



**Order of the Minister of Foreign Affairs of 10 July 2025, no. BZ2517990, laying down administrative rules and a ceiling for grants awarded under the Ministry of Foreign Affairs Grant Regulations 2006 (Grant Programme for Impact Clusters 2025-2028)**

The Minister of Foreign Affairs,

Having regard to articles 6 and 7 of the Ministry of Foreign Affairs Grants Decree;

Having regard to articles 5.1 and 7.2 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 articles 5.1 and 7.2 of the Ministry of Foreign Affairs Grant Regulations 2006, with a view to supporting activities in the field of market development in low- and middle-income countries by making use of the combined knowledge, know-how and technology of businesses, trade associations, knowledge institutions and civil society organisations, from the date on which this Order enters into force up to and including 31 December 2028.

**Article 2**

1. Grant applications in the first round of the Grant Programme for Impact Clusters 2025-2028 may be submitted from 12.00 CEST on 28 August 2025 until 15.00 CET on 4 December 2025.
2. Applications for grants in subsequent rounds of the Grant Programme for Impact Clusters 2025-2028 can be submitted during a time period to be announced at a later date.
3. Grant applications under the Grant Programme for Impact Clusters 2025-2028 must be submitted using the application form made available by the Minister and must be accompanied by the documents stipulated in that form.<sup>1</sup>

**Article 3**

1. With regard to applications as referred to in article 2, paragraph 1, grants awarded under the Grant Programme for Impact Clusters 2025-2028 from the date on which this Order enters into force up to and including 31 December 2028 are subject to an overall ceiling of €11.3 million, which is divided into the following ceilings:
  - a. €6.2 million for Impact Cluster projects as part of a combination track;
  - b. €5.1 million for regular Impact Cluster projects.
2. If the grant ceiling referred to in paragraph 1 is not fully depleted, the residual amount will be made available for applications in the subsequent round.
3. A ceiling will be announced at a later date for grants from the Grant Programme for Impact Clusters 2025-2028 with regard to applications as referred to in article 2, paragraph 2.

**Article 4**

The Order of the Minister for Foreign Trade and Development Cooperation of 24 May 2023, Min-BuZa.2023.15459-14, laying down administrative rules and a ceiling for grants awarded under the

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<sup>1</sup> <https://english.rvo.nl/subsidies-financing/impact-clusters-ic>.



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Ministry of Foreign Affairs Grant Regulations 2006 (Grant Programme for Impact Clusters 2023-2028)<sup>2</sup> is repealed, with the proviso that it continues to apply to grants awarded pursuant to it.

**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 2029, with the proviso that it continues to apply to applications submitted and grants awarded prior to that date.

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

S. Collet

Deputy Director-General for International Cooperation

For the Minister of Foreign Affairs of the Kingdom of the Netherlands

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<sup>2</sup> Government Gazette 2023, 15513.



## **ANNEX**

### **1. Background**

In 2023, the Minister for Foreign Trade and Development Cooperation decided to draw up the Grant Programme for Impact Clusters 2023-2028. It was apparent from the first two rounds of this grant programme that certain modifications were desirable. The Minister of Foreign Affairs ('the Minister') therefore decided to draw up a modified grant programme.

Under the Grant Programme for Impact Clusters 2025-2028 ('the grant programme'), the Minister intends to harness the private sector's international knowledge to help develop markets in low- and middle-income countries. In this way the grant programme will contribute to the implementation of the 2030 Agenda for Sustainable Development.<sup>3</sup>

The private sector is the driver of market development and thus of income growth and productive employment. Due to lack of knowledge, know-how and technology or other circumstances, this sector is not always well developed in low- and middle-income countries. Knowledge, know-how and technology that are available elsewhere in the world can help improve business capacity in low- and middle-income countries. A better functioning private sector promotes market development and, in the longer term, self-reliance in low- and middle-income countries, and thus contributes to stability and opportunities for business. Capacity building in a sector or subsector often requires a sector-wide approach.

Combining the existing knowledge of individual businesses, trade associations, knowledge institutions and civil society organisations that make up a specific sector or subsector can boost capacity building in the local private sector. In this way, this sector can become an attractive market affording trade and investment opportunities for participating businesses, including Dutch businesses, and increasing their earning capacity. Sometimes this development is a longer term process. In many low- and middle-income countries, Dutch embassies and consulates ('missions') implement programmes aimed at supporting the development of the local private sector and therefore also of the local market. To complement and enhance the effects of these programmes, businesses can form a partnership ('impact cluster') to carry out a coherent set of activities aimed at transferring knowledge, know-how and technology to the local private sector.

Part of the resources available under this grant programme is earmarked for projects in a combination track. The objective of the combination track approach<sup>4</sup> is to achieve development impact in low- and middle-income countries via the business sector. An approach combining trade, investment and development aid contributes to green economic transitions and digitalisation transitions. For 15 countries,<sup>5</sup> the Netherlands has defined one or more combination tracks within which different projects, including impact cluster projects, can be developed and implemented. Impact cluster projects in these combination tracks are subject to a separate grant ceiling. 'Regular impact clusters' are projects that contribute to a mission's other policy priorities relating to market development. The recommendation issued on the basis of the quick scan (see section 4.3) will indicate whether a project should be considered for a combination track or as a regular project. This recommendation does not affect the criteria which the grant application must meet.

### **2. Implementing organisation**

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<sup>3</sup> The 2030 Agenda for Sustainable Development, adopted by all United Nations members in 2015, created 17 Sustainable Development Goals (SDGs).

<sup>4</sup> <https://www.rvo.nl/onderwerpen/overzicht-combitracks>.

<sup>5</sup> Bangladesh, Colombia, Côte d'Ivoire, Egypt, Ghana, India, Indonesia, Kenya, Morocco, Namibia, Nigeria, Senegal, South Africa, Ukraine and Vietnam.



The Minister has mandated the Netherlands Enterprise Agency (RVO), an agency of the Ministry of Economic Affairs, to implement this grant programme.

### 3. Definitions

The following definitions are used in this grant programme:

- *trade association*: a foundation or association which, pursuant to its constitution, represents the interests of its members, consisting of businesses belonging to the same sector;
- *capacity building*: strengthening and improving local capacity and opportunities for grant programme beneficiaries at individual, organisational and institutional level, such as through education and empowerment, and advocacy for women's rights;
- *economic activity*: any activity in which goods or services are offered on a market;
- *group*: an economic unit in which:
  - a. an entity with legal personality governed by private law that directly or indirectly
    - o 1° holds more than half of the issued share capital of,
    - o 2° is a fully liable partner of, or
    - o 3° has a controlling interest in one or more legal persons, and
  - b. that legal person / those legal persons are organisationally linked;
- *tax group*: a group of businesses seen as one business for tax purposes;
- *impact cluster*: a partnership of businesses, and sometimes also trade associations, knowledge institutions and civil society organisations, that can provide a beneficiary with knowledge, know-how or technology that it lacks with the aim of increasing production capacity in local businesses and/or improving their sustainability;
- *knowledge institution*: an educational or research institution that contributes to knowledge exchange – to qualify as a knowledge institution, an organisation's core tasks must be independent research and/or knowledge transfer, regardless of whether it also carries out economic activities or is a public body;
- *local business*: a private business with legal personality under civil law in a country other than the Netherlands and which has its registered office in the country where the grant-funded activities are to take place;
- *civil society organisation*: a non-profit organisation that is not connected to a government organisation either de facto or under its constitution, which serves a public interest and possesses legal personality, and is registered as such – it must not have been established by a government organisation, or must have become fully autonomous from the government organisation that established it;
- *Minister*: the Minister of Foreign Affairs;
- *business*: a legal person carrying out economic activity, which is not a trade association, knowledge institution or civil society organisation;
- *low- and middle-income countries*: the countries on the grant programme country list;<sup>6</sup>
- *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 grant-funded 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 under civil law, 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.

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<sup>6</sup> <https://english.rvo.nl/subsidies-financing/impact-clusters-ic>.



## **4. Grant Programme for Impact Clusters 2025-2028**

### **4.1 Objective**

The objective of the grant programme is to contribute to market development in low- and middle-income countries through the deployment of international knowledge, know-how and technology.

Specifically, broad development of an underdeveloped local private sector or subsector is pursued through impact cluster activities that aim to strengthen knowledge, know-how and technology used by local businesses. This will improve their business cases, stimulate local entrepreneurship and, in the long term, directly and/or indirectly create sustainable new jobs. The long-term strategic ambitions of the businesses in the impact clusters play a role in this. Businesses in the impact clusters perceive long-term opportunities in sectors and subsectors that have yet to be fully developed, and are prepared to commit to multi-year projects in which their knowledge, skills and technology can support further development in the local sector.

Beneficiaries in this grant programme include local small and medium enterprises, including farms, and where possible also other relevant organisations in the low- and middle-income country in question, such as knowledge institutions in the sector or subsector.

### **4.2 Parties that may be eligible for a grant**

Grants in this programme are intended for impact clusters, represented by a lead party that submits the application for a project grant.

The impact cluster and the participating partners must meet the following requirements:

- The impact cluster must consist of at least three businesses that do not form a group or tax group. Trade associations, knowledge institutions and civil society organisations may also be partners, but this is not a requirement. An impact cluster must have at least one local partner.
- Each partner must have legal personality and the contributions of all partners together must be necessary to attain the objective of the activities for which a grant is requested.
- All partners in the impact cluster must have a long-term strategic interest in implementing the project. For businesses, this means that the sector or subsector being developed must in due course afford them opportunities for trade or investment. Civil society organisations, knowledge institutions and trade associations are committed to the development of the sector or subsector for the longer term in order to serve a societal or sector-specific interest. An organisation whose only role is project management or project development is not eligible for a grant.
- All partners in the impact cluster must have a proven, relevant track record of at least one year. Businesses must have experience in carrying out business activities in the sector or subsector targeted by the project. Other partners (civil society organisations, knowledge institutions and trade associations) must already be involved in the sector or subsector in some other way.
- The impact cluster must have been established prior to submission of the application.

The lead party is a business, trade association, knowledge institution or civil society organisation, with:

- its registered office in the Netherlands, or with its registered office in another country and a branch or permanent establishment in the Netherlands;
- an average annual turnover of at least €100,000 over the previous three years;
- at least three employees.



The lead party must demonstrate that each of the partners have adopted an integrity policy<sup>7</sup> and introduced procedures to apply that policy within their organisation. This integrity policy and these procedures should serve to prevent as far as possible any serious forms of inappropriate behaviour, including sexual misconduct, towards employees or other individuals during the implementation of the proposed activities by the partners and other parties they involve in the activities, and in the event of such incidents ensure that they are investigated and appropriate measures are taken to put an end as promptly as possible to the misconduct or inappropriate behaviour and mitigate the consequences. These procedures must be structured in a way that guarantees prompt reporting of any such incidents to RVO.

#### 4.3 Recommendation

If a lead party is considering submitting a grant application on behalf of an impact cluster, it must request a recommendation from RVO based on a quick scan submitted for that purpose.<sup>8</sup> The recommendation issued by RVO to the lead party is non-binding, and it is up to the lead party to decide whether or not to submit an application. If the lead party decides to submit an application, it is responsible for demonstrating that the criteria to be eligible for a grant have been met.

As it takes six weeks to process a quick scan, after which it must be possible to adapt the project on the basis of the recommendation issued, the quick scan must be submitted at least eight weeks before the latest application date for a funding round.

#### 4.4 Eligible activities

To be eligible for a grant under this programme, the application must describe a coherent, multi-year and comprehensive set of activities ('project') aimed at achieving the objective set out in section 4.1. The activities must take place in a single low- or middle-income country, unless convincing reasons are provided for why they would be more effective and/or efficient if carried out in two or more countries.

A cohesive combination of mutually reinforcing multi-year activities from the list below may be considered for a grant, in so far as they will contribute to alleviating a lack in the local private sector. The activities described under a and b must always be included:

- a. Activities that contribute to a structural transfer of knowledge and capacity building benefiting private sector actors, such as education and training. This could include 'train the trainer' activities and other ways of embedding new knowledge, and curriculum development.
- b. A joint demonstration of partners' proven technologies, capital goods or services, that are new for the country in question. The demonstration should primarily be for the purposes of knowledge transfer, training and illustrating a local business case for the use of the technology, capital goods or service in the country. It can also be used to investigate and test existing solutions for the local private sector.
- c. In-depth studies in support of impact cluster activities under a and b. The primary objective of these studies must be to obtain better insight into the problems in a sector or with an existing technology so as to design more effective interventions. They may also be used to establish a baseline and to monitor and evaluate interventions. General market studies are not eligible for a grant under this grant programme. Applicants are assumed to have a general knowledge of the target market prior to submitting their application.
- d. Coordination of impact cluster activities for achieving project aims. This includes general project management as well as harmonisation of the impact cluster's project activities involving other organisations such as government bodies, a steering group or an advisory committee.

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<sup>7</sup> <https://english.rvo.nl/topics/rbc/seah>.

<sup>8</sup> <https://english.rvo.nl/subsidies-financing/impact-clusters-ic>.



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- e. Drawing up and implementing an appropriate communication plan for the impact cluster, and establishing which of its milestones and/or results will be shared with which organisations.

The impact cluster's activities must contribute to and be necessary for achieving the market development objectives of the mission accredited to the country in question, which means they must correspond to local policy priorities.<sup>9</sup>

No grants will be awarded for:

- activities which already receive grant funding or a contribution directly from the Ministry of Foreign Affairs budget;
- product research and developing a proof of concept;
- sales activities, general promotional activities, activities related to general promotional material, and activities focusing on general market research;
- one-off training activities unrelated to multi-year activities;
- loans provided to third parties, including from revolving funds;
- activities that can be categorised as export or investment activities, for example the sale of technology prior to or during a project, or investments that could be recouped within a commercially acceptable period or which could be commercially funded.

Additionally, no grants will be awarded to projects involving coal, the exploration or development of new oil and gas reserves outside the Netherlands, or activities appearing on the exclusion list<sup>10</sup> of the Dutch development bank (FMO), in which 'weapons and ammunition' is understood to correspond to items named as such in the Firearms, Ammunition and Offensive Weapons Act.

### 4.5 Duration of activities

The activities for which a grant is requested must have a minimum duration of 24 months and a maximum duration of 48 months. Activities must start within six months of the grant award.

### 4.6 Size of the grant

Grants will be awarded for up to 60% of the eligible costs, with a minimum grant amount per application of €150,000 and a maximum of €620,000.

The portion of the total eligible costs for which no grant is provided must be self-financed by the impact cluster partners. This portion is referred to as the impact cluster's own contribution. This own contribution may not come directly or indirectly from grants or contributions from the budget of the Ministry of Foreign Affairs. The own contribution of businesses in the impact cluster must not be financed using funds received as a grant or contribution from any other government.

## 5. Eligible costs

### 5.1 Principles

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

- Costs must be reasonable, logical and necessary.<sup>11</sup>
- The activities must, by their nature, be suitable for the partner incurring the costs.
- Costs must be directly related to carrying out the activities and must not include contingencies.
- Only costs incurred after the application is submitted are eligible for a grant.
- Internal costs are eligible without mark-up.

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<sup>9</sup> <https://english.rvo.nl/subsidies-financing/impact-clusters-ic>.

<sup>10</sup> <https://www.fmo.nl/policies-and-position-statements>.

<sup>11</sup> See also article 14 of the Ministry of Foreign Affairs Grants Decree.



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- Costs will be compared with local standards and assessed for reasonableness.
- Costs relating to project management and coordination, including both staff costs and costs payable to third parties, may not exceed 20% of the total eligible costs.
- Revenues obtained directly from the activities, for example for providing training and advice, will be deducted from the eligible costs.

### 5.2 Eligible costs

The following costs to be incurred by the partners are eligible for a grant:

- a. Staff costs: the number of hours worked by people directly involved with the eligible activities, multiplied by no more than €87.50, which should include both direct wage costs and associated indirect costs, up to a maximum of €700 a day. The rates set out in the budget will remain the same for the entire project duration.
- b. Depreciation of assets during the course of the activities: the basis for determining depreciation is the purchase price – taking any residual value into account – plus any adjustment costs. If assets (with the exception of land and existing buildings) must be transferred to a local organisation after the project ends, the cost price of these assets can be included under eligible costs.
- c. Third party costs: costs payable to third parties, supported by an invoice.
- d. Travel costs: international travel costs and regional travel costs outside the Netherlands based on economy class fares.
- e. Subsistence costs: the maximum reimbursement is determined on the basis of the actual costs for accommodation plus the number of days in the project country multiplied by the amount shown under 'other costs' in the list of subsistence costs for official trips abroad.<sup>12</sup>

### 5.3 Costs not eligible for a grant

The following costs are in any event not eligible:

- the costs of developing, preparing or submitting the application;
- value-added tax (VAT), in so far as this is not a cost item, i.e. for project partners who are required to pay VAT on eligible activities but can deduct these costs when filing their VAT return with the Tax Administration;
- financing costs and interest payments;
- costs resulting from inflation and exchange rate fluctuations;
- costs of product development;
- costs of registering, maintaining and protecting intellectual property rights;
- contingencies.

## 6 Application

### 6.1 Requirements

Before submitting a grant application, the lead party must have obtained a recommendation from RVO on the basis of a quick scan as described in section 4.3. [noot AVT: in brontekst staat hier 'paragraaf 4.4' maar het is 4.3]

Applications must be submitted using the form supplied by RVO for this purpose and accompanied by the documents specified in it, in the format prescribed by RVO.<sup>13</sup>

The application must in any event include:

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<sup>12</sup> <https://www.sso3w.nl/travelpoint/algemeen/tarieflijsten-verblijfkosten>.

<sup>13</sup> <https://english.rvo.nl/subsidies-financing/impact-clusters-ic>.





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- the reference number of the recommendation issued by RVO;
- the project plan;
- a budget showing total project costs, and each partner's share of the own contribution;
- a signed agreement guaranteeing the participation of the partners in carrying out the activities in accordance with the division of roles between them, and their compliance with the agreements reached and with the obligations tied to the grant. The participation agreement may be elaborated further during the inception phase.

The partners must also declare that they are aware of and will comply with the OECD Guidelines.<sup>14</sup> This means that they will exercise due diligence in accordance with the Guidelines so as to identify and where necessary mitigate actual or potential negative effects of their actions and value chain on people and the environment, and communicate transparently about this.

After the application is submitted, Dutch businesses will be required to complete a self-assessment on responsible business conduct (RBC), which gives insight into the due diligence steps taken.<sup>15</sup> The self-assessment is mandatory and must be completed truthfully. RVO may contact a business in response to information provided in the RBC self-assessment.

The partners must immediately notify RVO of any facts or circumstances that indicate breaches of the OECD Guidelines, such as human rights violations or significant environmental damage. If the National Contact Point (NCP) for the OECD Guidelines for Multinational Enterprises receives a notification about a business,<sup>16</sup> the business is required to inform RVO accordingly and to cooperate with the NCP.

The partners must also declare that they are aware of the FMO exclusion list and will not engage in any activities on that list.<sup>17</sup>

### 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. This will increase the likelihood of rejection due to exhaustion of available resources.

Additionally, the shorter the time remaining between submission of the application and the deadline, the greater the risk that, if the application is incomplete, the Minister will not use their discretionary powers to request a supplement, given the time required to check that all applications are complete and to request and submit supplements. In this case, no supplement will be requested and the application will be assessed as it stands. This may result in rejection of the application.

Moreover, applications that are incomplete or insufficiently substantiated (in whole or in part) may be rejected on the grounds of failure to adequately satisfy the requirements and criteria.

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<sup>14</sup> <https://www.oecdguidelines.nl/>.

<sup>15</sup> If RVO is already in possession of a valid RBC self-assessment or if the application is likely to be rejected, it will not ask the business or businesses in question to provide another self-assessment.

<sup>16</sup> <https://www.oecdguidelines.nl/notifications/>.

<sup>17</sup> <https://www.fmo.nl/policies-and-position-statements>.



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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, except in so far as the application documentation explicitly states that this is acceptable. Incomplete applications may be rejected.

### **7 Assessment of applications and allocation of resources**

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.

Applications will be assessed in the order in which they are received, based on the date and time on which the application is considered complete or the last possible supplement is received (see section 6.2). When it becomes likely that funds will be exhausted based on the assessment of previously received applications, the processing of applications received from that point on will be suspended. If it emerges that applications submitted earlier have been rejected, the processing of applications will be resumed, in the order in which they were received.

To be eligible for a grant, applications must satisfy the above requirements, especially those set out in sections 4 to 6. Only applications that meet those requirements will proceed to an assessment of their quality based on the criteria set out below.

These criteria are as follows:

#### Policy contribution and impact

- a. The project contributes significantly to and is necessary for achieving local policy objectives for market development as set out by the mission in the country in question.<sup>18</sup>
- b. The project can be reasonably expected to produce favourable results and continuity for the development of the wider private subsector in the country in question, and to address the needs of this subsector, including by contributing knowledge, know-how or technology, directly or indirectly creating sustainable jobs in the long term, improving the business cases of existing local businesses and/or encouraging new local startups.
- c. The project contributes to strengthening seriously underdeveloped sectors and subsectors (or underdeveloped parts of these sectors) in their target markets.
- d. It is convincingly shown that the technology and/or approach that will be demonstrated during the project will be acceptable and affordable for the beneficiaries (i.e. it offers a potential business case).
- e. The activities have added value compared with existing activities aimed at development in the local private sector in question.

#### Partnership

- a. The partners complement each other well in achieving the project objectives. The partners reinforce each other and provide a substantial input and contribution to the project.
- b. The partners have relevant expertise and the organisational and financial capacity to achieve the project objectives. Each partner brings specific knowledge or technology to the project that is of added value to the development of the local private subsector on which the project focuses.
- c. There is a long-term strategy and there are clear long-term market opportunities for the participating businesses.

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<sup>18</sup> <https://english.rvo.nl/subsidies-financing/impact-clusters-ic>.



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- d. The partners have satisfactorily demonstrated that they have sufficient resources to finance their own contributions to the project and have come to clear agreements on how they will overcome financial setbacks.
- e. The local context offers sufficient support and assurances in regard to the project.

#### Action plan

- a. The project action plan is based on thorough and accurate contextual, stakeholder and problem analyses.
- b. The theory of change is directly linked to local issues and makes a logical connection between objectives, results and activities, and satisfactorily demonstrates the likelihood that the action plan will result in the achievement of the project objectives.
- c. Capacity building is firmly embedded in the project design.
- d. There is a solid plan for monitoring, evaluating and learning from the project.
- e. There is a clear timetable of project activities in which clear, realistic and quantifiable results with verifiable milestones have been defined.
- f. Satisfactory risk management is in place, consisting of a satisfactory risk analysis and satisfactory measures for mitigation.
- g. There are clear agreements on the division of roles and decision-making in the project and among the partners.
- h. There is a clear action plan for coordination and communication with respect to the project.
- i. There is a positive business case with regard to sustaining results after the project's conclusion.

#### Financial

- a. The project budget is reasonable and realistic.
- b. The costs of activities are proportionate to their impact in terms of quality and quantity, with value for money as the main criterion.

#### Responsible business conduct

- a. The project complies with the guidelines for responsible business conduct (RBC) as set out in section 6.1.
- b. The main RBC risks with regard to the environment, working conditions, land rights, human rights and animal welfare (as relevant) have been identified, and measures have been formulated to mitigate these risks. If a number of specific RBC issues are still unresolved at the time the application is made, these should at least be addressed by a study as part of the project.

In aid of its assessment, RVO may undertake action to verify any assumptions or statements made in the application. To this end, it may obtain the information needed to properly assess the quality of the application.

RVO may also consult external experts during the substantive assessment procedure. The missions are always asked for their opinion with regard to the assessment of the 'policy contribution' criterion, in particular the extent to which applications are aligned with the mission's policy and with the local situation.

### **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 this grant programme or if the available budget is insufficient.

### **9 Oversight**



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

RVO may also investigate the activities carried out as part of the project, including the grant recipient's reports and financial accounts and their compliance with the obligations tied to the grant. The grant recipient must render every assistance to the official or officials appointed by RVO to carry out such an investigation and allow them access to the documents relating to the grant. RVO will bear the costs of any such investigation.

### **10 Obligations**

The grant decision will set out obligations tied to the grant, including an obligation to notify the Minister of facts and circumstances that may have a significant impact on the grant, such as the applicant's temporary or complete inability to implement the activities for which a grant is awarded (see also section 9), and reporting obligations, including the submission of interim and final narrative and financial reports as set out in the International Aid Transparency Initiative (IATI).<sup>19</sup>

The grant decision will also forbid the grant recipient and the primary supplier from using child and/or forced labour.<sup>20</sup> The grant recipient must immediately notify RVO of any facts or circumstances that would suggest these organisations are using child and/or forced labour.

### **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 2.8%.

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<sup>19</sup> <https://projects.rvo.nl/iati-portals/>.

<sup>20</sup> Any form of labour that the International Labour Organization seeks to prevent with the Forced Labour Convention, 1930 (no. 29), the Abolition of Forced Labour Convention, 1957 (No. 105) or the Minimum Age Convention, 1973 (No. 138).