

Call for Expression of Interest: Addressing the Drivers of Migration and Forced Displacement by Supporting Economic Stabilization and Strengthening Community Resilience

(Ref: AFG/2026/Call for expression of interest 1)

Responses to questions received by email

| Question | Answer |
|---|---|
| <p>1. Is there any type of derogation for research social enterprise that would allow us to have them as co-applicant? If it is not the case, the best option would be to have them as a contractor. As we would like them to actively participate in the proposal writing, and considering they are highly specialized, is there another option than an international call for tender? Is it possible to mention them directly in the proposal and propose sort of waiver?</p> | <p>Eligibility criteria for lead applicants and co-applicants are clearly established in the Guidelines; applicants are kindly requested to refer in particular to the information provided on pages 8 and 9. No derogation from these eligibility requirements is foreseen under this Call.</p> <p>Research entities may, however, be involved as contractors, or individual experts may participate in the implementation of the action where this is considered the most appropriate arrangement. It is not mandatory to identify subcontractors at the Concept note stage.</p> <p>At the same time, applicants should note that subcontracting may not be used to outsource the core tasks and responsibilities of the action. In other words, a subcontractor cannot effectively replace the role of a co-applicant in the implementation of the project. Any subcontracting arrangements proposed at a later stage would need to comply with the applicable procurement and contracting rules, including the principles of transparency, equal treatment, and sound financial management as established in Annex IV to the Grant agreement.</p> |
| <p>2. The Call mentions, in the part <i>1.2 Objectives of the programme and priority issues</i>, that <i>“Concept notes are expected to include an estimate of the share of the budget”</i>. However, the template of Concept note does not specify the part to include this information. Could you please let us know where the most appropriate section is to include it?</p> | <p>Please include this information under Section 1.2 “Description of the Action” of Annex A.1 – Grant Application Form - Concept Note.</p> |
| <p>3. The Call states that applicants must be non-profit organizations registered in Afghanistan. However, given the specific context of Afghanistan, where gender and women empowerment are very sensitive topics with the authorities, many organizations with strong expertise in</p> | <p>Eligibility criteria for lead applicants and co-applicants are clearly established in the Guidelines; applicants are kindly requested to refer in particular to the information provided on pages 8 and 9. No derogation from these eligibility requirements is foreseen under this call.</p> |

| Question | Answer |
|---|--|
| <p>supporting women are not registered in the country. In this situation, how can these organizations be involved in EU-funded projects? Also, if they can only be involved as contractors, the requirement for NGOs to launch open calls for tender could mean sharing sensitive information publicly. This is a concern, especially for projects related to support for women. Given these challenges, is the EU considering any flexibility or waivers for the women-related components of these projects?</p> | <p>While the EU fully recognises the importance of organisations with strong expertise in women’s empowerment and gender-related programming, it is essential that organisations involved as lead applicants or co-applicants are legally established and operationally present in Afghanistan in order to ensure effective implementation, oversight, access, and accountability in the local context.</p> <p>At the same time, relevant expertise, experience, and technical capacities may still be incorporated through other arrangements, including the engagement of individual experts, advisory support, research contributions, or other forms of information and knowledge sharing, where appropriate.</p> <p>Please note that the involvement of contractors for the implementation of certain tasks under the action does not necessarily require an open procurement procedure in all cases. Applicants are kindly requested to consult <i>Annex IV: Procurement by Grant Beneficiaries in the Context of European Union External Actions</i> for the applicable rules and procedures.</p> |
| <p>4. According to the criteria for applicant in the guideline in page 9, the applicant must <i>"Be registered as a legal entity in Afghanistan and have a fully operational presence in the country"</i>. We would like to clarify if, for family organizations (as defined in the Companion 19.2.1.4) - whose organizational structure sets one operational office per country holding the registration with the authority in the country under the name of the whole family organisation, would the member of this family organisation satisfies the eligibility criteria above and able to participate in the call as lead applicant?</p> <p>In this case, the family organisation's operational office registered in Afghanistan will be included as affiliated entity to the lead applicant. The structural link between the affiliated entity and its family member (as lead applicant) will be of course duly justified in the application.</p> | <p>Yes. In the case of family organisations, the member organisation registered and operational in Afghanistan would satisfy the eligibility criteria under this Call for Expressions of Interest. As suggested, the family organisation’s office registered in Afghanistan should be included in the application as an affiliated entity to the lead applicant.</p> |

| Question | Answer |
|---|--|
| <p>5. If you receive a Concept note from a consortium where one of the partners is suggesting unique activities, however the overall concept note is not accepted based on other consortium members activities. Would you suggest/recommend to another consortium (who is moving to the proposal development stage) to include the partner with the unique activities in their consortium?</p> | <p>The Contracting Authority cannot commit, under any circumstances, to recommending or facilitating the inclusion of partners from one consortium into another consortium.</p> <p>The establishment of partnerships, the composition of consortia, and the allocation of roles and responsibilities among consortium members remain entirely the responsibility of the applicants themselves. Each consortium is expected to independently identify and engage the partners it considers most appropriate for the design and implementation of the proposed action.</p> |
| <p>6. Article 10.4(a) of the General Conditions (Annex II) provides that subcontracting "does not cover core tasks of the action." Given the substantial weight of technical delivery activities under Outputs 1.1–1.4 including skills development and vocational training, business development services (BDS), MSME technical advisory, and value-chain support - could the Contracting Authority provide further guidance on what is considered a "core task" of the action for the purposes of Article 10.4(a)? In particular, would the implementation of training programmes, the delivery of BDS to MSMEs, or the technical management of financial support to third parties (FSTP) typically fall within or outside the scope of "core tasks"?</p> | <p>At this stage, the Contracting Authority is not in a position to determine in abstract terms which specific activities could be subcontracted. Such an assessment can only be made on the basis of the specific information and implementation arrangements proposed by the applicants in their Concept notes and, where applicable, in the Full application.</p> <p>However, in principle, certain specialised or technical activities, including some training activities, business development services (BDS), or other forms of technical support, could potentially be considered for subcontracting where this is adequately justified and compliant with the applicable contractual and procurement rules</p> |
| <p>7. Section 1.2 of the Guidelines emphasises localisation, including "co-leadership and shared decision-making arrangements," "equitable allocation of resources," and "sustainable, context-specific capacity strengthening." Could the Contracting Authority confirm that engagement of Afghan-registered private-sector entities - such as consulting firms, BDS providers, training institutions, and women-led service enterprises - as implementation partners (whether through subcontracting under Article 10.4 of the General Conditions, or as recipients of financial support to third parties under Section 2.1.3 of the Guidelines) is consistent with the localisation principles set out in the Call?</p> | <p>The proposed arrangements could potentially be compatible with the localisation principles outlined in the Call, including the promotion of local ownership, context-specific expertise, and the meaningful involvement of Afghan actors in implementation. Engagement of Afghan-registered private-sector entities — such as consulting firms, BDS providers, training institutions, and women-led service enterprises — may therefore be considered possible under appropriate implementation modalities.</p> <p>However, as already indicated in the response to the previous question, the Contracting Authority is not in a position at this stage to determine in abstract terms which specific activities could be subcontracted or implemented through other arrangements. Such assessments can only be made on the basis of the concrete information and implementation structure proposed by the applicants in their Concept notes.</p> |

| Question | Answer |
|---|---|
| <p>8. According to Article 6.5.5 of the PRAG, “The minimum period for submission of concept notes is 45 days.” Given that the present EoI was published on the Delegation website on 3 May, with a submission deadline of 5 June, we note that the resulting preparation period is shorter than the minimum required by the PRAG. In the spirit of mutual respect and constructive cooperation between the Contracting Authority and the applicants, and considering the high budget value of this action - which requires proper coordination and sufficient time for partners to develop a high-quality proposal that fully responds to the objectives of the call - we kindly request an extension of the submission deadline.</p> | <p>In your question, you refer to Section 6.5 of the PRAG, which applies to grant award procedures under Calls for Proposals. However, the present procedure is a Call for Expressions of Interest conducted under a Direct Award procedure, as provided for under Section 6.4.4 of the PRAG. Consequently, the minimum submission periods applicable to Calls for Proposals do not apply in this case.</p> |
| <p>9. Our organisation is a U.S.-based non-profit one with long-standing operations in Afghanistan. In addition to our U.S. registration, we are also registered to operate in Afghanistan and work through established partnerships with multiple registered Afghan organizations and local stakeholders across several provinces. Given our organizational structure and operational presence in Afghanistan, we would appreciate clarification on whether our organisation would be considered an eligible applicant (or consortium member/subcontractor) under the applicable eligibility provisions of Regulation (EU) 2021/947 and the specific solicitation requirements. We would appreciate additional guidance regarding our eligibility to apply for this funding opportunity.</p> | <p>The Contracting Authority is not in a position to determine the eligibility of specific entities without reviewing all supporting documentation. The Guidelines provide only general guidance, while eligibility is assessed as part of the evaluation process. Please refer to the information provided on pages 24 and 25 of the Guidelines.</p> |
| <p>10. The guidelines note that co-financing must be provided in cash and constitute “fresh funding,” and that resources already allocated to other projects that do not generate additional support for beneficiaries will not be considered as co-financing. Could you please clarify whether existing or already awarded grants may be considered as co-financing where they demonstrably generate additional support for beneficiaries under the proposed EU action (e.g., expanded participation, additional activities, or increased reach directly linked to the programme)? Or is co-financing expected to derive</p> | <p>As clearly indicated in the Guidelines, funding that has already been programmed, committed, or allocated to other actions or programmes does not qualify as “fresh” co-financing for the purposes of this Call. The rationale behind this requirement is to ensure that co-financing mobilises additional resources that generate new and tangible benefits for beneficiaries, beyond those that would already materialise through existing interventions. Therefore, eligible co-financing is expected to consist of genuine in-cash contributions originating from new funding streams that have not already been allocated to other actions or programmes.</p> |

| Question | Answer |
|---|--|
| exclusively from entirely new funding streams not already allocated to other actions? | |
| 11. Could you kindly confirm whether there is any limit on the number of applications in which the same co-applicant may participate under this call? We have not identified any restriction in the guidelines but would appreciate confirmation. | There is no limitation on the number of applications in which the same co-applicant may participate under this call. Applicants are kindly requested to consult the relevant information provided on page 15 of the Guidelines. |
| <p>12. According to the criteria for applicants included in the guidelines (page 9), the applicant must "Be registered as a legal entity in Afghanistan and have a fully operational presence in the country". Could the Contracting Authority please clarify whether, for international 'family organisations' (as defined in the Companion 19.2.1.4), whose organisational structure established one operational office per country, responsible for project implementation, an EU Member State-based member organisation may act as lead applicant where the organisation's Afghanistan country office/entity is registered as a legal entity in Afghanistan and has a fully operational presence in-country?</p> <p>In other words, must the Afghanistan legal registration be held directly by the same legal entity as the lead applicant, or can this requirement be satisfied through the registered Afghanistan entity/office of the same international family organisation?</p> <p>Additionally, we would appreciate guidance on how the current requirement "Be registered as a legal entity in Afghanistan and have a fully operational presence in the country" differs from the wording used in the EU 2024 call for expressions of interest guidelines: "be operational (i.e. already managing a current project and/or have an office) in Afghanistan."</p> | <p>In the case of "family organisations", whose organisational structure consists of separate operational offices in each country responsible for project implementation, a member organisation based in an EU Member State may act as the lead applicant, provided that the organisation's Afghanistan country office/entity is legally registered in Afghanistan and maintains a fully operational presence in the country.</p> <p>The Guidelines for this CfEoI have introduced an additional eligibility criteria concerning the legal registration of lead applicants and co-applicants in addition to the requirement of an operational presence in the country (as specified under CfEoI/2024/1). This requirement has been introduced to ensure smooth and efficient implementation of actions in Afghanistan, particularly in light of shrinking resources and the need to respond promptly and effectively to growing needs.</p> |