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

**ANNEX III**

to the Commission Implementing Decision on the financing of the annual action plan in favour of the Islamic Republic of Pakistan for 2023

**Action Document for Promotion of Human Rights in Pakistan II**

**ANNUAL PLAN**

This document constitutes the annual 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**

|   |   |
|---|---|
| <b>1. Title<br/>CRIS/OPSYS<br/>business reference<br/>Basic Act</b> | Promotion of Human Rights in Pakistan II<br>OPSYS number: ACT-62170<br>Financed under the Neighbourhood, Development and International Cooperation Instrument (NDICI-Global Europe) |
| <b>2. Team Europe Initiative</b>                                    | No  |
| <b>3. Zone benefiting from the action</b>                           | The action shall be carried out in Pakistan   |
| <b>4. Programming document</b>                                      | Multi-annual Indicative Programme (MIP) for Pakistan for 2021-2027  |
| <b>5. Link with relevant MIP(s) objectives / expected results</b>   | MIP 2021-2017 Priority Area 3: Governance, including the Rule of Law and Human Rights<br>Objective 7: Strengthened Governance and Rule of Law in line with international standards. |
| <b>PRIORITY AREAS AND SECTOR INFORMATION</b>                        |   |
| <b>6. Priority Area(s), sectors</b>                                 | Government and Civil Society (DAC 150-151)  |
| <b>7. Sustainable Development Goals (SDGs)</b>                      | Main SDG: SDG Goal 16 - Targets 16.1, 16.2 & 16.3<br>Other significant SDGs:<br>SDG Goal 5 - Targets 5.1, 5.2 & 5.3<br>SDG Goal 8 - Targets 8.7, 8.8                                |
| <b>8 a) DAC code(s)</b>   | DAC code 15160 Human Rights (100%)  |
| <b>8 b) Main Delivery Channel</b>                                   | Multilateral Organisations – 40000<br>Donor Government 11000  |

|  |  |   |   |                                     |
|--|--|---|---|-------------------------------------|
| <b>9. Targets</b>                      | <input type="checkbox"/> Migration<br><input type="checkbox"/> Climate<br><input checked="" type="checkbox"/> Social inclusion and Human Development<br><input checked="" type="checkbox"/> Gender<br><input type="checkbox"/> Biodiversity<br><input checked="" type="checkbox"/> Education<br><input checked="" type="checkbox"/> Human Rights, Democracy and Governance |   |   |                                     |
| <b>10. Markers<br/>(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 type="checkbox"/>  | <input type="checkbox"/>  | <input checked="" type="checkbox"/> |
|  | Aid to environment @   | <input checked="" type="checkbox"/>   | <input type="checkbox"/>  | <input type="checkbox"/>            |
|  | Gender equality and women's and girl's empowerment   | <input type="checkbox"/>  | <input checked="" type="checkbox"/>   | <input type="checkbox"/>            |
|  | Reproductive, maternal, new-born and child health  | <input checked="" type="checkbox"/>   | <input type="checkbox"/>  | <input type="checkbox"/>            |
|  | Disaster Risk Reduction @  | <input checked="" type="checkbox"/>   | <input type="checkbox"/>  | <input type="checkbox"/>            |
|  | Inclusion of persons with Disabilities @   | <input type="checkbox"/>  | <input checked="" type="checkbox"/>   | <input type="checkbox"/>            |
|  | Nutrition @  | <input checked="" type="checkbox"/>   | <input 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 and Tags:</b>  | <b>Policy objectives</b>   | <b>Not targeted</b>   | <b>Significant objective</b>  | <b>Principal objective</b>          |
|  | Digitalisation @   | <input type="checkbox"/>  | <input checked="" type="checkbox"/>   | <input type="checkbox"/>            |
|  | digital connectivity<br>digital governance<br>digital entrepreneurship<br>digital skills/literacy<br>digital services  | YES<br><input checked="" type="checkbox"/><br><input checked="" type="checkbox"/><br><input type="checkbox"/><br><input type="checkbox"/><br><input type="checkbox"/> | NO<br><input type="checkbox"/><br><input type="checkbox"/><br><input checked="" type="checkbox"/><br><input checked="" type="checkbox"/><br><input checked="" type="checkbox"/> | /                                   |
|  | Connectivity @   | <input checked="" type="checkbox"/>   | <input type="checkbox"/>  | <input type="checkbox"/>            |
|  | digital connectivity   | YES<br><input type="checkbox"/>   | NO<br><input checked="" type="checkbox"/>   | /                                   |

|                                      |  |  |   |                          |
|--------------------------------------|--|--|---|--------------------------|
|                                      | energy<br>transport<br>health<br>education and research  | <input type="checkbox"/><br><input type="checkbox"/><br><input type="checkbox"/><br><input type="checkbox"/> | <input checked="" type="checkbox"/><br><input checked="" type="checkbox"/><br><input checked="" type="checkbox"/><br><input 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 type="checkbox"/>   | <input checked="" type="checkbox"/>   | <input type="checkbox"/> |
| <b>BUDGET INFORMATION</b>            |  |  |   |                          |
| <b>12. Amounts concerned</b>         | Budget line(s) (article, item): 14 02 01 31 (NDICI South and East Asia)<br>Total estimated cost: EUR 10 000 000<br>Total amount of EU budget contribution EUR 10 000 000 |  |   |                          |
| <b>MANAGEMENT AND IMPLEMENTATION</b> |  |  |   |                          |
| <b>13. Type of financing</b>         | Indirect management with the entity(ies) to be selected in accordance with the criteria set out in section 4.4.4   |  |   |                          |

## 1.2 Summary of the Action

The action will support the EU's priority to develop and consolidate democracy, the rule of law, and respect for human rights and fundamental freedoms worldwide. It will also contribute to implementing the EU's response to the 2030 Agenda, in line with the European Consensus for Development. Furthermore, it will contribute to the achievement of SDG 16 (Promote just, peaceful, and inclusive societies), SDG 5 (gender equality) and SDG 17 (partnerships). The action is in line with the State's global commitment to deliver target 16.a, to strengthen relevant national institutions for building capacities at all levels.

The action aims to promote human rights in Pakistan by strengthening institutions and systems promoting, protecting, and fulfilling human rights (outcome 1) and enhancing private sector participation in the protection of human rights and gender equality (outcome 2).

This action will build on the success and lessons of the "Promotion of Human Rights in Pakistan" programme, which was the first EU institutional project supporting human rights, implemented between December 2018 and February 2022. The requirement for Pakistan to re-apply for the preferential trade preferences under the new Generalised Scheme of Preferences Plus (GSP+) scheme starting in 2024 creates a positive momentum to strengthen human rights institutions further and accelerate progress in implementing and promoting human rights in Pakistan. The action will promote human rights by seeking to support an increasingly efficient, competent, inclusive, coordinated, and independent human rights system consistent with international standards. The action is expected to enhance the development of a more egalitarian society where human rights are respected and people have access to National Human Rights Institution (NHRI) services that are efficient, coordinated, and result-oriented.

The action supports the Global Gateway principle on good governance, specifically through its business and human rights (BHR) component, while working towards improved engagement of civil society organisations (CSOs) with National Human Rights Institutions. The institutional human rights set-up will be strengthened through working with the mandated government ministries at a federal and provincial level and the national human rights bodies. Given the post-flood context, the action should also promote and contribute to a human rights and standards resilient recovery and reconstruction effort.

A people-centred approach will be adopted by empowering people living in the most vulnerable situations with information, skills and opportunities: for rights holders to be aware of their rights, access and utilise those (non) state institutions for claiming a right, obtaining redress for a grievance or settling a dispute.

## 2 RATIONALE

### 2.1 Context

Pakistan's democracy has faced challenges since its inception, and in 2018 the country saw only the second consecutive constitutional power transfer from one civilian government to another.<sup>1</sup> While a civilian government runs the country, Pakistan's military remains an important stakeholder in the country's internal power balance, with significant influence on internal security and perceived related policy matters. As a result, the intensity of internal conflicts, including terrorism and ethnic conflicts, has subsided owing to applying a force-heavy model. However, most underlying drivers that cause and fuel these conflicts persist. These include poverty, gender-based discrimination, unemployment, discrimination of minorities, unequal distribution of wealth, illiteracy, poor access to social services, feudal culture, and a youth bulge due to overpopulation.

Moreover, the success of anti-terror operations is not matched by successfully containing religious extremism. Despite a recent phase of relative stability and a reduction in violent conflict, Pakistan remains vulnerable to both national instabilities and sub-regional conflicts. Overall, the Global Peace Index 2021 ranks Pakistan 150 out of 163 countries in terms of peacefulness and security, the 6<sup>th</sup> lowest ranking among South Asian countries, and ranked just above Afghanistan<sup>2</sup>. Extremist organisations have driven most violence in the conflict-prone Khyber Pakhtunkhwa, Balochistan provinces, and surrounding areas<sup>3</sup>. The Merged Areas in the Province of Khyber Pakhtunkhwa have suffered several cycles of conflict. Since 2001, as another cycle of war started in neighbouring Afghanistan, in the Merged Areas, the already fragile governance and the rule of law system quickly disintegrated, dramatically increasing violent conflict. In addition, militant organisations<sup>4</sup> supportive of the Taliban's war in Afghanistan joined the fighting alongside the Taliban, quickly expanding the conflict into Pakistan's border areas.

The coalition government in power since April 2022 originally appeared to be prepared to reverse the trend of pressurising critical voices and media in society. However, pending new legislation aiming at the prevention of 'fake news' in social media has been criticised by media and civil society, and social media activists and journalists have reported increased pressure in their work. Continued human rights problems in Pakistan include extrajudicial killings, enforced disappearances, and the use of the death penalty. At the same time, in August 2022, the National Assembly passed the Torture and Custodial Death Act, criminalising torture by law enforcement. Regarding the institutional human rights system, human and financial resources available to NHRIs remain insufficient to accomplish their objectives. In May 2023 a series of violent protests took place after the arrest of former Prime Minister, and opposition leader, Imran Khan which led to temporary internet shut-downs and accusations by journalists of attempts at intimidating and censoring their work. Several protesters were abducted and the use of military courts in civilian cases has been widely criticised by the international community. These developments showed clearly how fragile the political status quo in Pakistan remains and how important actions supporting the human rights agenda will be in the nearest future.

Pakistan's Constitutional and legal framework encompasses core principles of remediation, such as the separation of the judiciary and effective access to justice<sup>5</sup>. There is also an evolving role given to NHRIs in Pakistan, with special powers to help protect human rights and improve Pakistan's reporting standards internationally. In addition to the National Commission for Human Rights (NCHR), two other existing NHRIs are the National Commission on Child Welfare and Development (NCCWD) and the National Commission on the Status of Women (NCSW). Additionally, the process is underway to establish Pakistan's fourth NHRI, i.e., the National Commission on Minorities (NCM). The State of Pakistan is committed to introducing

<sup>1</sup> Human Rights Watch (2019), "Pakistan Upholds Rights of Speech and Dissent." January 17, <https://www.hrw.org/news/2019/01/17/pakistan-uphold-rights-speech-dissent>

<sup>2</sup> Global Peace Index 2021 <https://countryeconomy.com/demography/global-peace-index/pakistan>

<sup>3</sup> The Asia Foundation: Pakistan: At a Glance <https://asiafoundation.org/wp-content/uploads/2017/10/Pakistan-StateofConflictandViolence.pdf>

<sup>4</sup> For e.g. Tehrik-e-Taliban Pakistan, Lashkar-e-Islam, Hafiz Gul Bahadar Group, Jammatt-ur-Ahrar, Ilays Kashmiri Group. Lashkar-e-Tayyaba (LeT) etc.

<sup>5</sup> See: Constitution of Pakistan

robust implementation mechanisms and legislative amendments to bridge existing gaps and provide effective remedies to those adversely affected by business activity.

The EU-adopted 2030 Agenda for Sustainable Development ensures that the appropriate means of implementation (finance, trade, capacity building, and/or science, technology, and innovation) are given attention in formulating almost every Sustainable Development Goal. . The means of implementation in the 2030 Agenda also include commitments to address systemic issues, including policy and institutional coherence, multi-stakeholder partnerships, data, monitoring, and accountability – all of which are addressed in the design of the present action.

As a result of the EU's recent institutional support programme for human rights, the federal level, particularly the Ministry of Human Rights, has been able to raise awareness of key human rights issues. Future interventions must reflect the complex institutional structure of the human rights architecture in Pakistan based on lessons learned. Independent Commissions on Human Rights, beneficiaries of previous EU-funded interventions, have adequate monitoring mandates but are not operating in accordance with the Paris Principle. Moreover, the human and financial resources available are insufficient to accomplish their objectives. Therefore, the importance of providing targeted assistance to these Commissions cannot be overstated.

Moreover, there has been considerable political momentum at the federal level regarding business and human rights, and this area shows good complementarity with other EU-identified priorities in Pakistan. Therefore, a greater chance of success is apparent through comprehensively addressing all aspects of GSP+, in addition to human rights interventions.

Lastly, GSP+ has proven an effective instrument for encouraging the government to demonstrate its commitment to creating a more conducive normative environment for the national human rights mechanism to function effectively. Over 76% of Pakistan's exports, including textiles and clothing, enter the EU duty and quota-free as a result of GSP+<sup>6</sup>. This represents approximately 20% of Pakistan's global exports<sup>7</sup>. It is expected that the GSP+ preferences will also assist Pakistan in diversifying its exports. In this trade relationship, Pakistan and the EU must ensure that the benefits generated in the relevant economic areas and industries are appropriately achieved. In other words, the relevant EU standards that regulate the relationship between businesses and labour and the economic rights of individuals, communities, and groups (women, children, migrants, people with disabilities) should streamline the relationships in all industries that benefit from the trade agreement.

Pakistan's recent report submitted to United Nations (UN) Human Rights Committee was deemed unsatisfactory because it could not explain reported extrajudicial killings, enforced disappearance, and use of the death penalty in Pakistan. Moreover, according to the Human Rights Commission of Pakistan (HRCP) report, Pakistan has a poor record in implementing eight fundamental conventions it ratified. The report also points out poor enforcement of collective bargaining and failure to eliminate the worsts forms of child labour, forced labour, and discrimination in employment.

The EU granted the GSP+ status for Pakistan. In response, the Government was further encouraged to improve its human rights record and establish Treaty Implementation Cells (TICs) at the national and provincial levels to coordinate the implementation of treaty obligations among various line ministries<sup>8</sup>. Furthermore, the provincial governments have established their own Human Rights Departments and provincial Human Rights strategies. Therefore, compliance with GSP+ is a matter of political interest at the moment.

Over the past few years, the Government of Pakistan has introduced several significant legislative measures supporting human rights. There has been notable progress in the country with regard to the protection of children, and the following legislation was passed during this period: the Transgender (Protection of Rights) Act 2018, the

<sup>6</sup> See: EU trade relations with Pakistan. Facts, figures and latest developments. available at [https://policy.trade.ec.europa.eu/eu-trade-relationships-country-and-region/countries-and-regions/pakistan\\_en](https://policy.trade.ec.europa.eu/eu-trade-relationships-country-and-region/countries-and-regions/pakistan_en) <<last visited 13.02.2023>>

<sup>7</sup> Ibid.

<sup>8</sup> At the federal level, the focus of the TIC is on: i) the formulation of effective mechanisms for the implementation of the ratified conventions; (ii) the development of protocols for provincial Line Departments to document the implementation progress; (iii) the provision of support and guidance to the relevant Line Departments to formulate standardised reporting templates and to generate reports; (iv) the coordination with the respective Line Departments to collect and compile reporting data; and (v) the formation of a liaison mechanism with the relevant Federal Ministries (Ministry of Human Rights, Ministry of Law, Foreign Office) for reporting and monitoring.

Zainab Alert, Response and Recovery Act, the ICT Child Protection Act 2018, and the Juvenile Justice System Act 2018. A National Action Plan on Business and Human Rights was launched by the Federal Ministry of Human Rights (MoHR) with the support of development partners in September 2021.

Intending to seize the momentum, the present action is a flagship human rights intervention that promotes and contributes to the rule of law and the promotion of human rights by capacitating an increasingly competent, inclusive, coordinated, and independent human rights system consistent with international standards. To this end, building on the result and lessons of previous EU interventions, the action intends to i) Improve the effectiveness of the actions of independent NHRIs and CSOs through enhanced capacities for monitoring, oversight, reporting, and outreach to vulnerable groups; ii) Support effective, appropriate State-based system of non-judicial grievance mechanisms for the remedy of business-related human rights abuse with NHRI has a particularly important role to play in this regard; iii) Strengthen sustained human rights education and academic research to improve the promotion and protection of human rights and democracy.

The Multi-annual Indicative Programme for Pakistan for 2021-2027 aims to contribute to the implementation of Vision 2025 by focusing on three areas: (1) Green Inclusive Growth, (2) Human Capital, and (3) Governance, including Rule of Law and Human Rights. An important feature of this prospective action relates to the overarching framework of Priority Area 3. The SDGs where interventions under this priority will contribute are (in ascending order): 1 (No Poverty), SDG Goal 5 - Targets 5.1, 5.2 & 5.3, SDG Goal 8 - Targets 8.7, 8.8, 10 (Reduced Inequalities) and 16 (Peace, Justice, and Strong Institutions) Targets 16.1, 16.2 & 16.3.

The proposed action is consistent with the following global EU priorities: Digital transformation; Sustainable growth and jobs; Human development, peace, and governance. To this end, the action will fully align with the EU's Human Rights Strategy 2021-2024, the new CSO Roadmap and the Country Level Implementation Plan for the Gender Action Plan III 2021-2025. The action will support the Declaration adopted on 8 July 2017 in Hamburg, when G20 Leaders committed to fostering the implementation of labour, social and environmental standards and human rights in line with internationally recognised frameworks to achieve sustainable and inclusive supply chains and underlined the responsibility of businesses to exercise due diligence in this regard<sup>9</sup>.

## 2.2 Problem Analysis

### A lack of effective implementation of the Constitution and the realisation of fundamental rights.

As a developing country and a democracy that combines Islamic and secular law, Pakistan's situation in relation to human rights, social inclusion, and community stabilisation remains complex. There are also clauses in the Constitution that guarantee independent Supreme Courts, separation of executive and judicial branches, an independent judiciary, an independent Human Rights Commission, and freedom of movement within and abroad. It is, however, difficult to ensure compliance with and implementation of these laws and policies. It should be noted that although the fundamental rights spelt out in the Constitution are binding, **effective action is needed to ensure the implementation of human rights and gender-sensitive budgeting**. Furthermore, since the **18<sup>th</sup> Amendment to the Constitution of Pakistan** and the subsequent devolution of “human rights” to the sub-national level, multiple capacity constraints and challenges in relevant provincial line departments and institutions pose a substantial challenge towards ensuring that human rights concerns and violations are effectively and efficiently dealt with. These challenges range from the sporadic collection of human rights-based data to data analysis and human rights reporting, which continue to be critical constraints in guaranteeing a rights-enabling environment across the four provinces in Pakistan. In addition, unclear roles and responsibilities of **respective governments and statutory bodies** and the weak capacities of **civil society** continue to hinder **rights-based development** and gender justice across Pakistan.

### Business and Human Rights.

Business enterprises play a significant role in protecting human rights in Pakistan because the State's economy relies heavily on its industrial and services sectors, which constitute over 81% of the GDP.<sup>10</sup> Due to this, businesses can

<sup>9</sup> See: OECD Due Diligence Guidance for Responsible Business Conduct, OECD (2018)

<sup>10</sup> Source: Pakistan Bureau of Statistics. ‘Sectoral Shares in GDP (At Constant Basic Prices)’. Quoted In 1st Five Year National Action Plan On Business And Human Rights (2021-2026)

gravely affect human rights protection. They, thus, must work with the State to ensure the protection and promotion of the fundamental rights enshrined in the Constitution. In addition, a burgeoning workforce of 60 million people in Pakistan and the harsh human rights conditions they are subjected to underscore the need for BHR in the country. Although Pakistan has promulgated a number of laws under its international obligations to the International Labour Organisation (ILO) and other international human rights bodies, numerous cases have been documented that demonstrate human rights violations in the business context.

- a. *Human rights are adversely affected by a wide range of business activities in Pakistan. Examples include, but are not limited to, forced or bonded labour and child labour; discrimination and harassment against women and other vulnerable or **marginalised communities** in the workplace; poor implementation of labour standards; displacement and violation of land rights of rural, displaced and **indigenous communities**; high levels of environmental damage; and, the predominance of informal working arrangements in the economy which further contribute to increased labour and human rights violations.*
- b. *The most significant flaw in Pakistan's domestic framework from a BHR perspective is the lack of a legislative requirement to conduct human rights due diligence in business activity. Due to gaps in legislation and the lack of enforcement of existing laws, the country lacks a regulatory environment, which fails to keep businesses in check.*
- c. *Pakistan's business community appears to have a limited understanding of human and labour rights, which impacts corporate entities' implementation of human rights.*
- d. *The problem is exasperated by insufficient funding for the NHRIs charged with protecting and promoting human rights to fulfil their mandate and hold businesses accountable for their actions.*

Pakistan's GSP+ status, which the EU granted in exchange for improving compliance with 27 core international conventions pertaining to human rights, labour, corruption and the environment, is contingent upon implementing these conventions. According to the development principle of "do no harm," it is essential to ensure that the economic benefits of GSP+ are implemented responsibly. In this action, safety standards will be strengthened by supporting the development of normative environments and legal protection mechanisms for private sector workers. In addition, the action will support the implementation of the first National Action Plan on Business and Human Rights and its nexus with environmental access to justice in close coordination with the Ministry of Human Rights and other key government and private sector stakeholders.

#### Natural disasters and national response/redress mechanisms.

Pakistan faces several **environmental challenges**, including air pollution, water pollution, and water scarcity. Today, Pakistan is amongst the top ten countries identified as hotspots for climate impact<sup>11</sup> – ranking eighth globally and second-to-worst in South Asia, narrowly behind Bangladesh. Climate change will only intensify these challenges, highlighting the need for urgent action to protect the environment and its impacts on human well-being.

The devastating 2022 floods have disproportionately affected the most vulnerable, including women and minorities. According to the National Disaster Management Authority (NDMA) of Pakistan, between June and August 2022, approximately 33 million people – that is, one in seven – have been affected by a combination of riverine, urban, and flash flooding, including 8 million displaced. Out of the 25 poorest districts in Pakistan, 19 were calamity affected in the provinces of Sindh, Balochistan, and Khyber Pakhtunkhwa. The Post-disaster Needs Assessment (PDNA) 2022 report estimates total damages to the tune of EUR 15.3 billion and total economic loss of about EUR 15.6 billion.<sup>12</sup>

PDNA 2022 further estimates that 15.7 per cent of people in calamity-hit districts lacked access to electricity, compared to 9.3 per cent nationally. The post-flood scenario impacts the entire landscape of SDG prioritisation of the government of Pakistan. SDGs agenda is essentially based on the principles that 'seek to realise the human rights of all. More than 90 per cent of the targets reflect elements of international human rights and labour standards.<sup>13</sup> The pledge to "leave no one behind" mirrors the fundamental human rights principles of non-discrimination and equality. **A unified mechanism for expediting the redress of fundamental rights does not exist for the affected**

<sup>11</sup> See: D. Eckstein, V. Künzel, L. Schäfer, Global Climate Risk Index 2021. Who Suffers Most from Extreme Weather Events? Weather-Related Loss Events in 2019 and 2000-2019

<sup>12</sup> "Pakistan Floods 2022: Post-Disaster Needs Assessment (PDNA) - Main Report", UNDP Pakistan, October 2022 <https://www.undp.org/pakistan/publications/pakistan-floods-2022-post-disaster-needs-assessment-pdna-main-report>

<sup>13</sup> "Human Rights and SDGs – two sides of the same coin", Sarah Rattray, July 5, 2019, <https://www.undp.org/blog/human-rights-and-sdgs-two-sides-same-coin>

**population, nor is there a national system for monitoring** these rights adequately. Further, the affected population is unaware of the various non-judicial mechanisms available to resolve their complaints.

Monitoring and reporting of human rights recommendations are not coordinated, and politically sensitive human rights recommendations are still pending implementation.

Apart from the political will and normative environment to support the implementation, one challenge is coordinating and monitoring the progress of the UN TB and UPR recommendations. Moreover, the action can have far-reaching social, political, and economic implications for the State. By implementing the recommended measures, lives could have been saved, and the State's human rights record would have been improved, thereby allocating more economic resources from developed countries, including EU Member States.

The shrinking space for CSOs.

Civil Society and EU cooperation with Civil Society is facing significant challenges due to the shrinking space and the continuous degradation of an enabling environment. Civil society organisations and human rights defenders (HRDs) that operate in deteriorated environments are less able to act freely as agents of human rights, the rule of law advocacy, and good governance. Nevertheless, non-state actors wish to play a role in oversight and advocate for a human rights-based approach. The main challenge is that State has a restrictive political environment with a legal framework that hinders the development of an independent civil society. Consequently, the Civil Society Organisations majority of initiatives in the legal and judicial domains have been focused on actors engaged in disseminating legal information, legal aid, and alternative dispute resolution. The need for enabling CSOs is viewed as a key objective for EU efforts where, in the absence of a vibrant civil society, the EU's priorities and goals are undermined not only in the area of human rights and democratic governance but also in all other key areas of EU cooperation where civil society is an important partner in dialogue, implementation, and monitoring of interventions.

Gender Equality.

In July 2022, the World Economic Forum released its latest report on the Gender Equality Index, encapsulating the disparities between genders in education, health, economic opportunity and political empowerment. In this latest index update, Pakistan ranks 145 out of 146, hence the second worst-performing country in the world after Afghanistan. More specifically, Pakistan ranked 145 on economic participation and opportunity, 143 on health and survival, 135 on educational attainment and 95 on political participation. Notably, Pakistan is the country where women have the smallest share of senior, managerial and legislative roles (4.5%). It is challenging to improve gender equality performance because the socio-cultural barriers, such as gender-biased norms and customary stereotypes, are deeply rooted in generations of leaders, politicians, officials, business owners, men and women, and girls and boys in Pakistan. As a result of these norms and stereotypes, many women and girls are treated with discrimination, with prevalent issues including bias against women in leadership positions and a high prevalence of intimate partner and sexual violence. Pakistan rates as the third most dangerous country for women in the world and ranks 150/153 countries on the Women, Peace and Security index<sup>14</sup>.

Pakistan is a signatory to Human Rights Conventions (including CEDAW) and adopted 2030 SDGs, which are integrated into the national development agenda. The Constitution guarantees equality of citizenship, and several articles uphold the principle of gender equality.<sup>15</sup> Progressive legislation was introduced to protect women's socioeconomic and legal rights<sup>16</sup>. However, their implementation and monitoring still pose problems. The action will support the EU's priority to develop and consolidate democracy, the rule of law, and respect for human rights and fundamental freedoms. Gender equality is a core value of the EU and a universally recognised human right, and an imperative to well-being, economic growth, prosperity, good governance, peace, and security.

Academic Human Rights Education

<sup>14</sup> 2021-2025 Country Level Implementation Plan- CLIP Pakistan

<sup>15</sup> 2021-2025 Country Level Implementation Plan- CLIP Pakistan.

<sup>16</sup> 2016 Women Protection Act; 2011 Prevention of Anti-women Practices; Child Marriage Restraint Acts; 2010 Acid Control and Acid Crime Prevention Act; 2010 Prevention against Sexual Harassment at Workplace Act; 2017 Election Act; 2020 Enforcement of Women's Property Rights (Amendment) Bill; 2017 Hindu Marriage Act; Enactment of Domestic Violence Acts (in all provinces except Khyber Pakhtunkhwa).

Three of Pakistan's largest universities offer undergraduate and graduate programmes in human rights. However, there is a considerable lack of standards in the current curriculum for human rights education; the curriculum content is outdated and does not reflect the modern approach to legal protection for human rights. As a result, these studies are not popular and do not attract many young people. Meanwhile, there is an urgent need for qualified employees in the three national human rights commissions, the Ministry of Human Rights, and their regional representatives. Training and retaining qualified staff are one of the biggest challenges to implement national commitments. Furthermore, the ex-post evaluation demonstrated that development partners provide a wide range of human rights trainings. However, there is no coordination or quality control system; most importantly, these efforts are unsustainable. A number of challenges could be addressed by improving the quality of academic human rights education, including the problem of the supply and demand side of human resources, which is a system-wide issue in these institutions. In addition, the action could introduce EU standards through university networks and traineeships within the MoHR and NHRIs. As an investment over the long term, this action would also provide a significant return for the EU by reinforcing its added value.

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

*a. Key stakeholders*

Key stakeholders are the Federal Ministries of Human Rights of Law and Justice and Interior as well as their equivalents on the provincial level; Provincial Human Rights Departments; Treaty Implementation Cells (or any other structure mandated to collect and report on data on human rights); the National Commissions on Human Rights and the Rights of the Child; National and Provincial Commissions on the Status of Women, National & Provincial Standing Committees on Human Rights (and their provincial chapters), civil society national and provincial parliaments (incl. the standing committees on Human Rights), the judiciary, civil society, social partners, private sector, academia, higher education and training institutions.

*b. Involvement of local authorities and civil society*

In this action, CSOs' direct engagement will be fostered with national human rights, women organisations as well PWD institutions and trade unions through exchanges and consultations, contributing to their ability to monitor and ensure institutions are held accountable for their commitments and mandates, particularly focusing on women, youth and minorities.

### 3 DESCRIPTION OF THE ACTION

#### 3.1 Objectives and Expected Outputs

**The Overall Objective (Impact)** of this action is to enhance the fulfilment of human rights in Pakistan

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

*Outcome 1:* To improve effectiveness of institutions and systems promoting, protecting, and fulfilling human rights.

*Outcome 2:* To enhance private sector participation in the protection of human rights and gender equality

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

**Contributing to Outcome 1:**

1.1 Enhanced capacities of National Human Rights Institutions to monitor the State's human rights obligation and resolve complaints.

1.2 Strengthened reporting and digitisation capacities of Federal, Provincial and Local Human Rights Institutions to provide people-centred, gender-sensitive, disabilities-sensitive and inclusive services.

1.3. Improved monitoring and consultation mechanisms of the National Institutes of Human Rights, including with CSOs.

1.4 Strengthened academic standards of graduate and postgraduate Human Rights programmes.

### **Contributing to Outcome 2:**

2.1 Increased evidence and knowledge of the relevant stakeholders on best practices to harmonise regulations with the UN Guiding Principles on Business and Human Rights (UNGPs) and best EU business and human rights practices.

2.2 Strengthened capacities of state actors, CSOs and trade unions to effectively implement Pakistan's National Action Plan (NAP) on Business & Human Rights.

2.3 Due diligence and non-judicial grievance mechanisms are available within the business community of Pakistan.

2.4. Strengthened capacity of CSOs to facilitate and raise awareness of business and human rights, including labour rights, with a focus on gender equality and disabilities.

2.5 Improved capacities and tools to design, implement and monitor gender equality policies.

These outcomes will contribute to achieving SDG 16 (Promote just, peaceful, and inclusive societies), SDG 5 (Gender equality), and SDG 17 (Partnerships). Accordingly, an emphasis will be placed on ensuring that all initiatives undertaken under the action contribute to EU's overarching priorities, including through a consolidated focus on women's and youth-oriented organisations and, through partners' contributions, reducing inequality; social inclusion and human development; gender equality; and advancing the Commission's priorities related to gender and justice, and environmental justice.

## **3.2 Indicative Activities**

### Activities relating to Output 1.1

- Developing an effective rapid response and complaint review mechanism for the NHRIs
- Creating an information management system (IMS) at federal and regional levels to collect, analyse, and correlate all human rights reports concerning the GSP+.
- Building the capacity of the NHRIs in child Justice, women's rights, data protection and other new themes by introducing best EU Member States' practices.
- Gender Audit of the NHRIs (specifically MoHR) with development of the recommendations on addressing the barriers and determinants preventing the right-based approach in providing services.

### Activities relating to Output 1.2:

- Harmonise Human Rights Information Management System (HRIMS) with relevant reporting mechanisms, e.g., the National Compliance Center at the Ministry of Commerce, SDG Cell at the Ministry of Planning, and Provincial TICs
- Design Communication & Coordination Plan for Provincial Line Departments on HRIMS
- Pilot HRIMS at the sub-national level in the target district.

### Activities relating to Output 1.3:

- Analyses of the determinants and bottlenecks preventing a coherent execution of the mandates of the NHRIs with recommendations and action plans developed.
- Support digitalised platform for the MoHR to monitor institutional human rights action plans and policies, including the results frameworks and outcome indicators' progress at the provincial levels.
- Support the creation of consultation mechanisms with CSOs.

### Activities relating to Output 1.4:

- Support creating an academic task force to conduct national-wide analyses of the undergraduate, graduate, and postgraduate human rights-related curricula in four leading universities.
- Engaging EU academic institutions to support designing unified human rights curricula for undergraduate, graduate, and postgraduate studies in collaboration with the academic task force.
- Raising the awareness of youth on the human rights programmes and launching revised undergraduate, graduate, and postgraduate pilot programmes.
- Create a database for unified and accredited human rights trainings based on a stocktaking of the developed trainings.
- Developing lectures on human rights, including in formats suitable and appropriate for people with disabilities (inclusive delivery modalities for online and offline users).
- Support developing a modern, uniform human rights curriculum for Pakistani academic institutions
- Support creating a human rights digital library with access to participating universities, NHRIs and MoHR.

- Establishing links with EU' Member States' Masters and PhD programmes, student exchange and academic conferences.
- Support streamlining Human Resources Strategies to facilitate paid internships and job placements for the participating universities.
- Support developing a joint programme for traineeship and internship between the participating universities, NHRIs and MoHR.

Activities relating to Output 2.1:

- Review alignment of Pakistan's legal and regulatory framework with UNGPs
- Conduct a comparative analysis of European human rights due diligence legislation and the Pakistani normative environment.
- Support a participatory consultative process for drafting Pakistan's Human Rights Due Diligence Act.

Activities relating to Output 2.2:

- Build the Implementation Steering Committee's capacity to monitor the Business and Human Rights National Action Plan's result framework.
- Conduct analysis of NAP-BHR to align with GSP+ requirements for the final two years of its implementation.
- Raise awareness of civil society and workers on non-judicial grievance mechanisms

Activities relating to Output 2.3:

- Raise awareness of the private sector on UNGPs and European best practices on BHR in EU-exporting sectors.
- Develop sector-specific checklists for implementation of human rights due diligence in the sectors exporting to the EU.
- Review corporate grievance mechanisms and out-of-court settlements in the sectors exporting to the EU

Activities relating to Output 2.4:

- Training for a critical mass of CSOs delivered to establish a monitoring and awareness-raising network on business and human (B&HR).
- Creating platforms for CSOs to interact and exchange ideas with businesses and HR institutions.

Activities relating to Output 2.5:

- Conduct Gender Audit and analysis of barriers to entry and determinants to promote the participation of women, transgender persons and other marginalised groups in business activity and leadership positions.
- Developing recommendations to strengthen the normative environment.
- Assisting the NCSW in conducting four-yearly national analyses of Gender Equality's private sector performance.
- Assisting the NCRC in conducting four yearly analyses of child labour in the private and public sectors.

### 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 key environmental and climate-related aspects need to be addressed during design.

##### **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 B (not requiring an EIA, but for which environmental aspects will be addressed during design).

##### **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).

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#### **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 G1. This implies that gender equality is a significant objective of the action. By strengthening the regulatory environment to promote gender equality in the private and public sectors in accordance with international human rights standards, the action aims to promote economic, legal and social empowerment. It will also increase women's access to economic, social, political, and cultural rights through education, awareness-raising, and litigation of their complaints. To this end, the implementing partners will employ the following strategies to promote a supportive and gender-equal environment: create dialogue and raise awareness of gender inequalities and their negative consequences for women, men, girls and boys, the economy and society, and work with local champions and influencers at all levels including in private sector and at all levels of government to address them. The action is aligned with the Gender Action Plan III 2021-2025 (GAP III), in particular the thematic area of engagement 'Promoting economic and social rights and empowering girls and women'.

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#### **Human Rights**

Civil Society Organisations are critical for achieving human rights and democracy in all EU partner countries. To ensure that this action is entirely consistent with the implementation of the Human Rights-Based Approach (HRBA), CSOs, notably citizens' networks, media, universities, youth, women, and persons with disability, private sector organisations, and trade unions will become key actors in the implementation of the action, bearing in mind a Do-No-Harm and conflict-sensitive perspective, whereby existing tensions and divisions are not exacerbated (e.g., in relation to land dispossession, land rights, ethnic minorities vs. majority, etc.). Therefore, they will be fully involved in the implementation (through targeted capacity development activities within the action and the promotion of enhanced dialogue between state institutions, the private sector and CSOs). Dedicated funding will be provided through the Thematic Programme on Human Rights and Democracy. The EU will engage with CSOs through policy dialogue, institutional development, and co-financing of CSOs' activities.

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#### **Disability**

As per OECD Disability DAC codes identified in section 1.1, this action is labelled as D1. This implies that the action will ensure that representatives of persons with disabilities can participate in all relevant processes through specific and inclusive structured dialogues at all levels. As a result, legal protection of human rights for people with disability will be mainstreamed within all Outputs. Therefore, using the OECD Disability DAC codes described in section 1.1, this action is classified as D1. Specifically, the action will strengthen social and economic protection of individuals with disabilities by enhancing the normative environment in the private sector and engaging the organisations representing the rights of individuals with disabilities in the dialogues between the NHRIs, MoHR and private sectors.

**Reduction of inequalities**

By engaging in capacity development and capacity building interventions, action result areas are directly promoting the protection, promotion and fulfilment of human rights of people affected by the natural disaster and people in conflict with businesses/private sector. The action will strengthen the normative and work environment for women and girls to ensure a safe and respectful workplace environment and a mechanism for reporting sexual harassment.

**Democracy**

The action will enhance the capacities of the NHRIs and state stakeholders to respect and protect civil and political rights, which are cornerstones of democratic governance, implement measures to promote equality and drive powerful, sustainable economic development to which every member of society can fully contribute.

**Conflict sensitivity, peace and resilience**

By promoting the human rights values within the business sector and creating conducive normative and redress mechanisms for workers to protect and promote economic, social, and cultural rights, including the right to development, this action will contribute to reducing despair and grievances, and violent extremism. The action seeks to back the implementation with the political will of key actors to ensure effective, sustained human rights work that indirectly prevents, mitigates and helps to resolve conflict.

**Disaster Risk Reduction**

Not applicable.

**Other considerations, if relevant**

Not applicable.

### 3.4 Risks and Lessons Learnt

| Category             | Risks  | Likelihood<br>(High/<br>Medium/<br>Low) | Impact<br>(High/<br>Medium/<br>Low) | Mitigating measures   |
|----------------------|--|---|-------------------------------------|---|
| External environment | Floods and/or other natural disaster disrupts all levels of social, economic and political and priorities shift    | Medium                                  | High                                | The work plan will be adapted to reflect the extent to which project activities are affected and/or delayed in the event of a natural disaster (government institutions lose focus and effectiveness is reduced).   |
| External environment | The security situation deteriorates leading to unrest and worsening law and order                                  | Medium                                  | High                                | It should be possible to carry-out the action as planned, making adjustments on the needs base. Implementing partner(s) should use linkages with the governmental institutions (federal/local), security and law enforcement institutions to regularly analyse the situation and prepare and update mitigation plans. |
| External environment | Political instability paralyses the functioning of the government at the federal and provincial levels. Regulatory | Medium                                  | High                                | The project will monitor the situation closely and adapt to the reduced possibility of engaging with government   |

|                                  |   |        |        |   |
|----------------------------------|---|--------|--------|---|
|                                  | and elected institutions cannot exercise their functions.   |        |        | and institutional partners and continue, to the extent possible, activities foreseen with non-institutional and non-state stakeholders.   |
| External environment             | Macroeconomic instability leads to economic collapse, increased poverty, insecurity and unrest.   | High   | High   | The project will monitor closely and adapt especially to changes in the security environment to the reduced possibility of engaging with government and institutional partners.   |
| Planning, processes and systems. | Security concerns prohibit access to one or more priority provinces, or geographical distances lead to uneven funding distribution and capacity-building across the country. The grant component is particularly susceptible to this factor.  | Low    | Medium | Communication and relations with provincial leaders in focus provinces should be maintained to avoid delays.  |
| Planning, processes, and system. | Limited knowledge and understanding of treaty obligations among State actors. The UN treaty bodies have noted that poor implementation of human rights treaty obligations is partly due to government actors' inadequate or incorrect knowledge of the rights provided under CEDAW and their implications for women's rights. | Medium | Low    | The awareness will be raised at every implementation stage through sustained capacity building.   |
| Planning, processes, and system. | Paid internships for the Human Rights scholar at the MoHR and particularly at the NHRIs may require considerable financial resources  | High   | High   | The MoHR should conduct the initiative's cost and impact analysis to develop a realistic budget.  |
| Planning, processes, and system. | The development of digital solutions; and harmonisation of the mandates of the NHRIs - may require enacting additional legislation to protect rights holders in the first case and direct the mandates of duty bearers and regulatory legislation. Therefore, the implementation may be                                       | Medium | Medium | Implementing partners should rigorously assess the political will and national ownership level and set realistic deadlines for the outcomes.<br><br>The exit strategies, in such cases, should clearly define the role of the national partner in finalising the process; assess the level of ownership |

|                                  |  |        |        |  |
|----------------------------------|--|--------|--------|--|
|                                  | delayed until such legislation has been drafted and adopted.   |        |        | at every implementation stage.   |
| Planning, processes, and system. | The public administration reform that downsises the civil servant population continues, negatively affecting social sectors such as social welfare, health, and education, merging service stations in remote and most vulnerable areas and downsising the workforce in critical areas such as social care.  | Medium | Medium | Management of Human Resources plans will be reviewed to determine the level of preparedness, identify needs and gaps, and develop strategies to mitigate specific needs.<br><br>The workload and workforce will be forecasted appropriately.   |
| Planning, processes, and system. | Digitalised services could further enlarge the digital gap and create exclusion, as they rely on individuals' digital literacy and network connections while presenting important data protection/safety risks.  | Medium | Medium | In accordance with the needs of the relevant field, the capacity-building process will be planned taking into account gender mainstreaming.<br><br>An assessment of the technical and human capabilities of the beneficiary institutions will be performed at the beginning of the implementation process, and concrete solutions will be introduced jointly with the partners in the exit strategy. |
| Political                        | Weak enforcement. While each of the nine core human rights treaties is assigned monitoring bodies to assess implementation among States, and eight treaty bodies have communications procedures, States are not "sanctioned" for not implementing their treaty obligations. Therefore, some state actors may be reluctant to continue to address politically sensitive topics such as civil and political rights. In addition, the priorities may change due to a change in political power. | Medium | Medium | Continue the political dialogue with the EU, EU Member States, and development partners to gain political support, utilising the conditionality measures.  |
| Political                        | There is a lack of adequate interaction between the federal and regional governments. This atmosphere is also apparent in  | High   | High   | Increased frequency of Project Steering Committees will be proposed, as well as specific coordination meetings with provincial   |

|                 |  |               |               |  |
|-----------------|--|---------------|---------------|--|
|                 | the work of human rights agencies on these levels. Consequently, the action could be implemented isolated and incoherently due to this ongoing practice.   |               |               | departments. The project, in coordination with the EU Delegation, may seek to encourage a formalised coordination/consultation mechanism between federal and provincial levels, also capitalising on the joint use of data information systems that will be supported under outcome 1. |
| Gender Equality | A gender-blind, neutral, or negative context and problem analysis could reinforce existing gender inequalities and non-realisation of human rights in the sector and hinder the efficiency and sustainability of the action. | <b>Medium</b> | <b>Medium</b> | Knowledge and tools of gender mainstreaming are available.<br>Gender-sensitive monitoring, use of sex-disaggregated data, and gender-sensitive indicators.<br>Gender mainstreaming is applied in all phases of support services.   |

**Lessons Learnt:**

1. The risks can be viewed as relatively high in areas where human rights governance mechanisms alter how right-holders and their representatives interact with the government (oversight, dispute resolution, monitoring). Therefore, a long-term perspective is required for legal and institutional reforms and overcoming resistance to change regarding business and human rights. In addition to establishing public trust in the human rights system, there is the possibility that all necessary legislative steps and their full realisation may not be achieved within the action's lifecycle, depending on the political will of the future government.
2. CSOs may find it very challenging to participate in this process due to a shrinking space and increased administrative control. However, as part of the action, the EU will engage in regular dialogue with the Government to ensure that the security and safety risks for the CSOs representatives and organisations are mitigated to prevent unintended harmful effects.
3. The 18th Constitutional Amendment that was passed in the Parliament in 2010 redefined the institutional frame of the State through a shift from a heavily centralised to a predominantly decentralised federation. While this structure has advantages, it also poses significant challenges to national coordination since different provincial authorities have different levels of commitment to federal policies and plans for disability-inclusive development. The challenges include achieving a similar level of commitment and coordination from all provincial bureaus of statistics for consistency and efficiency in the statistical system.
4. E-justice could provide valuable solutions to enhance efficiency and quality by reducing the cost of services and minimising corruption. Developing realistic objectives and expected results is essential, considering the national partners' absorption capacity and political commitment. Comparative analyses of the normative environment on personal data protection with determinants and bottlenecks are an important start for such intervention. Pros and cons must be appropriately weighed during a project's design phase and should be incorporated into policies and programmes.

### 3.5 The Intervention Logic

The underlying intervention logic for this action is that through an increasingly qualified, transparent, inclusive, and independent human rights system, the action will strengthen the rule of law and promote human rights in Pakistan. This may be achieved through i) Improved effectiveness of NHRIs and CSOs for monitoring, oversight, reporting, and outreach to vulnerable groups, ii) building out regulatory responses to business' actual and potential impacts on human rights, and fostering effective, appropriate State-based systems of non-judicial grievance mechanisms for the remedy of business-related human rights abuses, where NHRIs play an important role, iii) sustaining quality human rights education and academic research. Based on the objectives and areas of engagement proposed, the following changes in system and behaviour are anticipated:

- Improved effectiveness of implementing public policies upholding all human rights as essential to human dignity in inclusiveness, accessibility, reach, and service quality, as well as ensuring equal treatment and gender responsiveness.
- Strengthened the position of the CSO in monitoring and reporting on human rights violations nationally and globally.
- Conducive normative environment for the business and human rights to streamline legal protection of all key stakeholders and beneficiaries.
- Improved private sector engagement in respect, protection, and promotion of human rights.
- Access to a non-judicial redress mechanism to resolve business-related human rights abuses, violations, and complaints in a timely and economically feasible manner.
- The new generation of highly skilled and educated human rights professionals and academics, building upon the experience of the European Master's Programme in Human Rights and Democratisation.

This action will achieve these goals through **strategies for institution-building**, strengthening the capacity of relevant duty bearers to protect, promote and respect human rights, developing dispute resolution mechanisms for businesses, and modernising human rights monitoring and reporting processes. **In addition, a people-centred approach** will be adopted by empowering the most vulnerable with information, skills, and opportunities: for rights holders to be aware of their rights and access and utilise those (non-)state institutions for claiming a right, obtaining redress for a grievance, or settling a dispute.

**Assumptions.** The main assumption underpinning the full implementation of the action is that Pakistan will enjoy a prolonged period of political and economic stability and that the new order will unite people and further strengthen the country's stability. Furthermore, it is assumed that the staff of NHRIs have the aptitude to absorb training and update and modernise those fundamental processes and procedures. For a coherent implementation to take place, a coordinated and collaborative approach between the federal and regional institutions is essential.

According to the Theory of Change for the present action, the following postulates apply:

*If oversight and protection mandate of the NHRIs are strengthened (output), State-based systems of non-judicial grievance mechanisms for business-related human rights abuses effectively fostered (output), and awareness, quality human rights education and academic research promoted (output), then people of Pakistan will enjoy the fulfilment of their human rights (Impact) because of: 1) improved implementation of public policies upholding human rights (outcome); 2) strengthened position of the CSO in monitoring and reporting on Human Rights violations (outcome); 3) improved private sector engagement in respect, protection, and promotion of human rights (outcome); 4) access to a non-judicial redress mechanism to resolve business-related human rights abuses, violations, and complaints in a timely and economically feasible manner (outcome); 5) the new generation of highly skilled and educated human rights professionals and academics will push forward the human rights agenda across all public and private sectors (outcome).*

*a. Mainstreaming of cross-cutting issues*

The action targets marginalised and disadvantaged communities, including in a post-floods context. It thus contributes to leaving no one behind while considering the Do-No-Harm and conflict-sensitive perspectives. Gender will be mainstreamed through women's legal and economic empowerment and women's equal rights to land ownership and/ or control. Special attention will be given to youth as a target group.

*b. Key stakeholders*

Key stakeholders are the Federal Ministries of Human Rights of Law and Justice and Interior as well as their equivalents on the provincial level; Provincial Human Rights Departments; Treaty Implementation Cells (or any other structure mandated to collect and report on data on human rights); the National Commissions on Human Rights and the Rights of the Child; National and Provincial Commissions on the Status of Women, National & Provincial Standing Committees on Human Rights (and their provincial chapters), civil society national and provincial parliaments (incl. the standing committees on Human Rights), the judiciary, civil society, and the private sector, as well as relevant academia and training institutes.

### 3.6 Logical Framework Matrix

At action level, the indicative logframe should have a maximum of 10 expected results (Impact/Outcome(s)/Output(s)).

It 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.

| Results       | Results chain (@):<br>Main expected results (maximum 10)                                      | Indicators (@):<br>(at least one indicator per expected result)   | Baselines<br>(values and years)<br>2023 | Targets<br>(values and years) 2028 | Sources of data  | Assumptions           |
|---------------|---|---|---|------------------------------------|--|-----------------------|
| <b>Impact</b> | The Overall Objective of this action is to enhance the fulfilment of Human Rights in Pakistan | 1 Country scores for civil and political rights<br>2 The extent of a country's compliance with Economic, Social and Cultural (ESC) Rights <sup>17</sup> .<br>3 Women, Business and the Law Indicator scores | 1. 37/100<br>2. Low<br>3. 55.6          | 1. 45/100<br>2. Partial<br>3. 62   | 1. Freedom House assessment of Global Freedom <sup>18</sup><br>NHRIs reports<br>2. UN Human Rights Council.<br>3. World Bank "Women, Business and Law" Database: <a href="https://wbi.worldbank.org/en/data">https://wbi.worldbank.org/en/data</a> | <i>Not applicable</i> |

<sup>17</sup> OPSYS core indicator.

<sup>18</sup> OPSYS core indicator

|                         |  |  |   |  |   |   |
|-------------------------|--|--|---|--|---|---|
| <p><b>Outcome 1</b></p> | <p>Improved effectiveness of institutions and systems promoting, protecting and fulfilling human rights.</p> | <p>1.1 Proportion of human rights complaints regarding human rights violations received that are processed are resolved by the relevant public authorities, disaggregated by sex and disability, sex and disability, type of violation, the authority reported upon and adjudicating authority<sup>19</sup></p> <p>1.2 % of the victims of disasters (floods, health emergencies etc.) that are covered by social protection measures, disaggregated by the category of rights, sex and vulnerabilities.</p> <p>1.3 Number of coordination mechanism developed with the support of the action that have been established and institutionalised, by type of mechanism.</p> <p>1.4 Number of discrepancies eliminated in the duplicated mandates.</p> <p>1.5 GERF 2.23 Number of state institutions and non-state actors supported by the EU on security, border management, countering violent extremism, conflict prevention, protection of civilian population and human rights.</p> <p>1.6 GERF 2.30 Number of victims of human rights violations directly benefiting from assistance funded by the EU , disaggregated by sex.</p> | <p>1.1 0<br/>1.2 TBD<br/>1.3. 0<br/>1.4 TBD<br/>1.5 TBD<br/>1.6 TBD</p> | <p>1.1 1TBD<br/>1.2 TBD<br/>1.3. TBD<br/>1.4 TBD<br/>1.5 TBD<br/>1.6 TBD</p>                             | <p>1.1 NHRIs data, baseline and end-line survey conducted and budgeted by the action.<br/>1.2 TBD<br/>1.3 Intervention progress and evaluation reports<br/>1.4 Intervention progress and evaluation reports<br/>1.5 Intervention progress and evaluation reports<br/>1.6 Intervention progress and evaluation reports</p> | <p>There is a genuine political will of the State to support the institutions.<br/>The forums and debates are held to raise awareness about human rights-sensitive issues among the population.</p> |
| <p><b>Outcome 2</b></p> | <p>Enhanced private sector's participation in protecting human rights and gender equality.</p>               | <p>2.1 Proportion and number of children aged 5-17 years engaged in child labour, disaggregated by sex and age (SDG 8.7.1)</p> <p>2.2 % women nominated to senior-level positions in the private sector (e.g. investment boards/fund management teams, corporate boards, CEOs, business associations, chambers of commerce, cooperative boards, professional bodies, etc.)</p>   | <p>2.1 TBD<br/>2.2 TBD<br/>2.3 not at all (0)<br/>2.4. 0<br/>2.5. 0</p> | <p>2.1 TBD<br/>2.2 TBD<br/>2.3 to a large extent (75% target stakeholders)<br/>2.4. TBD<br/>2.5. TBD</p> | <p>2.3 World Benchmarking Alliance Corporate Human Rights Benchmark indicator<br/>2.4 Steering Committee at Federal and Provincial Level, Minutes<br/>2.5 Intervention progress and final reports</p>   | <p>A sufficient number of businesses are participating in implementing Outcome 2.<br/>Quality data is collected.<br/>The Private Sector and CSOs are capacitated to</p>                             |

<sup>19</sup> OPSYS core indicator

|                                       |  |  |  |   |   |   |   |
|---------------------------------------|--|--|--|---|---|---|---|
|                                       |  | <p>2.3 Extent to which private sector entities identify, assess, mitigate and communicate the actual and potential adverse human rights impacts with which they are involved, as per Corporate Human Rights Benchmark<sup>20</sup></p> <p>2.4 Number of government policies developed or revised with civil society organisation participation through EU support (GERF 2.29)</p> <p>2.5 Number of relevant actors (private sector companies, ministries, etc.) influenced to adopt processes to improve women's economic empowerment / to remove barriers to market access for women in a given sector (FPI RF) (GAP III thematic outcome indicator)</p> <p><del>2.5. Number of people reached with EU support to increase their awareness about labour rights, disaggregated by sex, age, and disability status.</del></p> |  |   |   | conduct the baseline data.  |   |
| <b>Output 1 relating to Outcome 1</b> | 1.1. Enhanced capacities of National Human Rights Institutions to independently monitor and resolve complaints | <p>1.1.1 Number of resolved cases per year disaggregated by vulnerabilities and gender.</p> <p>1.1.2 Status of a coordination mechanism between the NHRIs on Federal and regional levels.</p>  | 1.1.1 - 3 (NHRIs with duplication on complaint management) | 1.1.1 TBC (No NHRIs with discrepancies) | 1.1.2 Developed or upgraded with the support of the action.                     | <p>1.1.1 Text of laws and regulations.</p> <p>1.1.2 Records of the joint coordination meetings.</p> | Legislative processes are proceeding at an appropriate pace. The core UN recommendations are placed at the centre of the reform. The NHRIs and TICs have sustained commitments to coordinate their efforts. |
| <b>Output 2</b>                       | 1.2. Strengthened reporting and digitalisation   | 1.2.1 Number of government ministries and Line Departments with institutionalised human rights   | 1.2.1 - 0<br>1.2.2 - 0                                     | 1.2.1 - 5 (1 federal Ministry and       | 1.2.1 - Official notification of institutionalising human rights data reporting | Continued cooperation and government will   |   |

<sup>20</sup> OPSYS core indicator

|                                       |   |  |  |   |  |  |
|---------------------------------------|---|--|--|---|--|--|
| <b>relating to Outcome 1</b>          | capacities of Federal, Provincial and Local Human Rights Institutions to provide people-centred, gender-sensitive and inclusive services. | digitisation systems (disaggregated by Ministry and Line Department).<br>1.2.2 Number of key government officials trained on people centred, gender-sensitive and inclusive services that acquire the necessary skills.  |  | 4 Provincial Human Rights Departments)<br><br>1.2.2 – 50 (10 in each location, Federal + Four Provinces | through the digital system (intervention progress report/Ministry)<br><br>1.2.2 – pre and post-training assessments  | work on promoting and protecting the rights of the most vulnerable populations   |
| <b>Output 3 relating to Outcome 1</b> | 1.3. Improved monitoring and consultation mechanism of the National Institutes of Human Rights, including with CSOs.                      | 1.3.1 Number of discrepancies eliminated in the duplicated mandates.<br>1.3.2 Status of a coordination mechanism between the NHRIs on Federal and regional levels.   | 1.3.1 – 0<br>1.3.2 – Non existent  | 1.3.1 – 1<br>1.3.2 – Developed with the support of the action.  | 1.3.1 reports and websites developed for awareness and transparency.<br>1.3.2 Intervention progress report.  | National and international development partners will provide a timely update and support the mechanism technically and financially.  |
| <b>Output 4 relating to Outcome 1</b> | 1.4 Strengthened academic standards of graduate and postgraduate Human Rights programmes.   | 1.4.1 Number of academic networks created and universities connected nationally and internationally.<br>1.4.2 Status of quality control and assurance mechanism for academic excellence.<br>1.4.3 Status of digitalised library<br>1.4.4 - Number of digitalised video/e-learning courses developed with the support of the EU-funded intervention.<br>1.4.5- Number of students enrolled in EU programmes, disaggregated by gender and disability status.<br>1.4.6 Number of traineeships secured at the MoHR and NHRIs, disaggregated by gender and disability status. | 1.4.1- 0<br><br>1.4.2 - TBD<br><br>1.4.3 – TBD<br>1.4.4 0<br>1.4.5 0<br>1.4.6 TBD<br>1.4.7 0 | 1.4.1 TBD<br>1.4.2 Developed<br><br>1.4.3 TBD<br>1.4.4 TBD<br>1.4.5 TBD<br>1.4.6 TBD<br>1.4.7 TBD       | 1.4.1 Intervention progress report<br>1.4.2 - Capacity development of the Higher Education Commission (HEC)<br>1.4.3 – Notification issued by the competent authority.<br>1.4.4 Intervention progress report<br>1.4.5 EU intervention monitoring and reporting systems: (i) interim and final reports from implementing organisations.<br>1.4.6 as above<br>1.4.7 same | The recognised universities collaborate to accredit human rights education curricula.<br><br>Academic institutions have sufficient human and financial resources to maintain the digitalised solution. The digitalised solutions and their |

|                                       |   |   |                          |  |   |  |
|---------------------------------------|---|---|--------------------------|--|---|--|
|                                       |   | 1.4.7 Number of students completing the internship (disaggregated by gender and disability status). |                          |  |   | contents are regularly updated   |
| <b>Output 1 relating to Outcome 2</b> | 2.1 Increased evidence and knowledge of the relevant stakeholders on best practices to harmonise regulations with the UN Guiding Principles on Business and Human Rights and best EU business and human rights practices. | 2.1.1 Status of due diligence and non-judicial grievance mechanism                                  | 2.1.1 – does not exist   | 2.1.1 – Developed.   | 2.1.1 Project reports.  | The process of legislative drafting is inclusive and participatory.                                    |
| <b>Output 2 relating to Outcome 2</b> | 2.2 Strengthened capacities of state actors and CSOs to effectively implement and monitor Pakistan’s National Action Plan (NAP) on  | 2.2.1. Status of the monitoring mechanism.  | 2.2.1 – 0 – non existent | 2.2.1 -1 (National Action Plan on BHR)<br>2.2.2 – 50 (10 in each location) | 2.2.1 – Official notification by Respective Social Welfare Departments on CSO network registrations | Credible and updated data is available.<br><br>The State is not interfering with the work of the CSOs. |

|                                       |  |  |  |   |   |  |
|---------------------------------------|--|--|--|---|---|--|
|                                       | Business & Human Rights.   |  |  |   |   |  |
| <b>Output 3 relating to Outcome 2</b> | 2.3 Due diligence and non-judicial grievance mechanisms are available within the business community of Pakistan. | 2.3.1. % private sector entities targeted in the intervention and their suppliers that show having acquired the necessary competencies on business and human rights<br><br>2.3.2 Number of best practices disseminated by the action (disaggregated by topic)<br>2.3.3. Status of due diligence and non-judicial grievance mechanism | 2.3.1 – 0<br><br>2.3.2 – 0<br><br>2.3.3. -0 – non existent | 2.3.1 – 50%<br>2.3.2 – 2 (1 Mandatory Human Rights Diligence, 1 Gender Empowerment Strategies)<br><br>2.3.3 Developed | 2.3.1 Intervention M&E system<br>2.3.2. EU intervention monitoring and reporting systems<br>2.3.3 Intervention progress report                              | The private sector committed to participating in the study.  |
| <b>Output 4 relating to Outcome 2</b> | 2.4. A network of CSOs monitoring and raising awareness of business and human rights established.                | 2.4.1 Number of grassroots civil society organisations benefitting from (or reached by) EU support <sup>21</sup> (GERF 2.28)   | 2.4.1 -0   | 2.4.1 - TBD   | 2.4.1. Project M&E system   | The conducive working environment for the CSOs provided.   |
| <b>Output 5 relating to Outcome 2</b> | 2.5 Improved capacities and tools to design, implement and monitor gender equality policies.                     | 2.5.1 – status of gender audit on participation of women and transgender persons<br>2.5.2 – number of national analyses of gender equality performance of the private sector<br>2.5. number of analyses of child labour in private and public sectors  | 2.5.1 – non existent<br>2.5.2 – 0<br>2.5.3 0               | 2.5.1 – 1<br>2.5.2 – 4<br>2.5.3 4   | 2.5.1. Status of recommendations generated by the national analyses on GE, child labour and other relevant subjects.<br>2.5.2 Pre and post training surveys | Businesses are open to cooperating with Government, CSO and the UN.<br>A sufficient number of capacitated CSOs are taking part in the process.<br>High-quality reports are produced. |

<sup>21</sup> GERF 2.28 indicator.

## 4 IMPLEMENTATION ARRANGEMENTS

### 4.1 Financing Agreement

In order to implement this action, it is envisaged to conclude a financing agreement with the Government of the Islamic Republic of Pakistan.

### 4.2 Indicative Implementation Period

The indicative operational implementation period of this action, during which the activities described in section 0 will be carried out and the corresponding contracts and agreements implemented, is 42 months from the date of entry into force of the financing agreement.

Extensions of the implementation period may be agreed upon by the Commission's responsible authorising officer by amending this Financing Decision and the relevant contracts and agreements.

### 4.3 Implementation of the Budget Support Component [For Budget Support only]

NA

### 4.4 Implementation Modalities

The Commission will ensure that the EU's 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.

#### 4.4.1 Direct Management (Grants)

NA

#### 4.4.2 Direct Management (Prize(s))

NA

#### 4.4.3 Direct Management (Procurement)

#### 4.4.4 Indirect Management with an entrusted entity

This action may be implemented in indirect management with an entity which will be selected by the Commission's services using the following criteria:

- first-hand understanding of International Human Rights Treaties and mechanisms;
- long-standing experience working on Rule of Law and Human Rights-related issues in Pakistan, supported by a presence in the country and a team of qualified core staff;
- good relations and track records working with the Government of Pakistan;);
- previous experience implementing EU-funded projects successfully in Pakistan;
- political leverage for the sensitive human rights issue and support to CSOs.

The implementation by this entity entails delivering on the two objectives (outcomes) and related outputs of the action while ensuring results-based monitoring and reporting.

If the envisaged entity needs to be replaced, the Commission's services may select a replacement entity using the same criteria. Whenever an entity is replaced, the decision to replace it must be justified.

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

In case the envisaged implementation modality (indirect management) cannot be implemented due to circumstances outside of the Commission’s control, the action will be implemented through:

**Grants: (direct management)**

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

to deliver on the two outcomes and related outputs of the action.

**(b) Type of applicants targeted**

NGOs

#### 4.5 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 the origin of supplies purchased as established in the basic act and set out in the relevant contractual documents shall apply.

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

#### 4.6 Indicative Budget

| <b>Indicative Budget components</b>   | <b>EU contribution<br/>(amount in EUR)</b> |
|---|--|
| <b>Implementation modalities:</b> cf. Section 4.4   | 9 700 000                                  |
| <b>Specific Objectives:</b><br><br><i>Outcome 1:</i> Strengthened institutions and systems promoting, protecting, and fulfilling human rights.<br><br><i>Outcome 2:</i> Enhanced private sector participation in the protection of human rights and gender equality |  |
| Indirect management with an entrusted entity - cf. section 4.4.0  |  |
| <b>Evaluation</b> – cf. Section 5.2   | 250 000                                    |
| <b>Audit</b> – cf. Section 5.3  | 50 000                                     |
| <b>Contingencies</b>  | 0  |
| <b>Totals</b>   | 10 000 000                                 |

#### 4.7 Organisational Set-up and Responsibilities

A Project Steering Committee (PSC) will be established with responsibility for guiding the project and approving work plans. The PSC will meet at least bi-annually. The PSC shall potentially comprise at least one representative of these participating entities: MoHR (co-Chair), EU Delegation (co-Chair), NHRC, NCSW, NHRC, implementing partner, academia, EU Member States, relevant Civil Society representatives.

The core responsibilities will be agreed upon with the Government of Pakistan (in line with their project document) and should cover: overseeing and validating the overall direction of the projects developed under the present action; verifying and approving annual programming proposals (annual work plans/programme

estimates), as well as subsequent changes, in accordance with EU guidelines; take decisions on any alterations, before submission for approval to the Commission; resolve issues brought before the PSC by one of the member agencies; provide advice on the nature of expertise required to achieve the objectives of the Programme;

Technical Working Committees (TWG) could be established under the Steering Committee and meet as often as necessary to ensure coherence and result-oriented execution. Depending on the specific sector or geographic intervention area, such committees may include mid-level management of MoHR, relevant Commissions, provincial departments, the implementing partner, academia, and representatives of relevant Civil Society networks. These bodies will revise risk-and mitigation plans, identify synergies and complementarities, and ensure that relevant grant proposals are connected. In addition, a yearly horizontal report covering this action's result areas/themes will be produced and shared with the stakeholders and beneficiaries.

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 the 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 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: the implementing partner (identified in section 4.4.4) will be responsible for monitoring and reporting on indicators of the log-frame matrix at least on an annual basis. This includes the collection of baselines and data (at least on an annual basis).

Indicators shall be disaggregated at least by sex. All monitoring and reporting shall assess how the action is taking into account gender equality, human rights-based approach, and rights of persons with disabilities, including inclusion and diversity.

### 5.2 Evaluation

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

The mid-term evaluation will be carried out for problem-solving and learning purposes, in particular, with respect to the project steering and possible challenges encountered in the implementation.

In addition, the 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 project supports the implementation of GSP+ in Pakistan.

The Commission shall inform the implementing partner at least 2 months 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.

Evaluations shall assess to what extent the action is taking into account the human rights-based approach as well as how it contributes to gender equality and women's empowerment and disability inclusion. Expertise in human rights, disability and gender equality will be ensured in the evaluation teams.

Evaluation services may be contracted under a framework contract.

### 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, 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.