

Brussels, 19.12.2019 C(2019) 9292 final

COMMISSION IMPLEMENTING DECISION

of 19.12.2019

on the financing of an individual measure in favour of Egypt for 2019

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THE EUROPEAN COMMISSION.

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Regulation (EU, Euratom) 2018/1046 of the European Parliament and of the Council of 18 July 2018] on the financial rules applicable to the general budget of the Union, amending Regulations (EU) No 1296/2013, (EU) No 1301/2013, (EU) No 1303/2013, (EU) No 1304/2013, (EU) No 1309/2013, (EU) No 1316/2013, (EU) No 223/2014, (EU) No 283/2014, and Decision No 541/2014/EU and repealing Regulation (EU, Euratom) No 966/2012¹, and in particular Article 110 thereof,

Having regard to Regulation (EU) No 236/2014 of the European Parliament and of the Council of 11 March 2014 laying down common rules and procedures for the implementation of the Union's instruments for financing external action², and in particular Article 2(1) thereof,

Whereas:

- (1) In order to ensure the implementation of an individual measure in favour of Egypt for 2019, it is necessary to adopt a financing Decision. Article 110 of Regulation (EU, Euratom) 2018/1046 establishes detailed rules on financing Decisions.
- (2) The envisaged assistance is deemed to follow the conditions and procedures set out by the restrictive measures adopted pursuant to Article 215 TFEU³.
- (3) The Commission has adopted the Single Support Framework in favour of Egypt⁴ for the period 2017-2020, which sets out the following priorities: economic modernisation, energy sustainability and environment; social development and social protection; and governance, enhancing stability and modern democratic state. Moreover, It includes complementary support for capacity development and institution building and measures in favour of civil society.
- (4) The objectives pursued by the measure to be financed under the European Neighbourhood Instrument⁵ are to support effective, accountable and participatory governance with the aim to promote and protect the universal values of democracy, the rule of law and human rights.

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OJ L 193, 30.7.2018, p.1.

OJ L 77, 15.3.2014, p. 95.

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

⁴ C(2017) 7175 final, 30.10.2017.

Regulation (EU) No 232/2014 of the European Parliament and of the Council of 11 March 2014 establishing a European Neighbourhood Instrument (OJ L 77, 15.3.2014, p. 27).

- (5) The action entitled "Support to Accountability and Democratic Governance" aims to provide support to the fight against corruption, to the Public Prosecution's efforts in the recovery and management of assets and proceeds resulting from corruption and other serious crimes, and to the Egyptian House of Representatives. The Commission aims to enable this support through two twinning projects and indirect management with the United Nations Interregional Crime and Justice Research Institute (UNICRI).
- (6) Pursuant to Article 4(7) of Regulation (EU) No 236/2014, indirect management is to be used for the implementation of the programme.
- (7) The Commission is to ensure a level of protection of the financial interests of the Union, with regards to entities and persons entrusted with the implementation of the Union's funds by indirect management as provided for in Article 154(3) of Regulation (EU, Euratom) 2018/1046. To this end, such entities and persons are to be subject to an assessment of their systems and procedures in accordance with Article 154(4) of Regulation (EU, Euratom) 2018/1046.
- (8) It is necessary to allow for the payment of interest due for late payment on the basis of Article 116(5) of Regulation (EU, Euratom) 2018/1046.
- (9) In order to allow for flexibility in the implementation of the programme, it is appropriate to allow changes that should not be considered substantial for the purposes of Article 110(5) of Regulation (EU, Euratom) 2018/1046.
- (10) The measure provided for in this Decision does not fall within the categories of measures for which the prior opinion of the Committee is required. The measure shall be communicated to the European Parliament and to the Member Stares through the European Neighbourhood Instrument Committee established under Article 15 of the financing instrument referred to in recital 4 within one month of its adoption.

HAS DECIDED AS FOLLOWS:

Article 1 The measure

The individual measure in favour of Egypt for 2019, as set out in the Annex, is adopted.

The measure shall include the following action:

Annex: "Support to Accountability and Democratic Governance".

Article 2 Union contribution

The maximum Union contribution for the implementation of the measure for 2019 is set at EUR 5 million, and shall be financed from the appropriations entered in the budget line 22.040101 of the general budget of the Union.

The appropriations provided for in the first paragraph may also cover interest due for late payment.

Article 3 Methods of implementation and entrusted entities or persons

The implementation of the part of the action to be carried out by way of indirect management may be entrusted to the entity referred to in point 5.3.3 of the Annex.

Article 4 Flexibility clause

Increases or decreases not exceeding 20% of the contribution set in the first paragraph of Article 2, as well as extensions of the implementation period shall not be considered substantial within the meaning of Article 110(5) of Regulation (EU, Euratom) 2018/1046, where these changes do not significantly affect the nature and objectives of the actions.

The authorising officer responsible may apply the changes referred to in the first paragraph, acting in accordance with the principles of sound financial management and proportionality.

Done at Brussels, 19.12.2019

For the Commission Olivér VÁRHELYI Member of the Commission



ANNEX

Commission Implementing Decision on the financing of an individual measure in favour of Egypt for 2019

Action Document for Support to Accountability and Democratic Governance

Individual Measure

This document constitutes the work programme in the sense of Article 110(2) of the Financial Regulation and action programme/measure in the sense of Articles 2 and 3 of Regulation N° 236/2014.

1. Title/basic act/ CRIS number	Support to Accountability and Democratic Governance CRIS number: ENI/2019/042-352 financed under the European Neighbourhood Instrument				
2. Zone benefiting from the action/location	Egypt				
3. Programming document	Single Support framework 2	017 – 2020			
4. Sustainable Development Goals (SDGs)	Main SDGs: 16; Secondary	SDGs: 16.4	, 16.5, 16.6		
5. Sector of concentration/ thematic area	Democratic Governance				
6. Amounts concerned	Total estimated cost: EUR 5 million.				
	Total amount of European Union (EU) contribution EUR 5 million.				
7. Aid modality(ies)	Project Modality				
and implementation modality(ies)	Direct management through	grants			
moduley (les)	Indirect management with the United Nations Interregional Crime and Justice Research Institute (UNICRI)				
8. DAC code(s)	15152 – Legislatures and political parties				
	15113 – Anti-corruption organisations and institutions				
9. Markers (from CRIS	General policy objective	Not	Significant	Main	
DAC form)		targeted	objective	objective —	
	Participation □ □ □ □ □ □ □ □ □ □ □ □ □ □ □ □ □ □ □				

	Aid to environment	\boxtimes		
	Gender equality (including		\boxtimes	
	Women In Development)			
	Trade Development	\boxtimes		
	Reproductive, Maternal,	\boxtimes		
	New born and child health			
	RIO Convention markers	Not	Significant	Main
		targeted	objective	objective
	Biological diversity	\boxtimes		
	Combat desertification	\boxtimes		
	Climate change mitigation	\boxtimes		
	Climate change adaptation	\boxtimes		
10. Global Public Goods and Challenges (GPGC) thematic flagships	N/A			

SUMMARY

This project is in line with the EU-EGYPT Partnership Priorities adopted in 2017, and responds to the third sector of the Single Support Framework (SSF) 2017-2020, which, in line with the provisions of the 2014 Egyptian Constitution, supports Egypt's process towards increased democratic governance, structural reform and political, social and economic stabilisation. The project's overall objective is to support the achievement of two specific objectives under the third sector of the SSF, namely: (1) to support effective, accountable and participatory governance, and (2) to promote and protect the values of democracy, the rule of law, human rights, fundamental freedoms and gender equality.

The overall objective will be pursued through three main components. Component 1 – Support to the fight against corruption - will aim at fighting corruption by enhancing the efficiency and effectiveness of the strategic, legislative and institutional framework already in place, with a focus on implementation aspects. Component 2 – Support to the Public Prosecution's efforts in the recovery and management of assets and proceeds resulting from corruption and other serious crimes - will aim at strengthening the mechanisms for the recovery of stolen assets linked to acts of corruption and other serious crimes, and the mechanisms for effective and transparent use of seized and confiscated assets, as well as at establishing processes for their transparent management and distribution, notably for use in the health and education sectors. Component 3 – Support to the Egyptian House of Representatives - will support the Parliament in its core legislative, representative and oversight functions, and in becoming more transparent and accountable. The action will aim at strengthening mainly the Parliament's permanent structures through capacity building.

EU Member States will be involved through two twinning projects, in order to transfer EU best practices to national beneficiaries in the areas in which the project operates. The United Nations Interregional Crime and Justice Research Institute (UNICRI) will be contracted for its highly specialised expertise and past experience in Egypt in the field of asset recovery and management.

1 CONTEXT ANALYSIS

1.1 Context Description

Corruption was one of the grievances at the root of the 2011 Revolution and the most recent protests in September 2019 confirm that corruption remains a serious concern for the Egyptian society¹. Corruption reduces economic efficiency and results in the unequal allocation of resources. The misuse of public office for private gain weakens state institutions

The government of Egypt has recovered over USD 400 million of stolen assets from former officials involved in acts of corruption. This recovery of assets is the most recovered by any MENA region country since the Arab Spring, and is the result of key reconciliation agreements with defendants in several cases starting from late 2016. Yet, assets valued at over USD 400 million are still frozen abroad.

After over three years without a Parliament, Egypt's new House of Representatives (HoR) convened in January 2016, hereby completing Egypt's 'democratic roadmap'. Formally, the one-chamber Parliament enjoyed wider powers vis-a-vis the Executive². The bylaws it adopted reflected the new balance among state powers as per the 2014 Constitution. The 2014 Constitution (prior to the 2019 constitutional amendments) with its provisions on human rights and individual freedoms and the 2015 parliamentary elections did constitute positive steps towards democracy. Egypt's parliament approved in April 2019 several constitutional amendments that strengthen President Sisi's power. The constitutional amendments have also re-established a high chamber (the Shura Council, i.e. Consultative Council). The second chamber of parliament will have at least 180 members, one-third of whom will be appointed by the president. While entering its fifth and last legislative session, the Egyptian Parliament is facing harsh criticism for having performed poorly in respect of accountability, public engagement, transparency and qualitative legislative work and ensuring checks and balances between the Executive and the Legislative branches. The next Parliamentary elections will be held in 2020.

1.2 Policy Framework (Global, EU)

The United Nations Convention against Corruption (UNCAC) was opened for signature in 2003 and became effective in 2005. It constitutes an international treaty, currently signed by 186 partners, including 182 member states of the United Nations and four non-state signatories. UNCAC has a broader scope than the OECD Anti-Bribery Convention, which was the first large scale convention targeting an aspect of corruption, when it came in 1999 into force. UNCAC does not exclusively focus on public officials but includes inter alia corruption in the private sector and non-bribery corruption, like e.g. money laundering and abuse of power. UNCAC also specifies a variety of mechanisms to combat corruption, e.g. international cooperation in detecting and prosecuting corruption, the cancellation of permits, when connected to corrupt behaviour, and the protection of whistle-blowers. The implementation of UNCAC is monitored by the International Association of Anti-Corruption Authorities (IAACA). Among their responsibilities, States parties to the Convention must undertake 'effective measures to prevent corruption' (chapter II, articles 7 to 14). In addition to calling for effective action in each of the areas covered by the Convention, article 5 imposes the more general requirements that each State party: (a) develop and implement or maintain effective, coordinated anticorruption policies; (b) establish and promote effective practices aimed at the prevention of corruption; and (c) periodically evaluate relevant legal instruments and administrative measures with a view to determining their adequacy to prevent and fight corruption. There are no acquis or European standards

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¹ In the Transparency International 2018 Corruption Perceptions Index, Egypt scored 35 on a scale of 0 to 100 and was ranked 105th out of 180 countries. The HoR can pass laws vetoed by the President and has to approve the State's budget and its accounts, as well as loans and financial agreements.

² The HoR can pass laws vetoed by the President and has to approve the State's budget and its accounts, as well as loans and financial agreements.

on whether or how an anti-corruption strategy should be designed or on how its action plan should look like. The European Commission on behalf of the European Union is party to the UNCAC. Hence, the EU institutions are to comply with the Convention and the Convention is the basis for the Commission to develop its anti-corruption policy in external relations. The fight against corruption, including effective asset recovery and management are also in line with the revised European Neighbourhood Policy (ENP), the New European Consensus on Development and with principles laid down in various EU decisions as well as other international instruments. It also provides concrete implementation to the Asset Recovery Action Plan for cooperation with transition countries in the MENA region.

The lack of international consensus on the basic requirements democratic and effective parliaments must meet has changed in the last years with the development of a standard-based approach by international organisations, parliamentary bodies and democracy support organisations. Some benchmarking initiatives recently emerged and these will be relevant for the proposed action in support to the Parliament.

1.3 Public Policy Analysis of the partner country

Egypt ratified the UNCAC in 2005³ and joined recently the African Union Convention on Prevention and Combatting Corruption. Egypt has a strong legal and strategic framework to address corruption and competent national authorities. A First National Strategy for Combatting Corruption was in place from 2014 until 2018. A Second National Strategy was adopted in December 2018 but with limited consultations and no evaluation of the previous strategy implementation. Despite robust laws and multiple administrative efforts, corruption remains endemic and money laundering a serious concern. Reasons for this lack of progress are mainly due to the poor implementation of the instruments in place, shortcomings in complaint mechanisms and insufficient involvement of civil society organisations (CSOs), the private sector, and the Parliament⁴ in the monitoring of anti-corruption policy. Prevention and public awareness are insufficient, despite two national media campaigns run in 2016 and 2017 which were discontinued afterwards.

Moreover, with the Arab Spring, several foreign jurisdictions froze assets of former high-level officials. The Asset Recovery Committee was formed and the General Prosecutor's Office initiated multiple actions, many of which involved the transmission of Mutual Legal Assistance requests (MLAs). Still, the General Prosecutor's Office struggles to recover assets. Legal and practical constraints in successfully executing MLA requests are hampering the conclusion of these judicial procedures, while freezing measures are being challenged. There is thus increasing pressure on the EU to lift the sanctions it imposed in 2011⁵ unless both Egypt and Requested States can resolve more quickly pending cases of corruption.

The Parliament has been accused of acting as a rubber stamp for the Executive. By quickly announcing parliament's full support for the government and after having repeatedly demanded that deputies avoid being too critical of the government, the speaker of the Parliament has clearly indicated that the Parliament shall not be too independent. This lack of autonomy of the House of Representatives has translated in poor performance when exerting its oversight function. The Parliament lacks accountability as public engagement and transparency quickly eroded and there is almost no interaction between the Parliament and CSOs. Convening formally as a Parliament has clearly proved insufficient to ensure strengthened democratic practices and qualitative legislative work.

3 The country has been reviewed under the first UNCAC review cycle on Chapter III (criminalisation of corruption) and Chapter IV (international cooperation). UNCAC Chapter II (Preventive Measures) and V (Asset recovery) have been reviewed in the second review cycle in 2019.

One major exception to this trend was the Parliament's investigation into a wheat corruption scandal, through the formation of a fact-finding committee. Minister of Supply Khaled Hanafi resigned in the face of the scandal.

⁵ Council Decision 2011/172/CFSP: http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2011:076:0063:0067:EN:PDF

1.4 Stakeholder analysis

A number of national authorities fighting corruption have been put in place in Egypt, i.e. the Administrative Control Authority (ACA), the Illicit Gains department of the Ministry of Justice, the Public Funds Investigation Department of the Ministry of Interior, and the Egyptian Financial Intelligence Unit (FIU). The Government of Egypt has also established a multi-institutional National Asset Recovery Committee, over which the Office of the Prosecutor General presides, as well as the National Coordinating Committee for Combating Corruption (NCCCC). In 2017, the adoption of amendments to the Administrative Control Authority's (ACA) law (law no.54/1964) to go in line with Egypt's 2014 Constitution and to reinforce its role in combating corruption by granting it administrative and financial independence was an improvement in the legal framework. However, the constitutionality and legality of the dismissal of the Chairman of the Administrative Control Authority (ACA) during the Parliament's 2018 summer recess and before the end of his term in April 2021 remains a matter of concern. In 2018, a new Academy for Governance, Combatting Corruption and Administrative Reform was established within the ACA in line with the 2017 ACA Law. The capacity of these stakeholders needs to be enhanced and aligned with international and European best practices.

As regards the HoR, it has not managed to become a decisive political actor in the Egyptian institutional landscape. A Parliamentary Training Institute is in place but has no permanent premises. It has limited equipment and qualified staff while it seeks to develop a regional and international dimension. Overall, the capacities of the HoR need to be considerably strengthened.

Civil society has been subject to a serious crackdown for years. Rights activists are particularly targeted with travel bans, asset freezing, etc. In the wake of widespread criticism of the previous NGO Law (Law No. 70 of 2017), a new NGO Law, Law No. 149 of 2019 came into effect this year. The new law features a number of positive developments, mainly abandoning imprisonment penalties and bringing back the Ministry of Social Solidarity (MoSS) as the lead entity on NGO regulation in Egypt. It allows local NGOs to be founded by notification and foreign NGOs by requesting a license from MFA. The law allows NGOs easier access to receive foreign funding (although MoSS can challenge the transaction within 60 days). Nonetheless, the law retains many restrictive elements. The mandate and scope for both domestic and foreign NGOs is limited to the 'developmental priorities'. NGOs are also prohibited from pursuing activities that breach a number of vaguely worded terms like 'national security', 'public order' and 'public morals'. The law will likely improve the environment for developmental and charity-based organisations and the ability of non-political, less critical NGOs to function, but its many restrictive provisions - along with other existing, repressive legislation and the current state of emergency - will continue to pose threats to critical human rights organisations and HRDs. It is to be noted that many crucial details regarding the implementation of the law will be defined by the executive regulations to be issued by the Prime Minister within six months of the law's ratification.

1.5 Priority areas for support/problem analysis

Egypt has a fairly developed legal and institutional framework to fight corruption which is in line with international standards. The implementation of the existing framework however poses important challenges. The very broad anti-corruption strategy covering the period 2014-2018 has ended, but its action plan has only been partly implemented. Given the unprecedented repressive context for civil society, the strategic goals concerning the involvement of civil society or the private sector remain unattained. On 9 December 2018, Egypt has adopted a new anti-corruption strategy for the period 2019-2022. The evaluation and consultation process along the preparation of the second national anti-corruption strategy lacked transparency. In the action, emphasis will be put on the creation of a more conducive and inclusive anti-corruption environment that could integrate civil society and the private sector by developing, more generally, to the extent possible, the legislation related to access to information, whistle-blowers, and witness protection. Indeed, the country is yet to introduce laws to ensure witness and whistle-blowers' protection as well as access to information. The protection gap for

whistle-blowers has been identified as a key issue to be addressed by the UN implementation review group for the UNCAC first cycle review in 2015. In 2018, the views within the Parliament remained divided on whether a specific legislation is required on witness protection or whether this should be addressed through the upcoming revision of the criminal procedure code. Scarce financial and human resources also imply that strategic policy decisions cannot be taken without adequate complaint mechanisms providing information on the most pressing needs. A major priority area in the above aspects is therefore related to capacity and institutional building. Internal awareness should also be enhanced to maintain anti-corruption as well as ethical conduct and transparency promotion high on the agenda.

Supporting the Government of Egypt in its efforts to recover and adequately manage stolen assets is key in fighting corruption and promoting transparent and accountable governance. In the field of asset recovery and management, the legal and institutional frameworks need to be enhanced in line with international standards. Emphasis must be put on building sustainable structures for bilateral dialogue with Requested States (particularly within the EU) to facilitate the tracing, freezing, and recovery of assets linked to corruption. In spite of the promising financial prospects offered by the return of assets, the competent Egyptian authorities do not have the capacity to respond adequately to MLA requests and therefore require further technical assistance to achieve results. In addition, the two specialised UN-software already in place (1) goCASE in case management meant for law enforcement, investigative, and prosecution agencies and (2) goAML in financial crime, including money-laundering and terrorism financing, meant for Financial Intelligence Units (FIU's), need to be further developed (and complemented where needed), and additional specialised training provided.

The performance of the Parliament has been criticised and the legislation it has passed is deemed of poor quality. It fell short of balancing the powers between the Executive and the Legislative branches of the state. Oversight functions over the Executive and Independent State Bodies are hardly discharged. A strong Parliament is, however, essential to plan and implement the important economic political, and social reforms Egypt initiated in the aftermath of the 2011 Revolution. The needs to reinforce the overall capacities of the HoR towards more efficiency, reliability, and transparency in fulfilling its core legislative, representative, and oversight functions are enormous. The quality of the Committees' work is uneven and there is a general lack of expertise and good practices⁶. The parliamentary research service in charge of processing, synthesising and editing background materials needs improvement. Advanced software tools should be purchased to increase the efficiency of research group operations in providing assistance necessary for parliamentary debates to MPs and Committees. In the current, rather closed, Egyptian political context, it seems more feasible to deliver assistance to the Parliament through the Egyptian Parliamentary Training Center targeted at the permanent structures and staff of the Parliament rather than interacting directly with the MPs or the Committees. The permanent Secretariat plays a crucial role and represents a valid entry point in the current context.

2 RISKS AND ASSUMPTIONS

Level of risk **Mitigation measures** Risk The Egyptian High The situation will be closely monitored by the EU economic. Delegation. This risk will be partly mitigated by political and social context is amending the content/timeline of activities if and plagued by chronic when required. instability. In the foreseeable future, terrorist insurgency as well as social discontent due to economic reforms, may

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⁶ The Egyptian HoR estimates that only about 5% of the more than 3,700 staff of the Parliament's Secretariat are qualified for their jobs, ie most MPs cannot receive the level of assistance they would require.

feed increasing instability and lead to tightened security measures (cf. constant renewal of the state of emergency), which, in turn, can seriously impede the project implementation in the sensitive field of governance.		
Lack of real political will to fight corruption.	Medium	The EU Delegation has witnessed a renewed appetite for fighting corruption / money laundering / terrorism financing, notably in the wake of the latest protest of September 2019. The EU Delegation (EUD) will also ensure a high level of coordination with the donors involved in this field to maintain pressure on the Government of Egypt.
The current closed political context is not conducive to international cooperation with the Parliament. Egypt regularly uses the narrative of external influences interfering with Egyptian internal matters and politics.	High	A peer-to-peer approach is proposed through a twinning project, which will allow Egypt to choose the European Parliament(s), with which it wishes to cooperate, hence facilitating future cooperation. The project aims at reinforcing the internal governance of the HoR to instil democratic practices and accountable governance principles without interfering with the Parliament's political work.
Considering the current repressive political and legislative context, CSOs cannot engage with the HoR or play their role in monitoring anti-corruption policy.	High	To the extent possible, specific activities will directly target CSOs and the private sector to foster their active engagement in anti-corruption and access to the Parliament.

Assumptions

- 1. The government will continue to maintain control of the situation.
- 2. As corruption is also at the root of the 2011 Revolution and remains a serious concern for the population, it is assumed that this will remain an area of interest and concern for the Government of Egypt.
- 3. Peer to peer cooperation between EU Member States (EUMS) and the training centre of the HoR should ensure minimum access to MPs, MPs assistants, and Committees.
- 4. Despite the unprecedented repressive context for civil society, some CSOs can still operate and be associated to certain project activities without jeopardising their security.

3 LESSONS LEARNT AND COMPLEMENTARITY

3.1 LESSONS LEARNT

From 2011 until 2016 the EU financed the project 'Supporting Measures to Combat Corruption and Money Laundering, and to Foster Asset Recovery, in Egypt' (ref. CRIS 268-770) implemented by UNODC. Since 2015, the 'Preparatory Action to Support Arab Spring Countries to implement asset recovery' (ref. CRIS 344-285) has been ongoing and has been extended until 2020 (ENI/2018/400-698). Component 1 and 2 of this proposed project targeting the fight against corruption and asset recovery and management are designed based on a thorough analysis of experiences from these two projects recorded in result-oriented monitoring (ROM) reports and a final external evaluation in the case of anti-corruption. Lessons learned from these projects underline the relevance of a more focused

and targeted approach in both cases. The analysis shows that anti-corruption needs to focus on implementation aspects and challenges posed by the legal and institutional framework already in place and on further developing complaint mechanisms and continuing awareness-raising activities. The ROM exercise on asset recovery states that the intervention needs to continue at national level rather than at the regional level since national institutional set-ups differ in many respects and require different approaches. The proposed action will also focus on how seized and confiscated assets should be used to address development needs. The practices and mechanisms proposed flow from the lessons learnt and good practices identified in the above-mentioned regional pilot project and from other countries. Regarding implementation modalities and implementing partners, in the case of anticorruption, indirect implementation with UNODC has proven to be of limited efficiency and effectiveness resulting in severe project implementation delays and limited results. Consequently, a twinning project with EUMS is favoured, ideally combining the experience of older EUMS in repressing corruption while new EUMS can offer valuable recent experience in preventing corruption. Experience with peer-to-peer cooperation/twinning in the governance sector in Egypt is positive and welcomed by the Government in the area of combatting corruption. Besides, the regional pilot project implemented by UNICRI in the field of asset recovery has delivered rather positive results so far and experiences in cooperation with UNICRI are good. The General Prosecutor Office also requested the continuation of the cooperation with UNICRI in this field. Therefore, choosing UNICRI as implementing partner for this sub-component will allow UNICRI to build on progress achieved and on the already well-established relationships developed with officials within the justice sector of the Government of Egypt.

No previous EU support has been provided to the Egyptian Parliament. The proposed twinning with EUMS results from the sensitive nature of the project, where the provision of technical assistance through external consultants does not seem to promise success. Peer-to-peer cooperation with EU Parliaments or related institutions will allow Egypt to choose, among European Parliaments, its preferred partner(s) to build trust and allow for a smoother cooperation.

3.2 Complementarity, synergy and donor coordination

The proposed action in the field of anti-corruption builds on the results achieved under a recently completed project⁸ and follows up on the gaps identified during the final evaluation. The proposed action in the field of asset recovery and management will continue and complement the 'Preparatory Action to Support Arab Spring Countries to implement asset recovery' (ref. CRIS 344-285 & ENI/2018/400-698). Presently, ACA is receiving support from the African Development Bank (AfDB). ACA's newly established national training academy will also soon be receiving technical assistance from USAID. The Parliament is currently supported by AfDB with a series of training courses, while the UK suspended its support to the Parliament.

Synergies will be sought between the interventions in anti-corruption, asset recovery, and support to the Parliament, as all three actions contribute to democratic governance and accountability. There is no other ongoing EU support directly related to these three fields of intervention, but anti-corruption and asset recovery feature in the wider support the EU is offering to Egypt in public administration reform, public finance management, justice, and support to civil society.

Donor coordination in the field of governance is ensured through the sub-group entitled 'Democratic Governance Group' (DGG) under the UN-led Development Partners Group (DPG). The DGG is cochaired by the EU and USAID.

4 DESCRIPTION OF THE ACTION

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⁷ This has included technical advice that led to increased use of reconciliation (an alternative to the traditional, long criminal process) in key cases, and the recovery of over 400 million US dollars in stolen assets.

Supporting Measures to Combat Corruption and Money Laundering, and to Foster Asset Recovery, in Egypt '(ref. CRIS 268-770)

4.1 Overall objective, specific objective(s), expected outputs and indicative activities

Overall objective: To support effective, accountable and participatory governance

Component 1 – Support to the fight against corruption

Specific objective: To enhance the efficiency and effectiveness of the fight against corruption

- Output 1: A new anti-corruption strategic framework is in place
- Activity 1: Develop operational mechanisms of the new anti-corruption strategy (2018-2022)
- Activity 2: Set-up practical plans for the goals of the national strategy of anti-corruption (2018-2022)
- Activity 3: Provide the necessary support to review best practices in the sphere of laws, regulations and systems related to preventing and combating corruption
 - Output 2: A more inclusive and more comprehensive anti-corruption environment in the field of information systems and follow-up of international indicators is prepared
- Activity 1: A more inclusive and more comprehensive anti-corruption environment in the field of information systems and follow-up of international indicators is prepared
- Activity 2: Provide the necessary support to enhance capabilities in relation to information system and the rules of national dataset and geographical maps.
- Activity 3: Support national efforts in preventing and combating corruption, and cooperating with international institutions concerned with preparing and monitoring the indicators.
 - Output 3: Develop institutional, citizen and private sector capacity to report and monitor corruption
- Activity 1: Develop work systems in the service areas, including health, education and local authorities
- Activity 2: Organise workshops for CSOs and the private sector
- Activity 3: Develop study tours and exchange visits
 - Output 4: Awareness and prevention of corruption are enhanced
- Activity 1: Develop educational and cultural activities at school and university level
- Activity 2: Support awareness procedures within the public administration
- Activity 3: Support the organisation of media campaigns on the risks of corruption and the means of reporting about contraventions

<u>Component 2 – Support to the Public Prosecution's efforts in the recovery and management of assets and proceeds resulting from corruption offenses and other serious crimes</u>

Specific Objective: To strengthen mechanisms and capacity for asset recovery and management

• Output 1: The capacity of members of the Public Prosecution to investigate and prosecute crimes of corruption and other crimes and the capacity of members of the Public Prosecution and the National Committee for the Recovery of Funds and Assets from Abroad to trace, freeze, seize, confiscate and recover assets are improved

Activity 1: Organise study visits for exposure to EU best practices

- Activity 2: Organise and/or facilitate participation in workshops (including training of trainers) to strengthen capacity to trace, identify, seize, freeze and recover assets linked to corruption and other serious crimes
- Activity 3: Organise peer-to-peer missions to discuss the outstanding bilateral issues with relevant agencies abroad
- Activity 4: Further develop the GO-AML and GO-CASE software, and/or incorporate any additional relevant software where needed
- Activity 5: Carry out training on GO-AML and GO-CASE, or other software as needed
- Activity 6: Provide additional technical support and expert advice where needed
 - Output 2: The capacity of members of the Public Prosecution and the National Committee for the Recovery of Funds and Assets from Abroad to effectively manage the recovered assets is improved
- Activity 1: Technical advice to strengthen mechanisms for asset management
- Activity 2: Identify programmes and good practices for the use and distribution of recovered assets through workshops and peer-to-peer missions with multiple relevant counterparts
- Activity 3: Organise study visits to learn about European best practices in the field of recovered asset management
- Activity 4: Organise/facilitate participation in workshops (including training of trainers) to improve capacities for the use, distribution and management of recovered assets
- Activity 5: Develop a manual on effective asset management and provide training on its use
- Activity 6: Organise a conference on asset recovery

Component 3 – Support to the Egyptian House of Representatives (HoR)

Specific objective: To strengthen the democratic functioning of the Egyptian HoR

- Output 1: The capacity of the Parliamentary Training Institute (TI) is improved
- Activity 1: Assist the Parliamentary Training Institute in the preparation of the Institute's Human Resources Development Plan, assess and finance the training requirements and assist in capacity building.
- Activity 2: Develop the research capacity of the HoR via improving the analytical and informational capabilities of researchers and capacity building with the Parliamentary Training Institute
- Activity 3: Assess the training's requirements and provide capacity building accordingly to MPs' assistants and MPs, including new and women MPs through the support of the Parliamentary Training Institute in accordance with the plan established.
- Activity 4: Organise study tours for the MPs and the support staff of the HoR as agreed.
 - Output 2: The transparency of the work of the HoR and outreach to the citizens are increased
- Activity 1: Develop tools for communication
- Activity 2: Enhance the scientific publications of the Parliamentary Training Institute

4.2 Intervention logic

In the field of anti-corruption, the Government of Egypt is expressing the will to do more and in a more focused way to yield concrete results. It has consequently requested the assistance of several international donors including the EU. This shows a momentum to engage more genuinely with the Egyptian authorities in combatting corruption and offers good prospects for ownership. The action will have a clear focus on addressing implementation challenges of the legal and institutional anti-corruption framework. It will also advocate for the inclusion of important players such as CSOs, business organisations, and the Parliament to play an active role in policy-making and monitoring of

anti-corruption. A peer-to-peer approach is favoured to ensure more buy-in from the Egyptian authorities. The proposed implementation modality (twinning), expected results, and envisaged activities, are drawn directly from lessons learnt from recent independent monitoring (ROM) and evaluation missions⁹ and are based on needs expressed by the Egyptian counterparts.

In the field of anti-money laundering, asset recovery and management, the same approach has been adopted, based on the lessons learnt of the ongoing regional pilot project ¹⁰. The proposed action aims at applying identified good practices in a tailored manner to Egypt. As requested by the Prosecutor General Office, the project will provide high quality technical guidance and facilitate peer-to-peer expert missions focusing on pending cases to achieve concrete results. It will upgrade the legal and institutional framework, enhance the IT capacity of the competent authorities through the further development of state of the art anti-money laundering software tools and improve the capacity of police, prosecutors and judges, as well as financial and intelligence analysts. CSOs will be consulted to help identify the ultimate destination of seized and confiscated assets, which will directly contribute to mainstreaming the EU support to civil society. Eventually, transparent asset management mechanisms will be set up to enable a more efficient return of assets from foreign jurisdictions.

The Delegation will engage for the first time in cooperation with the Egyptian HoR. The Parliament remains a rather closed institution in times when Egypt uses the narrative of external influences interfering with internal matters. It also suffers harsh criticism for its lack of independence. Therefore, interacting with the Parliament will prove challenging. In view of the above, the project's intervention logic will focus mainly on the permanent structures and staff of the Parliament in order to instil democratic practices and principles of accountable governance. In difficult times and within a sensitive political environment, such a project has to be understood as a pioneer one requiring a flexible approach that can eventually open the door to further cooperation with other Egyptian institutions. The proposed implementation modality through a twinning project also represents a carefully chosen entry point to ensure MPs and assistants are motivated to participate with their peers in activities and should reinforce the internal governance of the HoR without interfering with the Parliament's political work.

4.3 Mainstreaming

In view of the key role played by civil society in holding governments accountable, its involvement will be ensured in all components, to the extent possible given the current context.

The project will also contribute to the achievements of specific objectives defined under the Gender Action Plan II (GAP II) for Egypt, in particular the objective 'Equal rights and the ability for women to participate in policy and governance processes at all levels'. The project will target male and female actors in the Parliament and the Egyptian society, and will address the importance of gender equality and gender-sensitive approaches across its activities, for example in relation to quality aspects of legislation.

The rights-based approach (RBA) principles underpin the proposed project. The RBA working principles are the following: applying all rights based on the legality, universality and indivisibility of Human Rights, participation and access to the decision-making process, non-discrimination and equal access, accountability and access to the rule of law, as well as transparency and access to information.

4.4 Contribution to Sustainable Development Goals (SDGs)

This programme is relevant for the Agenda 2030. It contributes primarily to the progressive achievement of SDG Goal 16 but also promotes progress towards Goal(s) 16.4, 16.5 and 16.6. This does not imply a commitment by the country benefiting from this programme.

¹⁰ ROM ref. C-344285

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⁹ Final Evaluation ref. ENI/2017/384-271 & ROM ref. C-268770

5. IMPLEMENTATION

5.1 Financing agreement

In order to implement this action, it is foreseen to conclude a financing agreement with the partner country.

5.2 Indicative implementation period

The indicative operational implementation period of this action, during which the activities described in section 4 will be carried out and the corresponding contracts and agreements implemented, is 72 months from the date of entry into force of the financing agreement.

Extensions of the implementation period may be agreed by the Commission's authorising officer responsible by amending this Decision and the relevant contracts and agreements; such amendments to this Decision constitute technical amendments in the sense of point (i) of Article 2(3)(c) of Regulation (EU) No 236/2014.

5.3 Implementation modalities

The Commission will ensure that the EU appropriate rules and procedures for providing financing to third parties are respected, including review procedures, where appropriate, and compliance of the action with EU restrictive measures¹¹.

5.3.1 Grants: twinning contract to 'Support to the Fight against Corruption' (direct management)

(a) Purpose of the grant

The twinning contract will contribute to achieve the objectives and results described in Section 4.1.

(b) Type of applicants targeted

In line with Article 4(10)(b) of Regulation (EU) No 236/2014, participation in Twinning calls for proposals is limited to public administrations of the EU Member States, being understood as central or regional authorities of a Member State as well as their bodies and administrative structures and private law bodies entrusted with a public service mission under their control provided they act for the account and under the responsibility of that Member State.

5.3.2 Grants: twinning contract to 'Support to the Egyptian House of Representatives' (direct management)

(a) Purpose of the grant

The twinning contract will contribute to achieving the objectives and results described in Section 4.1.

(b) Type of applicants targeted

In line with Article 4(10)(b) of Regulation (EU) No 236/2014, participation in Twinning (calls for proposals is limited to public administrations of the EU Member States, being understood as central or regional authorities of a Member State as well as their bodies and administrative structures and private law bodies entrusted with a public service mission under their control provided they act for the account and under the responsibility of that Member State.

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

5.3.3 Indirect management with an international organisation to 'Support to the Public Prosecution's efforts in the recovery and management of assets and proceeds resulting from corruption offenses and other serious crimes'

A part of this action may be implemented in indirect management with the United Nations Interregional Crime and Justice Research Institute (UNICRI). This implementation entails strengthening the mechanisms and capacity of the GoE for effective and transparent asset recovery and management. The envisaged entity has been selected using the following criteria: highly specialised expertise, past experience in Egypt and positive assessment of previous cooperation with the organisation. The regional pilot project implemented by UNICRI in the field of asset recovery has delivered rather positive results so far and the General Prosecutor Office requested the continuation of the cooperation with UNICRI.

The entrusted entity will carry out the budget-implementation tasks of tendering and contracting a set of services and supplies required for the achievement of the results as described in section 4 of this Action Document and concerning an important share of the total budget. The entrusted entity will put in place and implement the control and monitoring mechanisms necessary to guarantee the execution of service and supply contracts in line with EU regulations and standards.

UNICRI has been pillar assessed in 2015.

5.4 Scope of geographical eligibility for procurement and grants

The geographical eligibility in terms of place of establishment for participating in procurement and grant award procedures and in terms of origin of supplies purchased as established in the basic act and set out in the relevant contractual documents shall apply.

The Commission's authorising officer responsible may extend the geographical eligibility, in accordance with Article 9(2)(b) of Regulation (EU) No 236/2014, on the basis of urgency or of unavailability of products and services in the markets of the countries concerned, or in other duly substantiated cases where the eligibility rules would make the realisation of this action impossible or exceedingly difficult.

5.5 Indicative budget

	EU contribution (amount in MEUR)	Indicative third party contribution, in currency identified
<u>Component 1</u> – Support to the fight against corruption		
5.3.1 Call for proposals for a twinning contract to 'Support to the Fight against Corruption' (direct management)	1.5	0
<u>Component 2</u> — Support to the Public Prosecution's efforts in the recovery and management of assets and proceeds resulting from corruption offenses and other serious crimes		
5.3.4 Indirect management with UNICRI to strengthen Asset Recovery and Asset Management	2	0
<u>Component 3</u> 'Support to the Egyptian House of Representatives'		
5.3.2 Call for proposals for a twinning contract to 'Support to the Egyptian House of Representatives' (direct management)	1.5	0

Total 5	0
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5.6 Organisational set-up and responsibilities

ACA will be the counterpart of the twinning contract in 'Support to the Fight against Corruption'. The General Prosecutor Office will be the counterpart of the delegation agreement with UNICRI to 'Strengthen Asset Recovery and Asset Management'. The Parliament will be the counterpart of the twinning contract in 'Support to the Egyptian House of Representatives'. Other relevant institutions will be closely associated to the implementation as needed. The project will be governed by a Steering Committee (SC), which will oversee and guide the overall direction and policy of the programme. It shall meet twice a year but can be convened whenever the project implementation requires strategic decisions. The project SC shall be chaired by the Ministry of Investment and International Cooperation and made up of representatives of the following entities: ACA, the General Prosecutor Office, the Parliament and a representative of the EUD. The SC has the right to invite other stakeholders whenever deemed appropriate, including representatives of CSOs.

5.7 Performance and Results monitoring and reporting

The day-to-day technical and financial monitoring of the implementation of this action will be a continuous process and part of the implementing partner's responsibilities. To this aim, the implementing partner shall establish a permanent internal, technical and financial monitoring system for the action and elaborate regular progress reports (not less than annual) and final reports. Every report shall provide an accurate account of implementation of the action, difficulties encountered, changes introduced, as well as the degree of achievement of its results (outputs and direct outcomes) as measured by corresponding indicators, using as reference the logframe matrix (for project modality).

The report shall be laid out in such a way as to allow monitoring of the means envisaged and employed and of the budget details for the action. The final report, narrative and financial, will cover the entire period of the action implementation.

The Commission may undertake additional project monitoring visits both through its own staff and through independent consultants recruited directly by the Commission for independent monitoring reviews (or recruited by the responsible agent contracted by the Commission for implementing such reviews).

5.8 Evaluation

Having regard to the nature of the action, a mid-term and a final evaluation will be carried out for this action via independent consultants contracted by the Commission. The mid-term evaluation will be carried out for problem solving purposes. The final evaluation will be carried out for accountability and learning purposes at various levels (including for policy revision).

The Commission shall inform the implementing partner at least 15 days in advance of the dates foreseen for the evaluation missions. The implementing partner shall collaborate efficiently and effectively with the evaluation experts, and inter alia provide them with all necessary information and documentation, as well as access to the project premises and activities.

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

Indicatively, the Commission may conclude two contracts for evaluation services under a framework contract in the second year of implementation and one at the end of all action's components through other sources of funding.

5.9 Audit

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 audits or expenditure verification assignments for one or several contracts or agreements. This would occur through other sources of funding.

5.10 Communication and visibility

Communication and visibility of the EU is a legal obligation for all external actions funded by the EU.

This action shall contain communication and visibility measures which shall be based on a specific Communication and Visibility Plan of the Action.

In terms of legal obligations on communication and visibility, the measures shall be implemented by the Commission, the partner country, contractors, grant beneficiaries and/or entrusted entities. Appropriate contractual obligations shall be included in, respectively, procurement, grant contracts, and delegation agreements.

The Communication and Visibility Requirements for European Union External Action shall be used to establish the Communication and Visibility Plan of the Action and the appropriate contractual obligations.

Through other funds the EUD will ensure adequate visibility and communication to the programme starting from 2021.

APPENDIX - INDICATIVE LOGFRAME MATRIX (FOR PROJECT MODALITY)

The activities, the expected outputs and all the indicators, targets and baselines included in the logframe matrix are indicative and may be updated during the implementation of the action without an amendment to the financing Decision. The indicative logframe matrix will evolve during the lifetime of the action: new lines will be added for listing the activities as well as new columns for intermediary targets (milestones) when it is relevant and for reporting purpose on the achievement of results as measured by indicators.

	Results chain: Main expected results	Indicators	Baselines (incl. reference year)	Targets (incl. reference year)	Sources and means of verification	Assumptions
Overall objective: Impact	To support effective, accountable and participatory governance	- Corruption perception index - Governance perception index	Indexes for Egypt in 2019	Indexes for Egypt at the end of the project	- Transparency International Global Corruption Index -World Bank Governance indicators -Freedom House Country Report - Tahrir Institute for Middle East Policy - Egypt Parliament Watch	
Specific objective(s): Outcome(s)	S.O 1: To enhance the efficiency and effectiveness of the fight against corruption S.O 2: To strengthen mechanisms and capacity for asset recovery and management S.O 3: To strengthen the democratic functioning of the Egyptian HoR	- New strategy implemented and adequately monitored - Strengthened capacities to combat corruption - Effectiveness of anti-money laundering (AML) and asset recovery (AR) - Asset management (AM) mechanisms in place - Institutional & legislative capacities of the HoR - Transparency and outreach of the HoR	To be determined	To be determined	- Actions Plans developed / Strategy implementation reports - Standard legislature- keeping record - Official decisions on assets recovery - Official decisions on asset management - Project data on transparency and outreach of the HoR	
Outputs SO100	Output 1: A new anti-corruption strategic framework is in place	- Multi-annual and/or annual actions plans developed in line with the strategy and implemented	0	N. of action plans developed and implemented	Publication of action plans and regular implementation reports	Valid for all outputs: -Anti-corruption remains an area of concern for, and action of, the GoE.
Outpu	Output 2: A more inclusive and more comprehensive anti-corruption environment in the field of information	- Number of analytical reports on implementation of anti- corruption legislation	Prevailing legislation in 2019	Improved implementation records of anti-corruption (AC) legislation	Project data Captured by standard legislature-record	- Involvement of media, representatives of civil society,

	systems and follow-up of international indicators is prepared.	- New legislative proposals and amendments addressing deficiencies and areas of		Improved legislation in line with international & EU standards by the end of the	keeping	and the private sector possible without jeopardising their security
		improvements identified		project		- The level of participation to the multi-sectoral consultations
	Output 3: Institutional, citizen, and private sector capacity to report and monitor corruption is developed	- Complaints mechanisms developed & operational - Number of periodic reports issued by all national authorities fighting corruption; - Number of reports submitted by citizens and private sector; - Number of investigations conducted based on citizen and private sector reports;	N. of mechanisms in place, number of complaints (breakdown by origin of complaint), and investigations in 2019 (tbd)	Increased N. of mechanisms, complaints (breakdown by origin of complaint), and investigations by the end of the project (tbd)	Experts' analytical reports / institutions' reports	assures proper representation of the Egyptian society
	Output 4: Awareness and prevention of corruption are enhanced	- Codes of ethics developed in selected public institutions - Number of and performance in workshops held with selected public officials - Quality educational programs developed and proposed	Baseline for awareness in public institutions resulting from needs assessment	Target for awareness in public institutions resulting from needs assessment	- Project data - Official decisions on expanding university and school curricula to governance and anticorruption topics	
	Output 1: The capacity of members of the Public Prosecution to investigate and prosecute crimes of corruption and other crimes and the capacity of members of the Public Prosecution and the National Committee for the	- New legislative and regulatory proposals and amendments addressing current deficiencies and areas of improvements identified through consultation and analytical reports.	Existing 2019 legal and regulatory framework	Legal and regulatory framework in line with EU and international guidelines	Captured by standard legislature-record keeping	Valid for all outputs: AML/AR/AM remain and an area of interest for, and action of, the GoE.
Outputs SO 2	Recovery of Funds and Assets from Abroad to trace, freeze, seize, confiscate and recover assets are improved.	- Quality of work through incorporation of technical advice of workshops/study tours - Pending cases developments	- Workshops performance at project start	- Workshops performance at project end	Valid for both outputs: Direct feedback from AML/AR/AM	- Involvement of representatives of civil society possible without
Outp		- Needs for GO-CASE and GO-AML software expansion addressed - Quality of work through optimal use of GO-CASE and GO-AML	- Evolution of pending cases in 2019 - State of play of GO-CASE and	- Evolution of pending cases in 2017at project end - GO-case allows proper case management by project end	practitioners and/or GoE officials - Tracking survey of workshop participants - Official data from	jeopardising their security
		- Number of ML cases autonomously initiated by GoE	GO-AML in 2019 - Number of ML	- GO-AML brings AML fight up to best IT standards by project end - Number of ML cases	relevant authorities operating GO-CASE / GO-AML - Official data from the	

	Output 2: The capacity of members of the Public Prosecution and the National Committee for the Recovery of Funds and Assets from Abroad to effectively manage the recovered assets is improved.	- Needs of AM in Egypt identified and addressed - Social programmes benefiting from recovered assets identified	cases initiated in 2019 - No AM mechanisms in place in 2019	- AM mechanisms in line with EU/international practices in place and address Egyptian needs by project end	General Prosecutor Office - Official decisions from AM institution	
Outputs SO.3	Output 1: The capacity of the Parliamentary Training Institute (TI) is improved	- Number of analytical reports on legislative proposals provided by staff to committees - Increased satisfaction of MPs with staff support - Improvement in the quality of work through incorporation of expert advice provided by support staff - Quality of legislative analysis and amendments presented - Use of oversight instruments & quality of oversight process improved (more in-depth reports; increased frequency of formal opportunities provided for CSOs input) - Number and nature of constituent interactions	Situation prior to support provided (tbd)	Situation after support provided (tbd) tbd	- Standard legislature record keeping - Focus groups and/or satisfaction surveys -Analytical reports by the project - Civil society reports	Valid for all outputs: Peer to peer cooperation between EU Member States (EUMS) and the training centre of the Parliament ensures minimum access to MPs, MPs assistants, Committees, and HoR support staff.
		-Human Resources Development Strategy developed - Channelling/ editing of background material for MPs	0 tbd	Strategy available		
	Output 2: The transparency of the work of the HoR and outreach to the citizens are increased	Number of informed stories on parliamentary work in print, online and broadcast media Communication strategy effectively implemented and monitored	tbd 0	tbd Strategy available		