

This document is an unofficial translation of the official version published in the Netherlands Gazette Nr. 31870, 12 juni 2018: 'Besluit van de minister voor Buitenlandse Handel en Ontwikkelingssamenwerking van 4 juni 2018, Min-BuZa.2018.1204-22, tot vaststelling van beleidsregels en een subsidieplafond voor subsidiëring op grond van de Subsidieregeling Ministerie van Buitenlandse Zaken 2006 (Subsidieprogramma Fonds Bestrijding Kinderarbeid 2018–2022)'

Order of the Minister for Foreign Trade and Development Cooperation of 4 June 2018, no. MINBUZA-2018.1204-22, laying down administrative rules and a ceiling for grants awarded under the Ministry of Foreign Affairs Grant Regulations 2006 (Grant Programme for the Fund against Child Labour 2018-2022)

The Minister for Foreign Trade and Development Cooperation,

having regard to articles 6 and 7 of the Ministry of Foreign Affairs Grants Decree and article 5.1 of the Ministry of Foreign Affairs Grant Regulations 2006,

Orders:

Article 1

The administrative rules appended as an annexe to this Order apply to grants awarded under article 5.1 of the Ministry of Foreign Affairs Grant Regulations 2006 with a view to supporting activities in the field of human rights and private sector development that are conducive to combating child labour, from the date on which this Order enters into force up to and including 31 December 2022.

Article 2

1. Grant applications under the Grant Programme for the Fund against Child Labour (FBK) 2018-2022 may be submitted in several different rounds.
2. Applications for FBK 2018-2022 grants in the first round may be submitted from 23 July 2018 until 15:00 CET on 3 December 2018.
3. Applications for FBK 2018-2022 grants in the second round may be submitted from 4 February 2019 until 15:00 CET on 2 December 2019.
4. Applications for FBK 2018-2022 grants in subsequent rounds can be submitted during a time period to be announced at a later date.
5. Applications for FBK 2018-2022 grants must be submitted using the model application form made available by the Minister and must be accompanied by the documents stipulated in that form¹.

Article 3

1. An overall ceiling of €5.5 million applies to FBK 2018-2022 grants as referred to in article 2, paragraph 2 that are awarded from the date on which this Order enters into force up to and including 3 February 2019.
2. An overall ceiling of €5.5 million applies to FBK 2018-2022 grants as referred to in article 2, paragraph 3 that are awarded from 4 February 2019 up to and including 31 December 2019.
3. If the grant ceiling referred to in paragraph 1 is not fully depleted, the residual amount will be made available for applications as referred to in article 2, paragraph 3.
4. An overall ceiling will be announced at a later date for FBK 2018-2022 grants as referred to in article 2, paragraph 4.

Article 4

¹ <https://english.rvo.nl/subsidies-programmes/fund-against-child-labour/apply-fund-against-child-labour>.

Applications will be assessed in the order in which they are received. If on a given day the grant ceiling risks being exceeded, the Minister will determine the order in which applications received will be processed by drawing lots.

Article 5

This Order enters into force on the day after the date of the Government Gazette in which it appears and lapses with effect from 1 January 2023, with the proviso that it continues to apply to grants awarded prior to that date.

This Order and its accompanying annexe will be published in the Government Gazette.

Reina Buijs
Director-General for International Cooperation
For the Minister for Foreign Trade and Development Cooperation

ANNEXE

1. Background

General

The Netherlands has for many years been involved in international efforts to protect human rights, and in particular to combat and prevent child labour. It has for many years endeavoured to set international standards on child labour through the International Labour Organization (ILO). In 1997 the Netherlands helped organise the first International Conference on Child Labour, which led to the adoption of, and broad support for, ILO Convention No. 182, on the Worst Forms of Child Labour. Together with ILO Convention No. 138, the Minimum Age Convention, this still constitutes the normative framework for combating child labour. The Netherlands continues to strive for ratification of these conventions by more countries, and above all for better compliance with them. A key moment in this struggle was the Global Child Labour Conference in 2010 in The Hague, where a Roadmap was adopted for achieving the elimination of the worst forms of child labour by 2016.² Nevertheless, there are still 152 million children engaged in child labour around the world. The Sustainable Development Goals (SDGs) therefore include an agreement to eliminate the worst forms of child labour by 2025. At the fourth Global Conference on the Sustained Eradication of Child Labour in Buenos Aires in 2017, the Dutch government explained the Netherlands' approach, including the Dutch grant programme aimed at combating child labour.

What is child labour?

The Grant Programme for the Fund against Child Labour 2018-2022 ('FBK 2018-2022') uses the ILO's definition of child labour.³ It includes any labour that is performed by children who are too young to work, is too heavy, interferes with their schooling, or is clearly mentally and/or physically dangerous and harmful to them. Such labour threatens not only the future of the children themselves, but also the development of the society in which they live, for example because these children grow up to become poorly educated adults. Child labour is not just a consequence of poverty, but also a cause. Child labour occurs mainly in emerging markets and developing countries where governments do not adequately protect human rights, and where companies can at best provide part of the solution.

Role played by companies

The Minister for Foreign Trade and Development Cooperation ('the Minister') expects Dutch companies to comply with the OECD Guidelines for Multinational Enterprises.⁴ These guidelines stipulate that companies' own activities and decisions must not be the cause of human rights violations such as child labour, and that they may not be linked to such violations through their business relationships. When child labour exists in a Dutch company's international supply chain without the company directly causing it or being directly linked to it through its business relationships, the company is nonetheless expected to seek ways of preventing such violations in the chain and to mitigate their effects.⁵⁶⁷⁸ These points are illustrated in Figure 1.

² <http://www.ilo.org/ipeinfo/product/download.do?type=document&id=13453>.

³ The ILO definition used can be found at <http://www.ilo.org/ipeinfo/facts/ILOconventionsonchildlabour/lang--en/index.htm> and http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C138.

⁴ <http://mneguidelines.oecd.org/guidelines/>.

⁵ OECD Guidelines, II. General Policies, paragraphs 11 and 12.

⁶ OECD Guidelines, V. Employment and Industrial Relations, esp. paragraph 1(c).

⁷ Policy letter, 'Justice and Respect for All', Parliamentary Papers, House of Representatives, 2012-2013, 32 735, no. 78.

⁸ OECD Guidelines, II. General Policies, paragraphs 11 and 12.

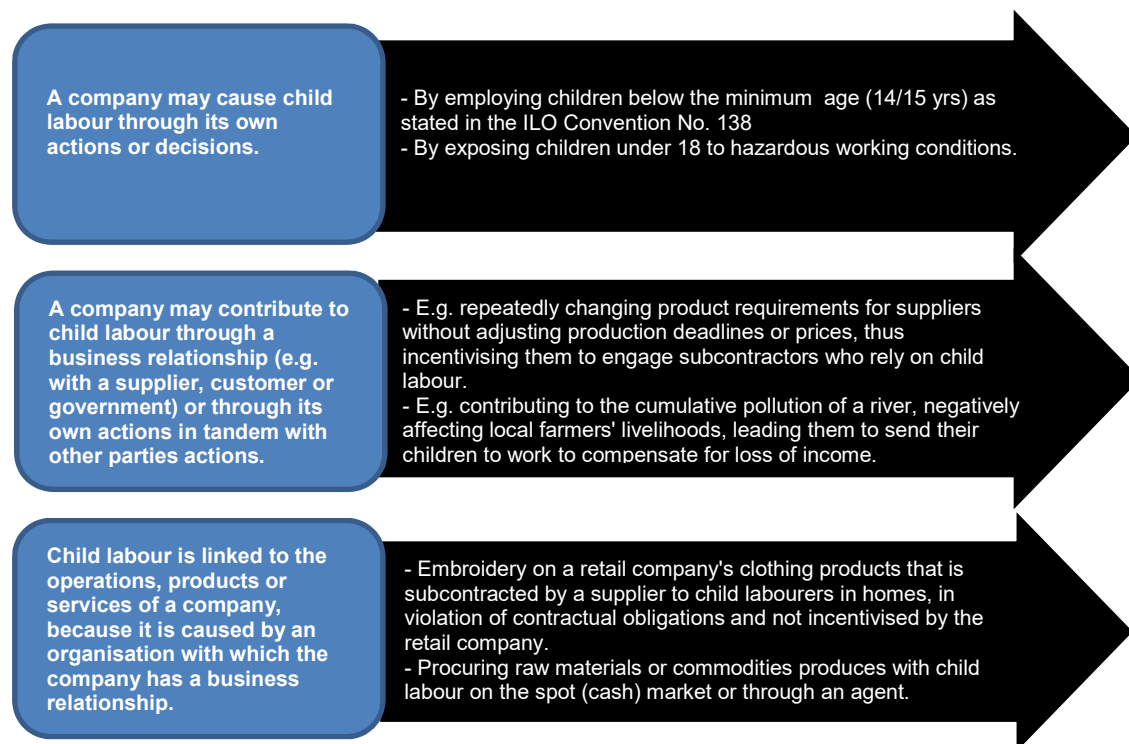


Figure 1 (Source: ILO-IOE Child Labour Guidance Tool for Business, 2015)

First grant programme

The Minister made funds available in 2016 to encourage multi-stakeholder initiatives to combat child labour, through the first Grant Programme for the Fund against Child Labour,⁹ in response to an amendment adopted by the House of Representatives. A number of companies subsequently sought to form partnerships with other companies in the same sector and/or through voluntary agreements on responsible business conduct, with non-governmental organisations (NGOs) and other partners. Information on these projects can be found on the website of the Netherlands Enterprise Agency (RVO.nl).¹⁰

Second grant programme

By a motion by MPs Roelof van Laar and Joël Voordewind, adopted in December 2016, the House of Representatives requested that €10 million be disbursed annually through a fund to help organisations and companies to combat child labour.¹¹ In response to this motion, the Minister decided to earmark €7 million annually for implementing a grant instrument and increasing knowledge on combating child labour. Another €3 million will be spent on other initiatives to combat child labour.

FBK 2018-2022 can also facilitate the implementation of existing and anticipated voluntary agreements in the field of responsible business conduct. Parties to these agreements can in fact submit grant applications for activities under these agreements as long as these are not already financed by the Ministry of Foreign Affairs.

2. Implementing organisation

The Minister for Foreign Trade and Development Cooperation has mandated the Netherlands Enterprise Agency (RVO.nl), an agency of the Ministry of Economic Affairs and Climate Policy, to implement FBK 2018-2022.

3. Definitions

⁹ Order of the Minister for Foreign Trade and Development Cooperation of 4 November 2016, no. MINBUZA-2016.732089, laying down administrative rules and a ceiling for grants awarded under the Ministry of Foreign Affairs Grant Regulations 2006 (Grant Programme for the Fund against Child Labour), Government Gazette 2016, no. 60276.

¹⁰ <https://aiddata.rvo.nl/programmes/NL-KVK-27378529-29557/?tab=summary>.

¹¹ Parliamentary Papers, House of Representatives, 2016-2017, 34 550, XVII, no. 26; Proceedings of the House of Representatives, 2016-2017, no. 22, item 15.

The following terms are used in this grant programme:

- *Child labour*: as defined by the International Labour Organization (ILO).¹²
- *Local business*: a business in the country where the activities will be carried out.
- *Minister*: the Minister for Foreign Trade and Development Cooperation.
- *SME*: an enterprise as described in Commission Recommendation 2003/361/EC of 6 May 2003 concerning the definition of micro, small and medium-sized enterprises.¹³
- *Non-governmental organisation (NGO)*: a not-for-profit organisation neither established by nor linked to a public authority either de facto or under its constitution, which possesses legal personality under civil law in the country where it has its registered office; this organisation must also be registered as such.
- *Company*: a legal person which is not an NGO, that carries out economic activities, regardless of the way it is financed. An economic activity is the offering of goods or services on an economic market. Entities that carry out economic activities on a not-for-profit, not-for-loss basis may also qualify as a company.
- *Public body*: all central, regional and local government bodies (central governments, provinces, municipalities or the equivalent in a given country). Semi-public bodies that carry out certain statutory tasks or serve the public interest and are financed entirely from the public purse may also take the role of 'public body' in a partnership.
- *Lead party*: member of the partnership that applies for the grant on its behalf. If the application is approved, the lead party is the grant recipient and, as such, bears full responsibility towards the Minister for implementation of the proposed activities and compliance with the obligations in respect of the grant.
- *Partnership*: a contractual partnership without legal personality, whose partners themselves each have legal personality, that is aimed at achieving common objectives by carrying out activities, such that each partner delivers part of the necessary input and bears part of the accompanying risks.

4. Grant Programme 2018-2022

4.1 Goal

The goal of FBK 2018-2022 is to help eliminate child labour (as defined by the ILO) by 2025. The Netherlands has committed itself to this objective in the form of target 8.7 of the Sustainable Development Goals. To this end, it is pursuing the following sub-goals:

- a. Dutch companies take responsibility for eradicating child labour.
So far many of the initiatives to combat child labour have been taken by NGOs, while the business community has been taking fewer. FBK 2018-2022 is aimed at making business play a far more active role, and at avoiding companies' being obliged to withdraw from a supply chain when problems are identified. Companies will deepen their understanding of their position in supply chains, of the scope they have for tackling child labour and their possible obligations in this regard, going beyond the first link in these chains. They will also deepen their understanding of the possible economic consequences of child labour for their operations and business cases, which will need to be mitigated. The grant programme's contribution to disseminating knowledge and suggesting possible courses of action for businesses will help them and other companies understand at an earlier stage what they could be doing. This should also help break the current taboo on addressing child labour.
- b. Sustainably combating child labour by working with the right partners to tackle its real causes.
Measures against child labour often need to be taken within businesses, as well as in partnership with other companies and stakeholders, and in the places where child labour exists. Local projects to combat child labour must be tailored to the local causes of child labour, including the impact of gender differences: labour often takes different forms for boys and for girls, and solutions can vary as well depending on the children's sex. NGOs and companies can also learn in the course of projects to understand each other's 'language', and to draw on each other's strengths in working together. At the same time companies can tackle internal resistance and find and apply appropriate business solutions. This kind of problem-solving is part of what is called 'due diligence'.
- c. Dutch companies exercise due diligence regarding other risks and in their other supply chains, and learn to repeat the process.
Due diligence is an ongoing process that helps companies map risks concerning labour rights, human rights and sustainability in their own organisation and in the broader supply chain, and then act to avoid or minimise these risks or to undo and/or compensate for the consequences. Child labour is distinguished from other human rights issues by the strength of the consensus that it must be eliminated. At the same time, child labour is so closely associated with other risks to human rights that combating it can serve as a catalyst or a starting point for tackling related issues as well (such as a living wage or the freedom to form trade unions).

4.2 Target group

Through FBK 2018-2022 the Minister aims to support sustainable efforts of Dutch companies and their partners to combat child labour.

No company wants to have child labour in its supply chains. In actual fact, however, few companies have insight into problems beyond the next link in the chain. Nor is tackling child labour usually a simple matter. There is still a taboo surrounding the issue; projects can be protracted and complex; and internal business

¹² <http://www.ilo.org/ipecc/facts/lang--en/index.htm>.

¹³ OJ 2003, L 124.

operations are still not always conducted in a way that helps combat child labour. Companies also sometimes have to contend with internal resistance, because of the risk of damage to the company's reputation and because of the scale of the investments required.

4.3 Parties that may be eligible for a grant

FBK 2018-2022 grants are intended for partnerships, represented by a lead party that submits the application.

An eligible partnership at least includes the following partners:

- one Dutch company,
 - one NGO,
 - one local business, unless this is not yet possible at the time the application is submitted. In that case, the application must make clear how a local business will be involved in the project.
- 'Dutch' means 'having legal personality under Dutch law and its registered office in the Netherlands'.

There should be a good balance in the partnership between the number of companies and the number of NGOs. Attainment of the objective of the project for which a grant is being requested must depend on the efforts of all partners.

An NGO in the target country may be included in the partnership, but may also be involved in implementing the project in some other way.

The companies included in the partnership:

- must be part of the same supply chain; for instance, companies that mainly provide consultancy services may not be included in a partnership,
- in the case of a Dutch company, must have substantial operations in the Netherlands,
- suspect that child labour exists in their supply chain,
- are not shell companies.¹⁴

The lead party is:

- a Dutch company, or
- a company with its registered office abroad and a branch office in the Netherlands that is entered in the commercial register of the Dutch Chamber of Commerce, or
- a Dutch NGO.

To be eligible for a grant, the lead party must demonstrate that it and its partners endeavour to prevent serious sexual and other misconduct and other serious forms of inappropriate behaviour towards employees and other individuals when implementing the proposed activities, and that in the event of such incidents, they will act as promptly as possible to put an end to the misconduct or inappropriate behaviour and mitigate the consequences.

4.4 Orientation phase

Before submitting a grant application, a potential grant applicant can always have an interview with RVO.nl, which will have no consequences for an eventual application. This makes it possible to share information in a confidential setting, including information about risks in the supply chain.

If a lead party decides to start making specific plans and is considering submitting a grant application on behalf of a partnership, it is required to enter an advice trajectory based on a submitted 'quick scan'. If applicable, RVO.nl will carry out a risk assessment in the commercial chain and in the own organisation of the companies. The lead party will receive advice from an RVO advisor and (possibly) an expert on child labour. For more information, please see the [website](#).

This stage ends when the RVO.nl adviser issues the advice. This advice is not binding; it is up to the potential applicant to decide whether or not to submit an application.

As a request for an advice takes about two weeks to process, RVO.nl cannot respond in time to requests that are made two weeks or less before the application deadline.

4.5 Eligible activities

To be eligible for a grant under FBK 2018-2022, the activities for which a grant is being requested must be aimed at combating child labour in one or more countries on the most recent List of Recipients of Official Development Assistance¹⁵ compiled by the Development Assistance Committee (DAC) of the Organisation for Economic Co-operation and Development (OECD). These activities must also be focused on or linked to the activities of the companies in the partnership.

¹⁴ Companies with only a postal box address in the Netherlands, which have their operations chiefly or entirely outside the Netherlands.

¹⁵ <http://www.oecd.org/dac/stats/dacdist.htm>.

A grant may be requested for a combination of an A project and a B project, or only for a B project, defined as follows:

- A project: a local impact study.
- B project: activities at a specific location in combination with due diligence measures within one or more companies in the partnership.

An A project, a local impact study, is an in-depth study of one or more companies' operations on location, as a logical extension of a previously conducted risk analysis. The study should include a stakeholder analysis, local field research and an analysis of the root causes of child labour.

An A project concludes with the drafting of an action plan for a B project, including a plan for monitoring and assessment with a theory of change. If an application for a combined A and B project is approved, the budgeted costs for the B project activities will only be eligible for a grant once RVO.nl has approved this action plan.

A B project, activities on location in combination with due diligence measures within one or more companies in the partnership, should result in the integration of a strategy against child labour locally and in the integration of due diligence in the company or companies.

When an application is submitted for a B project alone, the outcomes of a risk analysis and a local impact study must accompany the application. This applies both to the activities on location (the local project) and to the proposed approach within one or more organisations in the partnership (the due diligence measures). The application should also include a plan for monitoring and assessment, including a theory of change.

When a B project ends, there should be an overview of how the company or companies have integrated a strategy against child labour in their business operations, and what local measures will ensure the continuation of these efforts. The overview should also describe follow-up activities after the project period ends, in terms of funding, stakeholder involvement, risks to be mitigated, and activities to eliminate the root causes of child labour. The same naturally applies to cases involving a combination of an A project and a B project.

This is shown in the diagram below:



4.6 Duration of the activities

The maximum duration of activities that have received an FBK 2018-2022 grant is four years, and implementation must begin within 12 months after the application is submitted.

4.7 Size of the grant

Grants will be awarded for up to 70% of the eligible costs, to a maximum of €475,000.

The partners' own contribution to the project must not come directly or indirectly from grants or

contributions from the budget of the Ministry of Foreign Affairs.

5. Eligible costs

5.1 Principles

In calculating the costs eligible for a grant, the following principles apply:

- costs that cannot reasonably be considered necessary for carrying out the activities for which grant funding is sought are not eligible for a grant;
- costs that are not directly related to carrying out the activities are not eligible for a grant;
- costs incurred in submitting the application are not eligible for a grant;
- project management costs incurred entirely in coordinating the activities must not relate to more than 10% of the total number of days claimed for work done in the Netherlands and abroad;
- the hourly rate for external staff, such as self-employed persons without employees, must not be higher than €87.50;
- the internal costs (for hours spent and, in the case of capital goods, the cost price) of the lead party and its partners are eligible without mark-up;
- costs incurred in non-European countries will be compared with local standards.

5.2 Eligible costs

- a. Eligible costs are wage costs, which are calculated as follows: the number of hours spent on these activities by staff members of the lead party and/or partners that are directly concerned with them, multiplied by a fixed hourly rate of no more than €87.50, which should include both direct wage costs and associated indirect costs. Notwithstanding this fixed hourly rate, the hourly rate for staff of the lead party and/or partners in non-European countries will be fixed in line with local standards, to a maximum of the aforementioned fixed hourly rate.
- b. To these costs may be added in any case:
 - costs of the use of capital goods, buildings and/or software. Fixed depreciation periods are used to determine the depreciation charge:
 - Capital goods (machines and equipment): 5 years
 - Buildings (when used for activities such as meetings, knowledge transfer and/or training): 30 years
 - Software: 3 yearsThe basis for determining depreciation is the product's purchase price – taking any residual value into account – plus any adjustment costs.
 - Travel costs: international travel costs and regional travel costs outside the Netherlands, based on economy class fares.
 - Subsistence: the maximum reimbursement is the number of nights multiplied by the appropriate Daily Subsistence Allowance Rate (DSA lists) for the Ministry of the Interior and Kingdom Relations, valid on the start date of the project. See Schedule I., pertaining to article 3, paragraph 1 of the Foreign Travel Regulations.¹⁶
- c. In addition to the travel and subsistence costs specified above, other travel and subsistence costs may be grant eligible on account of risks, insurance requirements and travel warnings, provided that these additional costs are properly substantiated in the application.

5.3 Costs not eligible for a grant

The following costs are in any case not eligible for a grant:

- costs associated with developing, preparing or submitting the application;
- financing costs and interest payments;
- VAT;
- costs resulting from inflation and exchange rate fluctuations;
- costs related to promotional or sales activities or promotional materials;
- general translation costs;
- costs of registering and maintaining intellectual property rights.

6. Application

6.1 Requirements

Before a lead party can apply for an FBK 2018-2022 grant, RVO.nl must issue a recommendation as described in section 4.4.

Applications must be submitted using the form supplied for this purpose, which can be downloaded from <https://english.rvo.nl>. The form must be accompanied by the documents specified in it, in the format prescribed by RVO.nl.

The application must in any event include:

¹⁶ Foreign Travel Regulations (in Dutch), <http://wetten.overheid.nl/BWBR0006914>.

- the reference number of the recommendation issued by RVO.nl;
- partner forms;
- project plan:
 - a. for a combination of an A project and a B project, or
 - b. for a B project that also includes the outcome of a local impact study;
- description of the outcomes of the risk analysis;
- budget, showing how each partner's own contribution will be financed;
- CSR policy officially adopted by the Dutch company or companies;
- signed agreement guaranteeing the participation of the partners in carrying out the activities and their compliance with the agreements reached, as well as their compliance with the obligations incurred under the grant decision;
- monitoring and assessment plan, including a theory of change if the application only concerns a B project.

The lead party and other partners must also declare that they are aware of and will comply with the OECD Guidelines (<http://mneguidelines.oecd.org/guidelines/>) and that the activities for which a grant is being requested are not listed in parts 02 to 08 of the FMO Exclusion List (<http://www.fmo.nl/exclusion-list>).

6.2 Opportunity for supplementation

With regard to the application procedure, particular attention is drawn to article 7, paragraph 3 of the Ministry of Foreign Affairs Grants Decree. If an incomplete application is submitted, the Minister may request a supplement in accordance with Section 4:5 of the General Administrative Law Act. In this case, the date and time of receipt of the application will be the date and time on which the supplement was received. Moreover, incomplete or insufficiently substantiated applications (in whole or in part) may be rejected on the grounds of failure to adequately satisfy the requirements and criteria.

When filling in the form, it is not sufficient to refer for the sake of brevity to other parts of the application, websites or annexes, unless the application form states that this is wholly or partly acceptable. Incomplete applications may be rejected.

7. Assessment of applications and allocation of resources

7.1 Assessment

The provisions of the General Administrative Law Act, the Ministry of Foreign Affairs Grants Decree and the Ministry of Foreign Affairs Grant Regulations 2006 are fully applicable to the assessment of applications and the award of grants under this grant programme. Applications will be assessed in accordance with the above legislation and pursuant to the requirements set out in this grant programme.

To be eligible for a grant, applications must satisfy the requirements above, especially those set out in sections 4 to 6. Only applications that meet these requirements will be substantively assessed on the basis of the criteria set out below. Points will be awarded on these criteria depending on the degree to which applications satisfy them. Applications must achieve a minimum score in order to be eligible for a grant. The criteria are:

For combinations of A and B projects, and for B projects:

- a. The project aims to sustainably combat and prevent child labour.
- b. The project budget is reasonable in view of the nature, scope and intended results of the activities.
- c. The size of each partner's contribution to the project bears a logical relation to the allocation of the requested grant amount among the partners.
- d. The project results will be disseminated as widely as possible so as to help combat and prevent child labour at the project location, in the sector concerned and in general.

For A projects specifically:

- e. The information provided about risks in the supply chain must meet the following minimum requirements:
 - The parts of the chain (countries, regions, suppliers and sectors) with the highest risk of child labour have been identified. This information has been used to set priorities in combating child labour, taking account of the gravity of the problem, the likelihood of its occurrence, other initiatives already in progress and the impact that the company can have on the situation.
 - The application shows awareness of the opportunities that the fight against child labour offers to the companies and their suppliers, as well as of possible resistance to their efforts and the possible causes of this resistance.
 - The analysis of risks in the supply chain is based on research by experts with proven expertise on child labour, but local stakeholders must be involved too.
- f. Local field research is adequately focused on:
 - Identifying instances of child labour and establishing the underlying causes (e.g. failure to pay a living wage, gender differences, forced labour, lack of collective bargaining, lack of access to education, insufficient awareness of the harm done to the children, culture and tradition, etc.) in the local context.
 - Stakeholder mapping and consultation: identifying external stakeholders and relevant experts at local level

(e.g. suppliers, experts on child labour, local NGOs, parents, schools, teachers, local government, trade unions) and involving them in local research and project implementation.

- Identifying the role played by the partners: determining to what extent the lead party and/or its partners contribute to possible underlying causes of child labour (as causal agents, contributors or 'linked' organisations; see Figure 1). In doing so, account is taken of resistance to change, gender policy, pricing mechanisms, procurement practices, wage levels, quality standards and delivery time.

For B projects specifically:

- g. The significance of the action plan for efforts to combat child labour locally.
- h. The plan's usefulness for taking effective measures in the company and for overcoming resistance.
- i. Whether sufficient account is taken of situational factors revealed by the risk analysis and local impact study, which may have already been conducted as part of the A project.
- j. Whether sufficient account is taken of gender differences.
- k. The adequacy of the Monitoring & Evaluation system used for monitoring progress and taking corrective action in terms of resources, activities, outputs, outcomes and underlying assumptions.
- l. Whether sufficient attention is paid to ICSR risks and adequate measures are taken to mitigate these risks.
- m. The extent to which the activities to continue efforts to combat child labour, locally and within the company (due diligence), after the project period ends, are described.
- n. The credibility of the description given of follow-up activities after the project period in terms of funding, stakeholder involvement, risks to be mitigated, and activities to eliminate the root causes of child labour.

RVO.nl may consult external parties in carrying out the assessment.

7.2 Allocation of available resources

€5.5 million will be available for each of the first and second FBK 2018-2022 funding rounds. The same amount will probably also be available for subsequent funding rounds. Funds will be allocated considering grant applications in the order in which they are received. If the total amount requested by applications received on a given day exceeds the funds available for the funding round in question, the order in which the applications are processed will be determined by drawing lots.

8. Grounds for rejection

In addition to the grounds for rejection set out in section 4:35 of the General Administrative Law Act, a grant application will be rejected if it does not satisfy the provisions of the Grant Programme 2018-2022 or if the budget available is insufficient.

9. Project monitoring

RVO.nl will carry out random checks to assess the proper use of grant funds, checking regularity and efficiency under the terms of the grant decision.

10. Obligations

The obligations attached to the grant will be laid down in the grant decision and will in any case include the following: first, the notification requirement, which obliges the grant recipient to notify RVO.nl if it cannot or cannot fully meet the requirements for the grant and/or cannot or cannot fully carry out the activities for which the grant has been awarded; second, the obligation to cooperate with a self-assessment, a joint process of knowledge sharing and learning, and monitoring and evaluation by RVO.nl of the activities for which the grant has been awarded.

11. Administrative burden

A test based on a standard cost model has been carried out in the interests of accountability for the administrative burden that the applicant will face, from drafting and submitting the application to the management phase, the determining of the definitive grant amount, and any objection and review procedures. The calculation shows that the administrative burden expressed as a percentage of the total available grant budget is 4.04%.