



Belgrade,

### QUESTIONS and ANSWERS No.1

#### Human Rights, Democracy and Civil Society programme for Serbia 2024-2025

Publication reference: EuropeAid/184378/DD/ACT/RS

No.	Question	Answer
1.	<p>We are currently preparing our applications for the Call for Proposals: EuropeAid/184378/DD/ACT/Multi (Restricted Call 2024–2025) and would like to kindly request clarification regarding the section “Number of applications and grants per applicants / affiliated entities” as outlined in the Guidelines.</p> <p>Specifically, we would like to confirm whether it is permissible for an organisation to:</p> <ul style="list-style-type: none"><li>act as Lead Applicant in one application under Lot 1, and</li><li>simultaneously act as Co-Applicant in a separate application under Lot 2.</li></ul> <p>Based on the current wording, it is clear that the lead applicant may not be involved in another application of the same lot, but it is less clear whether this restriction applies across different lots.</p> <p>We would greatly appreciate your confirmation on whether this scenario would be eligible under the call.</p>	<p>As noted on page 15 of the Guidelines for applicants, under “<i>Number of applications and grants per applicants / affiliated entities</i>”, among other requirements:</p> <p>The lead applicant <b>may not submit more than 1 application under this call for proposals.</b></p> <p>The lead applicant <b>may not be a co-applicant</b> or an affiliated entity in another application <u>of the same lot at the same time.</u></p> <p>The restriction related to the lead applicant being a co-applicant or an affiliated entity in another application under this call for proposals, <u>is for the same lot at the same time.</u></p> <p>Consequently, the lead applicant that applies for a certain Lot under this Call for Proposals may be a co-applicant or an affiliated entity in another application of the remaining Lots of the Call for proposals, with taking note at the same time of the restrictions for the co-applicant/affiliated entity role.</p> <p>Therefore, please also take note that a co-applicant/affiliated entity <b>may not be the co-applicant</b> or affiliated entity <u>in more than 2 applications under this call for proposals.</u></p>
2.	<p>We kindly ask you to clarify whether Regional Development Agencies are eligible for this Call for proposal since we are:</p> <ul style="list-style-type: none"><li>-legal person and non-profit-making; we are independent from the Government but we are not registered as non-governmental organization than as body governed by public law (non-profit ltd, established by</li></ul>	<p>Please note that in line with the Guidelines for Applicants, section 2.2.4., p. 21, “<i>To ensure equal treatment of applicants, the contracting authority cannot give a prior opinion on the eligibility of lead applicants, co-applicants, affiliated entity(ies), an action or specific activities.</i>”</p> <p>In addition to other listed requirements of the</p>

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	local municipalities)	<p>eligibility of lead applicants (and co-applicants), in order to be eligible <u>the organisations must be non-governmental organisation, including civil society organisations, which is determined by the articles of association and organisation registration documents.</u></p> <p>For the avoidance of doubt, non-governmental organisation means a voluntary, independent from government, non-profit organisation, which is not a political party or a trade union (Article 2(49) FR).</p> <p>The broadest possible understanding about civil society organisations is applied under this call for proposals, as defined in 1999 by the European Economic and Social Committee (CES/1999/851) and further detailed by both the EESC (CES/1999/851, CES/2000/81) and the EC (COM/2002/0704 final, COM/2005/0290 final).</p>
3.	<p>We are writing to request clarification regarding the eligibility criteria for the Call for Proposals EuropeAid/184378/DD/ACT/RS, specifically concerning the participation of an organization legally established in an EU member state but without a registered office or legal entity in Serbia.</p> <p>For clarity, we would appreciate your guidance on the following questions:</p> <ul style="list-style-type: none"> <li>• Q1-LOT 1: Is such an organization eligible to apply as a lead applicant under Lot 1, provided that it includes at least two co-applicants that are effectively established in Serbia? If not, is it eligible to be a co-applicant under Lot 1?</li> <li>• Q2- LOT 2/3: Is such an organization eligible to participate as a co-applicant under Lot 2 or Lot 3?</li> <li>• Q3: Is it eligible to participate in the call as a co-applicant or affiliated entity in any of the lots?</li> </ul>	<p>Please note that in line with the Guidelines for Applicants, section 2.2.4., p. 21, <i>“To ensure equal treatment of applicants, the contracting authority cannot give a prior opinion on the <u>eligibility of lead applicants, co-applicants, affiliated entity(ies), an action or specific activities.</u>”</i></p> <p>The eligibility criteria for Lead applicants is clearly given on page 7 and where necessary specified per Lot. <u>Co-applicants must satisfy the eligibility criteria as applicable to the lead applicant himself.</u></p> <p>In addition to other listed requirements of the eligibility of lead applicants (and co-applicants), regarding the establishment:</p> <p><b>For Lot 1:</b> be <u>effectively established in a Member State of the European Union or in any eligible country</u>, as stipulated in the basic act NDICI-GE , (Article 28 of the Regulation (EU) 2021/947 of the European Parliament and of the Council );</p> <p><b>For Lot 2 and 3:</b> be effectively established in the Republic of Serbia.</p> <p>Please also note that there are mandatory requirements related to the participation of lead</p>

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		<p>applicants with co-applicants:</p> <p>The lead applicant must act with co-applicant(s) as specified hereafter.</p> <p><u>For Lot 1:</u> the lead applicant must have at least 2 co-applicants. In case the lead applicant is not effectively established in the Republic of Serbia, it must act with at least two co-applicants that are effectively established in the Republic of Serbia.</p> <p><u>For Lot 2 and 3:</u> the lead applicant must have at least 3 co-applicants.</p> <p><u>For all Lots:</u> majority of applicants (including lead applicant and co-applicants) in one grant application must be effectively established outside of Belgrade.</p>
4.	<p>We would like to ask a question which was not posed during the info session.</p> <p>Namely, can an NGO be lead applicant on one lot and partner/co-applicant in two other lots (three proposals in total)?</p>	<p>Please see answer to question number 1.</p>
5.	<p>The call guidelines state that “For all Lots: majority of applicants (including lead applicant and co-applicants) in one grant application must be effectively established outside of Belgrade”. We would appreciate clarification on what “effectively established outside of Belgrade” means in this context. Does it require that the majority of applicants have offices located outside of Belgrade? Or would it be acceptable if the majority of applicants are legally registered with their offices in Belgrade, as long as the majority of the activities of the action take place outside of Belgrade?</p>	<p>Formulation “<i>be effectively established outside Belgrade</i>” is a requirement, i.e. eligibility criteria of the applicants related to the official legal establishment of the organisation to be attested by the articles of association and registration documents of the organisation.</p>
6.	<p>I am writing to request clarification regarding Section 1.3 of the Guidelines for Grant Applicants under the call for proposals EuropeAid/184378/DD/ACT/RS. Specifically, I would like to better understand what is considered an acceptable non-EU source of co-financing. The guidelines state that the balance between the total cost of the action and the requested EU contribution must be financed from sources other than the EU general budget or the European Development Fund (EDF). Could you please confirm whether the</p>	<p>There is no pre-determined list of eligible or “acceptable” sources of non-EU co-financing. Accordingly, these funds from other sources, i.e. the co-financing, may take the form of:</p> <ul style="list-style-type: none"> <li>- the beneficiaries’ or affiliated entities’ own contribution</li> <li>- income generated by the action (if relevant an estimate should be provided at proposal stage; it must be confirmed when the request for payment of the balance is submitted)</li> </ul>

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	<p>following would be considered valid non-EU sources:</p> <ul style="list-style-type: none"> <li>• Own contributions from the lead applicant or co-applicants;</li> <li>• Public funding from non-EU governments</li> <li>• International organizations not funded by the EU</li> <li>• Funding from national or local public institutions in Serbia;</li> <li>• Private foundation grants or private sector sponsorships;</li> <li>• Crowdfunding or individual donations?</li> </ul>	<p>- financial or in-kind contributions by other donors.</p> <p>All items mentioned in your question could be considered acceptable.</p>
7.	Are universities or academic institutions eligible as applicants or co-applicants?	Please see answer to question number 2.
8.	Are media NGOs from Belgrade eligible as the main applicants?	Please see answer to question number 2 and number 3.
9.	Is it eligible for Lot 1 that the lead applicant to be from EU member states, one co-applicant from Belgrade and two co-applicants outside Belgrade.	Please see answer to question number 3.
10.	Can the lead applicant for Lot 1 be an organization established in the Republic of Serbia or must it be from EU member states?	Please see answer to question number 3.
11.	I noticed that transitional justice and reconciliation are listed among the priority teams in Lot 2. However, they do not appear among the suggested types of action. Would you please clarify whether projects focusing specifically on transitional justice and reconciliation would still be considerable eligible under Lot 2?	<p>Please note that in line with the Guidelines for Applicants, section 2.2.4., p. 21, <i>“To ensure equal treatment of applicants, the contracting authority <u>cannot give a prior opinion on the eligibility of lead applicants, co-applicants, affiliated entity(ies), an action or specific activities.”</u></i></p> <p>However, please also note that the proposals may focus on one or more of the specific sectors or themes and any theme listed to which the actions must relate to shall be the subject of a type of action / activities listed as may be financed.</p>
12.	Can applicant currently leading another European project apply as the lead applicant or as the co-applicant?	The organization who has ongoing EU funded projects, can apply. However, <u>actions</u> that are already funded by other Community programmes and undertaken before the date of contract signature, are ineligible.
13.	Do we necessarily have to have one co-applicant from Belgrade or is it possible to have all three from other places of Serbia?	Please see answer to question number 3.
14.	I represent an international network organization, including an organization in Serbia for Lot 2 and 3. May the international network as a whole be included in activities in Serbia as support?	<p>Please see answer to question number 3.</p> <p>In addition, please note that affiliated entity(ies) must satisfy the same eligibility criteria as the lead applicant and the co-applicant(s). You can</p>

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		find more details on the definition of an affiliated entity on page 8-9 of the Guidelines for applicants.
15.	<p>May our Serbian member organization refer to the membership in our network as financial administrative capacity in the application?</p> <p>For example, if part of co-financing would be provided in-kind from non-Serbian organization?</p>	<p>The financial capacity is assessed and can only be fulfilled by the lead applicant. Under point 1.4 of the full application evaluation grid, the evaluation committee is checking if the lead applicant has stable and sufficient sources of finance.</p> <p>Related to co-financing, please see answer to question number 6.</p> <p>In addition, for this call for proposals, the contracting authority may accept co-financing in kind in the form of volunteers' work. Volunteers' work may comprise up to 50 % of all sources of financing that is the Union grant, in-kind contributions and other sources of financing. For the purposes of calculating this percentage, contributions in kind in the form of volunteers' work <b>must be based on the unit cost per volunteer per day as defined and authorised by the European Commission at the following address:</b> <a href="https://ec.europa.eu/info/funding-tenders/opportunities/docs/2021-2027/common/guidance/unit-cost-decision-volunteers_en.pdf">https://ec.europa.eu/info/funding-tenders/opportunities/docs/2021-2027/common/guidance/unit-cost-decision-volunteers_en.pdf</a> This type of costs <u>must be presented separately from other eligible costs in the estimated budget, in the dedicated budget line 10.2 of the budget template (Annex B). The value of the volunteer's work must always be excluded from the calculation of indirect costs.</u> When the estimated costs include volunteers' work, the grant shall not exceed the estimated eligible costs other than the costs for volunteers' work.</p>
16.	Is it possible in lots 2 and 3 to have a lead applicant from Belgrade, one co-applicant from Belgrade, three or more co-applicants from outside of Belgrade?	Please see answer to question number 3.
17.	If it is stated that the actions proposed should prioritize development of regional resources, how will it be evaluated if the project activities are mostly focused on a specific geographic area of Serbia? For example, covering only a few districts, considering that the program is national.	<p>The additional elements indicated under 1.2 will be taken into account in the evaluation under point 1.4 and 2.4 of the evaluation grids.</p> <p>This criteria assesses overall added value elements of the proposal, i.e. does the proposal contain particular added-value elements (e.g. innovation, best practices) and the other additional elements indicated under 1.2. of the guidelines for applicants.</p> <p>As noted, these are only additional value-added elements, which are scored in line with the</p>

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		published evaluation grid.
18.	Is there any restrictions over the profile of associates?	Other organisations or individuals may be involved in the action as associates. Such associates play a real role in the action but may not receive funding from the grant, with the exception of per diem or travel costs. <u>Associates do not have to meet the eligibility criteria referred to in Section 2.1.1.</u>
19.	Can one organization be lead applicant in one application, for example, lot one, and also a co-applicant in another application for lot two and three? And can one organization be co-applicant in two applications for the same lot?	Please see answer to question number 1.
20.	Is it allowed for a newly established organization to be affiliated entity?	Please note that affiliated entity(ies) must satisfy the same eligibility criteria as the lead applicant and the co-applicant(s). You can find more details <u>on the definition of an affiliated</u> entity on page 8-9 of the Guidelines for applicants. There is no time requirement for the establishment of the organisation.
21.	If a Belgrade-based organization has branches working on outreach and more local activities that are registered in the Novi Sad and Nis, they would be affiliated entities in the context of a consortium setup. Would these affiliated entities count towards the minimum regional requirement, or is it necessary for a non-Belgrade organization to be partners?	Please see answer to question number 20.  In addition, mandatory requirements <u>for the participation of co-applicants</u> must be fulfilled. While the lead applicant and its co-applicant(s) <u>may act</u> with affiliated entity(ies), affiliated entities cannot replace the requirements for the co-applicants.
22.	Could you please confirm whether the 10% in-kind contribution can be considered as co-financing? What type of in-kind contribution is eligible?	Please see answer to question number 15.
23.	If we, as an organization registered in Serbia, apply as a lead, can one of our co-applicants be an organization registered in EU country, referring to Lot 2 and Lot 3?	For Lot 2 and Lot 3, all the applicants ((i.e. lead applicant and co-applicant(s)) must be effectively established in the Republic of Serbia.
24.	Could you please indicate when do you expect start of the implementation of approved projects?	The indicative date for the contract signature is November/December 2025, so the indicative implementation of the awarded grants could start in January 2026. Please note that this indicative timetable refers to provisional dates and may be updated by the contracting authority during the procedure.
25.	In the case where Organization X is the lead applicant in one lot and a co-applicant in another, would it be eligible to receive funding under both projects if both applications are successful? We ask this because the guidelines clearly state that "The lead applicant may not be	Please see answer to question number 1.  In addition, please note that the allocation of grants and participation is indicated according to the role an organisation takes. Consequently, an organisation applying as lead applicant may not be awarded more than one grant under this call

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	awarded more than one grant under this call for proposals," and that "A co-applicant/affiliated entity may not be awarded more than two grants under this call for proposals." However, the specific scenario described above is not explicitly addressed.	for proposals, as lead applicant. A co-applicant/affiliated entity may not be awarded more than two grants under this call for proposals, as co-applicant. Therefore, for e.g. the same organisation can be awarded a grant as lead applicant in one lot and as co-applicant in another lot.
26.	Is a network of organizations, formally registered in the Business Registers Agency as a union (savez organizacija), eligible to participate as a co-applicant?	Please note that in line with the Guidelines for Applicants, section 2.2.4., p. 21, <i>"To ensure equal treatment of applicants, the contracting authority cannot give a prior opinion on the eligibility of lead applicants, co-applicants, affiliated entity(ies), an action or specific activities."</i>  Please see answer to question number 2.
27.	With regard to the section on ineligible costs - specifically "salary costs of the personnel of national administrations" - does this also include fees for trainings/workshops that might be delivered by professionals from state institutions such as judges, prosecutors, inspectors, or employees of social welfare centres?	Salary costs of personnel of national administrations are an ineligible expenditure. However, if allowed by local legislation, personnel of national administration can be hired as external experts/consultants for short term assignments, in line with respective rules of "ANNEX IV - Procurement by grant beneficiaries in the context of European Union external actions".
28.	I have a question regarding the eligibility of co-applicants. The guidelines state that "co-applicants must satisfy the eligibility criteria applicable to the lead applicant," which I understand to mean that co-applicants must also be based in Serbia. Could you kindly confirm whether co-applicants are required to be based in Serbia, or if entities outside Serbia may be eligible?	Please note that the eligibility requirement for the establishment related to the applicants is different for different lots.  Please see answer to question number 3.
29.	Can you please provide more detailed clarification regarding page 5 of Guidelines: "Majority of activities proposed under an action should be developed, resourced and implemented outside of Belgrade." Can you please more closely define "majority"? Is it at least 51% or some other 75%? We are keen to follow the guidelines but need them to understand them better.	Please see answer to question number 17.  In addition, please note that majority of activities will be evaluated against the proposed activities within your proposed action as a whole and were not expressed in percentage in the guidelines. It is an added value element and not a mandatory requirement to be fulfilled.
30.	Pages 13-14 of Guidelines: in the section „Financial support to third parties“ we read the following statement: „The maximum amount of financial support per third party is EUR 60,000 except where achieving the objectives of the actions would otherwise be impossible or overly difficult, in which case this threshold can be exceeded. A threshold below EUR 60,000 can be set if	The lead applicant should define mandatorily in Section 2.1.1 of Annex a.2 (Grant application form – Full application) everything regarding Financial support to third parties, however you may already include the information in the Concept note as well.  The mandatory elements include those raised in the question:

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	<p>appropriate.”</p> <p>We can envision there will be such cases where the threshold of EUR 60,000 will be exceeded, and that will be supported by sufficient reasons. Should we provide the reasons in the concept note phase or only in the full application phase? And should the explanation be in the form elaborated selection criteria, and additional criteria which have to be met for the exception to be made?</p>	<p>(i) the overall objectives, the specific objective(s) and the outputs (i.e. the results) to be achieved with the financial support;</p> <p>(ii) the different types of activities eligible for financial support, on the basis of a fixed list;</p> <p>(iii) the types of persons or categories of persons which may receive financial support;</p> <p>(iv) the criteria for selecting these entities and giving the financial support;</p> <p>(v) <u>the criteria for determining the exact amount of financial support for each third entity;</u></p> <p><u>and</u></p> <p>(vi) <u>the maximum amount which may be given.</u></p>
31.	<p>As we are currently in the process of developing our project and preparing the concept note, we would greatly appreciate your clarification regarding the types of contributions that are considered eligible especially for cost share.</p> <p>To ensure full compliance with the applicable guidelines and avoid any misunderstandings, we would be grateful if you could provide an overview of the acceptable forms of financial contributions.</p>	<p>Please see the answer to question number 6.</p>
32.	<p><i>Eligibility of Networks as Co-applicants</i></p> <p>Can a network composed of civil society organisations, registered as an association or union under the Serbian Business Registers Agency (APR), act as a co-applicant in this call?</p>	<p>Please note that in line with the Guidelines for Applicants, section 2.2.4., p. 21, “<i>To ensure equal treatment of applicants, the contracting authority cannot give a prior opinion on the eligibility of lead applicants, co-applicants, affiliated entity(ies), an action or specific activities.</i>”</p> <p>Take note also of the definition of the affiliated entity on page 9 of the Guidelines for applicants. Depending on other required eligibility criteria, a network composed of civil society organisations can be considered eligible as co-applicant if it is established a single separate legal entity, not affiliated to the lead applicant.</p>
33.	<p><i>Financial Capacity of the Lead Applicant</i></p> <p>Is it mandatory for the lead applicant to demonstrate strong financial capacity in order to be eligible?</p> <p>Does the financial situation of the lead applicant affect the overall project selection in any way other than the 5 points allocated under the financial capacity section of the evaluation grid?</p>	<p>Financial capacity of the lead applicant is not an eligibility but a selection criteria. The selection criteria for financial capacity help to evaluate the lead applicant's financial capacity and are used to verify that <u>they have stable and sufficient sources of finance to maintain their activity and keep operating throughout the proposed action period and, where appropriate, to participate in its funding (this only applies to lead applicants).</u></p> <p>The assessments are made considering the action</p>



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		<p>proposed, the applicable payment schedule of the contract and on the basis of the relevant supporting documents defined in the guidelines for applicants. These may include an external audit report of the lead applicant, the profit and loss account and the balance sheet for the last financial year for which the accounts have been closed.</p> <p>For the purpose of the evaluation of the financial capacity, lead applicants must ensure that the relevant information and documents (i.e. accounts of the latest financial years and external audit report, where applicable) are up to date either in their PADOR profile or when submitting the requested documents with PADOR registration form.</p>
34.	<p><i>Sources of Co-financing (10%)</i> The guidelines state that co-financing must come from sources other than the general budget of the Union or the European Development Fund. Could you please clarify which EU funds would be considered acceptable as sources of co-financing under this rule?</p>	Please see the answer to question number 6.
35.	<p><i>Track Record of Co-applicants</i> Can an organisation that has been formally registered for several years but has not received its own direct project funding in recent years still be considered eligible as a co-applicant? To clarify, the organisation in question has been continuously active during this period, but its operations and key personnel have been funded via other legal entities (e.g. through expert contracts or project partnerships).</p>	<p>Operational capacity of the applicants is not an eligibility but a selection criteria. The selection criteria for operational capacity help to evaluate the applicant(s)'s and affiliated entity(ies)'s operational capacity and are used to verify that they have the management capacity, professional competencies and qualifications required to successfully complete the proposed action. This applies to applicants and any affiliated entity(ies).</p> <p>These are assessed under points 1.1-1.3 of the evaluation grid as published in the Guidelines for applicants on p.26. The applicants and any affiliated entity(ies) will be assessed for their in-house experience of project management, technical in-house expertise (especially knowledge of the issues to be addressed) and management in-house capacity (including staff, equipment and ability to handle the budget for the action).</p>
36.	<p><i>Eligibility of Network Members for Third-Party Support</i> If a network is included as a co-applicant, would its member organisations be eligible to apply for and receive financial support through the Financial Support for Third</p>	<p>Please note that each actor should only participate in a single role in an action. This is to avoid any potential conflicts of interest and ensure clear allocation of rights and obligations as well as certainty on cost eligibility. As defined under point 2.1.5 of the Guidelines</p>

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	Parties (FSTP) component of the project? Would this present any conflict of interest or restrictions?	for applicants, recipients of financial support are neither beneficiaries, affiliated entity(ies) nor associates nor contractors.
37.	We are currently preparing a proposal for the call and would appreciate your clarification on the eligibility limits related to the number of applications per organization, particularly concerning roles of lead applicant and co-applicant. Could you please confirm whether the following understanding is correct: 1. An organization can submit only one application as a lead applicant, 2. A lead applicant cannot act as a co-applicant (partner) in any other application under this call, even in a different lot, and 3. An organization can be a co-applicant in two separate applications, either in the same or different lots	Please see answer to question number 1.
38.	Can you please provide more detailed clarification regarding one matter stipulated in the Guidelines:  1. Is it possible that a same organization ends up with two approved proposals/grants, one where it will be a lead applicant on one Lot and other where it will be co-applicant on a different Lot? 2. The same question with 3 proposals – where a single organization will be lead applicant on one proposal on one Lot, and co-applicant on two different proposals on the remaining two Lots.	Please see answer to question number 1 and question number 25.
39.	I wanted to reach out with a question regarding your open call. Can one organisation be a partner on multiple project proposals? This refers to several combinations like: 1. Lead + partner 2. partner on 2 applications in the same LOT 3. partner on 2 applications in different LOTs.	Please see answer to question number 1 and question number 25.
40.	<i>Eligible costs – simplified cost options (SCOs)</i> • Section 2.1.3 (Form of the grant, p.15) states that grants under this Call may be awarded as reimbursement of eligible costs, either on the basis of: actual costs; or (ii) simplified cost options (SCOs), or a combination of both. However, in section 2.1.7 (Eligibility of costs and eligibility of results/conditions,	Please refer to Corrigendum 1 to Guidelines for applicants.  Simplified cost option is not an option in this Call for Proposals and reimbursement of eligible costs may be based on the actual costs incurred by the beneficiary(ies) and affiliated entity(ies).  As noted on page 16 of the Guidelines for applicants, under 2.1.7, “ <i>Eligibility of costs and</i>

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	<p>p.16), it is stated that “eligible costs must be reimbursed as actual costs.”</p> <p>Could you please confirm whether simplified cost options (unit costs, lump sums, or flat rates) are acceptable under this Call?</p>	<p><i>eligibility of results/conditions</i>”: Eligible costs can be reimbursed as actual costs.</p>
41.	<p><i>Co-financing requirements</i></p> <p>a) Is there any restriction on which budget categories must be co-financed? Is co-financing required for each cost category individually, or can it be provided in aggregate?</p> <p>b) If SCOs are used, how should co-financing be calculated and reported per SCO type (unit cost, lump sum, flat rate)?</p> <p>c) Are all co-applicants required to contribute co-financing in proportion to their share of the budget?</p> <p>d) Specifically, in the case where a co-applicant is responsible for managing Financial Support to Third Parties (FSTP), are they required to provide co-financing for the entire FSTP scheme or only for the portion of the project they directly implement?</p>	<p>Please see the answer to question number 6.</p> <p>In addition, there is no restriction on which budget categories must be co-financed. Co-financing is assessed/observed on the level of the whole budget.</p> <p>Simplified cost option is not an option in this Call for Proposals and reimbursement of eligible costs may be based on the actual costs incurred by the beneficiary(ies) and affiliated entity(ies). Please see answer to question number 40.</p> <p>Contribution to co-financing depends from the agreement between lead applicant and co-applicants and other donors, if applicable.</p>
42.	<p><i>FSTP and cost reimbursement method</i></p> <ul style="list-style-type: none"> <li>Can Financial Support to Third Parties (FSTP) be awarded using simplified cost options (e.g. lump sums or unit costs for re-granting schemes), or must it be reported exclusively based on actual costs incurred?</li> </ul>	<p>Simplified cost option is not an option in this Call for Proposals and reimbursement of eligible costs may be based on the actual costs incurred by the beneficiary(ies) and affiliated entity(ies).</p> <p>Please see answer to question number 40.</p>
43.	<p>We are kindly asking the clarification related to the number of applications in which one organisation can participate.</p> <p>Can one organization participate as a lead applicant in one application and as co-applicant in two more projects proposals?</p> <p>Should all three projects be in different lots or two projects in which the organization is co-applicant can be in the same lot?</p>	<p>Please see answer to question number 1 and question number 25.</p>
44.	<p><i>Geographical Scope of the Action:</i></p> <p>While the Call encourages decentralization—especially through the involvement of organizations primarily based outside of Belgrade—it does not clearly define whether implementing activities and achieving results within a</p>	<p>Please see the answer to question number 17.</p> <p>In addition, it is noted that majority of activities proposed under an action should be developed, resourced and implemented outside of Belgrade. Applicants are encouraged to demonstrate and summarise it under point 1.3.4 “Particular</p>

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	group of geographically close districts (e.g., 5–6 neighbouring regions) would be considered a limitation or potentially an added value. Could you kindly clarify how such a regional focus would be assessed?	added-value elements” of the Annex A.1 – Grant application form - Concept note, which will be then further assessed by the evaluation committee.
45.	<p><i>Purchase of Buildings for Project Implementation:</i></p> <p>We understand from the Guidelines that the purchase of land or buildings is generally not eligible, except when necessary for the direct implementation of the action, and provided that ownership is transferred in accordance with Article 7.5 of the General Conditions. In that context, is there a specific ceiling or percentage limit applied to such costs in relation to the total project budget?</p>	Please note that actions that are eligible under this call for proposals do not provide the necessity of purchase of land or buildings for the direct implementation of the action. Consequently, the purchase of land or buildings is not eligible under this call for proposal.
46.	<p><i>Financial support to third parties and intermediary CSOs</i></p> <p>On page 14 of Guidelines for applicants it is written: "informal groups can benefit from FSTP in the submitted proposal, however only via an intermediary CSO;"</p> <p>Can co-applicants act as the "intermediary CSO"? Or does the "intermediary CSO" have to be a third party?</p>	Please see answer to question number 36.
47.	<p><i>Audit costs</i></p> <p>No references are made regarding the audit costs in the Guidelines for applicants. However, in the budget template, under the Budget Heading 5 (Other costs, services) there is a budget line 5.3 Expenditure verification/Audit.</p> <p>Given the varying practice in previous calls (sometimes audit was procured and paid by the DEU, sometimes audit is procured and paid by the applicant), can you confirm whether audit costs should be budgeted or not?</p>	<p>As it is not noted in the Guidelines for applicants that the contractual expenditure verification(s) will be done by the Contracting Authority, it is the obligation of the beneficiary, as in line with General Conditions of the grant contract (Article 2.8 of Annex II).</p> <p>The expenditure verification is an eligible cost and it should be budgeted under budget item 5.3.</p>
48.	In the case where a network of organizations is eligible to apply as a co-applicant, can the individual member organizations within that network be considered as separate legal entities and submit their applications as a lead or co-applicant?	<p>Please see answer to question number 32.</p> <p>The organisation applying should always fulfil other eligibility criteria as defined for the applicants under section 2.1.4.</p> <p>In addition, please take note of the restrictions in number of applications and grants per applicant/affiliated entity.</p>

## QUESTIONS and ANSWERS No.1

No.	Question	Answer
49.	<p><i>Specifically, regarding Financial Support to Third Parties (FSTP):</i></p> <p>If the organisation intended to receive FSTP is not officially registered, is it possible to channel the financial support through a co-applicant?</p>	<p>As defined under the Guidelines for applicants, informal groups can benefit from FSTP in the submitted proposal, however only via an intermediary CSO.</p> <p>In addition, please see the answer to question number 36.</p>
50.	<p>Could you please confirm whether a non-governmental organisation registered in Switzerland is eligible to apply under Lot 1, as lead applicant, as stipulated in the basic act NDICI-GE (Article 28 of the Regulation (EU) 2021/947 of the European Parliament and of the Council, under the Call for proposals "Human Rights, Democracy and Civil Society programme for Serbia 2024-2025.</p>	<p>In addition to other listed requirements of the eligibility of lead applicants (and co-applicants), regarding the establishment:</p> <p><b>For Lot 1:</b> be effectively established in a Member State of the European Union <u>or in any eligible country</u>, as stipulated in the basic act NDICI-GE , (Article 28 of the Regulation (EU) 2021/947 of the European Parliament and of the Council ).</p> <p>Please note the following_NDICI-GE , (Article 28 of the Regulation (EU) 2021/947 of the European Parliament and of the Council:</p> <p><u>Article 28</u> Eligible persons and entities</p> <p>1. Participation in procurement, grant and prize award procedures for actions financed under geographic programmes and under the Civil Society Organisations thematic programme and the Global Challenges thematic programme shall be open to international organisations and to all other legal entities, including civil society organisations, who are nationals of and, in the case of legal persons, who are also effectively established in, the following countries:</p> <p>(a) Member States, beneficiaries listed in the relevant Annex to the IPA III Regulation and contracting parties to the Agreement on the European Economic Area;</p> <p>(b) Neighbourhood partner countries and the Russian Federation when the relevant procedure takes place in the context of the programmes referred to in Annex I in which it participates;</p> <p>(c) developing countries and territories, as included in the list of ODA recipients published by the OECD Development Assistance Committee, which are not members of the G-20 group, and overseas countries and territories;</p> <p>(d) developing countries, as included in the list of ODA recipients, which are members of the G-20 group, and other</p>

## QUESTIONS and ANSWERS No.1

No.	Question	Answer
		<p>countries and territories, when the relevant procedure takes place in the context of an action financed by the Union</p> <p>under the Instrument in which they participate;</p> <p>(e) countries for which reciprocal access to external funding is established by the Commission; that access may be granted, for a limited period of at least one year, whenever a country grants eligibility on equal terms to entities from the Union and from countries eligible under the Instrument; the Commission shall decide on the reciprocal access and on its duration after consultation of the recipient country or countries concerned;</p> <p>(f) member countries of the OECD, in the case of contracts implemented in a LDC or a highly indebted poor country, as included in the list of ODA recipients.</p> <p>2. Without prejudice to the limitations inherent to the nature and objectives of the action, participation in procurement, grant and prize award procedures for actions financed under the Human Rights and Democracy thematic programme and the Peace, Stability and Conflict Prevention thematic programme as well as rapid response actions, shall be open without limitations.</p>