



EN

**THIS ACTION IS FUNDED BY THE EUROPEAN UNION**

## **ANNEX II**

of the Commission Implementing Decision on the financing of the Special Measure 2021 for a regional response to the Afghanistan refugee and displacement crisis for 2021

### **Action Document for Enhanced Access to Rights, Essential Services, and Livelihoods for Vulnerable Afghans and Host Communities in Iran in the context of COVID-19 recovery**

#### **ANNUAL MEASURE**

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

## **1. SYNOPSIS**

### **1.1. Action Summary Table**

<b>1. Title CRIS/OPSYS business reference Basic Act</b>	<b>Enhanced Access to Rights, Essential Services, and Livelihoods for Vulnerable Afghans and Host Communities in Iran in the context of COVID-19 recovery</b> CRIS number: NDICI ASIA/2021/043-469 Financed under the Neighbourhood, Development and International Cooperation Instrument (NDICI-Global Europe)
<b>2. Team Europe Initiative</b>	Yes. The action could be part of the broader Regional Team Europe Initiative on the Afghan Displacement Situation proposed in the Asia-Pacific regional MIP, should it be adopted by the College and subsequently materialise.
<b>3. Zone benefiting from the action</b>	The action shall be carried out in the Islamic Republic of Iran (countrywide).
<b>4. Programming document</b>	Special measure for a Regional Response to the Afghanistan refugee displacement crisis for 2021
<b>5. Link with relevant MIP(s) objectives/expected results</b>	N/A
<b>PRIORITY AREAS AND SECTOR INFORMATION</b>	
<b>6. Priority Area(s), sectors</b>	Migration and Forced Displacement DEV. Assistance: YES
<b>7. Sustainable Development Goals (SDGs)</b>	Main SDG (1 only): SDG 1 (No Poverty) Other significant SDGs: SDG 3 (Good Health), SDG 4 (Quality Education), SDG 8 (Decent Work) and SDG 10 (Reduced Inequalities)
<b>8 a) DAC code(s) <sup>1</sup></b>	DAC 110 – Education (30%)

<sup>1</sup> DAC sectors (codes and descriptions) are indicated in the first and fourth columns of the tab ‘purpose codes’ in the following document: <http://www.oecd.org/dac/financing-sustainable-development/development-financestandards/dacandcrscodelists.htm>

	DAC 120 – Health (30%) DAC 160 - Other Social Infrastructure & Services (30%)			
<b>8 b) Main Delivery Channel</b>	21000 (International NGO)			
<b>9. Targets<sup>2</sup></b>	<input checked="" type="checkbox"/> Migration <input type="checkbox"/> Climate <input checked="" type="checkbox"/> Social inclusion and Human Development <input type="checkbox"/> Gender <input type="checkbox"/> Biodiversity <input checked="" type="checkbox"/> Education <sup>3</sup> <input type="checkbox"/> Human Rights, Democracy and Governance <sup>4</sup>			
<b>10. Markers<sup>5</sup> (from DAC form)</b>	<b>General policy objective</b>	<b>Not targeted</b>	<b>Significant objective</b>	<b>Principal objective</b>
	Participation development/good governance	<input checked="" type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Trade development	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Reproductive, maternal, new-born and child health	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Disaster Risk Reduction	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Inclusion of persons with Disabilities	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Nutrition	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	<b>RIO Convention markers</b>	<b>Not targeted</b>	<b>Significant objective</b>	<b>Principal objective</b>
	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"/>
<b>11. Internal markers<sup>6</sup> and Tags<sup>7</sup>:</b>	<b>Policy objectives</b>	<b>Not targeted</b>	<b>Significant objective</b>	<b>Principal objective</b>
	Digitalisation Tags: digital connectivity	<input checked="" type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>

<sup>2</sup> Actual contribution to targets will be confirmed ex-post based on a standardised methodology.

<sup>3</sup> This target is specific to INTPA. If the action is marked as contributing to the Education target, please make sure the target on "Social inclusion and Human Development" is also marked.

<sup>4</sup> Thematic target for geographic programmes (at least 15%) in delegated act.

<sup>5</sup> For guidance, see <https://www.oecd.org/development/financing-sustainable-development/development-finance-standards/> (go to "Data collection and resources for reporters", select Addendum 2, annexes 18 (policy) and 19 (Rio) of the reporting directive).

If an action is marked in the DAC form as contributing to one of the general policy objectives or to RIO principles as a principal objective or a significant objective, then this should be reflected in the logframe matrix (in the results chain and/or indicators).

<sup>6</sup> The internal markers have been created to report on the implementation of the Commission's own policy priorities in areas where no DAC reporting tool is available. For the sake of consistency and comparability, the methodology is equivalent to the DAC markers, with three possible positions (main target, significant target, not targeted)

<sup>7</sup> Methodology for additional tagging providing granularity on internal markers is under development.

	digital governance		<input type="checkbox"/>	<input type="checkbox"/>
	digital entrepreneurship		<input type="checkbox"/>	<input type="checkbox"/>
	job creation		<input type="checkbox"/>	<input type="checkbox"/>
	digital skills/literacy		<input type="checkbox"/>	<input type="checkbox"/>
	digital services		<input type="checkbox"/>	<input type="checkbox"/>
	Connectivity Tags: transport people2people energy digital connectivity	<input checked="" type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
Migration (methodology for tagging under development)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Reduction of Inequalities (methodology for marker and tagging under development)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Covid-19	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<b>BUDGET INFORMATION</b>				
<b>12. Amounts concerned</b>	Budget line (article, item): BGUE-B2021-14.020130-C1-INTPA Total estimated cost: EUR 14,000,000.00 Total amount of EU budget contribution EUR 14,000,000			
<b>MANAGEMENT AND IMPLEMENTATION</b>				
<b>13. Type of financing<sup>8</sup></b>	<b>Direct management</b> through: Grants			

## 1.2. Summary of the Action

For more than 40 years Iran has provided a sanctuary to Afghan refugees, hosting one of the largest and longest lasting displaced populations in the world. By 2020, Iran hosted an estimated 3 million displaced Afghans, of whom 780,000 are Amayesh cardholders (Afghans with de facto refugee status), 275,000 visa holders and an estimated 1.5 to 2 million undocumented Afghans.

Government of Iran has been the primary actor supporting Afghans in Iran. Its service provision outweighs that of any humanitarian and development actors. This level of support has been consistent despite the worsening economic crisis triggered by the re-imposition of US JCPoA-related sanctions in 2018. The economic situation is disproportionately affecting Afghans and their host communities.

The Action proposed in this Action Document is effectively the second phase of the EUR 7 million project MIGR/2018/395-984 'Enhanced access to rights, essential services and livelihoods for vulnerable Afghans in Iran'. The indicative budget of the Action is EUR 14 million.

The Overall Objective of the Action is to enhance resilience and self-reliance of vulnerable Afghans and their host communities in Iran to achieve safe and dignified lives. The Specific Objectives of the Action are to:

1. Increase access to rights, protection and essential services, including education and health, for vulnerable Afghans and host communities in Iran
2. Improve resilience of vulnerable Afghan and host community households through enhanced livelihoods and community-led initiatives to support sustainable income
3. Strengthen coordination and advocate with key stakeholders, nationally and internationally, for provision of relevant assistance, greater resilience and collaboration to facilitate durable solutions for vulnerable Afghans in Iran.

<sup>8</sup> Art. 27 NDICI

Special consideration is given to supporting women, girls, persons with disabilities and other marginalised groups. These are mainstreamed throughout the Action. Further, the Action is fully in line with the EU's New Pact on Migration and Asylum and has a focus on equipping Afghan nationals in Iran with proper documentation (Afghan e-tazkera and passports) and contributes to the Gender Action Plan III 2021-2025<sup>9</sup>.

## 2. RATIONALE

### 2.1. Context

The Islamic Republic of Iran was an Upper Middle Income Country (UMIC) until 2020<sup>10</sup>. It has a population of 85 million, educated workforce and massive fossil fuel reserves. Located at the intersection between the Middle East, Central Asia and South Asia, Iran is a key geopolitical power in the region. Following 40 years of protracted crisis in Afghanistan, Iran is hosting one of the largest refugee population in the world (up to 3 million Afghan nationals).

Relations with the EU are dominated by the implementation of the multilateral international agreement Joint Comprehensive Plan of Action (JCPOA) on the Iranian nuclear programme, which represents a key security priority for the EU. Signed in July 2015, this nuclear deal opened opportunities for dialogue and mutually beneficial cooperation in several areas. 2018 witnessed the retreat of the US from the agreement and re-imposition of sanctions on Iran. This has worsened the economic situation in the country; it has contributed to annual inflation rates of 30.5%<sup>11</sup>. Iran GDP in 2018 fell by 6% and in 2019 by 6.8%<sup>12</sup>.

EU-Iran cooperation is based on the full implementation of the JCPOA and defined in the April 2016 Joint Statement by HR/VP Mogherini and FM Zarif. The latter includes migration and forced displacement as an important area of engagement in which DG for International Partnerships has currently more than EUR 40 million worth of projects.

Currently, there are ongoing efforts to revive the JCPOA through the US re-joining the nuclear deal and subsequent lifting of US sanctions. Further, the security situation in neighbouring Afghanistan is worsening, following the US and other NATO troops' withdrawal. The estimated impact is difficult to define (150,000 people according to UNHCR and 1 million according to the Government of Iran (GoI)). Further, Iran has been badly hit by the COVID-19 pandemic<sup>13</sup>. However, its economy has proven to be resilient and in 2020 experienced a 1.5% GDP growth.

The main risks for EU-Iran cooperation are: (i) collapse of JCPOA; (ii) absence of an EU Delegation in Tehran, which limits monitoring, EU visibility and direct dialogue with Iranian counterparts.

The Action is in line with the EU's New Pact on Migration and Asylum where Iran is identified as one of the five key countries in Asia.

For more than 40 years Iran has provided a sanctuary to Afghan refugees, hosting one of the largest and longest lasting displaced populations in the world. By 2020, Iran hosted an estimated 3 million displaced Afghans, of whom 780,000 are Amayesh cardholders (Afghans with de facto refugee status), 275,000 visa holders<sup>14</sup> and an estimated 1.5 to 2 million undocumented Afghans.<sup>15</sup> Including all displaced Afghans in Iran, this represents approximately 3.6% of the countries' population, making Iran one of the few countries in the world taking responsibility for a disproportionately large share of the world's displaced and refugees.

Durable solutions for displaced Afghans in Iran are very limited. The situation in Afghanistan is not conducive for voluntary repatriation, and must improve before larger-scale voluntary, safe, dignified and sustainable returns may become a viable option. Afghans, both male and female, face acute and targeted risks including those associated with documentation and deportation and those linked to social and cultural factors (e.g. gender-based violence and child-marriage).

<sup>9</sup> [https://ec.europa.eu/international-partnerships/system/files/join-2020-17-final\\_en.pdf](https://ec.europa.eu/international-partnerships/system/files/join-2020-17-final_en.pdf). The Gender Action Plan III was welcomed through [Presidency Conclusions](#) by 24 Member States (<https://data.consilium.europa.eu/doc/document/ST-13947-2020-INIT/en/pdf>).

<sup>10</sup> Iran was reclassified from upper middle-income country to a lower income-country for 2020 as announced on 1 July 2021 by the World Bank. The World Bank income group classifications are updated each year on July 1 and are based on GNI per capita

<sup>11</sup> IMF Datamapper: <https://www.imf.org/external/datamapper>; recent official reports from the Statistical Organisation of Iran have reported rates up to 48.7% comparing to March 2020

<sup>12</sup> International Monetary Fund

<sup>13</sup> Since the onset of the COVID-19 pandemic Iran has officially experienced more than 3 million cases and 80 thousands deaths.

<sup>14</sup> Under the schemes of visas: 'Comprehensive Regularisation Plan', 'Alternative Stay Arrangement', and 'Student visas'.

<sup>15</sup> From the undocumented ones, one million are 'head-counted.' These population, although lack legal status, are registered/accounted for by the Government of Iran, as opposed to the undocumented that are completely 'hidden'.

GoI has been the primary actor supporting Afghans in Iran. Its service provision outweighs that of any humanitarian and development actors. This level of support has been consistent despite the worsening economic crisis triggered by the US unilateral sanctions in 2018. While the economic situation is disproportionately affecting Afghans who, due to their status, are more vulnerable to economic downturns and rising unemployment rates, the additional hardships posed by COVID-19 have likewise further compounded the vulnerability of many Iranians.

In spite of GoI's commendable commitments as hosts, the extreme challenges posed by the current context represent a risk to the inclusive health and education policies in place.

## 2.2. Problem Analysis

**Education:** Despite the 2015 decree granting access to education to all Afghan children regardless of legal status, limited space and resources add to the continued strain on the public education system. Existing access limitations for Afghan children, often stemming from household financial pressures, are further exacerbated by COVID-19. Face to face learning has been largely on hold as of end February 2020. It is expected that many Iranian and Afghan children, especially those who already faced barriers to education, will find it even harder to go back to school. As reported by the Ministry of Education, 3.2 million students (21%) were left out of distance learning as they lacked access to devices and/or sustainable internet access. Among these approximately 300,000 are refugees/migrants. Students are in need of safe and improved learning environments where cognitive, social, and emotional skills are developed to be able to get the education process back on track. To illustrate, Relief International (RI) conducted an assessment to measure the impact of COVID-19 on Afghan households in mid-2020; among 7,500 households interviewed in 7 provinces, 13.4% of households had a child primary breadwinner and they reported dropping out of school as a coping mechanism. In addition, observational data on the impact of COVID-19 on the education of vulnerable children has included increases in psychosocial stress and need for support, lack of media literacy and awareness among children and lack of support at household level. Moreover, there are unofficial reports indicating preschool registration rates have dropped drastically, which means many children would be registering at Grade 1 next year without having learned basic skills.

**Health:** Afghan populations in Iran demonstrate higher incidence of poor health conditions relative to general population, improper dietary behaviours, physical and mental health disorders all contributing to increased vulnerability. Despite policy improvements, Afghans already face severe barriers in accessing health care. This is compounded by the restrictions enacted to mitigate COVID-19, on top of an already costly healthcare system. One of the most critical constraints is lack of information about services, which has further deteriorated in the context of the pandemic. The primary challenge remains the cost of healthcare in a context of dwindling resources. A large-scale survey done by Relief International in 2020 demonstrated that limiting health expenses was the primary negative coping mechanism amongst vulnerable households when faced with COVID-19, with 49% of households surveyed reporting limiting health spending in 2020. Many refugees report they cannot afford insurance due to lack of adequate documentation, which results in untimely visit to health facilities and the aversion to be hospitalized, even in severe cases. As a result, preventable illnesses reach critical levels requiring life-saving interventions which are hugely costly and often exacerbate the poverty cycle for affected families. Studies have noted a decline in the number of Afghans accessing clinical care in health facilities; in addition to financial restrictions other severe constraints reported include fear that accessing health services will result in deportation for the undocumented, and in some communities, preferences for cultural healers<sup>16</sup>.

Women in particular face health issues associated with reproductive and sexual health. Socioeconomic disadvantages and comorbidities worsen the negative pregnancy outcomes among vulnerable Afghans while Iranian health resources have been inadequate to provide universal coverage for public – including reproductive - health. According to assessments the majority of reproductive and sexual health cases reaching health facilities had already developed a critical condition upon arrival.<sup>17</sup>

**Livelihoods:** Financial security and ability to generate income remain significant challenges for Afghan households in Iran with increasing numbers resorting to negative coping mechanisms as a result of the COVID-19 pandemic and restrictions on public life. Assessments by NRC and RI conducted during 2020 highlight decreased access to income generation for vulnerable people. According to RI's assessment, 64% stated that the main breadwinner of the

<sup>16</sup> Hosseini Divkolaye, N. S., & Burkle, F. M., Jr (2017). The Enduring Health Challenges of Afghan Immigrants and Refugees in Iran: A Systematic Review. PLoS currents, 9, ecurrents.dis.449b4c549951e359363a90a7f4cf8fc4. <https://doi.org/10.1371/currents.dis.449b4c549951e359363a90a7f4cf8fc4>

<sup>17</sup> Mohammadi S, Carlom A, Taheripناه R and EssénB (2017) Experiences of inequitable care among Afghan mothers surviving near-miss morbidity in Tehran, Iran: a qualitative interview study. International Journal for Equity in Health (2017) 16:121 DOI 10.1186/s12939-017-0617-8.

household lost his/her job due to the pandemic and 87% of households reported a drastic decrease in their income by more than 50%.<sup>18</sup> 89% of those surveyed by NRC have a monthly household income of less than 15 million Iranian Rial (approximately EUR 50).<sup>19</sup> Simultaneously faced with inflation and increases in the cost of living, this puts the vast majority of documented Afghans below the poverty line. Furthermore, undocumented Afghans – working informally usually in unskilled roles – are more likely to face inconsistent and lower levels of income and higher levels of economic vulnerability than those with documentation, who are allowed to work in certain categories in the formal sector pending obtaining a work visa.

Loss of jobs and livelihoods is resulting in increased negative coping mechanisms among people of concern. RI's assessment demonstrates that 71% of households whose main breadwinners are daily workers and lost their job due to the outbreak, tend to deploy negative coping mechanisms. Strategies reported to NRC include spending less on food, borrowing money, selling assets, withdrawing children from school, and withdrawing from medical treatment. 90% of the respondents are reducing food intake/expenditure due to sudden loss of income and approximately half of the surveyed population limited the expenditure on health. Economic fragility that pre-existed the pandemic has now become extreme.<sup>20</sup> NRC's assessment has found that the average food consumption score (FCS)<sup>21</sup> of interviewed Afghans was classified as 'borderline', with more than one-third (37%) of households falling in the 'poor' FSC category. Moreover, 93% of households either had no assets to sell or had sold assets to meet basic needs.

**Protection:** Access to civil documentation to attain legal identity or maintain refugee status continues to be bureaucratic, time-consuming and expensive. Between 2015 and 2019, there has been a 20% drop of Amayesh card holders while fees have increased by 16% compared to the previous renewal round. While the increase aligns with the inflation rate in Iran, this further impedes access to documentation for many refugees challenged by the already high costs and tight procedures associated with obtaining or renewing civil and legal documentation. At the same time, the number of undocumented Afghans according to headcount has increased from 800,000 in 2018 to one million in 2020. According to findings from NRC's Comprehensive Vulnerability Assessment Tool (CVAT) in 2020, 49% of households have a family member at risk of losing legal status, and a further 32% had a member who had already failed to renew legal residency. Limited data is available on Afghans' access to legal identity documents however many still hold either handwritten documents (Tazkera or passport) which are no longer recognized by the GoI, or no document besides their Amayesh cards. Biometric passports are now mandatory for visa renewal and it is planned for a biometric/electronic Tazkera to be made mandatory for Amayesh renewal as well. Access to valid legal identity documentation is essential for Afghans living in Iran to secure their stay as well as access to basic and essential services.

Vulnerability generally can reach critical levels among the Afghan population, with 24% women headed households, 14% elderly headed households and 18% of households containing persons with disabilities. The chronically low-income levels and insecurity have a direct link with protection outcomes, due to the inevitable reduced capacity to offset the negative coping mechanisms reported above and others less reported such as violence, substance abuse and prostitution. Gender, age and disability can heighten the risk of relying on negative coping mechanisms. For instance, female-headed households suffer from greater lack of resources<sup>22</sup> and are more prone to negative coping mechanisms. They are less likely to have assets or savings which further pushes some women towards engaging in negative and harmful coping mechanisms. While female headed households do have access to some forms of community support, protection mechanisms responding to risks such as gender-based violence and negative coping mechanisms such as sex work are underrepresented and under-reported. Households including a member with a disability are at critical protection risk despite the minimal degree of protection afforded by the GoI which provides some additional health support for some specific categories of physical and mental disability. These households inevitably have higher expenditure levels, leading to higher overall debt levels. Children face a variety of protection risks of varying severity levels. Child labour and lack of enrolment/withdrawal from school are common risks for Afghan children in Iran. A recent survey from RI documented an increase in the prevalence of child-headed households amongst vulnerable

<sup>18</sup> Assessment of the Economic Impact of Covid-19 on Afghan Refugee Households in Iran, Relief International - June 2020. (7,612 households were interviewed using RI's Comprehensive Vulnerability Assessment in 7 provinces).

<sup>19</sup> Living Precariously in Iran: A year of Covid-19 and increased unilateral sanctions, November 2020; the assessment was conducted between March and May 2020 and included information collected from 2,200 Afghan households through the Comprehensive Vulnerability Assessment questionnaire (CVAT).

<sup>20</sup> The percentage of households who had no assets to sell increased from 49% in 2019 to 65% in 2020, while the proportion of families who either spent savings or borrowed money to cover basic needs increased from 78% in 2019 to 85% in 2020, showing that the situation was already dire before COVID-19.

<sup>21</sup> Food Security Consumption is calculated based on the WFP index

<sup>22</sup> According to RI's programmatic data (case management reports), the income of female-headed households is approximately 66% of the level of income of male-headed households.

Afghans. Child-headed households were also found engaging in unsafe employment at higher rates than adult headed households (11% of all child-headed households reported they had engaged in unsafe work versus an average of 6% amongst all households surveyed)<sup>23</sup>. Smuggling and human trafficking are issues that have particular consequences for Afghan youth, while girls specifically face the risk of early and/or forced marriage.

The main responsible governmental body (duty-bearer) dealing with refugee matters in Iran is the Bureau for Aliens and Foreign Immigrants Affairs (BAFIA) under the Ministry of Interior (MoI). It undertakes the periodic renewal of refugee residency cards (Amayesh cards) to access basic services, facilitates the issuance of work permits, determines the total refugee population in Iran and is responsible for issuing and renewing licenses to international organisations and international NGOs working in the area of migration and forced displacement. MoI has authority over policing refugees and migrants as well as authority to fight trafficking of humans and smuggling of migrants. Other government bodies such as the Ministry of Health and Medical Education, Ministry of Education and Ministry of Cooperatives, Labour and Social Welfare hold remits over health, education and employment, respectively.

UNHCR is the internationally mandated authority that also leads on the ad-hoc mechanism “Solutions Strategy for Afghan Refugees<sup>24</sup>”. It is active on the issues of registration, advocacy and protection. UNHCR implements a complementary project at regional level (Afghanistan, Pakistan and Iran). The EUR 50 million second phase of this project is proposed under the 2021-2027 Asia-Pacific Regional Indicative Programme. In general, complementarity and synergies will be ensured with ongoing and future actions addressing Afghan displacement situation.

The international NGOs active in the field are the Norwegian Refugee Council, Relief International, and Doctors Without Borders. Together with UNHCR, these are indispensable as regards addressing status and living conditions of refugees in Iran. The number of international NGOs in Iran is declining as they face increasingly limited operational space and weak interest of donors. Although international NGOs have lower absorption capacity due to their size, it is believed that they have increased field access.

An increasingly important group of stakeholders are the local CSOs/NGOs. International organisations and NGOs implementing projects in the area of migration/forced displacement are mandated by the MoI to work alongside or through local CSOs/NGOs. This has the effect of higher transaction cost, lower implementation efficiency, but also allows to indirectly or directly build their capacity.

The most important stakeholders of the Action are rights-holders, i.e. vulnerable Afghans and their host communities.

### 3. DESCRIPTION OF THE ACTION

#### 3.1. Objectives and Expected Outputs

The **Overall Objective (Impact)** of this action is to enhance resilience and self-reliance of vulnerable Afghans and their host communities in Iran.

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

1. Increase access to rights, protection and essential services, including education and health, for vulnerable Afghans and host communities in Iran
2. Improve livelihoods and access to sustainable income
3. Enhance contribution of key national and international stakeholders in provision of assistance to vulnerable Afghans in Iran

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

- 1.1 contributing to Outcome 1 (or Specific Objective 1): Increased access to equal and quality education in enhanced learning environments
- 1.2 contributing to Outcome 1 (or Specific Objective 1): Improved capacity of health infrastructure
- 1.3 contributing to Outcome 1 (or Specific Objective 1): Enhanced access to protection resources for vulnerable households and persons with specific needs

<sup>23</sup> Assessment of the Economic Impact of Covid-19 on Afghan Refugee Households in Iran, Relief International - June 2020. (7,612 households were interviewed using RI's Comprehensive Vulnerability Assessment in 7 provinces).

<sup>24</sup> SSAR is a mechanism established by Afghanistan, Iran, Pakistan and UNHCR. UNHCR is the coordinator. EU and certain EU MS are members of the Core group of the Support Platform of the SSAR.

- 2.1 contributing to Outcome 2 (or Specific Objective 2): Enhanced access and linkages to market, economic and employment opportunities
- 3.1 contributing to Outcome 3 (or Specific Objective 3): Improved programmatic, thematic, geographic, advocacy and access-related coordination
- 3.2 contributing to Outcome 3 (or Specific Objective 3): Increased awareness both within Iran and internationally about the needs of vulnerable Afghans and their host communities in Iran

Crisis modifier: The risk related to evolving situation in Afghanistan could require modification of special objectives and outputs during contracting and implementation phases.

### 3.2. Indicative Activities

#### Activities related to Output 1.1

- Providing quality learning spaces and resources (e.g. building new classrooms, refurbishing old classrooms, equipping classrooms and school yards, refurbishing school sanitary facilities, provision of packages for pupils etc.)
- Providing access to school preparatory programmes (in-person or remote learning)
- Caregiver support including cash and in-kind support to overcome education related expenses

#### Activities related to Output 1.2:

- Setting up health facilities
- Refurbishment of existing health facilities
- Training of staff in health facilities
- Embedding sexual and reproductive health services in health facilities
- Production of informative material related to health
- Production of informative material related to communicable disease screening, testing and treatment and care, including possibly harm reduction services

#### Activities related to Output 1.3:

- Information and counselling on residence and legal identity (documentation and regularization)
- Cash and voucher assistance to address specific protection needs
- Improving personal capacity to manage protection needs through tailored and multisector services such as referrals, social work, mental health and psychosocial support, cash, vocational and life skills training (e.g. establishing/equipping and running safe homes or shelters for vulnerable individuals)

#### Activities related to Output 2.1:

- Providing equitable access to quality and relevant skill development (including online courses and the digital sector)
- Business start-up and business recovery/expansion support to vulnerable Afghans and Iranians (cash grants or in-kind support)
- Community led initiatives for livelihood outcomes

#### Activities related to Output 3.1:

- Facilitating coordination mechanisms (existing and new sectoral working groups, informal groups, women groups etc.) on sectoral and thematic issues, geographic coordination (at provincial level),
- Facilitating and coordinating establishment of national standards for the humanitarian community, especially in regards to access issues

#### Activities related to Output 3.2:

- Continuation of existing advocacy campaigns with local stakeholders
- Facilitating sharing of lessons learned, best practices and awareness raising with national stakeholders (particularly on the topics of Education, Livelihoods and Health that will commence under the existing action)
- Private influencing on access and other key topics
- International advocacy and awareness raising
- Support efforts to increase visibility for the EU's assistance in Iran, ensure alignment with the development of the EU-Iran migration dialogue as well as with the envisaged regional Team Europe Initiative on the Afghan Displacement Situation.



The commitment of the EU's contribution to the Regional Team Europe Initiative on the Afghan Displacement situation proposed in the Asia-Pacific regional MIP, should it be adopted by the College and subsequently materialise, will be complemented by other contributions from Team Europe partners. It is subject to the formal confirmation of each respective partners' 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 SEA screening** (relevant for budget support and strategic-level interventions)

The Strategic Environmental Assessment (SEA) screening concluded that no further action was required.

##### **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 is no or low risk (no need for further assessment).

---

#### **Gender equality and empowerment of women and girls**

No Gender Country Profile for Iran has been conducted. As per OECD Gender DAC codes identified in section 1.1, this action is labelled as G1. The Action will address female poverty and contributes to alleviate challenges and pressures on families due to their compulsorily negative coping mechanisms (e.g. child labour, gender-based violence, early marriage, labour exploitation, debt, illegal activities, onward migration etc.) and secondary displacement, encompassing all human rights.

In addition, the action will address gender-specific needs through efforts to reach extensive number of female-led households and businesses as well as women and girls in the need of sexual and reproductive health services. This will contribute towards gender equality. Similarly, disaggregated data collected during the programme cycle will help make clear to what extent the action benefits women and men according to their needs.

---

#### **Human Rights**

Cross-cutting issues, such as gender and human rights, will be carefully considered and mainstreamed throughout the implementation process, ensuring a Rights Based Approach (RBA), i.e. addressing the five RBA working principles (participation, non-discrimination, accountability, transparency, respect to all human rights).

---

#### **Disability**

As per OECD Disability DAC codes identified in section 1.1, this action is labelled as D1. The Action makes special consideration of targeting families with members with disabilities as they are under an increased pressure in terms of cost of living. Due to Afghanistan being a conflict area for many decades there is a high proportion of such families among Afghan communities in Iran.

---

#### **Democracy**

The Action has no direct impact on or linkages to democratic processes in Iran.

---

#### **Conflict sensitivity, peace and resilience**

No conflict analysis has been conducted by HQ. By supporting vulnerable Afghans and their host communities, the Action contributes to their resilience and consequently to greater inter-communal harmony. The Action combines short and more long-term support and has been designed as an implementation of the humanitarian-development nexus.

---

#### **Disaster Risk Reduction**

While this Action does not directly contribute to disaster risk reduction, to a small extent it contributes to the preparedness for the natural and man-made disasters by increasing the resilience of the most vulnerable groups in Iran.

### 3.4. Risks and Lessons Learnt

Category	Risks	Likelihood (High/ Medium/ Low)	Impact (High/ Medium/ Low)	Mitigating measures
Political	Termination or suspension of JCPoA	Medium	High	Contingency planning for EU's engagement in the area of migration and forced displacement in Iran.
Political	Hosting fatigue negatively affecting the public sentiment towards Afghans.	Medium	Medium	Continued protection-related advocacy/work with the GoI. Sensitization of various stakeholders through briefing sessions for print, electronic and broadcast media.
Political/operational	Absence of EU Delegation – decreased ability to monitor	High	Medium	Regular project and system audits of the implementing partners. High insistence on deploying ROM missions. Regular missions conducted by HQ.
Political/operational	Absence of EU Delegation – decreased EU visibility	High	Medium	Specific EU visibility provisions included in the project activities and future contract. Regular missions conducted by HQ.
Political/operational	Absence of EU Delegation – decreased ability to engage Iranian counterparts	High	Medium	EU-Iran Dialogue on Migration and Refugees. Regular missions conducted by HQ.
Operational	Mitigation measures to limit the spread of Covid-19 prevent certain activities and monitoring to be conducted	High	High	All activities will have the safety and security of the staff and beneficiaries as priority, health protocol to prevent from Covid-19 transmission will be systematically put in place, including design of remote alternatives to in-person activities where possible.
Operational	Interference in programme design, implementation, monitoring and evaluation	High	High	Continuous engagement and negotiations with authorities to ascertain implementing partners' independence and mandate; establishment of Government Liaison unit; establishment of M&E unit with capacity to monitor and evaluate.
Operational	Decreasing support and cooperation from authorities relating to livelihoods interventions to improve opportunities for Afghan refugees	Medium	Medium	Continued engagement and negotiations with authorities to advocate for support to Afghan refugees to maintain livelihoods and ability to become independent and more resilient to economic shocks & stresses.
Operational	Low programmatic and physical access to target populations,	High	High	Continuous engagement and negotiations with authorities to increase access to target populations, Collaboration with Afghan

	protracted delays in government approvals			volunteers, Collaboration with local NGOs.
--	---	--	--	--

#### **Lessons Learnt:**

This action is effectively the second phase of the current EUR 7 million project implemented by NRC and their partners and financed under the Commission Decision MIGR/2017/040-582 (MIGR/2018/395-984 ‘Enhanced access to rights, essential services and livelihoods for vulnerable Afghans in Iran’). During the two years of implementation, the project has supported more than 25 000 vulnerable individuals, constructed 43 new classrooms, refurbished 77 and equipped 141 classrooms, built health and COVID-19 facilities in five provinces etc. It has been successfully providing assistance to Afghans in Iran in spite of significant contextual limitations, exacerbated by COVID-19. The foundations of collaborative and coordinated responses to the needs of vulnerable Afghan and host communities have been established over the last two years while familiarity and crucially trust have been established with key stakeholders such that significant gains could be achieved through building on initiatives and successes to date.

For instance, improving access to documentation (either residence or legal identity) will rely on project’s extensive legal experience in Iran. Specifically, the action defined in this document would continue the efforts started by NRC in 2019 and 2020 to support the Afghan and Iranian governments to provide access to Afghans displaced in Iran to e-Tazkera (Afghan biometric ID card). With the experience and expertise of the last two years in all sectors to build upon, this action affords the possibility to secure increased efficiency and quality of services to vulnerable groups, and to further reap the benefits of the networks and relationships that have been established with external stakeholders to date. Furthermore, a formal referral pathway has been established between NRC and Relief International, with referral Standard Operating Procedures and a joint referral tracker to facilitate secure exchange of information and measurement of outcomes.

In addition, the current project has secured significant progress in raising the profile of vulnerable women and acceptance of their hitherto marginalized needs by obtaining approval to provide services in safe shelters. Such assistance is noted among protection actors as being in severe need and is envisioned to be expanded in through this action.

### **3.5. The Intervention Logic**

The underlying intervention logic for this action is designed to build the resilience of migrants and refugees as well as their host communities by increasing access to and providing various services in the area of education, health, livelihood creation and protection. Improving beneficiaries’ access to these four areas constitute main ways to improve living conditions of vulnerable Afghans and their host communities in Iran.

The specific needs are inferred from the current project implemented by NRC in the same area and various assessments NRC and its partners are conducting on a regular basis. This includes new needs related to the COVID-19 pandemic, especially considering Afghan nationals and their host communities have been disproportionately hit by the crisis. Therefore, this Action significantly adds to EU’s contribution to the post-COVID-19 recovery in Iran.

The Action plans to provide quality learning spaces and resources, access to preparatory programmes (both physical and e-learning) and supporting with cash and in-kind contributions individuals who are at the risk of opting out and adopting negative coping mechanism (e.g. child labor etc). As these are the gaps in the education sector, these activities are expected to significantly complement the education services delivered by GoI and reach the SO1. The health objective will be achieved by increasing awareness about health and diseases, establishing new health facilities and maintaining those already established. Special attention will be given to family health facilities (e.g. sexual and reproductive health). Protection objectives entail introducing vulnerable Afghans with their rights under Iranian and international law and equipping them with legal and legitimate documentation issued by Afghan and Iranian governments. This is especially important considering proper documentation is often a formal requirement to access other services. Activities related to coordination at the national level are key to increase efficiency of the public policy implementation.

Throughout the Action’s activities special attention will be given to women and persons with disabilities since there is a significant proportion of female-led households and businesses as well as families with a member who has a disability.

The comprehensiveness of Action’s thematic scope and the fact that host communities are also targeted will result in increased communal harmony and will mitigate the risk of local conflicts.

### 3.6. Logical Framework Matrix

Results	Results chain: Main expected results (maximum 10)	Indicators: (at least one indicator per expected result)	Baselines (values and years)	Targets (values and years)	Sources of data	Assumptions
<b>Impact</b>	To enhance resilience and self-reliance of vulnerable Afghans and their host communities in Iran.	<ol style="list-style-type: none"> <li>1. Percentage of Afghan and host communities' population with access to education services (by sex, age and disability).</li> <li>2. Percentage of Afghan and host communities' population with access to health services (by sex, age and disability).</li> <li>3. Percentage of Afghan and host communities' population able to maintain livelihood (by sex, age and disability).</li> </ol>	tbd	tbd	1. Government reports and surveys	<i>Not applicable</i>
<b>Outcome 1</b>	Increased access to rights, protection and essential services, including education and health, for vulnerable Afghans and host communities in Iran	<ol style="list-style-type: none"> <li>1.1 Number of migrants, refugees, and internally displaced people or individuals from host communities assisted or protected with EU support, (disaggregated by sex, age, disability) (EURF 2.20)</li> <li>1.2 Number of students enrolled in education with EU support: (a) primary education, (b) secondary education, (c) tertiary education, disaggregated by sex (EURF 2.25)</li> </ol>	tbd	tbd	<ol style="list-style-type: none"> <li>1.1 Database of beneficiaries/participants</li> <li>1.2 Database of beneficiaries/participants</li> </ol>	National and local government remain committed to well-managed and inclusive migration policies.
<b>Outcome 2</b>	Improved livelihoods and access to sustainable income	2.1 Number of Afghan nationals and members of host communities who received support in the area of livelihood creation from the EU by sex, age and disability.	tbd	tbd	2.1 Database of beneficiaries/participants	National and local government remain committed to well-managed and inclusive migration policies.

<b>Outcome 3</b>	Enhanced contribution of key national and international stakeholders in provision of assistance to vulnerable Afghans in Iran	3.1 Number of national and international organizations involved in support and provision of the assistance to vulnerable Afghans in Iran with EU support	tbd	tbd	3.1 Baseline and endline assessment, database of beneficiaries/participants	National and local government remain committed to well-managed and inclusive migration policies.
<b>Output 1 related to Outcome 1</b>	Increased access to equal and quality education in enhanced learning environments	1.1.1 Number of classrooms built, refurbished and equipped with support of the EU-funded intervention 1.1.2 Number of students that can access improved additional education facilities	tbd	tbd	1.1.1 database of beneficiaries/participants 1.1.2 database of beneficiaries/participants	Factors outside project management's control as analysed in the risk assessment part of the action document.
<b>Output 2 related to Outcome 1</b>	Improved capacity of health infrastructure	1.2.1 Number of new health facilities established 1.2.2 Number of old health facilities maintained 1.2.3 Number of displaced persons and community members with access to health facilities with support of the EU-funded intervention	tbd	tbd	1.2.1 database of beneficiaries/participants 1.2.2 database of beneficiaries/participants 1.2.3 database of beneficiaries/participants	Factors outside project management's control as analysed in the risk assessment part of the action document.
<b>Output 3 related to Outcome 1</b>	Enhanced access to protection resources for vulnerable households and persons with specific needs	1.3.1 Number of female-led households and household with a member with disabilities receiving in-kind or cash support from the EU 1.3.2 Percentage of beneficiaries who report possessing civil documentation (identity confirmation code, Tazkera or passport) as a result of the ICLA pilot project (disaggregated by type of civil documentation, age, sex)	tbd	tbd	1.3.1 database of beneficiaries/participants 1.3.2 database of beneficiaries/participants	Factors outside project management's control as analysed in the risk assessment part of the action document.
<b>Output 1 related to Outcome 2</b>	Enhanced access and linkages to market, economic and employment opportunities	2.1.1 Number of businesses receiving in-kind, cash or training support from the EU (including percentage of female-led businesses)	tbd	tbd	2.1.1 database of beneficiaries/participants	Factors outside project management's control as

						analysed in the risk assessment part of the action document.
<b>Output 1 related to Outcome 3</b>	Improved programmatic, thematic, geographic, advocacy and access-related coordination	3.1.1 Number of multi-stakeholder coordination activities delivered	tbd	tbd	3.1.1 database of beneficiaries/participants	Factors outside project management's control as analysed in the risk assessment part of the action document.
<b>Output 2 related to Outcome 3</b>	Increased awareness both within Iran and internationally about the needs of vulnerable Afghans and their host communities in Iran	3.2.1 Number of national and international awareness raising activities delivered	tbd	tbd	3.2.1 database of beneficiaries/participants	Factors outside project management's control as analysed in the risk assessment part of the action document.

## 4. IMPLEMENTATION ARRANGEMENTS

### 4.1. Financing Agreement

In order to implement this action, it is not envisaged to conclude a financing agreement with the partner 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 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 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 measures<sup>25</sup>.

#### 4.3.1. Direct Management (Grants)

##### **Grants: (direct management)**

##### **(a) Purpose of the grant**

The purpose of the grant is to implement all objectives of the Action. Therefore:

The **Overall Objective (Impact)** of the grant is to enhance resilience and self-reliance of vulnerable Afghans and their host communities in Iran.

The **Specific Objectives (Outcomes)** of the grant are to

1. Increase access to rights, protection and essential services, including education and health, for vulnerable Afghans and host communities in Iran
2. Improve livelihoods and access to sustainable income
3. Enhance contribution of key national and international stakeholders in provision of assistance to vulnerable Afghans in Iran

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

contributing to Outcome 1 (or Specific Objective 1): Increased access to equal and quality education in enhanced learning environments

contributing to Outcome 1 (or Specific Objective 1): Improved capacity of health infrastructure

contributing to Outcome 1 (or Specific Objective 1): Enhanced access to protection resources for vulnerable households and persons with specific needs

contributing to Outcome 2 (or Specific Objective 2): Enhanced access and linkages to market, economic and employment opportunities

contributing to Outcome 3 (or Specific Objective 3): Improved programmatic, thematic, geographic, advocacy and access-related coordination

contributing to Outcome 3 (or Specific Objective 3): Increased awareness both within Iran and internationally about the needs of vulnerable Afghans and their host communities in Iran

<sup>25</sup> [www.sanctionsmap.eu](http://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.

**(b) Type of applicants targeted**

The applicants targeted are international Non-Governmental Organisations (INGO) active in the sector of migration and forced displacement, with expertise in supporting Civil Society Organisations (CSO).

#### 4.3.2. Changes from direct to indirect management mode due to exceptional circumstances

In the event of exceptional circumstances that would render the execution of the current project design, or distinguishable parts thereof, impossible, this Action may be implemented in indirect management with an pillar assessed entity, which will be selected by the Commission's services using the following criteria:

- Extensive experience and expertise in the area of migration and forced displacement in Iran;
- Experience and expertise in the area of supporting local Civil Society Organisations in Iran;
- Sufficient absorption capacity related to the Action's indicative budget;
- Established relations with the Government of Iran, local CSOs/NGOs and other stakeholders;
- Extensive experience in implementing EU funded projects in the area of migration and forced displacement in Iran;

The implementation by this entity entails implementing the totality of the Action as described in section 3 of this Action Document.

#### 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

<b>Indicative Budget components</b>	<b>EU contribution (amount in EUR)</b>
<b>Overall Objective:</b> To enhance resilience and self-reliance of vulnerable Afghans and their host communities in Iran	
Grants (direct management) – cf. section 4.3.1	14,000,000.00
<b>Evaluation</b> – cf. section 5.2 <b>Audit</b> – cf. section 5.3	Will be covered by another Decision.
<b>Communication and visibility</b> – cf. section 6	N/A
<b>Totals</b>	14,000,000.00

#### 4.6. Organisational Set-up and Responsibilities

The basis for this action is the already existing structures as part of the current project (MIGR/2018/395-984 'Enhanced access to rights, essential services and livelihoods for vulnerable Afghans in Iran'). The second phase proposed in this Action Document will entail more responsibilities for the implementer (NRC) and coordinated and coherent work with its partners. Further, NRC will closely coordinate and de-conflict with other stakeholders such as UNHCR. It will also establish a reporting mechanism toward the envisaged regional Team Europe Initiative on the Afghan Displacement Situation. The six-month or annual Project Steering Committee set up will ensure overall coherence and coordination of activities. It will comprise of representatives of relevant Ministries (MFA, MoI, MoE, MoHME, MCLSW), Contracting Authority, secretariat of the regional TEI on the Afghan Displacement Situation and others.



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.

#### 4.7. Pre-conditions

N/A

## 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), the ODDs and the GAP III indicators and the partner's strategy, policy or reform action plan list (for budget support). For certain indicators from the logical framework, the implementer will conduct a baseline and endline assessment.

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: Implementing partner and its partners are responsible for data collection and analysis as well as for relaying that data and findings to the Contracting Authority and the secretariat of the envisaged regional Team Europe Initiative on the Afghan Displacement Situation. The main implementer of the Action is responsible to establish proper and robust monitoring and evaluation systems on its partners.

### 5.2. Evaluation

Having regard to the importance of the action, a mid-term evaluations will be carried out for this action or its components via independent consultants contracted via an implementing partner.

It will be carried out for problem solving, learning purposes, in particular with respect to assessing benefits to final beneficiaries (i.e. vulnerable Afghans and host communities) and political relevance.

The evaluation reports shall be shared with the partner country and other key stakeholders following the best practice of evaluation dissemination<sup>26</sup>. 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 shall be covered by another measure constituting a Financing Decision.

The Evaluation will assess the gender and human rights impacts as well as the respect of the five RBA working principles (participation, non-discrimination, accountability, transparency and respect to all human rights).

### 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.

<sup>26</sup> See best [practice of evaluation dissemination](#)

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.

## APPENDIX 1 REPORTING IN OPSYS

An Intervention<sup>27</sup> (also generally called project/programme) is the operational entity associated to a coherent set of activities and results structured in a logical framework aiming at delivering development change or progress. Interventions are the most effective (hence optimal) entities for the operational follow-up by the Commission of its external development operations. As such, Interventions constitute the base unit for managing operational implementations, assessing performance, monitoring, evaluation, internal and external communication, reporting and aggregation.

Primary Interventions are those contracts or groups of contracts bearing reportable results and respecting the following business rule: 'a given contract can only contribute to one primary intervention and not more than one'. An individual contract that does not produce direct reportable results and cannot be logically grouped with other result reportable contracts is considered a 'support entities'. The addition of all primary interventions and support entities is equivalent to the full development portfolio of the Institution.

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 is defined in the related Action Document and it is revisable; it can be a(n) (group of) action(s) or a (group of) contract(s).

Tick in the left side column one of the three possible options for the level of definition of the Primary Intervention(s) identified in this action.

In the case of 'Group of actions' level, add references to the present action and other action concerning the same Primary Intervention.

In the case of 'Contract level', add the reference to the corresponding budgetary items in point 4.6, Indicative Budget.

<b>Option 1: Action level</b>		
<input checked="" type="checkbox"/>	Single action	Present action: all contracts in the present action
<b>Option 2: Group of actions level</b>		
<input type="checkbox"/>	Group of actions	Actions reference (CRIS#/OPSYS#): N/A
<b>Option 3: Contract level</b>		
<input type="checkbox"/>	Single Contract 1	N/A
<input type="checkbox"/>	Single Contract 2	N/A
<input type="checkbox"/>	Single Contract 3	N/A
<input type="checkbox"/>	Group of contracts 1	N/A

<sup>27</sup> [ARES \(2021\)4204912](#) - For the purpose of consistency between terms in OPSYS, DG INTPA, DG NEAR and FPI have harmonised 5 key terms, including 'action' and 'Intervention' where an 'action' is the content (or part of the content) of a Commission Financing Decision and 'Intervention' is a coherent set of activities and results which constitutes an effective level for the operational follow-up by the EC of its operations on the ground. See more on the [concept of intervention](#).

