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ANNEX II

to the Commission Implementing Decision on the 2023 annual action plan for the global threats part of the thematic programme on peace, stability and conflict prevention

Action Document for Chemical, Biological, Radiological and Nuclear (CBRN) Risk Mitigation

ANNUAL PLAN

This document constitutes the annual work programme within the meaning of Article 110(2) of the Financial Regulation, within the meaning of Article 23 of the NDICI-Global Europe Regulation.

1 SYNOPSIS

1.1 Action Summary Table

1. Title	Chemical, Biological, Radiological and Nuclear (CBRN) Risk Mitigation
CRIS/OPSYS business	OPSYS/CRIS ¹ number: ACT-61667
reference	Financed under the Neighbourhood, Development and International Cooperation Instrument -
Basic Act	Global Europe (NDICI-Global Europe) Regulation
2. Team Europe	No
Initiative	
3. Zone benefiting from	The action shall be carried out worldwide.
the action	
4. Programming	Peace, Stability and Conflict Prevention Thematic Programme 2021 – 2027
document	
5. Link with relevant	Area of intervention: Global, trans-regional and emerging threats
MIP(s) objectives /	Priority 5 - Mitigation of threats posed by intentional, accidental or naturally occurring release of
expected results	chemical, biological, radiological and nuclear (CBRN) materials or agents and related risks to
	installations or sites
	Specific objective 1: Improved detection of and mitigation against risks related to CBRN materials
	or agents and risks related to installations or sites through the EU CBRN Centres of Excellence
	Initiative and associated actions.
	Specific objective 2: Enhanced capacities on strategic trade controls of dual-use goods
	Specific objective 3: Promote a culture of safety and responsible science and engineering
	PRIORITY AREAS AND SECTOR INFORMATION
6. Priority Area(s),	Global, trans-regional and emerging threats
sectors	152 - Conflict, Peace & Security
7. Sustainable	Main SDG: 16 (Peace and Justice Strong Institutions)
Development Goals	Other SDG: 13 (Climate Action)
(SDGs)	
8 a) DAC code(s)	15210 – Security system management and reform - 100 %
8 b) Main Delivery	PUBLIC SECTOR INSTITUTIONS – 10000
Channel	

¹ Depending on the availability of OPSYS at the time of encoding, a provisional CRIS number may need to be provided.

9. Targets	\Box Migration						
J' Turgets	\Box Climate						
	□ Social inclusion and Human Development						
	\Box Gender						
	□ Biodiversity						
	\Box Education						
	Human Rights, Democracy and Governance						
10. Markers			Significant	Principal			
(from DAC form)	General policy objective @	Not targeted	objective	objective			
	Participation development/good governance			\boxtimes			
	Aid to environment @	\boxtimes					
	Gender equality and women's and girl's	\boxtimes					
	empowerment						
	Trade development						
	Reproductive, maternal, new-born and child health						
	Disaster Risk Reduction @						
	Inclusion of persons with Disabilities @						
	Nutrition @	\boxtimes					
	RIO Convention markers	Not targeted	Significant objective	Principal objective			
	Biological diversity @	\boxtimes					
	Combat desertification @	\boxtimes					
	Climate change mitigation @	\boxtimes					
	Climate change adaptation @	\boxtimes					
11. Internal markers and Tags:	Policy objectives	Not targeted	Significant objective	Principal objective			
-	Digitalisation @	\boxtimes					
		YES	NO	/			
	digital connectivity		\boxtimes				
	digital governance		\boxtimes				
	digital entrepreneurship		\boxtimes				
	digital skills/literacy						
	digital services						
	Connectivity @		\boxtimes				
		YES	NO				
	digital connectivity	\boxtimes					
	energy	\boxtimes					
	transport health	\boxtimes					
	education and research	\boxtimes					
		\square		<u> </u>			
	Migration @ (methodology for tagging under development)						
	Reduction of Inequalities @ (methodology for marker and tagging under	\boxtimes					
	development)	<u> </u>	<u> </u>				
	Covid-19	\boxtimes					
10 A	BUDGET INFORMATION			CLODAL			
12. Amounts concerned	Budget line(s) (article, item): BGUE-B2023-14.0202 AND TRANSREGIONAL THREATS	50 – STABILIT I	AND PEACE -	GLUBAL			
	Total estimated cost: EUR 37 000 000	0.000					
	Total amount of EU budget contribution: EUR 37 000 MANAGEMENT AND IMPLEMENTA						
13. Type of financing	Project Modality						
10. I JPC Of Infuncting	Direct management through: Procurement						
	Indirect management with the entity(ies) to be select	ted in accordance	with the criteria	set out in			
	section 4.3.2						

1.2 Summary of the Action

This action will contribute to achieving the three specific objectives as set out in the multiannual indicative programme:

- 1. Improved detection of and mitigation against risks related to CBRN materials or agents and risks related to installations or sites through the EU CBRN Centres of Excellence Initiative and associated actions.
- 2. Enhanced capacities on strategic trade controls of dual-use goods.
- 3. Promote a culture of safety and responsible science and engineering.

Results will be obtained mainly through awareness raising activities aimed at promoting a CBRN security and safety culture; provision of advice for legal framework reviews; delivery of capacity building activities; promotion of national interagency cooperation and regional and global/multilateral cooperation for exchanging best practices and lessons learnt in the CBRN domain; and re-training of scientists with dual-use knowledge.

Most activities will be identified and formulated under the EU CBRN Centres of Excellence Initiative, which has proven to be an efficient and flexible programme, fostering multilateral and multi sectoral cooperation in civilian security and promoting sustainability and national ownership. It is based on a unique bottom up and demand-driven approach, following a set-up which encourages cooperation and knowledge-sharing with EU Member States and between partner countries at regional and inter-regional level.

Efforts will focus, in particular, on the following areas:

- resilience of critical infrastructure from CBRN risks, including the risks resulting from climate change; public health, food safety and food defence, in particular reinforcing the capacities to prevent, protect against, mitigate and recover from incidents related to the food supply chain; water management and wastewater surveillance.
- assisting partners in developing sound legal frameworks at national and, if applicable, regional level, inspired primarily by the newly revised and expanded EU Regulation on the **export of dual-use goods**; building institutional capacities for the implementation and enforcement of effective export controls; strengthening communities of practice of export control officials, scientists, academia, industry and other stakeholders; and increasing coordination and dialogue with other donors, arms export control programmes and regimes and related international organisations.
- fulfilling the EU's legal obligation to support the International Science and Technology Center (ISTC) and the Science and Technology Center in Ukraine (STCU) two international organisations specialised in securing sensitive scientific knowledge and technical knowhow, as well as CBRN risk mitigation and enhancing their links and synergies with the EU CBRN CoE and with the EU Partner2Partner (P2P) export control programme for dual use goods.

All components will be implemented in full complementarity with bilateral and regional programmes and in coordination with EU Delegations and relevant units in the Directorates-General for International Partnerships (INTPA) and Neighbourhood and Enlargement Negotiations (NEAR).

2 RATIONALE

2.1 Context

The inadequate control over high-risk chemical, biological, radiological and nuclear materials that pose a danger to the security of populations, especially to people living in vulnerable situations and to the environment, continues to raise serious concern. In a globalized world characterised by rapid and extensive circulation of persons and goods, it is crucial to cooperate on CBRN risks mitigation with regions of strategic importance for the EU.

Specific challenges relate to the lack of coordination and preparedness for CBRN risks at national and regional level in several countries: the fragmentation of responsibilities, inadequate knowledge and capacity to address these risks within a country or a region can have dramatic consequences at global level. Supporting the national authorities in better preventing, detecting and responding to CBRN incidents inter alia by fostering better cooperation among them, contributes to sustain peace and stability and build societal resilience domestically and globally.

Global infectious disease outbreaks have always been of concern for the international community. The COVID-19 pandemic has underlined the importance of improving bio-surveillance systems with rapid detection capacities and

efficient reporting to key agencies. The economic and socio-political consequences of the pandemic measures have a clear impact on stability and peace. Also importantly, recent studies demonstrate the disproportionate impact of the pandemic and responses to the pandemic experienced by women and girls and other vulnerable sectors of the general population (elderly people, people with disabilities, etc.). Better mitigating such threats will have a positive effect on women and other vulnerable groups' safety, as well as on loca communities and vulnerable populations in general.

The production of chemicals has considerably increased in recent decades, such that today there are chemical production facilities and stockpiles in many countries and regions, which can pose majors risks to human populations through potential explosions or environmental pollution. While many countries are Parties to international conventions, such as the Strategic Approach to International Chemicals Management, implementation capacity remains a challenge.

Increasing quantities of biological and chemical waste are produced and need to be managed in line with the international best practices on environmental protection.

Radioactive materials are also widely present in industrial activities such as mining or oil refining as well as in hospitals for imagery and radiotherapy. These radioactive sources are often inadequately managed and stored and can pollute the environment for many years. It is therefore crucial that regulatory processes apply the best international standards, especially in countries (i.e. Sub-Saharan African states) that are planning to enhance their uranium mining activities.

Climate change acts as a risk multiplier in situations where CBRN threats are already present.

Both infrastructure and resources are subjected to additional stress due to environmental degradation. Biodiversity loss and destruction of ecosystems and increased temperatures will contribute to geographic changes in vector- as well as in water-borne zoonoses.

The use of chemicals in extractive and industrial processes can also result in degradation of freshwater resources and aquifers. Natural disasters such as floods and droughts render water sources more vulnerable to contamination from:

- hazardous chemicals such as petrol and diesel that can spill out of vehicles, industrial facilities, fuel supplies, and other sources
- obsolete chemicals stockpiled in learning and research institutions; seaports; agricultural farms (banned pesticides, fertilizers), chemical industries, due to a lack of waste management practices

Many materials/products/technology play a significant role for civilian use; however, many also harbour a significant 'dual-use' application potential, and could be used for nefarious purposes (e.g. pesticides for explosives, radioactive sources for dirty bombs, or software technologies to engineer biological weapons)

United Nations Security Council Resolution 1540 (2004) provides that all States are to take and enforce effective measures to establish domestic controls to prevent the proliferation of nuclear, chemical or biological weapons and their means of delivery, including by establishing appropriate controls over related materials, equipment and technology. Effective strategic trade control systems are necessary to comply with this international commitment and represent a major contribution to international peace and security as they combat the proliferation of weapons of mass destruction and related materials, equipment and technologies. Export controls of strategic goods, as implemented in all 27 EU member states, ensure legitimate trade in dual-use items. They are, therefore, key for governments and high-tech industries, particularly in light of rapid technological and scientific developments, international technology transfer, transformations in ever more inter-connected economies and evolving proliferation threats.

Meanwhile, new scientific and technical developments give rise to new types of security and proliferation concerns, and an increase in actual or potential new dual-use technologies and technology transfer. These challenges are exacerbated by the rapid spread of sensitive technology and know-how via cyber space. Additionally, scientific developments in the field of biotechnology make potentially nefarious technologies more accessible for non-state actors. Issues related to security and non-proliferation are no longer limited to nation states but extend to non-state actors, including those who use scientific and technical knowhow for malicious purposes. These challenges require an adequate response, focusing on harnessing this knowhow for sustainable development and fostering peace and security.

2.2 Problem Analysis

Short problem analysis:

The evolving nature of the CBRN threats facing the world today warrants new and adapted responses. In order to fulfil public health and security requirements, guarantee and protect human rights, protect the environment and build resilience and fight organised crime involved in the management of toxic waste, countries will not only have to carry out continuous monitoring of their population's safety and security, but also develop the capacity to identify potential risks emerging internationally that could affect their population. Supporting EU partners to develop their security capacities in this area will enhance our mutual protection.

Weak governance, including fragmentation of responsibilities, lack of harmonized national preparedness and/or lack of controls on the trade in dual-use items, coupled with the diffusion dynamics of related sciences and technologies and the availability of open access knowledge and know-how, may be easily exploited by non-state actors to engage in illegal traffic in CBRN materials and related technologies.

At a global level, no single country has all the capabilities needed to respond to international public health emergencies caused by pandemics (like COVID-19), new and emerging infectious diseases, natural events (e.g. floods, earthquakes, drought) or major accidental disasters, environmental emergencies, chemical, biological or radiological attacks. Effective CBRN security requires cooperation and coordinated action between and within governments, the private sector, civil society, the media first at country level, then at regional level and finally with global actors.

Last but not least, the Russian aggression against Ukraine has created an unstable environment at the EU external borders and increased the level of CBRN threat including to the EU's internal security.

Key cross-cutting issues

The CBRN threats are also shaped by climate and environmental change and have been evolving throughout recent decades. New diseases are emerging or spreading in countries where they were previously absent. The disruption of the ecological balance in many places leads to the multiplication of certain pathogens and increasingly resistant strains, with an increased risk of contamination of plants, animal and humans. The increase of droughts, floods and earthquakes could lead to resurgence of re-emerging pathogens such as, e.g., anthrax (succession of droughts and floods) or plague (earthquakes). A better awareness of these new biological threats with a harmonious coordination of the different sectors concerned is urgently needed. Capacity building for improved surveillance, early detection, disaster risk reduction and adequate response plans is needed, together with procedures to ensure appropriate handling of potentially hazardous samples.

Likewise, due to an increase in droughts, floods, storms or pest invasions, climate change and related environmental damage are impacting agricultural production, leading to the overuse of fertilizers and pesticides. This increase in chemicals should be carefully monitored with appropriate management and surveillance put in place with the objective to reduce the impact on food, water and soil quality, but also to prevent accidents (such as the Port of Beirut explosions) and any malicious diversion, including by organised crime. Natural disasters such as floods and droughts also render water sources more vulnerable to contamination and may result in the forced displacement of affected populations.

The role of women is crucial in dialogue facilitation, mediation, peace negotiations and other conflict prevention and resolution tools. In its capacity building programmes, the EU encourages the participation of women as trainers and trainees. Until now a consistent presence of women has been recorded in the field of medical preparedness to respond to CBRN incidents and women associations are integrated in the activities aiming at fighting the illicit trafficking of counterfeit medicines. Special effort will be made to further explore how to implement specific gender sensitive measures to increase opportunities for women empowerment and gender equality, according to EU internal and external policies on gender equality.

Relevance and credibility of Partner Country's/Regional Policies and Strategies

The partner countries that have joined the EU CBRN Centres of Excellence Initiative, with very few exceptions, have lacked comprehensive public policies in CBRN risk mitigation. At the same time, they are Parties to various international conventions, treaties and regimes designed to ban proliferation activities, promote peaceful activities and strengthen national actions to ensure the safe management and prevent the misuse of CBRN agents, including by terrorists and other non-state actors.

This is why the EU is supporting through this programme (a) the design of national strategies through the establishment of National Action Plans based on needs assessment and risk assessmen, and the principles of

disaster risk reduction and preparedness (b) the adoption of such plans by the government and (c) their subsequent implementation. Needs and threats are specific to each country, but once they are identified and prioritised, partner countries can look for synergies and cooperate to formulate projects for which a regional approach proves to be more effective. Hence, the actions that will be financed under this programme are mainly identified following a demand driven and inter-ministerial approach and have a regional scope. This approach is a transfer of the EU philosophy of cooperation and sharing of knowledge between partner countries. Using the structure and identification methodology of the Centres of Excellence Initiative, the CBRN scope can be progressively extended to other areas identified by the partner countries as emerging or underdeveloped regional CBRN related priorities. As of January 2022, 30 countries have completed their National Action Plan and 10 are in the process of drafting them.

The majority of partner countries cooperating in the field of strategic trade controls often lack the fundamental legislative and regulatory framework to ensure effective controls of the export, transit and brokering of dual-use items. A national roadmap is then established with the assistance of the EU Partner-to-Partner (P2P) Programme, which constitute a credible and relevant strategy for the development of a comprehensive strategic trade control system at the national level. The more advanced partner countries rely on the EU Dual-use Regulation and control lists, which guarantees a solid basis for national legal frameworks and ensures the implementation of multilaterally agreed controls by countries that are not members of multilateral export control regimes. Some regions, such as South-East Asia, are in the process of establishing strategic trade related regional policy priorities (e.g. regional use of the Association of Southeast Asian Nations-ASEAN single window for strategic trade). The EU supports the harmonisation of legal frameworks (based on the EU Regulation) at regional level, especially in the case of trade blocs, as well as trans-regionally whenever appropriate.

EU added value

The EU CBRN Centres of Excellence Initiative is unique in its scope and structure. It is demand-driven, responding to the needs and priorities identified by partner countries, which are also involved in setting joint priorities for action around CBRN related risks. There are no comparable initiatives of this nature funded by EU Member States or other countries or organisations in this field.

Complementarity with EU and other Donors/Partners

The EU CBRN Centres of Excellence Initiative is led by the Commission's Service for Foreign Policy Instruments (FPI), in close coordination with the European External Action Service (EEAS). The Joint Research Center (JRC) provides technical support to partner countries to identify CBRN needs/gaps and to prepare national action plans, while the United Nations Interregional Crime and Justice Research Institute (UNICRI) ensures a coherent and effective national, regional and international cooperation. Coherence, complementarity and synergies between global, national and regional programmes are ensured through close coordination with the EU Delegations and INTPA/NEAR geo-desks and in the framework of high-level Security and Counter Terrorism (CT) Dialogues, as well as political and cooperation dialogues and the actions of the Network of key CT/Security experts deployed in the EU Delegations.

Synergies are sought with other EU funded initiatives regarding prevention, preparedness and response to natural and man-made disasters such as: the Prevention Preparedness and Response to Disasters programmes in the Middle East and North Africa; Instrument for Pre-accession Assistance regional programmes, twinning and Technical Assistance and Information Exchange (TAIEX) instrument (implemented by DG NEAR and DG ECHO); the Initiative on Health Security (managed by DG NEAR); activities under the European Union Civil Protection Mechanism (managed by DG ECHO); the Internal Security Fund as well as Community of European Research and Innovation for Security (DG HOME); and with other activities (like training courses) on the area of rapid response and preparedness implemented by other DGs (DG TAXUD for example), as well as Research & Innovation actions (e.g. the European and Developing Countries Clinical Trials Partnership - EDCTP or the Global Research Collaboration for Infectious Disease Preparedness network - GloPID-R). Collaboration with the Instrument for Nuclear Safety Cooperation will be reinforced (in particular in Central Asia and Africa) and common projects (e.g. water security, transport of radio-nuclear materials) will be promoted to address these issues. The action will also ensure synergies and coordination with non-proliferation and disarmament actions funded under the Common Foreign and Security Policy Council Decisions, in particular with the actions in support of: the United Nations Security Council Resolution 1540 (2004), the universalisation and effective implementation of the International Convention for the Suppression of Acts of Nuclear Terrorism, the Biological and Toxin Weapons Convention, the Chemical Weapons Convention and its implementing body, i.e. activities of the Organisation for the Prohibition of Chemical Weapons, strengthening biological safety and security in Ukraine and the activities of the International Atomic Energy Agency.

With regard to coordination with international organisations, cooperation is taking place mainly with the World Health Organization, United Nations Office on Drugs and Crime, the International Atomic Energy Agency, the Committee under United Nations Security Council Resolution 1540, the Organisation for the Prohibition of Chemical Weapons, the Biological and Toxin Weapons Convention, NATO, the International Crime Police organization, the G7 Global Partnership Programme Against the Spread of Weapons and Materials of Mass Destruction (e.g. through thematic workshops, regular meetings, ad hoc conferences, joint activities, etc.). This is enabling the exchange of information, ensuring better coordination and avoiding any overlaps of activities.

Coordination also takes place with regional organisations (e.g. with ASEAN, the African Union). In Central Asia, synergies will also be sought with the long-established Integrated Border Management Programme.

Two intergovernmental organisations, the Science and Technology Center Ukraine (in Kyiv) and the International Science and Technology Center (in Astana), were established to support the redirection of scientists and engineers with dual use knowledge and the implementation of CBRN activities. The EU is a member of both organisations and coordination takes place with other member countries, including the United States and Japan.

In the field of export controls, a coordination working group has been established with the United States to share ideas on threat prioritization and impact assessment tools and to discuss intervention strategies in priority countries. Joint and complementary efforts in the field have consistently yielded better project results in partner countries. More coordination is planned with Japan and Korea so as to increase synergies in South East Asia. Since 2015, Strategic Trade Controls have been integrated into Non-Proliferation Dialogues with third countries, Common Foreign and Security policy funded conventional arms trade related projects were associated to the EU P2P Programme branding. Since 2015, more regional efforts have been deployed including in the Gulf, Middle East, South East Asia, North Africa and the Western Balkans. Efforts will continue to increase regional and also transregional cooperation on export controls of dual-use goods.

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

The main stakeholders are the national and regional authorities, administrative infrastructures and agencies in charge of CBRN governance, as well as civil society, such as industry representatives, EU professional associations, individual scientists and engineers, academics and, ultimately, the citizens of the countries benefiting from these actions. Indirectly, the EU internal security in this area will be enhanced and EU citizens will benefit from increased safety and security resulting from these measures.

3 DESCRIPTION OF THE ACTION

3.1 Objectives and Expected Outputs

The Overall Objective (Impact) of this action is to address specific global and trans-regional threats to peace, international security and stability, through enhancing governance and cooperation on CBRN risk prevention, detection and mitigation.

The Specific(s) Objective(s) (Outcomes) of this action are:

- 1. Improved detection of and mitigation against risks related to CBRN materials or agents and risks related to installations or sites through the EU CBRN Centres of Excellence Initiative and associated actions;
- 2. Enhanced capacities on strategic trade controls of dual-use goods;
- 3. Promote a culture of safety and responsible science and engineering.

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

- 1.1 Effective CBRN risk mitigation and security governance mainly through the EU CBRN Centres of Excellence Initiative.
- 1.2 Strengthened cooperation in CBRN risk mitigation among EU CBRN Risk Mitigation Centres of Excellence Initiative partners of a given region and among different regions for exchanging best practices and lessons learnt.
- 1.3 Increased capacity of partner countries to deal with safety and security challenges related to biological threats and CBRN related disaster relief.
- 2.1 Reinforced legal capacities in partner countries to enable them to enhance strategic trade controls legal and

regulatory frameworks.

- 2.2 Improved capacities in partner countries to establish, implement and enforce strategic trade controls of dualuse items.
- 2.3 Reinforced communities of practice of export controls stakeholders.
- 2.4 Enhanced coordination, dialogue and synergies with donors and principal stakeholders.
- 3.1 Activities and membership in the International Science and Technology Center and the Science and Technology Center in Ukraine are promoted and expanded geographically.
- 3.2 Increased retraining and alternative employment (peaceful research activities or commercial programmes) of scientists having dual use technology knowledge.

3.2 Indicative Activities

Type of activities this action might fund:

Output 1

- Organise needs assessment exercises and workshops to draft the CBRN national and regional action plans and promote their implementation
- Identify, formulate and contract trans-regional and global projects, following the demand-driven approach. Non exhaustive list of activities that can be funded:
 - measures for assuring that all the legislative framework, regulations and standards of the countries are in conformity with international rules and regulations, and standards on management of CBRN materials and agents and are regularly updated accordingly;
 - measures for assuring the safety of personnel working with dangerous biological agents, or dangerous chemicals at relevant facilities;
 - measures to establish bio and chemical risk management systems preferably based on relevant EU and international risk management standards, best practices and guidelines;
 - measures to assure effective controls and protection against illegal or unintentional release of dangerous biological agents, chemical compounds or radioactive/nuclear materials to ensure their security;
 - measures to conduct threat prioritisation exercises and determine the effect of releases, accidental or intentional, of pathogenic agents, chemical compounds or radioactive/nuclear materials;
 - measures to ensure the proper management of CBRN waste, taking into account their environmental, social and human rights consequences ;
 - capabilities to investigate and diagnose any events that might be caused by CBRN agents, including those escaping controls;
 - measures against plant and livestock pathogens that present risks in respect of assuring food safety;
 - capabilities and measures for reference laboratories in chemical and biological risks: detection and identification (both environmental as well as for diagnosis purposes in the biological field);
 - capabilities and measures to ensure safe and secure transport of biological agents between laboratories;
 - reference laboratories in radioprotection/detection/identification capabilities and protection of radioactive sources;
 - enhancing the safety and security levels of laboratories and institutes that handle sensitive materials, including by equipment supply;
 - training of first responders in the context of regional preparedness and response; training of field epidemiologists;
 - export and border control;
 - training of trainers (women and people representing minority groups will be encouraged to participate);

- field exercises.
- Organize regional and inter-regional meetings, and global annual meetings gathering representatives of the partner countries' governments;
- Organize high level meetings at ministerial level to raise awareness and enhance political support in cooperation with EU Delegations
- Consolidate the functioning and coordinating role of the eight regional CBRN risk mitigation Centres of Excellence within the regional and international security framework;
- Provide global on-site technical assistance covering all regions;
- Provide capacity building opportunities for the national focal points to increase leadership, team management and communication skills;
- Maintain and promote the CBRN CoE webpages on the EC website;
- Enhance the coordination between international partners and organisations in the different aspects of chemical, biological, radiological and nuclear security.

Output 2:

- Supporting countries which expressed their willingness to share common legal structures, applying comparable assessment criteria and procedures to establish "safe" regions with respect to foreign trade activities and harmonisation of export control legislation;
- Developing new tools for cooperation in countries or regions affected by conflicts together with the local authorities and exploit potential synergies in the field of CBRN risk mitigation. The aim of these tools is to establish export control programmes for dual use items e.g. risk analysis, law enforcement, customs, updating licensing processing systems, transfer and transhipment of sensitive goods, possible role and interference of organised crime;
- Promoting a regulatory framework, covering primary and, where applicable, secondary legislation, including procedural questions;
- Implementing a licensing processing system that pays particular attention to questions around end use and end user assessment techniques;
- Developing an outreach to industry (including academia and research community) programme, that provides timely, adequate information and fosters interaction between government and industry in a dialogue to increase awareness and cooperation;
- Strengthening the enforcement sector, by addressing customs with specific topics, e.g. on risk management and commodity identification techniques, but with information exchange tools to other government authorities as well.
- To organize an EU Partner2Partner (P2P) Programme Summer University and other networking events with the export control regimes.

Output 3:

- Supporting the European Union's share of the running costs of the ISTC and STCU;
- Providing scientists and engineers who hold knowledge or skills which can be considered sensitive with opportunities for training, networking and alternative employment where their knowledge and skills can be used for peaceful activities;
- Raising awareness through actions addressed to the scientists engaged in activities that require the use of dangerous materials about the safety and security risks;
- Supporting basic and applied research that will contribute to solving national and global technological problems, including forensics;
- Promoting networking and partnering in order to encourage the integration of scientists with dual use knowledge into the international scientific community;
- Maintaining the possibility of the existing ISTC and STCU to implement the projects but also opening the

activities of alternative scientist employment under the CBRN Centres of Excellence Initiative's activities and on a multilateral/bilateral basis with individual countries when urgent emerging needs arise

3.3 Mainstreaming

Environmental Protection & Climate Change

CBRN threats evolve due to climate and environmental change. The geographic scope of vector-borne diseases is gradually shifting northward, reaching previously unexposed populations. Likewise, biodiversity loss is altering the interconnections between animals, pathogens and humans, with the rise of known or new zoonotic diseases. Increasing periods of drought as well as pest invasions reduce agricultural production which stimulates the overuse of fertilizers and pesticides.

The CBRN Centres of Excellence Initiative aims to develop better knowledge of these diseases in partner countries with improved coordination between the different sectors and the establishment of sensitive detection systems and adapted response plans. It also aims at setting more sound and secure management of chemicals, their storage and their waste.

The Initiative will help to establish the one-health approach, a single platform gathering the various actors together with rapid data sharing and fostering integrated cross-sectoral collaboration at the human-animal-plants interface and their shared environment. It is promoting early warning systems and a focus on security aspects linked to the handling of dangerous biological samples, together with the adoption of appropriate operating procedures in order to decrease the risks of accidents or potential malicious use.

Better management and control of all CBRN materials, such as those used in mining industries, chemical plants, illegal dump sites or intensive farming, can reduce their impact on natural resources and enhance resource efficiency.

Gender equality and empowerment of women and girls

As per OECD Gender DAC codes identified in section 1.1, this action is labelled as G0. This implies that it is not a significant objective of the action. Nonetheless, attention will be given to SDG 5 "Gender equality" by ensuring the participation of women in awareness campaigns and in the risk management decision making, etc. In addition, CBRN capacity building activities must be designed to ensure there is no stigmatization of beneficiaries nor undue burden or expectation, in particularly with regards to women. This would be in line with GAP III commitments, including the Women, Peace and Security Agenda.

Human Rights

All project activities will be carried out in conformity with the principles of good governance, anti-corruption and Rule of Law, internationally recognised human rights standards as well as taking into account gender equality and the rights enshrined in the Charter of Fundamental Rights.

Disability

As per OECD Disability DAC codes identified in section 1.1, this action is labelled as D0.

Conflict sensitivity, peace and resilience

Through SDG 16, the international community is promoting resilience by strengthening relevant national institutions to prevent the intentional release of CBRN materials. Conflicts can fuel the spread of CBRN weapons and related technologies and CBRN risk mitigation related interventions will be more effective when they are conflict sensitive.

Disaster Risk Reduction

As mentioned in section 2.2 under "Complementarity with EU and other Donors/Partners" synergies will be sought with other EU funded initiatives regarding prevention, preparedness and response to natural and man-made disasters as well as Research & Innovation actions. Collaboration with the Instrument for Nuclear Safety Cooperation will be reinforced and common projects will be promoted to address these issues.

3.4 Risks and Lessons Learnt

Category	Risks	Likelihood	Impact	Mitigating measures
		(High/	(High/	
		Medium/	Medium/	

		Low)	Low)	
General	Difficulties with gaining access to reliable data and sites (when pertinent disaggregated by sex and nationality).	M	M	The Commission services and the European External Action Service (EEAS) will play a key role in contacting and involving targeted countries and has already established a network of contacts. The Needs Assessment Questionnaire (NAQ) and the National Action Plans (NAP) ensure consistency and ownership and contribute to minimize this risk.
General	Difficulties in addressing countries' requirements	М	M	The technical support will be provided mainly by the JRC - follow-up of implementation, technical compliance of proposals, etc and by targeted on-site assistance. Staff in EU DELs will also support these activities.
General	Engaging national agencies responsible for dealing with CBRN threats	М	М	The integrated NAQs and the formulation of a NAP help to engage relevant agencies and ministries from partner countries. A specific governance team has been providing support. They have transferred best practices and dealt with the inter agency dimension. Relevant EU Delegations have been asked to nominate focal points for CBRN actions.
General	Frequent government restructuring, lack of clear delineation of duties and responsibilities between federal agencies; changes in the composition of national teams (NT)	М	М	The Regional Secretariats and National Focal Points are invited to inform promptly the Commission and EU DELs about potential changes in the partner countries, which might affect the work of NT.
General	Industry remains unconvinced of the benefits of an efficient export control system, or is deterred by bureaucratic procedures, delays and administrative hurdles	Н	Н	The EU Export Control outreach programme will address, among others, industry representatives.
General	Industry and scientific community's relations to the State are still marked by caution and suspicion, and the related temptation to perform external economic operations without consideration of the relevant legislation	М	М	The role of National Focal Points and National Teams should be further enhanced. It is important to provide the sufficient political support to the Initiative at the national level to reinforce the inter-ministerial working level of cooperation through methodology and projects.
General	Risks of Human rights violations/harmful impact/ inadvertently fuelling conflict	М	М	The "Do not harm" principle will aim to avoid/mitigate any unintended/indirect human right violation/harmful impacts etc. (e.g.: UN Guidelines for Human Rights and Business will be respected). The "leave no one behind" principle will be ensured by the bottom up approach, the inclusion and the active participation of civil society organisations (CSOs) and academia actors.
General Lessons I	Political instability, national and regional security threats in the partner countries or neighbouring countries. Natural disasters and infectious diseases.	Н	Н	Where infectious diseases or other health risks emerge, these will be monitored closely. If it becomes unsafe or logistically impracticable to conduct a visit, training or workshop at the scheduled time, the activities will be deferred or transferred on line.

Lessons Learnt:

In the last 10 years, the Court of Auditors has twice acknowledged that the EU CBRN Centres of Excellence Initiative has contributed to mitigating CBRN risks from outside the EU (Special Report 17/2014 and Special Report (14/2018). The recommendations provided by the Court have all been implemented in particular:

- a systemic risk assessment component has been introduced in the needs assessment and national action plan methodologies, and a methodology for prioritising. The evaluation of external risks to the EU will be gradually

implemented through the development of country profiles using open source data integrated into structured methodological tool enabling the assessment of priority countries and impact of the EU CBRN Centres of Excellence Initiative.

- regional and inter-regional activities including field and table-top exercises at regional level are being promoted and implemented in all regions. Centres of Excellence regional round tables show an increasing level of ownership and more initiatives for regional networking, cooperation and set up of activities as well as outreach towards international or regional organisations.
- all project results are monitored by external consultants at least once and subject to a final evaluation carried out by JRC. Work has been done to improve the projects individual Logical Framework Matrix and the reporting tools. A comprehensive evaluation of the EU's cooperation with the Science Centres (ISTC and STCU) resulted in a positive assessment .
- focal points at the EU Delegations in partner countries are appointed, and regular contact mechanisms are in place to enhance the Initiative's visibility. CBRN risk mitigation related issues have been incorporated into agenda of respective dialogues (political, security, cooperation) with some partner countries.

3.5 The Intervention Logic

The underlying intervention logic for this action is that:

IF effective CBRN risk mitigation and security governance is reinforced, mainly through the EU CBRN Risk Mitigation Centres of Excellence Initiative (**Output - Op 1.1**): specific CBRN technical assistance continues to be deployed in all regions; awareness is raised at the level of decision makers; capacities are built to prevent and respond to CBRN accidents based on sound risk assessments; advice is provided to revise legal frameworks and standard operating procedures;

IF the cooperation among EU CBRN Risk Mitigation Centres of Excellence Initiative partners is strengthened at regional, inter-regional and global level for exchanging best practices and lessons learnt **(Op 1.2)**: the functioning and coordinating role of the eight regional CBRN risk mitigation Centres of Excellence within the regional and international security framework is consolidated; the participatory approach is maintained; the participation of national/regional experts of the partner countries is encouraged; duplication of efforts is avoided through coordination with other actors; so that common challenges are tackled at regional and global level;

IF the capacity of partner countries to deal with security challenges related to biological threats and CBRN related disaster relief is increased (**Op 1.3**);

IF the legal capacities in partner countries to enable them to enhance strategic trade controls legal and regulatory frameworks are reinforced (**Op 2.1**);

IF the capacities in partner countries to establish, implement and enforce strategic trade controls of dual-use items are improved (**Op 2.2**);

IF coordination, dialogue and synergies with donors and principal stakeholders active in export control are enhanced **(Op 2.3)**;

IF activities and membership in the International Science and Technology Center and the Science and Technology Center in Ukraine are promoted and expanded geographically (**Op 3.1**);

IF retraining and alternative employment (peaceful research activities or commercial programmes) of scientists having dual use technology knowledge is increased (**Op 3.2**);

THEN the detection of and mitigation against risks related to CBRN materials or agents and risks related to installations or sites through the EU CBRN Centres of Excellence Initiative and associated actions will be improved (**Outcome - O 1**); the capacities on strategic trade controls of dual-use goods will be enhanced (**O 2**); international scientific cooperation and knowledge on CBRN related security issues, promoting a culture of safety and responsible science and engineering will be enhanced (**O 3**);

This cause-effect relationship is based on the assumptions that (i) partner countries have the political leverage to allow the implementation of CBRN policies and are willing to commit to regional cooperation (ii) partner countries are willing to fulfil their obligations under the UN SCR 1540 (iii) partner countries provide access to relevant and reliable data and information; (iv) new threats do not emerge which draw resources away from the main programme outlined here.

The actions described above will contribute in the longer-term to enhance governance and cooperation on CBRN risk detection and mitigation hence addressing specific global and trans-regional threats to peace, international security

and stability (Impact),

The logic of intervention of the EU CBRN Risk Mitigation Centres of Excellence Initiative advocates for a demand driven and regional approach. This methodology ensures the cooperation of the partner countries in the design of projects with regional/trans-regional/global interest. This should create a more genuine sense of ownership and should increase the chances of sustainability of their outcomes and of the Initiative as a whole.

In case of emerging and urgent needs to mitigate CBRN imminent risks (regional/trans-regional or global) some funds can be re-directed to actions to be identified in coordination with the other services of the Commission to avoid duplications, as it was the case for the Covid-19 response. The final decisions on the selection and funding of these specific projects will be made in close coordination also with the institutions of the target countries and with the international organisations. The number of such projects will be limited compared to those initiated by the EU CBRN Centres of Excellence Initiative. Where relevant, Centres of Excellence partner countries will be regularly updated on such activities outside their geographical scope to ensure consistency.

3.6 Logical Framework Matrix

Results	Results chain	Indicators	Baselines (values and years)	Targets (values and years)	Sources of data	Assumptions
Impact	To address specific global and trans-regional threats to peace, international security and stability, through enhancing governance and cooperation on CBRN risk detection and mitigation.	1.1 Number of countries supported by this action implementing obligations under CBRN-related international conventions and treaties (CBRN prohibition instruments)	To be defined	To be defined	Multiple	Not applicable
Outcome 1	1 Improved detection of and mitigation against risks related to CBRN materials or agents and risks related to installations or sites through the EU CBRN Centres of Excellence Initiative and associated actions	 1.1 Number of countries where safety and security measures that enhance governance and cooperation on CBRN risk detection and mitigation have been undertaken at country and/or regional level 1.2 Number of countries where revised/updated national strategies and policies on crisis management, dealing especially with security challenges related to pandemics and natural or man-made disasters, have been adopted 	1.1 0 1.2 0	To be defined	Baseline and end line mapping reports on safety and security measures for risk mitigation at country/regional level	Partner countries have the political leverage to allow the implementation of CBRN policies and are willing to commit to regional cooperation
Outcome 2	2 Enhanced capacities on strategic trade controls of dual-use goods	2.1 Number of partner countries using the EU Dual use list as a reference		To be defined	Baseline and end line mapping reports on safety and security measures for risk mitigation at country/regional level	
Outcome 3	3 Promote a culture of safety and responsible science and engineering	3.1 Number of scientists (disaggregated by sex) with sensitive or dual use knowledge integrated into the international scientific community	3.1 0	To be defined	Reports provided by ISTC and STCU	
Output 1 related to Outcome 1	1.1 Effective CBRN risk mitigation and security governance mainly through the EU CBRN Risk Mitigation Centres of Excellence Initiative	 1.1.1 Number of state institutions supported with drafting/reviewing the CBRN National Action Plans (NAP) and performing risk assessment exercises 1.1.2 Number of state institutions supported with legal frameworks or Standard Operating procedures (SOPs) review, revision or development related to CBRN matters 1.1.3 Number of experts and officials (disaggregated by sex) of the partner countries that report increased knowledge on best practices and lessons learnt on 		To be defined	Reports provided by implementers	

		CBRN risk mitigation at regional and global level			
Output 2 related to Outcome 1	1.2 Strengthened cooperation in CBRN risk mitigation among EU CBRN risk mitigation Centres of Excellence Initiative partners of a given region and among different regions for exchanging best practices and lessons learnt	1.2.1 Number of global, regional and inter-regional cooperation events for exchange of best practices and lessons learnt on CBRN risk mitigation organised	1.2.1 0	To be defined	Reports provided by implementers
Output 3 related to	Increased capacity of partner countries to deal	1.3.1 Number of countries supported by actions for improving their national health security strategy, including pandemic preparedness and response	1.3.1 0	To be defined	Reports provided by implementers
related to Outcome	2.1 Reinforced legal capacities in partner countries to enable them to enhance strategic trade controls legal and regulatory frameworks	2.1.1 Number of state institutions supported with the review, revision and/or development legal frameworks in light of the EU's dual use regulation and the EU dual-use export control list	2.1.1 0	To be defined	Reports provided by implementers
Output 2 related to	2.2 Improved capacities in partner countries to establish, implement and enforce strategic trade controls of dual-use items	2.2.1 Number of experts (disaggregated by sex) of the partner countries that report increased knowledge on strategic trade control as a result of conferences, workshops or dialogue events	2.2.1 0	To be defined	Reports provided by implementers
Output 1 related to Outcome 3	3.1 Activities and membership in the International Science and Technology Center and the Science and Technology Center in Ukraine are promoted and expanded geographically	3.1.1 Number of countries of strategic importance where a culture of safety and responsible science with respect to the handling and use of CBRN materials or related equipment and technologies is promoted.;	3.1.1 0 3.1.2 0	To be defined	Reports provided by ISTC and STCU
Output 2 related to Outcome 3	3.2 Increased retraining and alternative employment (peaceful research activities or commercial programmes) of scientists having dual use technology knowledge	3.2.1 Number of scientists (disaggregated by sex) with sensitive or dual use knowledge participating in research and technology projects with peaceful application (responsible science)	3.2.1.0	To be defined	Reports provided by ISTC and STCU

4 IMPLEMENTATION ARRANGEMENTS

4.1 Financing Agreement

In order to implement this action, it is not envisaged to conclude a financing agreement with the partner country.

4.2 Indicative Implementation Period

The indicative operational implementation period of this action, during which the activities described in section 3 will be carried out and the corresponding contracts and agreements implemented, is 72 months from the date of adoption by the Commission of this Financing Decision.

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

4.3 Implementation Modalities

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

4.3.1 Direct Management (Procurement)

A part of this action (mainly the specific objectives 1 and 2) will be achieved in direct management, through the conclusion of contracts with third parties.

4.3.2 Indirect Management with a pillar assessed entity

A part of this action may be implemented in indirect management with entities, which will be selected by the Commission's services using the following criteria: (1) the long-standing experience of these organisations in dealing with CBRN or export control issues (2) anchorage with local authorities and existing expert networks (3) experience in procurement of services and equipment specific to the security domain.

The selected entities will carry out the following tasks among others: managing procurement procedures for purchasing goods, contracting consulting services and any other relevant transactions; contributing to the administrative budget according to the respective International Establishing Agreements; coordinating CBRN Centres of Excellence Regional Secretariats and organising regional and inter-regional meetings; conducting promotion and visibility activities, following up of the implementation of CBRN national and regional action plans. This will contribute to achieve the expected results under the three specific objectives of this action document.

The specific objective 1 and 2 will be partially achieved in indirect management. The specific objective 3 will be entirely achieved in indirect management by fulfilling the EU's legal obligation to support the International Science and Technology Center (ISTC) and the Science and Technology Center in Ukraine (STCU).

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

In the interest of the programme, or if the negotiations with the selected entities fail, that part of this action may be implemented in direct (or indirect) management according to the same selection criteria as above.

4.3.4 Other actions or expenditure

Part of this action may be implemented through a Service Level Agreement with JRC in order to mobilise its expertise in the achievement of "improved detection of and mitigation against risks related to CBRN materials or agents and risks related to installations or sites through the EU CBRN Centres of Excellence Initiative and associated actions".

4.4 Scope of geographical eligibility for procurement and grants

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

4.5 Indicative Budget

Indicative Budget components	EU contribution (amount in EUR)
O1. Improved detection of and mitigation against risks related to	
CBRN materials or agents and risks related to installations or sites	
through the EU CBRN Centres of Excellence Initiative and	
associated actions composed of	
Procurement (direct management) – cf. section 4.3.1	8 000 000
Indirect management with international organisations - cf. section 4.3.2	24 500 000
O2. Enhanced capacities on strategic trade controls of dual-use goods composed of	
Procurement (direct management) – cf. section 4.3.1	2 000 000
O3. Enhanced international scientific cooperation and knowledge on CBRN related security issues, promoting a culture of safety and responsible science and engineering	
Indirect management with international organisations - cf. section 4.3.2	2 500 000
Evaluation – cf. section 5.2	will be covered by another Decision
Audit – cf. section 5.3	-
Strategic communication and public diplomacy (cf. section 6)	will be covered by another Decision
Contingencies	NA
Totals	37 000 000

4.6 Organisational Set-up and Responsibilities

The Commission will coordinate and lead the implementation of this action partly through the procurement of service and supply contracts and partly by entrusting tasks to international organisations in which case the Commission will be closely involved through a Steering and/or Coordination Committee.

The Commission is also a permanent member of the ISTC and STCU Governing Boards, representing the EU.

As part of its prerogative of budget implementation and to safeguard the financial interests of the Union, the Commission may participate in the above governance structures set up for governing the implementation of the action.

5 PERFORMANCE MEASUREMENT

5.1 Monitoring and Reporting

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

(for budget support).

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).

5.2 Evaluation

Having regard to the nature of the action, evaluations of single components/projects are carried out via an implementing partner.

The Commission may, during implementation, decide to undertake mid-term or final evaluations for duly justified reasons either on its own decision or on the initiative of the partner.

The evaluation reports shall be shared with the partner country and other key stakeholders following the best practice of evaluation dissemination. The implementing partner and the Commission shall analyse the conclusions and recommendations of the evaluations and, where appropriate, 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.

5.3 Audit and Verifications

Without prejudice to the obligations applicable to contracts concluded for the implementation of this action, the Commission may, on the basis of a risk assessment, contract independent audit or verification assignments for one or several contracts or agreements.

6 STRATEGIC COMMUNICATION AND PUBLIC DIPLOMACY

The 2021-2027 programming cycle will adopt a new approach to pooling, programming and deploying strategic communication and public diplomacy resources.

It will remain a contractual obligation for all entities implementing EU-funded external actions to inform the relevant audiences of the Union's support for their work by displaying the EU emblem and a short funding statement as appropriate on all communication materials related to the actions concerned. This obligation will continue to apply equally, regardless of whether the actions concerned are implemented by the Commission, partner countries, service providers, grant beneficiaries or entrusted or delegated entities such as UN agencies, international financial institutions and agencies of EU member states.

However, action documents for specific sector programmes are in principle no longer required to include a provision for communication and visibility actions promoting the programmes concerned. These resources will instead-be consolidated in Cooperation Facilities established by support measure action documents, allowing Delegations to plan and execute multiannual strategic communication and public diplomacy actions with sufficient critical mass to be effective on a national scale. Communication and visibility measures may be funded from the amounts allocated to the action. For the purpose of enhancing the visibility of the EU and its contribution to this action, the Commission may sign or enter into joint declarations or statements, as part of its prerogative of budget implementation and to safeguard the financial interests of the Union. Visibility and communication measures should also promote transparency and accountability on the use of funds.

Effectiveness of communication activities on awareness about the action and its objectives as well as on EU funding of the action should be measured.

Implementing partners shall keep the Commission and concerned EU Delegation/Office fully informed of the planning and implementation of specific visibility and communication activities before work starts. Implementing partners will ensure adequate visibility of EU financing and will report on visibility and communication actions as well as the results of the overall action to the relevant monitoring committees.

Appendix 1 REPORTING IN OPSYS

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

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

Act	Action level					
\boxtimes	Single action	Present action: all contracts in the present action				
Gr	Group of actions level					
	Group of actions	Actions reference (CRIS#/OPSYS#):				
Co	Contract level					
\boxtimes	Single Contract 1	To be defined				
\boxtimes	Single Contract 2	To be defined				
	Etc.	To be defined				
	Group of contracts 1					

The present Action identifies as