EN

ANNEX V

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 Support to Civil Society in Pakistan (SCSP)

ANNUAL PLAN
This document constitutes the annual work programme in the sense of Article 110(2) of the Financial Regulation, and action plans of Article 24 of NDICI-Global Europe Regulation.

1   SYNOPSIS

1.1   Action Summary Table

1. Title **CRIS/OPSYS** **business reference** **Basic Act**	Support to Civil Society in Pakistan (SCSP) OPSYS number: ACT-61928 Financed under the Neighbourhood, Development and International Cooperation Instrument (NDICI-Global Europe)
2. Team Europe Initiative	☒ Not applicable ☐ Supporting (inter alia) TEI.
3. Zone benefiting from the action	The action shall be carried out in Pakistan.
4. Programming document	Multi-annual indicative programme for Pakistan for 2021-2027
5. Link with relevant MIP(s) objectives / expected results	Priority area 3– Governance, including the Rule of Law and Human Rights Support measures Measures in favour of civil society Expected results: Objective 7: Strengthened Governance and Rule of Law in line with international standards. 7.4 Improved access to social and economic rights.
PRIORITY AREAS AND SECTOR INFORMATION	
6. Priority Area(s), sectors	Governance (DAC 150)
7. Sustainable Development Goals (SDGs)	Main SDG (1 only): 17 (Partnerships to achieve the goals Other significant SDGs (up to 9) and where appropriate, targets: 16 (Peace, Justice and Strong Institutions). The action will contribute not only to achieve the targets of SDG-17 but also accelerate the progress in all other SDGs though the capacity building of CSO working towards achievement of all other SDGs.
8 a) DAC code(s)	DAC 15150 – Democratic participation and civil society- 50%

	DAC 43010- Multi sector- 50%
8 b) Main Delivery Channel	–EC 40000
9. Targets	☐ Migration ☐ Climate ☒ Social inclusion and Human Development ☒ Gender ☐ Biodiversity ☐ Education ☒ **Human Rights, Democracy and Governance**

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

	Policy objectives	**Not targeted**	**Significant objective**	**Principal objective**
11. Internal markers and Tags:	Digitalisation @	☐	☒	☐
	digital connectivity	☒	☐	
	digital governance	☐	☒	
	digital entrepreneurship	☒	☐	
	digital skills/literacy	☒	☐	
	digital services		☐	
	Connectivity @	☒	☐	☐

		YES	NO	
	transport	☒	☐	
	people2people	☒	☐	
	energy	☒	☐	
	digital connectivity	☒	☐	
			☐	
	Migration @	☒	☐	☐
	Reduction of Inequalities @	☐	☐	☒
	Covid-19	☒	☐	☐

BUDGET INFORMATION	
12. Amounts concerned	Budget line(s) (article, item): 14.020131
	Total estimated cost: EUR 2 986 000
	Total amount of EU budget contribution EUR 2 986 000

MANAGEMENT AND IMPLEMENTATION	
13. Type of financing	**Indirect management** with the entity(ies) to be selected in accordance with the criteria set out in section 4.4.4
14. Type of measure	☐ Cooperation facility ☒ Measures in favour of Civil Society

1.2 Summary of the Action

The proposed action is part of the Multi-annual indicative programme (MIP) for Pakistan for 2021-2027 and will facilitate the implementation of the EU Roadmap for engagement with civil society in Pakistan 2021-2027, which was endorsed in June 2022.

The MIP 2021-2027 envisages Support to Civil Society Organisations (CSOs) under the support measures with the objective of developing CSO capacities for collective engagement in advocacy and policy dialogue and improving linkages and coordination with the Government for a more enabling environment. The action specifically contributes to priority area 3 of MIP 21-27, i.e., Governance, including the Rule of Law and Human Rights.

The action contributes to the implementation of the EU Roadmap for Civil Society Engagement in Pakistan 2021-27, particularly with regards to its priorities 1 and 3: 1). Support reform efforts and processes aimed at developing a better understanding of CSOs roles in poverty reduction and governance and a streamlined regulatory and institutional framework allowing CSOs to effectively perform such roles; 3). Support CSOs, including grassroots organisations/women and youth organisations, efforts to enhance their collective voice, deepen their accountability systems and foster their credibility and legitimacy vis-a- vis their constituencies, the authorities, general public and donors.

The overall objective of this action is to strengthen inclusive democratic processes related to public good at the national and provincial level. The action, which will work on both the demand and supply side of governance, has two main outcomes (i.e. Specific Objectives): (i) Strengthen effectiveness of engagement of civil society networks in policy dialogue and advocacy with the government on sectoral issues and the overall enabling environment for civil society and; (ii) Enhance the capacity of the Ministry of Economic Affairs and provincial regulatory bodies for constructive, transparent, and accountable engagement with CSOs in Pakistan. The action foresees providing Technical Assistance to the Federal Ministry of Economic Affairs for capacity building of its NGO Unit. This could also include support for digitalisation. Additionally, it will work with existing CSO platforms or networks for their capacity building. During implementation, the action will also explore the possibility of collaborating with the Open Government Partnership Programme (to be contracted soon by Headquarters).

Along with contributing directly to SDG 16 (Peace, Justice, and Strong Institutions), the project makes significant contributions to SDG 17 (Partnerships for the Goals).

2 RATIONALE

2.1 Context

Pakistan's organised civil society sector has grown exponentially in terms of size and influence. According to the Pakistan Centre of Philanthropy, there are around 55 000 registered CSOs in Pakistan[1]. Civil society is diverse, with a range of organisations working, from the grassroots to the national level, on a broad range of themes, from humanitarian and social basic services delivery to advocacy and human rights. Recent years have also seen a rise of new and emerging forms of feminist and social civic movements led by women and younger activists.

In an apparent paradigm change with implications for the regulatory role of the state and the non-profit sector there has been a trend in Pakistan in which the State is moving away from being the monopoly provider of social services allowing for a variety of non-state actors to deliver social services. [2]

Although government regulations have resulted in many CSOs becoming dormant, today Pakistan's non-profit sector employs around 300 000 people, uses around 200 000 full time staff, and engages in a wide range of activities ranging from service delivery to sophisticated financial services and technical advice in areas like agricultural extension, water and sanitation, and housing construction. Increasingly, CSOs are engaged in advocacy and lobbying activities for legal and fiscal reform and take a proactive approach in defining issues for the national agenda[3].

With respect to the legal and institutional environment, CSOs continue to be governed by a wide array of laws, which are enforced by multiple government institutions at provincial and federal levels. One of the most relevant pieces of legislation is the NGO Policy in Pakistan, which had been introduced in 2013 to provide a regulatory framework for the functioning of non-governmental organisations (NGOs) in the country. The policy was aimed at promoting transparency and accountability in the sector and ensuring that NGOs operate within the legal and regulatory framework of the country. The NGO Policy was driven by government concerns about the transparency and accountability of NGOs operating in the country, and alleged involvement of NGOs in activities that were deemed to be against the national interest. The policy was designed to address these concerns and provide a clear framework for the functioning of NGOs in the country.

However, CSOs and development partners criticised the restrictive provisions of the policy. CSOs also demanded effective but simpler regulation and the establishment of a "one-window" mechanism, for CSOs to comply with the necessary administrative, financial, and reporting requirements. The Government initiated the process of revising the NGO Policy around 2018. The new, revised Policy was approved by the Cabinet on 24 November 2022. It incorporates some of the issues and concerns raised by development partners as well as NGOs following a consultation process with local and international NGOs that preceded its revision. While the Policy is not unproblematic, and has been criticised for lack of coherence, incompleteness and an overly strong focus on service delivery NGOs, marginalising the work of right holders organisations, nonetheless, it may have the potential of being implemented in a manner that can remove some of the complications and bottlenecks of registration and operation. Following consultations of the government on the policy, there might also be an opening for supporting reform efforts and processes aimed at developing a better understanding of CSOs roles in poverty reduction and governance and a streamlined regulatory and institutional framework allowing CSOs to effectively perform such roles.

Capacity related weaknesses are common among CSOs. Generally, there is a need to improve compliance systems as many organisations struggle to submit the required reports to the government. There is also widespread perception of misuse of funds, implying the need for more solid systems of financial accountability. Furthermore, organisations need to compensate a lack of available trained individuals to run effective organisations and limited access to funding.

On the collective side, civil society remains fragmented, with more coordination and networking efforts required to overcome the divisions that characterise the sector. According to the EU survey launched for the preparation of the EU Roadmap for engagement with CSOs in Pakistan in 2021, 45% of the surveyed CSOs are members of at least one network/coordination/alliance. In general, they are satisfied with their effectiveness, but there is room for improvement (i.e. 39% of the surveyed CSOs believe them to be somewhat effective).

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[1] https://pcp.org.pk/
[2] https://www.icnl.org/resources/civic-freedom-monitor/pakistan
[3] idem

The EU is recognised in Pakistan as a long-standing and trusted partner in development, including on dialogue in relation to civil society space. In recent exchanges, the Ministry of Economic Affairs has expressed interest in EU support in improving the capacity of its NGO Unit which oversees the implementation of the national NGO policy and its registration requirements. The proposed two-stranded approach of technical assistance to the Ministry and strengthening civil society collaboration has the potential of deepening the EU dialogue with the Government on issues of civil society space, as well as strengthening the voice and role of key CSO networks and alliances and improving CSO-Government relations and dialogue.

The action will contribute to the implementation of the EU Gender Action Plan 2021-2025 GAP III, with a focus on its thematic areas of engagement "Promoting equal participation and leadership".

2.2   Problem Analysis

Short problem analysis:

With an exponential growth of the civil society in Pakistan, questions remain whether this trend can be sustained given the capacity limitations and weaknesses that are bound to inhibit further growth. There are a number of relevant challenges, including poor financial transparency, development partner dependency and more generally weak financial sustainability (particularly for large development-oriented and advocacy organisations, as opposed to Community-Based Organisations (CBOs)[4]), and internal governance and accountability[5], which afflict the sector and continue to hamper its efforts to provide effective partnerships in the delivery of services, and an effective counterpoise of the state[6]. Other relevant areas where more technical skills need to be developed, as highlighted by the surveyed CSOs[7], include evidence-based research, policy dialogue and advocacy; communication and storytelling and use of e-tools. Because of weak organisational capacity, CSOs in Pakistan also face significant challenges in accessing funding, particularly from domestic sources, which further limits their ability to implement programmes and sustain their operations. The limited availability of funding also restricts the diversity of CSOs and the range of issues they can address.

On the collective side, CSOs have formed networks and alliances to strengthen their voice as a sector vis-a-vis the government. These networks have a fairly large membership base. However, they are mostly sector-focused and built around specific themes such as humanitarian response, child rights, climate change and food and nutrition etc. As such, their collective voice and power remains limited to the issues and challenges emerging within their programmatic themes. Although CSOs of all networks experience constraints due to the restrictive enabling environment, the networks themselves have made so far limited efforts to come together and speak effectively for the civil society as a whole.

Main challenges hampering cooperation and networking include: (i) lack of funding and competition for funding (particularly with INGOs); (ii) limited trust and mutual understanding (particularly between more traditional vs. modern sections within civil society) ; (iii) lack of co-operation from the government and non-conducive environment (iv) capacity issues such as governance and management gaps; (v) lack of sectoral expertise and skills; (vi) duplication of work and overlapping areas that exhaust resources and; (vii) leadership challenges.

There is still little communication, let alone cooperation, between the large and "politically influential" wing of civil society that draws its strength from religion, and the small but increasingly vocal wing that draws its strength from modern development theories and the rights movement[8]. Improved communication within the sector could help improve public perceptions of CSOs.

On the legal and institutional framework, and despite the recent reforms (see section 2.1. on the revised 2022 NGO Policy), CSOs continue to be governed by a wide array of laws, which are enforced by multiple government

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[4] The widespread public impression that CSOs in the country are heavily dependent on foreign funds holds true for large development-oriented and advocacy organizations, but not all others. While intermediary NGOs have multiple funding sources, CBOs rely mostly on local sources.

[5] One positive development in terms of the professionalization of the sector was the adoption back in 2007 of a code of conduct by the Pakistan NGO Forum (PNF). Its implementation remains however very limited. See: https://ngospk.webs.com/code-of-conduct.

[6] Civil Society and Social Development in Pakistan. How the State can support its development through effective regulation. Briefing Paper No.101. Democracy Reporting International. December 2019

[7] Survey launched for the preparation of the EU Roadmap for engagement with CSOs in Pakistan. 2021

[8] Overview of Civil Society Organizations: Pakistan," ADB Civil Society Briefs.

institutions at provincial and federal levels. While some laws govern the registration, internal governance, and accountability of CSOs, other laws govern how CSOs are to be financed and managed. Still other rules govern the reporting relationship between the state and CSOs with respect to their operations or the legal obligations towards their employees. This multiplicity of laws and governmental interlocutors, coupled with ample room for interpretation they leave in their enforcement, testify to the complicated and burdensome regulatory environment that CSOs face in their registration and operations in Pakistan. Main difficulties reported by CSOs include the lack of a consistent definition, increasing scrutiny from government and law enforcement agencies, a shrinking space for activism, complex verification processes, and a lack of trust and understanding between CSOs and the government.

While discussing the 2022 NGO Policy during the consultations organised for the preparation of this action, CSOs put forward a number of recommendations to promote an enabling environment for CSOs in Pakistan. They included the need for sustained engagement between different stakeholders, including CSOs, government, and development partners, to alleviate the mistrust between the government and civil society. Organisations also called for the establishment of a one-window system for CSOs, digitalisation and integration of different registration regimes, and better coordination among the CSOs.

The Ministry of Economic Affairs which is responsible for the registration, scrutiny, and issuance of Non-Objection Certificate for CSOs seeking foreign funds, faces significant challenges in the implementation of the 2022 NGO Policy. With the whole process being digitised, the Ministry received a high volume of online applications since late 2022. Many CSOs lack the technical knowledge and capacity to upload required documents online, leading to delays in the process. A backlog of applications exists, and the Ministry team is struggling to meet the 60-day timeline promised in the new policy.

Also, the time taken by verification agencies to meet the 45 days deadline has shown to be a serious challenge. In most cases the field staff of verification agencies are unable to submit their recommendations in the stipulated time frame due to their traditional ways of investigation, capacity, and policing attitude. This delays the whole process of issuing Non-Objection Certificates as envisaged in the new NGO Policy 2022 and puts pressure on the Ministry's performance.

While the new 2022 Policy aims to streamline the process and reduce the time required for approval, there have been some issues with the capacity of the online platform, particularly ensuring the accuracy and completeness of the uploaded documents. Due to the lack of clarity on what constitutes a complete set of documents, CSOs sometimes submit incomplete or inaccurate information. This has led to delays in processing and approval of applications, which is contrary to the intended objective of the new policy.

The proposed action seeks to address these issues by providing technical assistance to relevant government ministries, supporting CSO networks and platforms, and building their capacity in better self-governance, evidence-based research, and advocacy.

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

Main stakeholders of the proposed action are:

1.   Formal Civil Society Organisations (CSOs):
Civil society in Pakistan includes a wide range of actors, from charitable and worship organisations, associations, and endowments to professional associations, labour unions as well as informal movements and more recently (overlapping into the private sector) social enterprises. Civil society in Pakistan is characterised by multiple legacies, with CSOs being registered under various laws. A large proportion of the sector (i.e., 38% of the organisations) remains, however, informal or not registered under any law. CSOs in Pakistan are active in a wide variety of sectors and themes, ranging from the provision of food, shelter, health, education, sanitation, or financial services to the underprivileged, to conflict resolution, peacebuilding and the promotion of intra-community and inter-faith dialogue and, more recently (yet still limited) to lobbying for legal and fiscal reforms and taking a proactive approach in defining issues for the national agenda. Approximately nine out of ten CSOs in Pakistan are involved in service delivery/welfare activities, and they are often at the front line of responding to critical development needs as well as

ad-hoc crises (including the recent COVID pandemic and floods in 2022). CSOs are rooted and work in all sectors of society be they religious, conservative, liberal, from cities or from the countryside[9].

2.   Civil society networks and alliances:

Civil society networks and alliances in Pakistan play a crucial role in bringing together diverse CSOs around common goals and amplifying their collective impact. These networks and alliances provide platforms for CSOs to collaborate, share resources, coordinate efforts, and jointly advocate for policy reforms and social change. They facilitate information sharing, capacity building, and mutual support among CSOs, while also providing a unified voice to address social, political, and economic challenges. Civil society networks and alliances in Pakistan serve as important catalysts for strengthening civil society engagement, promoting democratic governance, and advancing human rights and social justice issues in the country. Despite their growth, fragmentation and polarisation continue to characterise civil society in Pakistan. CSO networks and alliances need support in improving internal governance; accountability and transparency; digital transformation; networking and collaboration; resource mobilisation and sustainability; results-based reporting; communication; and engagement with their constituencies and the public in general.

3.   Emerging civic movements:

In recent years, Pakistan has witnessed the emergence of new forms of civic engagement. Women and youth-led movements (articulated around students demands, urban concerns, feminist agendas; etc.) have gained visibility and raised important social issues related to human rights, gender equality, and social justice. These movements have used creative and innovative approaches, including street protests, social media campaigns, and advocacy efforts, to challenge traditional power structures and advocate for change. They highlight the emergence of new leadership and the changing dynamics of civil society and its evolving role in shaping public discourse, advocating for policy reforms, and demanding accountability from authorities. By fostering collaboration, inclusivity, capacity building, information sharing, advocacy, and innovation, the gap between new movements and traditional CSOs in Pakistan can be bridged, leading to more effective civic engagement and positive social change.

4.   Ministry of Economic Affairs:

The Ministry is responsible for the registration, scrutiny, and issuance of Non-Objection certificates for those local CSOs who seek foreign funds. Where a CSO registered in Pakistan is interested in receiving foreign contributions (money, services and goods being sourced from outside Pakistan), before it does so, it needs to enter into a Memorandum of Understanding with the Ministry as provided by the framework laid down in 2022 NGO Policy.

5.   Provincial Regulatory/Registration Bodies ("Charities Commissions"):

Provincial regulatory bodies oversee the implementation of rules and regulations related to CSOs in their respective provinces. The Provincial Governments, as well as the Islamabad Capital Territory, have made it compulsory for CSOs with operations in a particular province/territory to register with their respective charities' commissions. Under the Charities Commission Acts, the respective Commissions are tasked with, inter alia, maintaining public trust in charities, registering, and protecting charities, ensuring their regulatory compliance, and inquiring into the functioning of charities.

Both the Ministry of Economic Affairs and the provincial regulatory bodies can play a vital role in creating an enabling environment for civil society through a more constructive and transparent mechanism for engagement with CSOs. The Ministry and provincial regulatory bodies need support to streamline the registration, reporting, renewal, and compliance of CSOs. They also need to enhance their capacity to facilitate regular and structured exchanges and consultations around relevant policy and implementation issues with civil society.

The proposed action aims to address the institutional and organisational issues faced by these stakeholders by building their capacities, enhancing their understanding of each other's roles and contributions, and improving their engagement with each other to create an enabling environment for civil society in Pakistan.

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[9] Civil Society and Social Development in Pakistan. How the State can support its development through effective regulation. Briefing Paper No.101. Democracy Reporting International. December 2019

3 DESCRIPTION OF THE ACTION

3.1 Objectives and Expected Outputs

The Overall Objective of this action is to strengthen inclusive democratic processes related to public good at the national and provincial level

The **Specific(s) Objective(s)** of proposed action are to:

1 Strengthen effectiveness of engagement of civil society networks in policy dialogue and advocacy with the government on sectoral issues and the overall enabling environment for civil society.

2 Enhance the capacity of the Ministry of Economic Affairs and provincial regulatory bodies for constructive, transparent, and accountable engagement with CSOs in Pakistan.

The Outputs to be delivered by this action contributing to the corresponding Specific Objectives are:

Outputs contributing to outcome 1:

1.1 Enhanced institutional, organisational and technical capacities of selected CSO networks and their members and alliances

1.2 Enhanced capacity of selected CSO networks and alliances for evidence-based policy dialogue on both sectoral policy issues and around the conditions to improve an enabling environment for civil society.

1.3 Enhanced CSOs capacity to promote and communicate their roles and contributions to the country's development and governance challenges.

Outputs contributing to outcome 2:

2.1 Improved mechanisms of the Ministry of Economic Affairs for CSO registration, reporting, renewal and compliance.

2.2 Improved consultations and dialogue mechanisms between the government and CSOs focusing on regulatory, institutional and implementation issues affecting the enabling environment for CSOs.

3.2 Indicative Activities

Activities related to Output 1.1

1.1.1. **Assessment of the capacity development needs of relevant CSO networks.** The assessment will be done in close collaboration with the networks/alliance, using surveys, interviews, focus groups, and other methods to gather information about their organisational strengths, weaknesses, opportunities, and challenges.

1.1.2. **Identification of key capacity development providers in Pakistan** including academic institutions and resource centres managing **e-learning platforms and on-line** communities and fora.

1.1.3. **Assessment of existing CSO self-regulation & internal governance mechanisms** practiced/available in Pakistan.

1.1.4. **Developing a workplan** for the CSO capacity development programme and **selection of methodologies**. These would include a mix of:

- Action-oriented workshops, leadership retreats and policy/advocacy and data-driven bootcamps.
- Strategic Mentoring. A special focus should be placed on emerging youth and women activists and leaders in civil society networks and their members.
- On-the-job learning
- Peer learning exchanges (across Pakistan and regional)

1.1.5. **Implementation of the CSO capacity development programme,** using the selected methodologies and promoting a culture of learning and adaptation. Continuous feedback and reflection will be encouraged. Gender Transformative Approaches (using an intersectional lens) and the principle of leave-No-One behind will be mainstreamed throughout the implementation of the capacity development programme.

1.1.6. Develop a **sustainability plan (exist strategy) for the capacity development programme** to ensure its long-term impact.

Activities related to Output 1.2

1.2.1.   Mapping and assessment of the key **multi-stakeholder platforms (**both formal and informal) **which bring** together CSOs, government officials, and other relevant stakeholders around key sectoral policy issues in Pakistan, including questions on the enabling environment for CSOs.

1.2.2.   Support selected networks and alliances to engage effectively in evidence-based policy dialogue in existing multi stakeholder platforms or directly with the authorities), ensuring the participation of women, youth, and other marginalised groups.

1.2.3.   Organisation of a **series of periodical policy dialogues or roundtable discussions** to engage in substantive discussions on specific policy areas not addressed by existing platforms.

1.2.4.   Broker the **space for existing networks and alliances** to come together, build trust and **strengthen their collective voice** around key policy issues in Pakistan, including questions related to the **enabling environment for CSOs**.

1.2.5.   Support in **restoring international fora memberships for Pakistan** if there is a demand (for example re-enact the membership of Pakistan to the **Open Government Partnership (OGP)** (suspended since 2022[10]).

Activities related to Output 1.3:

1.3.1. Support CSO networks and their members and alliances capacities in **storytelling and data visualisation techniques** for drafting of communication products that highlight their impact and contributions to development of society.

1.3.2. Promote exchanges between **CSO platform/ networks and their members and the relevant government agencies in Pakistan at federal and provincial levels** to build trust and credibility within the verification agencies by organising dialogues and integrating with in-house workshops within their training wings.

1.3.3. Produce a yearly **Public Perception of Civil Society Contributions Report** in collaboration with a policy institute/think tank in Pakistan.

Activities related to Output 2.1:

2.1.1.   Conduct a **technical and organisational capacity review of the NGO Unit at** the Ministry of Economic Affairs, including:

- Capacity review among relevant government staff of the NGO Unit at Ministry;
- Review of existing IT systems (i.e., Registration portal)/infrastructure;
- Review of existing standard operation systems and procedures addressing registration, inquiries and complaints, etc.

2.1.2   Strengthen the **capacities of the NGO Unit** through:

- Providing trainings and building capacities for efficient and improved registration of CSO and ensuring the registration, reporting, renewal, and compliance of CSOs;
- Enhancing registration portal functionalities by adding features like application tracking and user-feedback and developing robust data protection systems etc.

2.1.3.   Support the NGO Unit in **development of online user-friendly awareness-raising and training materials** (PPTs, handouts, etc) for CSOs.

2.1.4.   Support NGO Unit in ensuring compliance by **familiarising CSOs through dialogues, seminars and workshops** at Federal and provincial levels.

2.1.5   Support Ministry and its NGO Unit in development of its **communication strategy** (if there is a demand).

Activities related to Output 2.2

2.2.1.   Support regular **exchanges between Ministry of Economic Affairs, relevant provincial regulatory bodies and selected CSO networks** to discuss relevant **regulatory, institutional and implementation issues affecting the enabling environment for CSOs**.

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[10] https://www.opengovpartnership.org/pakistan-withdrawn/

2.2.2. Provide support to Ministry of Economic Affairs and relevant regulatory bodies to **enhance their capacity for issue based structured and regular exchanges with CSOs**.

2.2.3. Support in holding a **multi-stakeholder annual progress review forum**, to monitor the implementation of the 2022 NGO policy.

3.3 Mainstreaming

Environmental Protection & Climate Change
Outcomes of the EIA (Environmental Impact Assessment) screening (relevant for projects and/or specific interventions within a project)
The EIA (Environment Impact Assessment) screening classified the action as Category C (no need for further assessment).
Outcome of the CRA (Climate Risk Assessment) screening (relevant for projects and/or specific interventions within a project)
The Climate Risk Assessment (CRA) screening concluded that this action is no or low risk (no need for further assessment).

Gender equality and empowerment of women and girls
Civil society organisations play an important role in promoting gender equality and empowering women and girls in Pakistan. According to the CLIP Pakistan (2021), there are various CSOs/NGOs targeting programmes on women empowerment and gender equality, and there are various specific networks and/or alliances created through donor-funded programmes such as the Gender and Humanitarian Task Force. Hence, the importance of including such CSO organisations, networks and alliances as beneficiaries of the proposed action.

The EU's Action Plan on Gender Equality and Women's Empowerment in External Action 2021–2025 (GAP III) aims to accelerate progress on empowering women and girls and safeguard advances in gender equality. GAP III particularly emphasises the need for inclusion of CSOs in an effort to address some of the shortcomings identified in the "Evaluation of the EU's external action support in the area of gender equality and women's and girls' empowerment (2019-2020)". Among its findings, the evaluation highlighted how "while the EU's substantial support for CSOs active in advancing gender equality and women's empowerment (GEWE) has led to many positive experiences, the EU had yet to find an approach to ensure more strategic, comprehensive partnerships on GEWE with these actors at the country level, including the stronger involvement of grassroots organisations in EU external action".

By strengthening the capacity of CS networks and alliances to effectively engage in policy dialogue and advocacy with the government, the proposed action can contribute to creating an enabling environment for CSOs to address GEWE. This can include advocating for policies that promote gender equality and women's rights and holding the government accountable for implementing gender-sensitive policies and programmes.

In addition, by supporting CSOs to develop their organisational and technical capacities, the proposed action can enhance their ability to effectively address gender-related issues in their work. For example, CSOs can develop expertise in conducting gender analysis, implementing gender-responsive and gender transformative programmes, and monitoring and evaluating the impact of their programmes on women and girls.

Throughout the implementation of the capacity development programme for CSOs, gender (using an intersectional lens) and the principle of leave-No-One-behind will be mainstreamed. Close cooperation with other EU supported initiatives (e.g., Women Political Participation and Leadership in Pakistan) will also be ensured.

Furthermore, by promoting a better understanding and knowledge about the roles and contributions of CSOs, including those focused on gender equality and women's empowerment, the proposed action can help to raise awareness and support for gender-related issues in Pakistan. This can lead to greater public engagement and support for policies and programmes that promote gender equality and women's empowerment.

Therefore, this action is categorised as G1 - gender equality is a significant objective. While it is not the principal objective, gender equality is a clear focus of the action, and specific measures are included to promote it.

Human Rights
This action will contribute to human rights in several ways, as per the OECD DAC codes.

First, by strengthening the capacity of the MoEA and provincial regulatory bodies for constructive, transparent, and accountable engagement with CSOs, the action will facilitate the creation of an enabling environment for CSOs to operate and contribute to political, social, and economic dialogue in Pakistan. This will support the right to freedom of association and expression, as well as the right to participate in the decision-making processes that affect people's lives.

Second, by building the capacities of CSOs for collective advocacy and policy dialogue, the action will strengthen their ability to hold the government and networks accountable for its policies and actions. This will support the right to an effective remedy, the right to participate in public affairs, and the right to access information.

Third, the action aims to enhance the capacity of the Ministry of Economic Affairs and provincial regulatory bodies for constructive, transparent, and accountable engagement with CSOs. This can contribute to the promotion of human rights by ensuring that government policies and regulations are developed and implemented with the input and participation of civil society and other stakeholders, including those most affected by policies.

Fourthly, the action supports CSO networks and alliances in developing their institutional, organisational, and technical capacities in areas such as accountability and transparency. This can promote the protection of human rights by ensuring that CSOs are transparent in their activities and accountable to their stakeholders, including those they serve.

Fifthly, the action supports CSOs in their efforts to promote a better understanding and knowledge of their roles and contributions to the country's development and governance challenges. This can contribute to the adoption of a Human Rights-Based approach (HRBA) by promoting the principles of non-discrimination, participation, and accountability in the development and implementation of policies and programmes. The action also promotes transparency and accountability in the engagement between CSOs and the government. Overall, the proposed action aligns with the principles of participation, empowerment, and accountability that are central to a HRBA, as endorsed by the EU.

Finally, close cooperation with other EU supported initiatives (e.g., programme on Promotion of Human Rights) will also be ensured.

Overall, this action can be categorised as having a significant objective for human rights, as it seeks to create an enabling environment for CSOs to operate, strengthen their capacities for advocacy and policy dialogue.

Disability
The proposed action does not have a specific focus on disability inclusion and does not target persons with disabilities as a principal or significant objective. Therefore, it would be categorised as D0, meaning that it is not considered relevant for inclusion of persons with disabilities. However, CSOs addressing the issues of disability were included in the consultative process. All these CSOs are currently facing issues regarding registration, NoC and compliance. The enhancing of the enabling environment for CSO will also ensure ease of business for the CSOs working on disability and increase access of the people with disabilities to their services.

The proposed action will pay attention these organisations will benefit from its capacity building activities. This will support CSOs working on disability.

Reduction of inequalities
The proposed action does not have a specific focus on inequality and does not directly target inequality as a principal or significant objective. Therefore, it would be categorised as I-0, meaning that it is not considered relevant for inequality.

However, the proposed action aims to address some of the underlying drivers of inequality by improving the regulatory environment and increasing the capacity of civil society organisations for policy dialogue and collective advocacy. By supporting the registration and operation of CSOs, the action seeks to create an enabling environment for the most marginalised communities to have a voice in shaping policies and programmes that affect their lives.

Democracy
The proposed action aims to strengthen the capacity of the MoEA for constructive, transparent, and accountable engagement with CSOs in Pakistan can contribute to strengthening democracy in the CSOs, networks and country in several ways.

Firstly, by enhancing the regulatory environment and improving dialogue between civil society and government, the action can create a more enabling environment for CSOs to operate and engage in policy dialogue. This can increase citizen participation and engagement in decision-making processes at all levels, which is a crucial aspect of a democratic society.

Secondly, by building the capacity of CSOs for collective advocacy and policy dialogue, the action can contribute to the development of more informed and evidence-based governance structures and policies that better represent the needs and interests of different sections of society, including marginalised and disadvantaged groups.

Conflict sensitivity, peace and resilience
By strengthening the capacity of civil society organisations, including CSOs working on GEWE, the action can help promote their role in conflict resolution and peacebuilding efforts. CSOs can play an important role in advocating for peaceful and inclusive solutions to conflicts, and in promoting dialogue and reconciliation between different groups.

The action's focus on improving the regulatory environment for CSOs and promoting their engagement with the government can also help build trust between these two important actors. This can contribute to more effective and collaborative approaches to addressing social, economic, and political challenges, which can ultimately promote peace and stability.

Disaster Risk Reduction
The proposed action aims to indirectly contribute to disaster risk reduction by supporting the role of civil society organisations in rural communities in flood recovery and reconstruction activities.

By building the capacity of CSOs and their networks (like Human Rights Network (HRN) and Pakistan Humanitarian Forum (PHF)), the action contributes to improve the resilience of communities to future disasters and reduce the risk of loss and damage. Additionally, by supporting CSOs in their efforts to increase transparency and accountability in flood response and recovery action plans and budgeting, the action aims to contribute to the 4R framework.

Furthermore, the action also aims to strengthen the collaboration and collective advocacy of CSOs, which can play a critical role in disaster risk reduction efforts. By enhancing the dialogue between civil society and the government and improving the capacity of CSOs for evidence-based research, analysis, and constructive advocacy, the action can help ensure that disaster risk reduction efforts are more inclusive, effective, and sustainable.

Overall, by building the capacity of CSOs and improving their collaboration with the government, the proposed action can contribute to disaster risk reduction in Pakistan and help build more resilient communities.

3.4 Risks and Lessons Learnt

Category	Risks	Likelihood (High/ Medium/ Low)	Impact (High/ Medium/ Low)	Mitigating measures
External Environment	Security situation deteriorates leading to unrest and worsening law and order	Medium	High	The action regularly monitors the security situation and takes into account local security situation for planning activities. If the situation deteriorates to a level where physical meetings cannot take place, the action will find alternate means to continue activities such as online / virtual meetings/ workshops.
External environment	Political instability paralyses the functioning of government at	Medium	High	The project will monitor the situation closely and adapt to the reduced possibility of engaging with government and institutional partners and continue, to the

	federal and provincial levels. Regulatory and elected institutions cannot exercise their functions.			extent possible, activities foreseen with non-institutional and non-state stakeholders.
External environment	Macro-economic instability leads to economic collapse, increased poverty, insecurity and unrest	High	High	The project will monitor the situation closely and adapt especially to changes in the security environment to the reduced possibility of engaging with government and institutional partners.
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 loses focus, effectiveness is reduced).
Legality and regulatory aspects	The government will not be receptive to civil society engagement and its input into development discourse and public policy outcomes.	**Medium**	**High**	Evidence-based policy dialogue and advocacy for the importance of creating an enabling environment for CSOs. This will involve documenting and presenting evidence of the positive contributions that CSOs can make to development and the benefits of greater collaboration between CSOs and the government. Additionally, the proposed action will offer technical assistance and capacity building to the relevant government entities (i.e., Ministry and Provincial Charities Commissions) to support their efforts to reform laws and regulations governing civil society organisations and help ensure that CSOs are able to register and operate more easily. Building strong relationships with government counterparts and cultivating champions of reform within these institutions will also be used as a mitigation strategy. Finally, the action will work to engage with other stakeholders, such as the media and the public, to raise awareness of the importance of a robust civil society sector and to build support for the necessary reforms.
External environment	Security concerns: civil society organisations may face security concerns as a result of their engagement	**Medium**	**High**	As outlined above, the proposed action will offer technical assistance and capacity building to the relevant government entities (i.e., Ministry and Provincial Charities Commissions) to support their efforts to reform laws and regulations

	in advocacy and policy dialogue.			governing CSOs and help ensure that CSOs (including those involved in policy dialogue) are able to register and operate more easily. Building strong relationships with government counterparts and cultivating champions of reform within these institutions will also be used as a mitigation strategy. The action will also work to engage with other stakeholders, such as the media and the public, to raise awareness of the importance of a robust civil society sector engaged in policy dialogue and advocacy for the necessary reforms. Finally, the action will also support developing the capacity of networks and alliances, including the developing of robust internal governance systems and codes of conduct to strengthen CSOs accountability and transparency systems.
Legality and regulatory aspects	Negative role and attitude of the agencies involved in the verification of CSOs applying for registration	**Low**	**High**	The action will organise awareness-raising sessions with the agencies to sensitise them about the importance of civil society and the role it plays in democratic governance, development and human rights. This will help in dispelling any misunderstandings or misconceptions they may have about CSOs. Establish transparent and accountable mechanisms for the verification of CSOs applying for Ministry of Economic Affairs registration. This will help in ensuring that the verification process is objective, fair and free from any biases.
People and organisations	Capacity building efforts may not be sustainable over the long term, particularly if there is a lack of ownership or commitment from civil society organisations.	**Low**	**High**	The intervention will focus on building the ownership and sustainability of capacity building efforts by involving civil society networks and alliances (and their leadership) in their planning and implementation, and also by working with the supply-side of capacity development (capacity development providers in Pakistan). This will help to ensure that civil society networks and capacity development providers have a stake in the success of the intervention and are committed to its sustainability. An exit strategy will also be developed within the action to ensure the sustainability of the capacity development programme.

Lessons Learnt:

Experience from previous EU interventions in support to CSOs shows that it is critical to promote an enabling environment that allows civil society in Pakistan to develop in a sustainable manner. There is substantial and increasing demand for EU financial assistance to support capacity building of CSOs for better governance and participative development process, to improve the quality of democratic institutions.

Even though this is the first time that the EU supports such an action in Pakistan, there are important lessons that can be learned from previous interventions from other donors and INGOs, and which should inform the current action. They include:

1. The importance of building relationships: The success of this intervention (which works both on the demand and supply side of governance) will depend heavily on the ability of the EU and its partners to foster dialogue and strong relationships with relevant government agencies (i.e., Ministry of Economic Affairs and provincial Charities Commissions), CSOs, and other stakeholders (including the media and the public). Maintaining open lines of communication, developing trust, and working collaboratively to identify shared goals will be crucial to achieving the desired outcomes.

2. The importance of ownership and leadership: Ownership and leadership of the capacity development process by the networks and alliances is critical to its success. This includes active engagement and participation of networks and alliances members in the planning, implementation, and monitoring of capacity development initiatives. Networks and alliances will be empowered to take ownership of their capacity development journey and drive the process forward.

3. The value of context-specific solutions: Capacity development for civil society networks and alliances should be designed and implemented with a deep understanding of the local context, including the socio-political environment, cultural norms, and specific challenges faced by CSOs in that context. Pakistan's legal and institutional context for civil society is unique and a one-size-fits-all approach is not effective. The proposed intervention recognises this and seeks to build on existing structures and networks to achieve its objectives.

4. The need for ongoing support and capacity building: Strengthening civil society in Pakistan is a long-term process which requires a sustained effort over many years. The proposed intervention recognises this, builds on previous interventions and the existing ecosystem for the provision of capacity-development, focuses on the level of networks and alliances (in an effort to strengthen the collective voice of civil society) and includes an exit strategy to ensure that gains are not lost over time.

5. The need for participatory and inclusive approaches: Capacity development initiatives should adopt a participatory and inclusive approach, involving all relevant stakeholders (with a focus on women, youth and emerging leaders), in the planning, implementation, and evaluation of the capacity development interventions. This ensures that the interventions are not only relevant and responsive to the needs of the networks or alliances, but also inclusive, leaving-No-One-Behind.

6. Building on existing strengths: Capacity development initiatives should build on the existing strengths and capacities of the networks or alliances, rather than focusing solely on their weaknesses or gaps. By recognising and leveraging existing strengths, the effectiveness and sustainability of the capacity development process will be enhanced, as it will build on the assets and resources that the networks and alliances in Pakistan already possesses.

7. The importance of collaboration and coordination: Considering the divisions that continue to characterise the sector, strengthening civil society in Pakistan requires a coordinated effort across a range of stakeholders. The proposed intervention recognises this and includes provisions for building collaborative networks and alliances to promote collective advocacy and policy dialogue. This will be a great opportunity for stakeholders to come together, increase trust and develop a joint voice.

8. The need for flexibility and adaptability: The operating environment for civil society in Pakistan is dynamic and subject to change. The proposed intervention recognises this and includes provisions for flexibility and adaptability (i.e., adaptative management) to ensure that the intervention can respond to changing circumstances and emerging needs.

3.5 The Intervention Logic[11]

The underlying intervention logic for this action is to support the EU-Pakistan partnership. It will enable the EU to: contribute to enhancing the enabling environment for civil society in Pakistan and the collective voice and capacity of Pakistani CSOs at the national and provincial level around public good agendas affecting governance, citizen participation and development. IF the capacity of civil society networks, alliances and joint efforts which aim to increase collaboration, networking, sharing of information, constructive evidence-based advocacy, and exchange opportunities is strengthened, with a special attention to those networks and alliances representing women, youth, the most vulnerable populations and minority groups.

AND the capacity of relevant government entities (i.e., mainly Ministry of Economic Affairs but also provincial regulatory bodies) is strengthened to implement policies that provide improved systems for CSO registration, and compliance.

AND there is increased awareness within civil society of the legal and regulatory framework and requirements for registration through adequate interfaces for dialogue and consultation with relevant government institutions.

AND there is increased awareness of the authorities and the public about the important roles played by CSOs CSO networks and their members and alliances in Pakistan.

THEN

More CSO networks and their members and alliances in Pakistan will have enhanced capacities for evidence-based policy dialogue on both sectoral policy issues and around the conditions to improve an enabling environment for civil society.

More CSO networks and their members and alliances in Pakistan will engage effectively with the authorities on both sectoral policy issues and around the conditions to improve an enabling environment for civil society.

More CSO networks and their members and alliances in Pakistan will have enhanced capacity to promote and communicate their roles and contributions to the country's development and governance challenges.

The Ministry and relevant provincial regulatory bodies will have improved mechanism CSO registration, reporting, renewal and compliance.

Improved consultations and dialogue mechanism between the government and CSOs will take place focusing on regulatory, institutional and implementation issues affecting the enabling environment for CSOs.

THEN

The inclusive democratic processes related to public good at the national and provincial level will be strengthened.

The Ministry of Economic Affairs and relevant provincial regulatory bodies will engage more constructively, transparently, and accountably with civil society organisations in Pakistan.

A more collaborative and conducive environment will exist for civil society to operate effectively and make meaningful contributions to the development of Pakistan.

BECAUSE

As a result of providing capacity development, ensuring effective vertical and horizontal linkages between stakeholders, meeting demand side needs and reforms at supply side, oversight and monitoring through regulatory bodies and civil society, an ecosystem of sustainable and effective civil society participation will be created.

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[11] @TEI Methodological Note to Support Design

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.

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

Results	Results chain **Main expected results**	Indicators (at least one indicator per expected result)	Baseline (Values and years)	Targets (Values and years)	Sources of data	Assumptions
Impact	*To strengthen inclusive democratic processes related to public good at the national and provincial level.*	1. Pakistan ranking in the Civicus civic space index 2. Freedom House index 3 CS Overall Sustainability Index 4. Percentage of CSO representatives involved in government committees and consultations.	1. 30/100 Repressed (2022) 2. 37/100 (2022) 3. 4.3 (2018) 4. Low and less meaningful representation of CSOs on government committees and consultation	1. 40-50/100 Obstructed (2026) 3. 50/100 (2026) 4. 4.5 (2026) 4. 20% representative participation of CSOs in decision-making bodies of government. (2026)	1. Civicus index 2. Freedom House index 3. CSO Sustainability Index 4. Pakistan Humanitarian Forum Annual Report 2021	
Outcome 1	**Strengthen effectiveness of engagement of civil society networks in policy dialogue and advocacy with the government on sectoral issues and the overall enabling environment for civil society**	1.1 Number of networks having improved their capacities in policy dialogue and advocacy as a result of CD interventions. 1.2 Number of new collective advocacy campaigns and policy dialogue initiatives launched by networks and alliances supported by the EU.	1.1 0 1.2 0	1.1 Four CSO networks (2026) 1.2 6 dialogues (three per year) (2026)	1.1 Progress reports for the EU-funded intervention; 1.2 Progress reports for the EU-funded intervention;	● The regulatory and institutional environment for CSOs will remain stable, and there will be no unilateral changes in laws or regulations that may hinder CSOs' ability to operate effectively. ● The government will fulfil its obligations to the international commitments and convention on

		1.3. Number of policy and implementation issues influenced by CSOs networks and alliances coming together.	1.3 0	1.3 03 policy issues including reforms in NGO policy (2026)	1.3 Progress reports for the EU-funded intervention;	promoting sustainable development goals (SDGs).
		1.4. Number of networks/alliances that publish annual reports	1.4 02 (tbc)	1.4 04 networks (2026)	1.4 Baseline and endline surveys conducted and budgeted by the EU-funded intervention.	● There will be no significant security threats or conflicts that could disrupt the implementation of CSOs' programmes.
Outcome 2	**Enhance more constructive, transparent, and accountable engagement of the Ministry of Economic Affairs and provincial regulatory bodies with CSOs in Pakistan.**	2.1. Number of CSOs successfully registered and compliant after implementation of the one-window system within stipulated time frame	2.1 Around 200 NOCs issued since inception. (as of March 2023)	2.1 1000 CSOs have NOC/MOU (2026)	2.1 Progress reports for the EU-funded intervention	● Government and public institutions increasingly recognise and value the role and contributions of CSOs in promoting good governance, poverty reduction, and development in Pakistan.
		2.2 Percentage of CSOs that are satisfied with the registration and compliance process	2.2 0	2.2 50% get registered and compliant within stipulated time (2026)	2.2 Baseline and endline surveys conducted and budgeted by the EU-funded intervention	
		2.3. Time taken for CSOs to complete the registration and compliance process, disaggregated by active/urban and new/rural CSOs	2.3 45 days for active, urban CSOs; 75 days for new, rural CSOs (value 2023)	2.3 30 days for all types of CSOs (2026)	2.3 Baseline and endline surveys conducted and budgeted by the EU-funded intervention	

Output 1.1	Enhanced institutional, organisational and technical capacities of selected CSO networks and their members and alliances	1.1.1. % of implementation of the capacity development workplan developed by the EU-funded intervention	1.1.1 0	1.1.1 80% of implementation of the capacity development workplan developed by the EU-funded intervention (2026)	1.1.1 Progress reports for the EU-funded intervention	● The CSOs can invest time and resources in their organisational effectiveness.
		1.1.2 Percentage of CSOs expressing satisfaction with the capacity building provided by the EU-funded intervention	1.1.2 0	1.1.2 70% CSOs expressing satisfactions (2026)	1.1.2 Baseline and endline surveys conducted and budgeted by the EU-funded intervention.	
		1.1.3 Number of civil society professionals trained by the EU-funded intervention with increased knowledge and/or skills in financial and organisational management and advocacy, disaggregation by sex and age	1.1.3 0	1.1.3 1200 professionals (Value 2026)	1.1.3 Pre- and post-training test reports	
Output 1.2	Enhanced capacity of selected CSO networks and alliances for evidence-based policy dialogue on both sectoral policy issues and around the conditions to improve an enabling	1.2.1 Number of government policies developed or revised with civil society organisation participation through EU support (GERF 2.29)	1.2.1 0	1.2.1 04 policies (2026)	1.2.1 Progress reports for the EU-funded intervention	● The government will be receptive to civil society engagement and its input into development discourse and public policy outcomes. ● CSO networks will have the capacity and resources to effectively engage in
		1.2.2 Number of joint problem-solving mechanisms between	1.2.2 0	1.2.2 4 mechanism (2026)	1.2.2 Progress reports for the EU-funded intervention	

	environment for civil society.	regulatory bodies and CSOs established with support of the EU-funded intervention				evidence-based advocacy and dialogue with the government and other stakeholders.
Output 1.3	Enhanced CSOs capacity to promote and communicate their roles and contributions to the country's development and governance challenges	1.3.1 Number of CSO networks' and alliances' members trained by the EU-funded intervention with increased knowledge and/or skills in storytelling and data visualisation, disaggregated by sex	1.3.1 0	1.3.1 4 networks (2026)	1.3.1 Pre- and post-training test reports	● Verification agencies involved in the scrutiny process are willing to understand the role and contribution of CSOs ● All agencies show collaborative engagement in implementation of the action.
		1.3.2. Number of CSOs reporting better understanding and support from verification agencies and their representatives	1.3.2 0	1.3.2 400 (40% of members of 4 networks) (2026)	1.3.2 Baseline and endline surveys conducted and budgeted by the EU-funded intervention	
		1.3.3 Percentage of staff of verification agencies that report increased awareness and knowledge about CSOs role and contribution resulting from the support of the EU-funded intervention	1.3.3 0	1.3.3 30% of staff of verification agencies	1.3.3. Baseline and endline surveys conducted and budgeted by the EU-funded intervention.	

Output 2.1	Improved mechanisms of the Ministry of Economic Affairs for CSO registration, reporting, renewal and compliance.	2.1.1 Number of MoEA and provincial regulatory body staff trained by the EU-funded intervention with increased knowledge and/or skills on registration, reporting, renewal and compliance of CSOs	2.1.1. 0	2.1.1 20 staff trained (2026)	2.1.1 Pre- and post-training test reports	• Adequate political will and commitment from MoEA to undertake necessary reforms for ease of doing business for CSOs in Pakistan • Robust technical expertise for portal development and ongoing maintenance is available within the country.
		2.1.2. Number of NGO Unit awareness raising initiatives implemented with support of the EU-funded intervention .	2.1.2 0	2.1.2 5 annual events at federal and provincial level.	2.1.2 Progress reports for the EU-funded intervention	
Output 2.2	Improved consultations and dialogue mechanisms between the government and CSOs focusing on regulatory, institutional and implementation issues affecting the enabling environment for CSOs	2.2.1 Number of consultations between regulatory bodies and CSOs supported by the project.	2.2.1 0	2.2.1 Six consultations	2.2.1 Progress reports for the EU-funded intervention.	• Willingness on part of the government to work collaboratively with civil society for policy and its implementation reforms. • Relations between the MoEA and CSO networks' platform continue to be effective to pursue policy reform agenda
		2.2.2 Number of recommendations submitted by CSOs for incorporation into the NGO Policy supported by the project	2.2.2 0	2.2.2 Four recommendations	2.2.2 Progress reports for the EU-funded intervention	

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 Pakistan.

4.2 Indicative Implementation Period

The indicative operational implementation period of this action, during which the activities described in section 3 will be carried out and the corresponding contracts and agreements implemented, is 36 months from the date of entry into force of the financing agreement. Extensions of the implementation period may be agreed by the Commission's responsible authorising officer by amending this Financing Decision and the relevant contracts and agreements.

4.3 Budget Support – NOT APPLICABLE

4.4 Implementation Modalities

The Commission will ensure that the EU appropriate rules and procedures for providing financing to third parties are respected, including review procedures, where appropriate, and compliance of the action with EU restrictive measures.

4.1.1 Direct Management (Grants) – NOT APPLICABLE

4.1.2 Direct Management (Prize(s)) – NOT APPLICABLE

4.1.3 Direct Management (Procurement) – NOT APPLICABLE

4.1.4 Indirect Management with an entrusted entity

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

- experience of managing actions engaging directly with civil society and their role in development at national or international level;
- operational capacity for implementing activities at federal and provincial level;
- technical competencies in implementation of projects and programmes related to the specific objectives of the action;
- The organisation should be a respected and established development partner interacting with a wide range of State and Non State stakeholders in Pakistan.

The implementation by this entity entails the implementation of the entire action (both outcomes).

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:
Procurement: (direct management)
Purpose of the procurement:
to deliver on the two outcomes and related outputs of the action.

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 origin of supplies purchased as established in the basic act and set out in the relevant contractual documents shall apply, subject to the following provisions.

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

4.6 Indicative Budget

Indicative Budget components	EU contribution (amount in EUR)	Third-party contribution, in currency identified
Implementation modalities – cf. section 4.3.1		
Objective/Outputs1-2 composed of	2 986 000	
Indirect management with an entrusted entity- cf. section 4.3.1	2 986 000	
Evaluation – cf. section 5.2 **Audit** – cf. section 5.3	200 000 [to be covered by another Decision][12]	N.A.
Contingencies	NA	N.A.
Totals	3 186 000	

4.7 Organisational Set-up and Responsibilities

The project implementing partner will be responsible for overall project management and will work closely with the government of Pakistan, civil society networks and alliances, and development partners. The entrusted entity (as per the description provided under section 4.3.1.) will oversee the project's implementation and ensure that it is aligned with the objectives, results, principles, methodology and schedule as per agreement requirements of the European Union. The Project will have the following management structure:

Project Steering Committee (PSC): A project steering committee will be established to provide strategic direction and oversight to the project. The steering committee will be composed of representatives from the Government of Pakistan, civil society networks and alliances, interested development partners as observers. The Ministry of Economic Affairs and the European Union will act as co-chairs. The steering committee will meet every six months and will be responsible for approving the annual work plan and budget, monitoring the progress of the project based on agreed KPIs, and making decisions on any changes to ensure that project outputs and outcomes are achieved and necessary modifications in the project's implementation carried out in consultation with the development partners. The PSC will have specific roles and responsibilities, as outlined below:

- Provide strategic guidance and oversight to the project
- Review and approve project plans, budgets, and reports
- Ensure project activities are aligned with national policies and priorities

Terms of references of PSC will be finalised by the project implementation partner in consultation with stakeholders from Government and CSO networks and alliances.

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.

4.8 Pre-conditions

NA

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[12] Where the action is not covered by a financing agreement (see section 4.1), but 'will be covered by another Decision' as it is unlikely that evaluation and audit contracts on this action would be concluded within N+1. These contracts have to be authorised by another Financing Decision.

5 PERFORMANCE MEASUREMENT

5.1 Monitoring and Reporting

During the inception phase, a baseline survey will be conducted by the implementing partner (preferably outsourced) as part of project activities. Similarly close to the end of the project, an end line survey will also be commissioned by the implementing partner.

The day-to-day technical and financial monitoring of the implementation of this action will be a continuous process, and part of the implementing partner's responsibilities. To this aim, the implementing partner shall establish a permanent internal, technical and financial monitoring system for the action and elaborate regular progress reports (not less than annual) and final reports. Every report shall provide an accurate account of implementation of the action, difficulties encountered, changes introduced.

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).

Monitoring and reporting shall assess how the action is considering the principle of gender equality, human rights-based approach, and rights of persons with disabilities including inclusion and diversity. Indicators shall be disaggregated at least by sex.

5.2 Evaluation

Having regard to the nature of the action, a final] evaluation will be carried out for this action via independent consultants contracted by the Commission.

It will be carried out for accountability and learning purposes at various levels (including for policy revision), taking into account in particular the fact that this action is a pilot initiative for the EU.

The Commission shall inform the implementing partner at least 03 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.

Evaluation services may be contracted under a framework contract.

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 on human rights, disability and gender equality will be ensured in the evaluation teams.

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

Audiences Targeted:
The primary audience for this communication plan includes government officials from the Ministry of Economic Affairs and provincial regulatory bodies, CS networks, and their member organisations.

Communication Objectives:

a. To increase the understanding of government officials from the Ministry of Economic Affairs and provincial regulatory bodies on the importance of constructive, transparent and accountable engagement with CSOs.

b. To enhance the knowledge and skills of CS networks and their members on sectoral issues and their ability to engage with the government for an enabling environment for civil society.

c. To promote awareness among stakeholders on the impact of civil society on governance, citizen participation, and development.

Core Narrative:

The goal of the action is to enhance the enabling environment for civil society in Pakistan by enhancing the collective voice and capacity of Pakistani CSOs. The action is built on the assumption that by working together, CSOs can play a critical role in addressing sectoral issues affecting governance, citizen participation, and development. The action aims to promote constructive, transparent and accountable engagement between CSOs and government officials to create an enabling environment for civil society.

The core narrative would also focus on the importance of a strong and vibrant civil society for democracy, good governance, and citizen participation in Pakistan. The narrative would emphasise that a thriving civil society is crucial for the development of the country and that the EU is committed to supporting this through strengthening the enabling environment for civil society in Pakistan. It would also highlight the importance of collaboration between CSOs and government bodies for achieving common goals and the need for transparency, accountability, and constructive engagement to ensure effective implementation of public good agendas.

Preliminary Suggestions for Content, Partnerships, and Channels:

a. Content: The content would focus on success stories and best practices from CSOs, government officials, and other stakeholders in creating an enabling environment for civil society. The messages would highlight the importance of sectoral issues affecting governance, citizen participation, and development and the role of CSOs in addressing these issues.

b. Partnerships: Partnerships with CS networks and their member organisations will help increase the reach and effectiveness of the communication plan. Influencers from the civil society sector and relevant government officials will be engaged as partners to endorse the message.

c. Channels: The communication plan will be disseminated through various channels, including social media, radio, television, and print media. Webinars, workshops, and conferences will also be organised to engage with the target audience and promote the core narrative.