activities.

3.2 Indicative Activities

Building on the experience gained in previous regional projects on AML/CFT in Africa, a non-exhaustive and indicative overview of activities that are foreseen under **Outcome/component 1** is herewith listed:

Activities relating to Output 1.1:

- Support the adoption of legal frameworks to prevent and criminalise money laundering, terrorism financing and IFFs linked to TOC
- Where needed, support the creation of a national (risk-based) strategy to combat IFFs
- Support the adoption of adequate legal frameworks for private sector professionals and NPOs, with for the latter a focus on addressing and mitigating the adverse effects of AML/CFT tools on NPOs, Civil liberties, Human Rights and Financial Exclusion
- Support the creation and/or consolidation of specialised bodies or agencies working on IFFs, ML/FT (coordination unit, FIU, Asset Recovery, Financial Courts, Prosecutors' Office and Customs, Police, bank supervision entities), where needed;
- Support countries in addressing AML/CFT deficiencies (compliance-related), as identified by FATF and EU-led assessments, in complementarity with the EUGF AML/CFT

Activities relating to Output 1.2

- Reinforce capacities and capabilities by training of key national stakeholders with a mandate to fight IFFs related to organised crime, ML/FT, including through joint trainings (financial analyses & investigations, asset recovery, confiscations, industry/sector- and traffic-specific trainings)
- Strengthen national capacities to enlarge and sustain the capacity building efforts through training of trainers (ToT) with relevant national training bodies (ownership objective)
- Workshops on information sharing and best practices with peer national institutions involved in fighting IFFs in the region, e.g.: through interactive or simulation exercises (table-top and real-life exercises);
- Support the drafting/adoption of conventions, guidelines and/or Standards Operating Procedures and/or manuals for multi-agency cooperation between peer institutions of the continent
- Raise awareness, reinforce capacities and capabilities of regulated professions and organisations (FIs, DNFBPs, NPOs) on risks; on their role and legal obligations regarding IFFs, ML/FT, especially in the detection and reporting of suspicious transactions
- Implement or strengthen the monitoring of FIs, DNFBPs and NPOs (registry, communication, procedures), including through the training of supervisory bodies
- Support to justice institutions in organising litigation and the distribution of ML cases, with the potential specialisation of teams/institutions in the field of organised/financial crime
- Support to national law enforcement agencies (LEA) coordination structures with a specific focus on strengthening the links between central and peripheric agencies
- Support countries in addressing AML/CFT deficiencies (effectiveness-related), as identified by FATF and EU-led assessments, in complementarity with the EUGF AML/CFT

Activities relating to Output 1.3

- Support in enhancing inter-ministerial cooperation in AML and coordination of the national criminal chain, with a special focus on justice-police cooperation in criminal investigations
- Support nation-wide (self)-evaluation of the national system (National Risk Assessments)
- Support the implementation of risk-based assessment methodologies, focusing on most at-risk sectors (e.g. extractives industries, banking and finance, real estate, VAPS, etc)
- Support/enhance the ability of FIUs to gather a wide variety of financial intelligence and other relevant information and to disseminate it to competent authorities to investigate money laundering, associated predicate offences and terrorist financing
- Support the creation/enhancement of data collection systems by national financial, justice and police authorities (especially for FIUs) (under this activity equipment could be acquired)
- Support IT integration of FIU systems with other prevention actors (Tax, Customs, FI, etc.), defining implementing data exchange protocols, the automatisisation of suspicious transaction reports (under this activity equipment could be acquired)

- Support the creation of national beneficial ownership register available to competent authorities
- Support the creation/enhancement of registers containing basic information and available publicly (tbc)

Considering the geographic span of the project and the varying level of maturity of countries with regards to tackling IFFs, ML/FT, activities at the national level under SO 1 will follow a threefold approach:

- i) A common core capacity building program offered to all countries covered by the Action in the region¹²
- ii) An on-demand, short-term expertise delivered on specific topical elements. These activities will focus on supporting a large number of countries based on identified priorities during the inception phase and/or on specific AML/CFT deficiencies identified in FATF reports/national action plans;
- iii) Country pilot projects, set up based on more profound and long-term needs, centred on one or several key element(s) of the national system (ex: supporting the creation of an asset recovery agency). These pilot projects will be conducted either with a (limited) pre-identified list of countries, validated during the inception phase, and/or as identified along the life of the Action given the evolving context. If necessary, such pilot initiatives could be supported by an intermittent deployment of expertise in the country(ies) selected.

At the three levels, coordination and sharing of best practices with relevant non-EU and EU-funded country level programmes (e.g., with security, anti-corruption, justice sector reform, DRM/PFM programmes) will be put in place and promoted by EU Delegations. Furthermore, appropriate engagement and coordination with FSRBs for country-based activities will ensure policy/strategy alignment between the regional and national. Training and mentoring activities will benefit from EU professionals' expertise (law enforcement officers, financial investigators, prosecutors, judicial staff, supervisory entities, etc).

Building on the experience gained in previous regional capacity-building projects on AML/CFT in Africa, a non-exhaustive and indicative overview of activities that are foreseen under Outcome/component 2 is herewith listed:

Activities relating to Output 2.1:

- Support the adoption of cooperation and information exchange protocols at regional/multi-country level
- Support FSRBs in coordinating/supporting preparation of FATF mutual evaluations reports
- Promote the use of coordination tools in the conduct of cross-border / joint investigations
- Promote the reporting and sharing of information to relevant international bodies (e.g.: EUROPOL/INTERPOL/EUROJUST, other)
- Support international mutual legal assistance in criminal matters by promoting the signature or use of Mutual Legal Assistance agreements
- Study visits among peers or international criminal chain actors

Activities relating to Output 2.2:

- Support FSRBs in fulfilling their coordination/steering role (such as conducting evaluations, defining engagement strategies, conducting gap analysis against their mission's statement)
- Deliver training programmes for AML/CFT regional trainers
- Support FSRBs in accompanying FATF-listed countries and countries under FATF one year observation period
- Support FSRBs countries to prepare their post-observation period evaluation by the FATF Joint Groups
- Promote and reinforce good practices for sound financial management, independence and deontology of regional and national bodies in charge of AML/CFT

Activities relating to Output 2.3:

- Support FIUs to submit a membership request to EGMONT, CARIN and/or AMON networks as well as developing cooperation with other networks, such as EUROJUST

¹² Angola, Benin, Botswana, Burkina Faso, Burundi, Cabo Verde, Cameroon, Central African Republic, Chad, Comoros, Congo (Dem. Rep.), Congo (Republic of), Côte d'Ivoire, Djibouti, Equatorial Guinea, Eritrea, Eswatini, Ethiopia, Gabon, Gambia (the), Ghana, Guinea, Guinea-Bissau, Kenya, Lesotho, Liberia, Madagascar, Malawi, Mali, Mauritania, Mauritius, Mozambique, Namibia, Niger, Nigeria, Rwanda, Sao Tome & Principe, Senegal, Seychelles, Sierra Leone, Somalia, South Africa, South Sudan, Sudan, Tanzania, Togo, Uganda, Zambia, Zimbabwe

- Support the hosting of and participation to conferences or side events on technical standards and specific threats/thematic
- Train on the use of the OECD Global Forum on Common Reporting Standards for Tax and Customs administrations to support the identification of beneficial owners
- Organise High-level technical dialogue(s)

Under **Outcome/component 3**, activities implemented will include sub-granting to CSOs/NPOs. Identified activities include, but are not limited to the following:

Activities relating to Output 3.1:

- Under the lead of relevant stakeholders (such as FSRBs, selected CSOs, etc), conduct nation and region-wide sensitisation campaign on AML/CFT, related corruption and negative impact this has
- Develop and disseminate online training modules on AML/CFT and anti-corruption
- Train CSOs and investigative journalists to foster knowledge and understanding of IFFs, AML/CFT, to develop secure investigation techniques and confidential information management, advocacy skills and legal knowledge of existing laws and regulations (national and international) as well as their obligations/rights, paying attention to gender and human-rights based approach
- Create and/or support regional networks of investigative journalists and CSOs and link them up with EU/international networks/organisations

Activities relating to Output 3.2:

- Advocate for, and provide legal expertise/support towards the adoption or improvement of legal/operational frameworks for whistle-blower protection, in line with international standard (e.g. UNODC) including gender and human rights-based approach
- Train/sensitise focus/target groups, especially from at-risk sectors, on whistleblowing and safe reporting mechanisms (and their obligations/rights according to the law)
- Support CSOs/NPOs providing legal assistance to journalists/whistle-blowers
- Strengthen the partnership/networking between local, regional and EU networks protecting whistle-blowers/investigative journalists

The commitment of the EU's contribution to the Team Europe Initiative to which this action refers, will be complemented by other contributions from actors following a Team Europe approach. It is subject to the formal confirmation of each respective member's meaningful contribution as early as possible. In the event that the TEIs and/or these contributions do not materialise, the EU action may continue outside a TEI framework.

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).

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 no or low risk (no need for further assessment).

Gender equality and empowerment of women and girls

As per the OECD Gender DAC codes identified in section 1.1, this action is labelled as G0. This implies that the Action is not primarily targeting gender equality and the empowerment of women. However, activities implemented within the framework of the Action will pay due consideration to the importance of questions relating thereto, and, when relevant, mainstream gender equality and empowerment of women and girls. At operational level, a particular attention shall be put in the provision of gender diverse expertise and forming gender diverse pool of trainees, mindful of cultural norms of participating countries, or of countries where activities/meetings are planned. Gender disaggregated data will be integrated into the logical framework whenever appropriate

About the support/grants which will be provided to CSOs and/or NGOs (Outputs 3.1 and 3.2), applicants might be required to demonstrate how their projects will take gender equality and empowerment of women and girls into account. In particular, the component encompassing the protection of whistle-blowers would include a specific attention to the protection of women and girls' human rights, who may face a higher costs whistleblowing.

Human Rights

A Human rights-based approach will be applied by the respect of the working principles (participation, non-discrimination, accountability, and transparency). Appropriate vetting of all trainers and participating institutions is necessary to assure that human rights standards are maintained. All assistance and training aspects will include precautionary measures to ensure that international human rights standards and norms are met.

In particular, the Action (outcome 3) will empower right-holders by supporting to CSOs, whistleblowers and investigative journalists, including support to access to legal assistance; the Action will further promote advocacy to States towards the adoption or improvement of legal/operational frameworks for whistle-blower protection, in line with international standard (outcome 3).

Disability

As per OECD Disability DAC codes identified in section 1.1, this action is labelled as D0. This implies that the Action does not specifically address the inclusion of people living with disabilities. Nonetheless, specific needs of persons with disabilities as rights-holders (including for access to the facilities supported by this project) will be duly assessed and addressed.

The Action will ensure that rights of persons with disabilities will be respected and will encourage stakeholders and programme participants to take the initiatives to protect persons with disabilities, in accordance with the Convention on the Rights of Persons with Disabilities (CRPD)¹³, and the EU Strategy for the Rights of Persons with Disabilities 2021-2030¹⁴.

Reduction of inequalities

Given its focus on tackling transnational organised crime related IFFs, money laundering and financing of terrorism, this Action does not directly address the reduction of inequalities. However, those illicit financial flows do divert resources from sustainable development and escape domestic resources mobilisation mechanisms, which in turn increases and worsens inequalities within and between nations. Therefore, by contributing to curbing IFFs and promoting asset recovery, the Action could participate to reduce inequalities in Sub-Saharan Africa and enable countries to provide their citizens basic social services and better social protections.

Democracy

Effectively tackling transnational organised crime, IFFs, and money laundering is crucial to the integrity not only of financial systems, but of democratic institutions and societies. Moreover, it is intrinsically linked to the combat of corruption, which is another major factor leading to failings in democratic processes. Similarly, terrorism threatens democracy: measures taken by States to respond to terrorist threats, in addition to the violence perpetrated by the same groups on the populations, can generate restriction to civil liberties and citizens' participation in political life (e.g.: elections). Fear of terrorism can further stifle public debates, empower political extremes, and polarise societies, thereby threatening their democratic functioning. Activities proposed in this Action aim at improving governance/institutions integrity as well as combating criminal activities, corruption and terrorism by targeting the illicit financial resources they generate and rely on. In that respect, it may contribute to safeguard/promote the democratic functioning of societies.

Conflict sensitivity, peace and resilience

The Action will adopt a conflict sensitive approach by gaining a sound understanding of the two-way interaction between activities and context and acting to minimise negative impacts (do no harm) and maximise positive impacts of intervention. By reducing the incidence and risks associated to transnational organised crime, money laundering and the financing of terrorism, it will directly contribute to peace and stability in Sub-Saharan Africa.

¹³ [Convention on the Rights of Persons with Disabilities](#) (CRPD).

¹⁴ [EU Strategy for the Rights of Persons with Disabilities 2021-2030](#)

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	Risk 1 Health, Safety and related mobility restrictions	Medium	High	Ensure an ongoing monitoring of the situation and develop a contingency plan, based on lessons learnt from the COVID-19 pandemic. The project spans a sufficiently large number of countries to reduce risks of project blockage. If needed, the project will make use – where this is feasible – of online technology to ensure continuity of the Action's activities.
External environment	Risk 2 Unstable political and security situation	Medium	High	Development of a safety and security plan for the action in order to guarantee the experts' security and alternative actions to secure the partial implementation of activities. If contextual factors require, activities may be suspended/relocated until the situation improves (if suitable and possible, support may be continued remotely, using online tools). In case of suspension of activities and/or of the involvement of one/several countries, implementation will be redirected and prioritised towards non-affected countries.
People and organisation	Risk 3 Lack of engagement from national/regional authorities and/or competing priorities among national and regional institutions	Medium	Medium	Engage in early dialogue with authorities in order to guarantee discussions on unclear issues, enlist their support/commitment to the objectives of the Action and workplan. The methodology of implementation will allow adjustment and flexibility, where possible, to respond to emerging needs and challenges on the course of implementation, which can contribute to enhancing active engagement and ownership. Capitalise upon motivation and interest of other countries and 'champions' for certain causes. When possible, include relevant thematic (IFF, AML/CFT) into regular political dialogues between EU and African partners (at country and regional level) to underline their importance.

People and organisation	Risk 4 High turnover of staff in trained institutions and/or difficulty to get the right stakeholders attending activities/events	High	Medium	<p>Liaise with focal points at the national and regional levels to identify, together, the most relevant stakeholders for each training, activity, event; where possible, use of digital technology to make it easier to access and mobilise certain stakeholders.</p> <p>Sensitise African counterparts on the need to appoint the right trainee and ensure the appointee can follow the entire module.</p>
Planning, processes and systems	Risk 5 Limited capacities at national and regional level	Medium	Medium	Capitalising on knowledge gained from previous projects, assess the level of capacity in target countries and design activities accordingly; where needed, run early in-country needs assessments to adapt workplan.
Planning, processes and systems	Risk 6 Continental project coordination and coherence	Medium	Medium	Action to contracted/managed from Commission HQ, to ensure a consistent, centralised follow-up and monitoring, reporting adequately to EUDs. In terms of implementation, solid project management and coordination architecture to be requested from implementing partners, with teams (regional offices) based on the field, reporting to a centralised Project Management Unit tasked with steering and coordinating the work and ensure overall coherence of the Action (more information in section 4.7).
Planning, processes and systems	Risk 7 Overlapping between activities implemented by different implementing agencies (both EU and non-EU funding)	High	Medium	Early mapping / identification of overlapping activities and discussion with other implementing agencies to guarantee coordination and synergies (process that is expected to be facilitated by the TEI on IFF-TOC which is an EU coordination forum for IFF related actions in Africa).
External environment	Risk 8 Participation of CSOs funded by the actions implemented under Component 3 obstructed by repressive/non-democratic systems or non-inclusive laws	Low	High	<p>Carry out early identification of obstacles and risks via in-depth assessment of the political, human rights and social context, in close consultation with CSOs (during the programming and the implementation phases), in close coordination with the EU Delegations and relevant Commission services in Brussels.</p> <p>Support to CSOs shall be decided only when the situation has been cleared, based on a do-no-harm based analysis.</p>
People and organisation	Risk 9 Low participation of women in training activities and events	High	Low	Implementing partners to encourage women to take part into training activities and events.

	sponsored by the action			
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Lessons Learnt:

- Lessons learnt and knowledge from previous programmes (OCWAR-M in the Western Africa, AML/CFT ESCAY in Eastern, Southern and Central Africa) will be integrated into the Action design and inform its implementation;
- Current actions in the field of anticorruption/rule of law will be taken into account into the Action design and inform its implementation;
- Guarantee/improve communication between implementing partners, the Commission and EU Delegations;
- Involvement of key stakeholders from the early stages of the programme and link with implementing partners, especially through identification and appointment of a project's technical focal point in each country/FSRB;
- When possible, involve regional bodies in the implementation of multi-countries activities, as a way to both strengthen their regional mandate and increase the legitimacy of the Action ;
- Promote the signing of Memoranda of Understanding (MoU) between peer institutions which has proven, based on beneficiaries' feedback, highly efficient to facilitate bilateral/regional cooperation ;
- A degree of flexibility is necessary to adapt to varying context and capacities, both at project's workplan and HR levels;
- Ensure proper coordination and cooperation with other donors/development actors active in the countries/regions in connected domains, to avoid duplication of efforts but also to respond to emerging needs the Action could not meet (for instance, supporting the digitalisation of administration is key to implement effective AML/CFT regime but cannot be directly addressed by the Action)
- Training should be open to law enforcements actors who are not directly in charge of financial investigations to increase interagency information sharing. LEAs officers tackling the main underlying offences (drugs, human, natural resources trafficking) shall benefit from AML/CFT sensitisation and training to ensure that the control and evidence collected are duly passed on to the relevant financial investigation units; such support is key to increase the dialogue and inter-agency coordination to repress criminal activities.
- Support should focus on new emerging threats/most at-risk sectors.
- Virtual and hybrid meeting formats are appropriate for some types of meeting (such as thematic events) but should not be relied on solely. For certain trainings and events, face-to-face meetings should be given priority. Feedback has been consistent from dialogue partners pointing out that opportunities for networking and bilateral relationship-building are lost with virtual meetings, and there is insufficient time for discussions, debate and questions and answer sessions. These points will be factored into the Action.
- This Action has a highly political dimension. It may be better integrated into political dialogues conducted at both national and regional (RECs) level.
- Establish strong M&E frameworks.

3.5 The Intervention Logic

The underlying intervention logic for this action is that:

IF

- National systems ensure technical compliance and adequate governance and powers to detect, investigate, prosecute, adjudicate and recover assets/capital used to fund criminal activities (Op. 1.1), AND
- National stakeholders have the operational capacity to efficiently prevent and repress IFFs linked to TOC, ML/FT (police, customs, intelligence, prosecutors, judiciary, asset recovery agencies, FI, DNFBPs & NPOs) (OP 1.2), AND
- National stakeholders work together in a coordinated ‘whole-of-government’ approach to fighting IFFs linked to TOC, ML/FT guided by risk-based assessments and supported by a comprehensive data management (OP 1.3),

THEN

National capacities, including law enforcement and judicial capabilities to prevent and respond to illicit financial flows (IFFs) linked to transnational organised crime and the financing of terrorism are strengthened and FATF-compliant (SO1)

AND IF

- Peer national institutions collaborate efficiently at the regional and international level with AML/CFT chain actors (Op 2.1), AND
- FSRB are strengthened and have the capacity and skills to fulfil their mandate of oversight and accompanying members in the application of international standards (Op 2.2), AND
- Countries adhere to and partner efficiently with international and regional networks fighting IFFs & TOC (Egmont Group, Interpol, Europol, the AMON network, Eurojust, CARIN, UMEOA, CEDEAO, CEEAC, UNODC, etc.) (Op 2.3)

THEN

- Effective regional and inter-regional cooperation and information sharing in the fight against IFFs, money laundering and the financing of terrorism is enhanced (SO2),

AND IF

- CSO and international journalists are sensitised, trained, empowered and networked at regional and international levels to leverage their watchdog and advocacy role, including gender and human rights-based approach (Op 3.1), AND
- Whistle-blowers and investigative journalist receive adequate protection from state and CSOs and carry out their activities contributing to detect corruption and others lucrative illicit activities (Op 3.2),

THEN

- Increased public awareness promotes greater transparency and holds States and relevant entities accountable to take action against IFFs and organised crime (SO3).

ULTIMATELY contributing to the fight against illicit financial flows linked to transnational organised crime and financing of terrorism to increase domestic resource mobilisation, stabilisation and security in Sub-Saharan Africa

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	Results chain (e): Main expected results (maximum 10)	Indicators (e): (at least one indicator per expected result)	Baselines (values and years)	Targets (values and years)	Sources of data	Assumptions
Impact	To contribute to fighting illicit financial flows linked to transnational organised crime and financing of terrorism in order to increase domestic resource mobilisation, stabilisation and security in Sub-Saharan Africa	1. Total value of inward and outward illicit financial flows (in current USD); 2. Criminality rates in Sub Saharan Africa **OPSYS indicator 3. AML/CFT performance in Sub Saharan Africa	1. Tbd (last recorded) 2. Tbd (last recorded) 3. Tbd (last recorded)	1. after 4 years 2. after 4 years 3. after 4 years	1.1 UNODC/ UNCTAD 2.1 ENACT OC Index 2.2 Global Initiative-TOC 3.1 AML indicator of the ENACT OC Index 3.2 Basel AML Index	<i>Not applicable</i>

					3.3 FATF Consolidated assessment rating	
					3.4 'EU AML list' and 'EU tax list'	
Outcome 1	National capacities, including law enforcement and judicial capabilities to prevent and respond to illicit financial flows (IFFs) linked to transnational organised crime and the financing of terrorism are strengthened and FATF-compliant	1.1 Number of states with implemented integrated AML/CFT strategies and policies 1.2 Number of court cases and convictions on accounts of money laundering and terrorism financing (disaggregated by country/ FSRB) 1.3 Number of civil and criminal forfeiture from financial investigations (disaggregated by country/ FSRB) 1.4 Number of countries listed / delisted from AML/CFT FATF and EU lists	1.1 tbd 1.2 tbd 1.3 tbd	1.1 tbd 1.2 tbd 1.3 tbd	1.1 Ministries of Justice 1.2 Ministries of Justice, project reporting, press statements 1.3 Ministries of Finance / Asset Recovery agencies / Mutual Evaluations / press statements 1.4 FATF / EU lists	tbd
Outcome 2	Effective regional and inter-regional cooperation in the fight against IFFs and money laundering linked to transnational organised crime and the financing of terrorism is enhanced	2.1 Number of information requests issued under specific international standard (e.g.: Egmont) 2.2 Number of signed MLA, MoU or other conventions for assistance in information sharing or assistance in investigation in SSA with the support of the Action 2.3 Number of cross-border and/or transnational joint operations and joint	2.1 0 2.2 0 2.3 0 2.4 0	2.1 tbd 2.2 tbd 2.3 tbd 2.4 tbd	2.1 FIUs, Tax Administrations; informants from international organisations; project reporting 2.2 Ministries of Foreign Affairs / Ministries of	tbd

		<p>investigations conducted on the ground of ML/FT</p> <p>2.4 Number of guidelines/policy documents issued, and training organised by FSRBs for their member states with the support of the Action</p>			<p>Finance / project reporting</p> <p>2.3 Key informants within LEAs and the justice; Project reporting</p> <p>2.4 FSRBs; project reporting</p>	
Outcome 3	Increased public awareness promotes greater transparency and holds States and relevant entities accountable to take action against IFFs and organised crime	<p>3.1 Number of investigations/studies published by investigative journalists / CSOs/academics on IFFs and related corruption matters with the support of the Action</p> <p>3.2 Number of regional networks of investigation journalists/CSOs supported in their whistleblowing action/work</p> <p>3.3 Number of regulation, laws or mechanisms put in place to protect whistle-blowers (disaggregated by country/ RECs)</p>	<p>3.1 0</p> <p>3.2 0</p> <p>3.3. tbd</p>	<p>3.1 tbd</p> <p>3.2 tbd</p> <p>3.3 tbd</p>	<p>2.1 Press; project reporting</p> <p>2.2 Ministries of Foreign Affairs / Ministries of Finance / RECs; project reporting</p>	tbd
Output 1 relating to Outcome 1	National systems ensure technical compliance and adequate governance and powers to detect, investigate, prosecute, adjudicate and recover assets/capital used to fund criminal activities	<p>1.1.1 Number of regulations, laws, policy strategies addressing AML/CFT and/or organised crime adopted/revised or enhanced with the support of the Action (disaggregated by country)</p> <p>1.1.2 Number of training modules created/disseminated by the Action to increase AML/CFT regime compliance</p>	<p>1.1.1 - 0</p> <p>1.1.2 - 0</p> <p>1.1.3 - 0</p>	<p>1.1.1 - tbd</p> <p>1.1.2 - tbd</p> <p>1.1.3 - tbd</p>	<p>1.1.1 Parliaments; FIUs, project reporting</p> <p>1.1.2 Project reporting</p> <p>1.1.3 Ministries of Finance;</p>	tbd

		and effectiveness at national level 1.1.3 Number of asset recovery agencies created/better tooled with the support of the project			project reporting and post-training surveys	
Output 2 relating to Outcome 1	National stakeholders have the operational capacity to efficiently prevent and repress IFFs linked to TOC, ML/FT (police, customs, intelligence, prosecutors, judiciary, asset recovery agencies, FI, DNFBPs & NPOs)	1.2.1 Number of financial institution representatives trained with increased knowledge and skills in AML/CFT policy compliance (disaggregated by sex, function and countries) 1.2.2 Number of criminal chain actors (law enforcement, prosecutors, etc) trained with increased capacities to repress and prosecute AML/CFT cases (disaggregated by sex, function and countries) 1.2.3 Number of AML/CFT related cases opened by the judiciary (disaggregated by country) 1.2.4 Understanding of legal obligation post-training for public and private actors trained by the Action (on a scale from 1 to 5 (disaggregated by FSRBs) 1.2.5 Number of certified trainers trained on AML/CFT with the support of the Action (disaggregated by sex, country and institution)	1.2.1 - 0 1.2.2 - 0 1.2.3 - 0 1.2.4 – n/a 1.2.5 - 0	1.2.1 1.2.2 1.2.3 1.2.4 1.2.5	1.2.1 project reporting, post-activity survey results 1.2.4 project reporting, post-activity survey results 1.2.2 Ministries of Finance and Justice 1.2.3 post-activity survey results 1.2.5 project reporting	tbd
Output 3 relating to Outcome 1	National stakeholders work together in a coordinated ‘whole-of-government’ approach to fighting IFFs linked to TOC, ML/FT, guided by risk-based	1.3.1 Number of cases on financial investigations adopted by the prosecution for adjudication (disaggregated by country)	1.3.1 - 0 1.3.2 - 0	1.3.1 - tbd 1.3.2 - tbd	1.3.1 FIUs / coordinating unit; project reporting	tbd

	assessments and supported by a comprehensive data management	<p>1.3.2 Volume of suspicious transaction report transmitted to FIUs by Tax & Customs, Central Banks, and all others public or private participants (disaggregated by country)</p> <p>1.3.3 Number of countries drafting/adopting multi-agency guidelines on fighting IFFs with support of the Action</p> <p>1.3.4 Number of events/activities supported by the intervention with ministerial/high-level political representation</p>	<p>1.3.3 – 0</p> <p>1.3.4 - 0</p>	<p>1.3.3 - tbd</p> <p>1.3.4 - tbd</p>	<p>1.3.2 LEA / Prosecutors; project reporting</p> <p>1.3.3 FIUs; project reporting</p>	
Output 1 relating to Outcome 2	Peer national institutions collaborate efficiently at the regional and international levels	<p>2.1.1 Number of regional and interregional high-level meetings organised with the support of the intervention</p> <p>2.1.2 Number of regional and interregional trainings and/or networking events organised with the support of the intervention</p> <p>2.1.3 Volume of report received / shared with foreign administrations by targeted countries</p>	<p>2.1.1 - 0</p> <p>2.1.2 - 0</p> <p>2.1.3 - 0</p>	<p>2.1.1 - tbd</p> <p>2.1.2 - tbd</p> <p>2.1.3 - tbd</p>	<p>2.1.1 Project reporting</p> <p>2.1.2 Project reporting</p> <p>2.1.3 FIUs, tax administrations, Ministry of Finance, project reporting</p>	tbd
Output 2 relating to Outcome 2	FSRB are strengthened and have the capacity and skills to fulfil their mandate of oversight and accompanying members states in the application of international standards	<p>2.2.1 Number of regional initiatives led/hosted by FSRB with the support of the intervention</p> <p>2.2.2 Results of the FATF evaluation of FSRB</p>	<p>2.2.1 - 0</p> <p>2.2.2 - n/a</p>	<p>2.2.1 - tbd</p> <p>2.2.2 - tbd</p>	<p>2.2.1 FSRBs, project reporting</p> <p>2.2.2 FATF</p>	tbd

Output 3 relating to Outcome 2	Countries adhere to and partner efficiently with international and regional networks fighting IFFs & TOC (Egmont Group, Interpol, Europol, the AMON network, Eurojust, CARIN, UMEOA, CEDEAO, CEEAC, UNODC, etc.)	2.3.1 Number of membership submissions/adhesion from African FIUs to EGMONT group, CARIN or AMON networks (disaggregated by country and by network) 2.3.2 Number of regional and interregional high-level meetings organised with the support of the intervention	2.3.1 - tbd 2.3.2 - 0	2.3.1 - tbd 2.3.2 - tbd	2.3.1 Regional / International networks 2.3.2 Project reporting	tbd
Output 1 relating to Outcome 3	CSO and international journalists are sensitised, trained, empowered and networked at regional and international levels to leverage their watchdog and advocacy role, including gender and human rights-based approach	3.1.1 Number of trainings for CSOs/media on IFFs, AML/CFT, advocacy tools and whistleblowing techniques 3.1.2 Number of journalists trained on information gathering and management and fact-checking and their legal obligations and rights (disaggregated by country and by sex) 3.1.3 Number of CSO-led nation and region-wide sensitisation campaign/advocacy actions on AML/CFT and anti-corruption conducted with support from the project 3.1.4 Number of actors networked with international advocacy / investigative journalism consortia	3.1.1 0 3.1.2 0 3.1.3 0 3.1.4 - 0	3.1.1 - tbd 3.1.2 - tbd 3.1.3 - tbd 3.1.4 - tbd	3.1.1 Supported CSO / journalists 3.1.2 Supported CSO / journalists 3.1.3 Supported CSO / journalists 3.1.4 project reporting	tbd
Output 2 relating to Outcome 3	Whistle-blowers and investigative journalist receive adequate protection from state and CSOs and carry out their activities contributing to detect corruption and others lucrative illicit activities	3.2.1 Number of countries accompanied by the intervention in the adoption or improvement of their legal framework for whistle-blower protection	3.2.1 - tbd	3.2.1 - tbd	3.2.1 Parliaments; project reporting 3.2.2 Project reporting	tbd

		<p>3.1.2 Number of actors, especially from at-risk sectors, sensitise on whistleblowing and safe reporting mechanisms</p> <p>3.2.3 Number of whistle-blowers/journalists legally assisted and judicially represented (disaggregated by country and by sex)</p>	<p>3.2.2 - tbd</p> <p>3.2.3 - tbd</p>	<p>3.2.2 - tbd</p> <p>3.2.2 - tbd</p>	<p>3.2.3 Rights-holders; project reporting</p>	
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4 IMPLEMENTATION ARRANGEMENTS

4.1 Financing Agreement

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

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 60 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 of Budget Support Component

Not applicable

4.4 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 measures¹⁵.

4.4.1 Indirect Management with an entrusted entity

The Action may be implemented in indirect management with **Expertise France, GIZ and CIVIPOL**. Expertise France will be the lead agency. This partnership shall take the form of a single Multi-Party Contribution Agreement.

The entities have been selected by the Commission's services using the following criteria:

- Have a technical competence and high degree of specialisation on financial criminality and AML/CFT related issues in Africa (on legal, law enforcement and judicial aspects) and a thorough knowledge of FATF's standards and methodology;
- Have an extensive thematic knowledge and experience dealing with financial crime (IFFs, AML/CFT) especially investigations and prosecutions in Africa, with the possibility to mobilise public expertise e.g. by mobilising experts from the Member States' specialised bodies (law enforcement, prosecutors, asset recovery agency, etc);
- Have a footprint in the countries/regions where this Action will take place, and work relationship established with key national, regional and international stakeholders targeted by the Action;
- Have a positive track record in implementing EU-funded capacity-building activities in Africa, efficient rules and procedures and be able to sub-contract to local organisations
- Have an experience working with CSOs, including advocacy networks.

Other entrusted entities may be selected by the Commission's services using the same criteria to partially implement the action or replace the entity(ies) mentioned above. In case an entity is replaced and/or if a new entity joins the MPCA, the decision needs to be justified.

¹⁵ www.sanctionsmap.eu. Please note that the sanctions map is an IT tool for identifying the sanctions regimes. The source of the sanctions stems from legal acts published in the Official Journal (OJ). In case of discrepancy between the published legal acts and the updates on the website it is the OJ version that prevails.

4.5 Indicative Budget

Indicative Budget components	EU contribution (amount in EUR)	EU Budget 2023	EU Budget 2024	Third-party contribution in EUR
Implementation modalities – cf. section 4.4				
Objective/Outputs 1: <i>National capacities, including law enforcement and judicial capabilities to prevent and respond to illicit financial flows (IFFs) linked to transnational organised crime and the financing of terrorism are strengthened and FATF-compliant</i> composed of	19 100 000	11 900 000	7 200 000	
Indirect management with entrusted entities - cf. section 4.4.1	19 100 000	11 900 000	7 200 000	1 500 000
Objective/Outputs 2 <i>Effective regional and inter-regional cooperation in the fight against IFFs and money laundering linked to transnational organised crime and the financing of terrorism is enhanced</i> composed of	14 300 000	9 000 000	5 400 000	
Indirect management with entrusted entities - cf. section 4.4.1	14 300 000	9 000 000	5 400 000	3 500 000
Objective/Outputs 3 <i>Increased public awareness promotes greater transparency and holds States and relevant entities accountable to take action against IFFs and organised crime</i> composed of	6 600 000	4 100 000	2 500 000	
Indirect management with entrusted entity(ies) - cf. section 4.4.1	6 600 000	4 100 000	2 500 000	1 500 000
Evaluation – cf. section 5.2 Audit – cf. section 5.3	may be covered by another Decision			N.A.
Totals	40 000 000	25 000 000	15 000 000	6 500 000

4.6 Organisational Set-up and Responsibilities

At the policy level, the project will be governed by a Steering Committee. A Technical Committee will be tasked with supervising the Action's implementation and preparing the Steering Committee. At the operational level, the implementation of the project will be steered by a centralised Project Management Unit (PMU) responsible for coordinating the work of the project's regional offices. Given the broad scope of this Action and its contracting/management at HQ level, specific information sharing and consultation mechanisms will be set to ensure the involvement and proper flow of information to all EU Delegations.

Steering Committee

A Steering committee will be set up and responsible for reviewing the overall policy and strategic direction of the programme, monitoring the overall performance and coherence between the different components, as well as ensuring the coordination across its components and geographic areas.

The Steering Committee will be co-chaired by the EU (permanent co-chair) and a partner regional/continental organisation (on a rotational basis). It will consist of representatives of all implementing partners, representatives of participating countries/RECs/FSRBs (selected on criteria yet to be defined), representatives from EU Institutions (FPI, EEAS, other DGs), EU Delegations (e.g. those hosting a regional project office) and observers (e.g. TEI IFF-TOC Members, other donors and representatives from relevant support programmes, relevant international organisations, civil society representatives, etc.) The final composition of the SC will be confirmed once the programme is operational. The first Steering Committee meeting will endorse the updated version of the log-frame.

Detailed modalities of the Steering Committee will be discussed and refined during the inception phase. It is expected to meet twice a year during the first year of programme implementation. The frequency of meetings can then be revised, and a new calendar established by consensus of its members

Technical Committee

A Technical Committee (hosted by the PMU) will prepare the Steering Committee meetings (preparation of Agenda, discussion papers, progress reports and organisation of logistic arrangements). It will be responsible for supervising/reporting on the programme implementation on a quarterly basis. The Technical Committee will consist of implementing partners, the European Commission and, on occasion, representatives of EU Delegations. On an *ad-hoc* basis, it may take the form of a sub-regional technical committee, to discuss with EU Delegations in a smaller format progress and challenges at the level of each regional clusters.

Project Management Unit (PMU)

The action will be steered by a Project Management Unit (PMU), headquartered in Europe, whose role will be to oversee the project on a daily basis and lead on/coordinate regional and inter-regional activities. It will report on engagements and will ensure the consistent implementation of activities across geographies/regional project teams. In addition to its operational steering, monitoring, coordination and administrative role, the PMU will provide regional teams with technical support through the mobilisation of three thematic key experts in Criminal Investigations, Finance (in supervision, intelligence, etc.), and Justice. These key experts will ensure that a consistent approach is developed across regions and promote the smooth exchange of information and best practices. The PMU will validate disbursements. The acquisition of equipment for third parties will remain *ad hoc* and only considered after detailed demand analyses. Such acquisition may be considered when IT gaps constitute an identified obstacle to the adequate delivery or practical application of the assistance provided. Provision of equipment will be limited and may be considered in priority under pilot-country activities.

Regional teams

The backbone of the project will be a minimum of three (3) decentralised regional teams (project offices), based in strategic locations in order to adequately cover the Action geographical area (East, West, Central and Southern Africa). Reporting to the PMU, they will be charged with identifying target rights-holders and implementing the work plan in their area of operation. These regional units may be composed of a Regional Coordinator, three (3) thematic key experts (in Criminal Investigations, in Finance and in Justice) as well as two (2) Administrative Staff.

Internal coordination and reporting arrangements between Project Team, the Commission and EU Delegations

Given its broad geographic scope, the Action will be centrally managed by the Commission . Specific information sharing arrangements with EU Delegations will be put in place, including (minimum) a quarterly reporting. The updated calendar of activities will be sent on a monthly basis (on average) with updated information on planned events/activities to enable EU Delegation to follow-up on the Action's implementation (this practice has been developed in the context of ESCAY programme, covering 34 countries, and is proving quite effective). Direct contacts will be established between the regional project teams and EU Delegations. The Commission will facilitate such contacts when needed and provide adequate support and information to EU Delegations upon their requests. Before engaging in a pilot-country initiative, close engagement and systemic consultation of the concerned EUD will be ensured.

Detailed modalities of arrangements to be put in place between the Commission, the implementing partners and EU Delegations will be discussed and defined during the inception phase.

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 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 partner's responsibilities. To this aim, the implementing partner shall establish a permanent internal, technical and financial monitoring system for the action and elaborate regular progress reports (not less than annual) and final reports. Every report shall provide an accurate account of implementation of the action, difficulties encountered, changes introduced, as well as the degree of achievement of its results (Outputs and direct Outcomes) as measured by corresponding indicators, using as reference the logframe matrix (for project modality) and the partner's strategy, policy or reform action plan list (for budget support).

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).

Roles and responsibilities for data collection, analysis and monitoring:

Each implementing entity will have specific responsibilities for monitoring and reporting under this action. Common indicators be used across countries and regions in order to allow Action Document wide reporting. Indicator values could be measured at regional level or at country level and then harmonised depending on the nature of the activities. Relevant stakeholders will be engaged as much as possible in participatory monitoring approaches to strengthen collaboration, partnership, learning and accountability.

Monitoring and evaluation will assess gender equality results and the implementation of the rights based approach working principles (applying all human rights for all; meaningful and inclusive participation and access to decision-making; non-discrimination and equality; accountability and rule of law for all; and transparency and access to information supported by disaggregated data). Monitoring and evaluation will be based on indicators that are disaggregated by sex, age, disability when applicable.

5.2 Evaluation

Having regard to the importance and the nature of the action, a mid-term and final evaluation(s) will be carried out for this action or its components via independent consultants contracted by the Commission or via an implementing partner.

The mid-term evaluation will be carried out for problem solving and learning purposes, in particular with respect to adaptation of the action to a changing context.

A final evaluation will be carried out for accountability and learning purposes at various levels (including for policy revision) taking into account in particular the fact that the action is complementary to other interventions and helps to meet national, regional and international public policy implementation needs.

The Commission shall inform the implementing partner(s) at least 1 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 may be shared with the partners and other key stakeholders following the best practice of evaluation dissemination. The implementing partner and the Commission shall analyse the conclusions and recommendations of the evaluations and, where appropriate, apply the necessary adjustments.

A gender and human rights expertise will be ensured during all evaluation missions. The financing of the evaluation may 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.

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 '[Communicating and Raising EU Visibility: Guidance for External Actions](#)', 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, duty bearers, grant rights-holders 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.

Appendix 1 REPORTING IN OPSYS

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

Articulating Actions or Contracts according to an expected chain of results and therefore allowing them to ensure efficient monitoring and reporting of performance;

Differentiating these Actions or Contracts from those that do not produce direct reportable development results, defined as support entities (i.e. audits, evaluations);

Having a complete and exhaustive mapping of all results-bearing Actions and Contracts.

Primary Interventions are identified during the design of each action by the responsible service (Delegation or Headquarters operational Unit).

The level of the Primary Intervention chosen can be modified (directly in OPSYS) and the modification does not constitute an amendment of the action document.

The intervention level for the present Action identifies:

Contract level		
<input checked="" type="checkbox"/>	Single Contract 1	Indicatively: Multi-Party Contribution Agreement with pillar assessed entities (EUR 40 million) to implement Specific Objectives 1, 2 and 3.