
HUMANITARIAN IMPLEMENTATION PLAN (HIP)

DIPECHO South America

The activities proposed hereafter are still subject to the adoption of the financing decision ECHO/WWD/BUD/2013/01000

0. MAJOR CHANGES SINCE PREVIOUS VERSION OF THE HIP

Several successful tools and practices have been developed through the ECHO DRR programmes (DIPECHO and Drought Resilience Initiative) in the Latin America and Caribbean (LAC) region that enhance livelihood protection. As livelihood protection is a relatively new component in these programmes, there is a need to share experiences and evidence on these successful practices and tools. A regional training and exchange session with implementing partners involved in this issue will allow this information to be compiled and disseminated and will enhance knowledge and information, and provide tools and opportunities for advocacy. This is key to enhancing resilience in the face of natural disasters, providing knowledge and skills about which prevention or mitigation measures are most effective. For this reason, the allocation of this HIP is increased by EUR 36 130.

1. CONTEXT

Due to its geography, geology and climate South America is exposed to a wide range of disasters caused by hydro-meteorological and related hazards (including floods, landslides, mudflows, avalanches and windstorms), geological events (earthquakes, volcanic eruptions, tsunamis, etc.), droughts and related crises (including extreme temperatures and wildfires). Over the past six years, hydro-meteorological related disasters have proved to be the most recurrent in the region.

The most dramatic manifestation in the region is the El Niño event, attributable to warming in the eastern and central Pacific¹. Floods are very frequent in South American countries, not only due to the El Niño phenomenon, but also commonly generated by climatic anomalies. According to the 2004 United Nations Development Programme (UNDP) report "Reducing Disaster Risk: a challenge for development", the annual average number of people exposed to floods, considering the registered data from 1980-2000, is estimated at more than 48 million in South America. In 2007, more than one million people were affected by floods, mainly in Brazil, Bolivia and Peru. The situation was even more severe in 2008; Peru, Brazil, Argentina, Colombia suffered floods, as well as Bolivia and Ecuador where the situation was acute (more than 600,000 and 350,000 people respectively were affected and in need of humanitarian assistance). In 2012, more than 1.2 million people were affected by floods and landslides in Bolivia, Brazil, Colombia, Ecuador, Peru and Paraguay, caused by exceptional levels of rainfall in the Andean region.

¹ Some experts estimate a high probability of a strong El Niño event (comparable to El Niño 1982-83) during the 2009-2015 period. The 1997-98 El Niño did not generate a high number of casualties but caused significant economic losses in the South American region amounting to USD 7.5 million. Scientists expect that a moderate episode of El Niño will occur at the end of 2012.

The region is particularly vulnerable to earthquakes. The most significant registered in the last decade are: Chile February 2010 which was the 5th most powerful recorded on the Richter scale (8.8)²; Peru – Ica 2007 and Arequipa 2001³.

Many volcanoes are active: in Ecuador, there were two consecutive eruptions of the Tungurahua volcano in 2006. During 2008, 2009, 2010 and 2011 Tungurahua and Reventador volcanoes presented levels of activity which caused concern. In April 2006, the Ubinas volcano eruption in Peru led to an evacuation process. In Colombia, concerns linked to the Galeras and Huila volcanoes are ongoing and Nevado del Ruiz erupted in 2012. In Chile, two volcanoes - the Llaima and the Chaitén - started an eruption process in 2008.

Cold waves affect certain areas of the region in a recurrent and increasing manner, particularly affecting the Peruvian and Bolivian Highlands. Since 2007, Peru and Bolivia have been affected by extreme cold temperatures and hailstorms affecting populations living in high altitude areas, undermining livelihoods and necessitating humanitarian assistance. This phenomenon is linked to the effects of climate change. According to the abovementioned UNDP report, climate change will generate lasting and cumulative stresses and shocks.

Drought, also linked to climate change, is a recurrent slow-onset disaster that affects the El Chaco region (Bolivia, Paraguay, Argentina, and Brazil) and the Andean highlands (Bolivia, Peru, Colombia and Ecuador). The number of droughts is on the rise, affecting 1.2 million people in Brazil, Bolivia, Paraguay and Peru during the 2000-2010 period and entailing heavy crop and livestock losses and shortages of safe water for human consumption.

Scientific predictions and evidence indicate that global climate change may further increase the number of extreme hydro-meteorological events, creating more frequent and intensive natural hazards such as floods, droughts, glacier lake outburst flows, cold waves and windstorms⁴.

Additional threats such as environmental degradation, inadequate land planning, inappropriate agricultural practices and uncontrolled exploitation of natural resources will continue to make thousands of people more vulnerable to natural hazards. In the last three decades, the rapid rise of the urban population from 30% to 75% has further increased the number of disaster-prone areas due to a lack of urban planning and strong demographic pressure and will certainly further reinforce the current vulnerability.

Vulnerability indicators at national level in many countries of South America may be considered medium level⁵. However, social disparities are among the highest in the world. Latin America and the Caribbean is the region of the world with the greatest

² Despite the relatively low number of deaths (521 is the official figure), destruction was enormous; 75% of the Chilean population lives in the affected regions, and the Government of Chile estimated damage of USD 30bn (compared to estimated damage of USD 11bn from the 2010 Haiti earthquake).

³ In Ica, 519 people died and over 430,000 were severely affected. In Arequipa, 240 died and 320,000 were affected.

⁴ According to CRED (Centre for Research on the Epidemiology of Disasters) and ICHARM (International Centre for Water Hazard and Risk Management under the auspices of UNESCO), over the last 10 years, the number of hydro-meteorological events has dramatically increased.

⁵ **2011 UNDP Human Development (HD) Index:** two South American countries are ranked in the first category (Very High HD) – Chile 44th and Argentina 45th out of 47 countries in that category; 6 are ranked in the second category: Uruguay 48th, Venezuela 73rd, Peru 80th, Ecuador 83rd, Brazil 84th, Colombia 87th; while Paraguay (107th) and Bolivia (108th) are ranked in the third category. **2010-2011 GNA (Vulnerability Index and Crisis Index):** vulnerability index: 1 (Argentina, Chile, Brazil, Uruguay, Venezuela); 2 (Bolivia, Ecuador, Colombia, Peru, Paraguay); Crisis index: 0 (Argentina, Brazil, Uruguay, Venezuela); 2 (Peru, Paraguay); 3 (Bolivia, Chile, Ecuador, Colombia,)

inequality with respect to income, and with huge disparities in access to education, health, water and electricity and opportunities; although poverty and inequality have decreased recently in some Latin America countries as a result of strong growth and innovative social programmes. Even within relatively well-off countries, certain regions suffer from very high levels of vulnerability⁶. Social inequalities are particularly pronounced in Bolivia, Colombia, Paraguay, Brazil⁷, Chile and Argentina⁸.

The damage caused by natural disasters in the region is expected to increase from an annual average of 1.5% of Gross Domestic Product (GDP) over the last 30 years to 5% for the period 2000-2014.⁹

Despite the awareness of disasters and the political commitment of many South American countries, Disaster Preparedness (DP) is not yet a full strategic priority for many of the national and local authorities. A vision or a proper implementation of disaster risk reduction (DRR) measures is not yet fully present in most countries, and the focus still tends to be on disaster response. Proactive risk reduction policies are in general rather weak, for a series of reasons such as excessive centralisation whereby regional and local authorities lack capacity; territorial inequalities whereby some regions even in the same country may attain high development standards while others are in situations of poverty and underdevelopment; low human capital at regional, local and community levels, lacking training and knowledge on DRR; information problems that cloud the prospect for consensus on approaches to take; lack of public visibility in DRR as opposed to response to emergencies; budgetary and administrative constraints.

Consequently the ability of these countries to cope with disasters is weak, particularly at local level where many communities and local institutions lack awareness, knowledge, expertise, resources and mandate. This is clearly demonstrated, for instance, in the immediate response following an emergency and in events occurring in remote areas, where several countries (in particular the Andean countries and Paraguay) regularly rely on international assistance to respond to natural disasters, rather than promoting themselves preparedness and prevention activities. In such a scenario, the lack of resilience of populations, institutions, basic services (commonly ruptured during natural disasters) and other infrastructure results in vulnerabilities and losses (both in lives and assets lost) that in many instances could be mitigated or avoided. The lack of investment in prevention and mitigation measures to cope with natural disasters reinforces the need to intervene in disaster preparedness.

2. HUMANITARIAN NEEDS

(1) Affected people/potential beneficiaries

There is increasing awareness of the importance DRR in the region, with new policies as well as DRR laws and regulations being developed in Chile, Colombia, Ecuador, Peru and Paraguay; however, local communities in disaster prone areas are still exposed to risk. Institutions involved in disaster risk reduction/disaster management have

⁶ In the Risk indicators project report of the Inter-American Development Bank (IDB) – University of Colombia Institute for Environmental Studies (UNC/IDEA), Argentina came out with a less favourable Local Disaster Index than Ecuador, Colombia and Peru.

⁷ 31% of the total population (i.e. 54 million people) live below the poverty line in Brazil.

⁸ UNDP 2011 Report on Human Development: Gini coefficient equal to 0.43 in Bolivia, 0.47 in Colombia, 0.50 in Paraguay, 0.57 in Brazil, 0.65 in Chile and 0.64 in Argentina – as compared to for example 0.94 in Norway, the top ranking country for equality.

⁹ Centre for Economic and Environmental Studies.

insufficient capacities and/or resources, as in many cases they do not receive adequate support from their governments. Economic problems together with short term priorities have led to DRR not being considered a priority. Although in some cases economic resources are made available to local authorities to tackle DRM (Disaster Risk Management) issues, there is a lack of capacity as to how to use the funds. As a consequence, many areas are in a situation of permanent potential but foreseeable disaster. Currently the achievement of DRR goals requires international support, for communities and institutions and to trigger, accompany and complement national DRM processes.

The DIPECHO programme will focus on local communities in disaster prone areas and on institutions involved in disaster risk reduction/disaster management. Priority will be given to those communities with the highest risk levels and the lowest coping capacities, which are most exposed to natural disaster.

It is estimated that around 1 million direct beneficiaries will be targeted under this Action Plan.

Apart from these areas, interventions in urban surroundings highly exposed to disasters will also be considered. New areas and populations will be targeted under this DIPECHO Action Plan, although in some cases consolidation of previous actions may be considered.

Actions will be considered in the following countries: Argentina, Bolivia, Brazil, Chile, Colombia, Ecuador, Paraguay, Peru, Uruguay and Venezuela.

Priority will be given to:

1. *Hydro-meteorological hazards*: Floods, drought and extreme temperatures principally in Bolivia, Paraguay, Peru, Colombia, Ecuador, and in some measure in Argentina, Brazil, Uruguay and Venezuela.
2. *Geophysical hazards*: volcanic eruption, earthquakes and landslides will be also considered as a priority in Colombia, Ecuador and Peru and in some measure in Argentina, Bolivia, Chile and Venezuela

When relevant, multi-hazard projects will be encouraged. The European Commission's Directorate-general for Humanitarian Aid and Civil Protection (DG ECHO) will continue to promote joint initiatives, alliances, synergies and consortiums of its partners in each country, in multiple countries, and/or regionally.

A key objective will be advocacy towards local/national actors and other pertinent stakeholders in order to integrate a risk management approach.

Partners will be encouraged to build synergies with development initiatives funded by the EU and other donors which target the same geographical areas or address similar hazards.

All actions must be aligned with national and/or regional DRR/disaster management legal, policy and planning frameworks and contribute to their implementation and consolidation. Coordination must be assured with national authorities responsible for disaster management.

(2) Description of most acute humanitarian needs

Lessons learned from the repeated and recurrent disasters in South America (whether large or small-scale) and from the implementation of previous DIPECHO Action Plans in the region have confirmed the need to put into place effective and efficient early warning systems, enforce building codes, prepare communities to react in the first hours of a disaster, train people, organise awareness campaigns, mitigate the impact of disasters and carry out advocacy towards all relevant stakeholders. In most of the countries where DRM is being decentralised to municipalities and sub-national institutions, capacities need to be strengthened at these levels in order to enable them to design appropriate emergency and DRR plans as well as to access public resources to make them feasible and sustainable. These types of activities will be carried out in the framework of the projects financed under the Action Plan 2013-2014.

A specific emphasis will be put on regional cooperation, exchange of information, capacity building and training and advocacy at national and regional level.

More concretely, at a local level there is a need for the following actions:

- a) Local disaster management components: targeting local actors in disaster prone areas: early warning systems, mapping and data computerisation, local capacity-building, training.
- b) Institutional linkages: targeting institutions involved in disaster management/disaster risk reduction at regional, national and sub-national levels with special emphasis in Municipalities: advocacy, facilitation of coordination, institutional strengthening.
- c) Information, Education, Communication, targeting direct and indirect beneficiaries: awareness raising among the general public, education and dissemination.
- d) Small-scale infrastructure and services, at community level: infrastructure support and mitigation works, reinforcing critical infrastructure, operation and maintenance systems; non-structural mitigation activities.
- e) Stock-building of emergency and relief items: targeting the reinforcement of the response capacity of local actors and institutions in disaster-prone areas in view of contributing to ensuring an adequate response to natural disaster by strengthening the response capacity in the early hours and days of a disaster.
- f) Livelihoods and economic assets protection: supporting direct and indirect beneficiaries to adapt, prepare or protect their livelihoods against natural disasters.

3. HUMANITARIAN RESPONSE

(1) National/local response and involvement

Despite existing knowledge of natural disasters and the political commitment of many South American countries, DP is not yet a full strategic priority for many of the national authorities. Nevertheless, during the last two years awareness has grown and important steps have been taken in many countries to improve DRR legislation and decentralise

risk management to local governments. But absence of technical knowledge and local implementation capacity means that communities are not yet benefitting from this progress. The lack of public visibility and understanding of disaster risk reduction, as opposed to visibility generated during emergency response, is another factor discouraging authorities from committing further funds to DRR actions at local, regional and national level.

(2) International Humanitarian Response

As in previous DIPECHO Action Plans, continuous support will be given for the implementation at country level of UN strategies such as Resilient Cities (Urban DRR), Safe Hospitals, Safe Schools as well as the implementation of the Hyogo Framework for Action (particularly the monitoring component). DRR components of Climate Change Adaptation strategies will also be explored.

The DIPECHO Action Plan for South America will continue to encourage close coordination with key sub-regional actors such as the Andean Committee for Disaster Prevention and Management (CAPRADE) and the MERCOSUR¹⁰.

Coordination with other development partners and donors, and institutions such as the World Bank, Inter-American Development Bank, Swiss Cooperation, Spanish Cooperation, Office of U.S. Foreign Disaster Assistance (OFDA), Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ), Japan International Cooperation Agency (JICA), etc. will be encouraged both geographically and per sector in order to avoid overlapping and promote synergies.

(3) Constraints and DG ECHO response capacity

Access to the areas of intervention does not generally present any major constraint, with some exceptions:

- Criminality in most peri-urban areas of South America is high, and the situation is getting worse in many cities (e.g. of Ecuador and Venezuela). Activities to be carried out in these areas can imply certain security risks to the partners' staff. Considering that some of these zones are among the most vulnerable to natural disasters and where many operations are expected to be carried out, it should be considered that access remains difficult in these areas and specific security measures have to be taken by the partners.
- Security problems are also an issue in some areas of Colombia affected by the conflict, where access is frequently problematic as well in borders between countries. Social conflicts as the ones happened in Bolivia and Peru due to indigenous protests can also be a concern. In previous Action Plans, some operations experienced significant delays due to this fact.

The likelihood of heavy rains, floods and other hazards in some areas can result in the isolation of some remote communities for relatively long periods of time, affecting the normal development of activities.

¹⁰ Mercado Común del Sur (Argentina, Brazil, Paraguay, Uruguay and Venezuela)

Frequent political turnover in the region can hamper the effectiveness of some actions which require the involvement of local or national authorities. Lack of involvement of authorities could undermine the continuity/sustainability of DRR actions.

Social and/or political instability in some countries could disrupt the projects and result in suspensions.

There are sufficient potential partners in the region with appropriate technical and operational capacity to carry out the activities foreseen and achieve the objectives of the Action Plan.

Absorption capacity does not present any problem considering the level of needs and demand together with the existing capacities on the ground.

The efficiency of the actions remains variable due to the variety of partners and contexts in which operations will be implemented.

(4) Envisaged DG ECHO response¹¹

The added value of DG ECHO interventions in South America can be summarized as follows:

- Strengthening articulation of communities with local, regional and national authorities.
- Promoting scaling up of good practices at regional level and facilitating exchanges among beneficiary countries.
- Complementing and supporting efforts of national authorities.
- Triggering and accompanying processes at local, regional and national level.
- Action Plans consist of a balance between national, multi-county and regional projects; which means that the experience gained at community level can inform national and regional levels.
- DIPECHO regional projects provide a forum for interchange of best practices and common approaches, otherwise lacking.

For further details on sectors of intervention and priorities see information provided above under section 2 and in "Operational Recommendations for DG ECHO potential partners wishing to submit proposals for the DIPECHO Action Plan 2013-2014 for South America".

Expected results of humanitarian aid interventions.

- Better prepared communities and strengthened local, regional and national institutions to face disasters; thus reducing the vulnerability of the most vulnerable population.

¹¹ This response takes account of DG ECHO's operational policies http://ec.europa.eu/echo/policies/strategy_en.htm and "Operational Recommendations for DG ECHO partners wishing to submit proposals for the Seventh DIPECHO Action Plan for South America".

- Wider awareness and advocacy regarding the benefits of adopting preventive approaches to disaster management.

4. LRRD¹², coordination and transition

(1) Other DG ECHO interventions

Strengthening resilience to drought

- Paraguay and Bolivia (Chaco region): July 2011, 18 months, EUR 3,000,000

Regional Emergency Response decision 2012:

- Floods: May 2012 – duration 12 months, amount EUR 5,000,000.00. Implementation area: Ecuador, Peru, Bolivia, and Paraguay.

Bolivia:

- Supported under Small Scale Disasters (SSD) decision:
 - Floods: April 2011 - duration 6 months, amount EUR 200,000. Implementation area: Cochabamba (Chapare region).
 - Floods: April 2012 – duration 6 months, amount EUR 200,000. Implementation area: Oruro
 - Cold Wave: August 2011 - duration 4 months, amount EUR 200,000. Implementation area: Potosí.
 - Landslides: December 2010 – duration 6 months, amount EUR 200,000. Implementation area: La Paz
- Emergency response:
 - Drought: November 2010 – duration 10 months, amount EUR 1,500,000. Implementation area: Tarija, Chuquisaca, and Santa Cruz.
- IFRC Disaster Relief Emergency Fund (DREF) – Floods: February 2010 – duration 3 months, amount EUR 99,995. Implementation area: Beni, Cochabamba, Chuquisaca, La Paz and Santa Cruz.

Peru:

- SSD – Floods: March 2011 – duration 5 months, amount EUR 200,000. Implementation area: Ucayali
- DREF – Floods and landslides: February 2010 – duration 3 months, amount EUR 92,800. Implementation area: Cusco department.
- Emergency response– Floods and landslides: April 2010 – duration 12 months, amount EUR 2,000,000. Implementation area: Cusco and Puno.

¹² Linking Relief, Rehabilitation and Development

- Emergency response – Floods: August 2011 – duration 6 months, amount EUR 2,000,000.00. Implementation area: Ucayali

Paraguay:

- DREF – Cold wave: August 2011 – duration 3 months, amount EUR 130,545.60. Implementation area: Itapúa.

Chile:

- Primary Emergency – Earthquake: February 2010 – duration 3 months, amount EUR 3,000,000. Implementation area: Regions V to IX (Valparaíso to Araucanía).
- Small Scale Response decision – Earthquake: October 2010 – duration 6 months, amount EUR 200,000. Implementation area: Maule region.
- DREF – Extreme weather – August 2011 - duration 3 months, amount EUR 60,000. Implementation area: Region of Araucanía.

Colombia

- Floods: December 2010 – duration 12 months, amount EUR 2,000,000.00. Implementation area: Colombia.
- SSD – Floods: December 2011 – duration 6 months, amount EUR 200,000. Implementation area: Colombia, Valle del Cauca department, Buenaventura municipality.
- SSD – Floods: March 2012 – duration 9 months, amount EUR 200,000. Implementation area: Colombia, Nariño department, El Charco municipality.
- HIP – Floods: April 2012 – duration 3 months, amount EUR 170,000. Implementation area: Colombia, Nariño department, Barbacoas municipality.

Brazil:

- SSD – Floods and landslides: January 2011 – duration 6 months, amount EUR 200,000. Implementation area: Rio de Janeiro.
- SSD – Floods: April 2012 – duration 6 months, amount EUR 200,000. Implementation Area: State of Acre.

Argentina:

- SSD – volcano eruption: August 2011 – duration 4 months, amount EUR 200,000. Implementation area: State of Miranda and Capital Caracas.

Venezuela:

- SSD – floods landslides: December 2010 – duration 6 months, amount EUR 200,000. Implementation area: Provinces of Neuquén and Río Negro.

Epidemics:

- Bolivia and Peru: April 2011 – duration 6 months, amount EUR 350,000.
- DREF - Bolivia (Beni) and Peru (Loreto): February 2011 – duration 3 months, amount EUR 34.372,00.

(2) Other services/donors

The main development partners interested in investing in DRR in the region are the Spanish agency for international cooperation and development (AECID), the Office of US Foreign Disaster Assistance (OFDA), the Inter-American Development Bank (IADB), the World Bank, Japanese Cooperation (JICA); DG ECHO is in permanent contact with all of these actors.

(3) Other concomitant EU interventions

Although EU cooperation will be re-oriented in the region whereby bi-lateral funding will end in most South American countries with the exception of Paraguay and Bolivia, thematic lines and sector programmes have potential to build synergies and increase the sustainability of DG ECHO initiatives. In several countries, the Non-State Actors Budget Line has started to integrate DRR as one of the priority axes. Climate Change and Environment can also be a vehicle to upscale good practices developed in DG ECHO projects.

(4) Exit scenarios.

At country level it is not feasible to plan for an early exit strategy due to the geographical diversity of South America, which means that there is a great variety of hazards and risks which have not been properly addressed at local, regional or national level. International support remains necessary to accompany this process. DIPECHO Actions, despite their small size (broadly an average EUR 600,000 per year per country in the main targeted countries – Peru, Paraguay, Ecuador, Bolivia and Colombia - and less in the others have a significant triggering impact on the process of developing DRR at national and regional level, and provide an important forum for interchange of lessons learned and best practices.

In the case of the Chaco in Bolivia and Peru, DG ECHO has been funding since 2011 an initiative to increase resilience to recurrent drought, which aims also to compile and systematise current and past DIPECHO experiences with the objective of advocating for drought management good practices towards development donors and local institutions. This provides a window for successful hand over and an appropriate exit strategy.

Given the diversity of the countries concerned, in order to define its exit strategy DG ECHO will need to analyze in depth the degree of risk and the coping capacities of the countries versus the interest of other development partners or EU services to continue addressing these themes.

However, there are specific hazards in some areas that have been successfully approached and some areas within countries which have developed successful DRR strategies through DIPECHO programmes and which now need little DG ECHO support, while representing an opportunity to replicate or promote at national and regional level.

5. OPERATIONAL AND FINANCIAL DETAILS

The provisions of the financing decision ECHO/WWD/BUD/2013/01000 and the general conditions of the Partnership Agreement with the European Commission take precedence over the provisions in this document.

(1) Contacts¹³

Operational Unit in charge: DG ECHO/B5

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(2) Financial info

Indicative Allocation: EUR 12,055,130

DIPECHO: Dis.Prep.: EUR 12,055,130

¹³ The Single Forms must be submitted to DG ECHO using APPEL.

(3) Proposal Assessment

- a) Description of the humanitarian aid interventions relating to this assessment round: Interested parties are invited to submit Single Forms for response to the needs and sectors of intervention identified in section 2 and 3.4 of this HIP.
- b) Indicative amount to be allocated in this round of proposals: up to EUR 12,055,130.
- c) Costs will be eligible from 01/03/2013¹⁴. Actions will start from 15/04/2013.
- d) The expected initial duration for the Action is up to 18 months.
- e) Potential partners: All DG ECHO Partners.
- f) Information to be provided: Single Form.
- g) Indicative date for receipt of the above requested information: by 21/01/2013.¹⁵
- h) Commonly used principles will be applied for the assessment of proposals, such as quality of needs assessment, relevance of intervention sectors, and knowledge of the country/region. See also Operational Recommendations for DG ECHO partners wishing to submit proposals for the DIPECHO Action Plan for South America 2013-2014 available at http://ec.europa.eu/echo/funding/decisions_en.htm.

¹⁴ The eligibility date of the Action is not linked to the date of receipt of the Single Form. It is either the eligibility date set in the Single form or the eligibility date of the HIP, what ever occurs latest.

¹⁵ The Commission reserves the right to consider Single Forms transmitted after this date, especially in case certain needs/priorities are not covered by the Single Forms received.