



# **Grant Procedures Manual**

## **Applying for and awarding of Blue Action Fund Grants**

**June 2024**



## **Grant Procedures Manual**

This Grant Procedures Manual details the requirements and procedures for each step of the grant making process of Blue Action Fund (hereafter 'Blue Action'). Section 1 introduces Blue Action's Grant Programme and Section 2 provides full details on grant eligibility. Section 3 then details the application process. Finally, Section 4 highlights information with regards to project implementation and monitoring that is important for potential grantees to understand at the application stage.

The aim is to ensure a standard approach for each project and adherence to policies that safeguard Blue Action's projects and comply with donor requirements.

This Manual will be reviewed regularly and amended to reflect new requirements and best practices. NGO users are invited to offer feedback on the appropriateness and usability of this Manual.

## Contents

<b>1</b>	<b>About Blue Action Fund.....</b>	<b>4</b>
1.1	Blue Action’s Focus .....	4
1.2	Grant Programme Structure and Governance .....	4
<b>2</b>	<b>Blue Action Funding Eligibility Requirements .....</b>	<b>5</b>
2.1	Who .....	5
2.2	What and How .....	6
2.3	Eligible Measures .....	7
<b>3</b>	<b>Grant Award Process .....</b>	<b>11</b>
3.1	Formulation of Strategy and Focus Areas.....	11
3.2	Specification of Selection Criteria and Launch of Calls .....	11
3.3	Preparation of Grant Application.....	11
3.4	Appraisal and Shortlisting of Grant Applications.....	11
3.5	Development of Full Proposal.....	12
3.6	Appraisal and Approval of Full Proposals .....	12
3.7	Grantee Vetting/Due Diligence.....	12
<b>4</b>	<b>Implementation, Monitoring and Evaluation of the Projects ..</b>	<b>12</b>
4.1	Grant Agreement .....	13
4.2	Procurement and Subcontracting .....	13
4.3	Reporting.....	13
4.4	Financial and Technical Project Reviews .....	14
4.5	Monitoring and Evaluation .....	14
4.6	Communications .....	14
4.7	Environmental and Social Safeguards.....	14
	<b>Annex 1: Project Logframe Template .....</b>	<b>15</b>

## Glossary

AFD	Agence Française de Développement
Blue Action	Blue Action Fund
BMZ	German Federal Ministry for Economic Cooperation and Development
EBSA	Ecologically and Biologically Significant Marine Area
EUR	Euro
E&S	Environmental and Social
ESMS	Environmental and Social Management System
FAO	Food and Agriculture Organisation of the United Nations
IFC	International Finance Cooperation
ILO	International Labour Organisation
IUCN	International Union for the Conservation of Nature
Irish Aid	Department of Foreign Affairs of Ireland, Development Cooperation Division
KfW	KfW Development Bank
MPA	Marine Protected Area
NGO	Non-governmental Organisation
Norad	Norwegian Agency for Development Cooperation
ODA	Official Development Assistance
OECSs	Other Effective Area-based Conservation Measures
PS	Performance Standards
SE MFA	Swedish Ministry for Foreign Affairs
SDG	Sustainable Development Goal
UN	United Nations

## 1 About Blue Action Fund

Although our global ocean is of immense value, at present only a marginal fraction is protected. Blue Action was founded in 2017 by the German Federal Ministry for Economic Cooperation and Development (BMZ) in conjunction with KfW Development Bank as one of several international initiatives to respond to that deficiency. Since its founding, the governments of Sweden, France, Norway and Ireland<sup>1</sup> have also joined and today Blue Action is among the world's largest funders of marine conservation.

Working mainly in its donors' partner regions for international development cooperation, Blue Action supports non-governmental organisations (NGOs) in their efforts to conserve the ocean and coastlines and promote sustainable livelihoods in coastal communities.

Blue Action is a non-profit foundation established under German law. Entrusted with public funds, it follows principles of good governance and efficiency. For more information on Blue Action's organisational structure and the roles of its Management and Supervisory Boards, please refer to our website [www.blueactionfund.org](http://www.blueactionfund.org).

### 1.1 Blue Action's Focus

Blue Action's overall goal is to reduce the dramatic loss of marine biodiversity and improve incomes of coastal fishing communities. It is dedicated to supporting Marine Protected Areas (MPAs) and the most sensitive coastal waters of Africa, Latin America and Asia/Pacific - focusing on projects with measurable outcomes in two areas:

- Newly established or better managed MPAs or networks of MPAs, as well as Other Effective Area-based Conservation Measures (OECMs) which result in conservation of biodiversity;
- Enhanced livelihood conditions in coastal communities.

Blue Action operates through a programme of providing grants to NGOs that typically work in partnerships with various local actors.

### 1.2 Grant Programme Structure and Governance

**NGO/Grantee:** In response to Blue Action's open Call for Proposals, NGOs can submit Grant Applications. Once a Grant Agreement is concluded, they take on the responsibility for implementing their project within the overall Grant Programme. As Blue Action's Grant Programme implementation partner, NGOs are responsible and accountable under their project for proper delivery of funds and/or services, financial and administrative management, reporting to Blue Action and monitoring at project level.

**Blue Action:** Blue Action's two constituent bodies - its Management Board and Supervisory Board - shape and guide the Grant Programme in different ways.

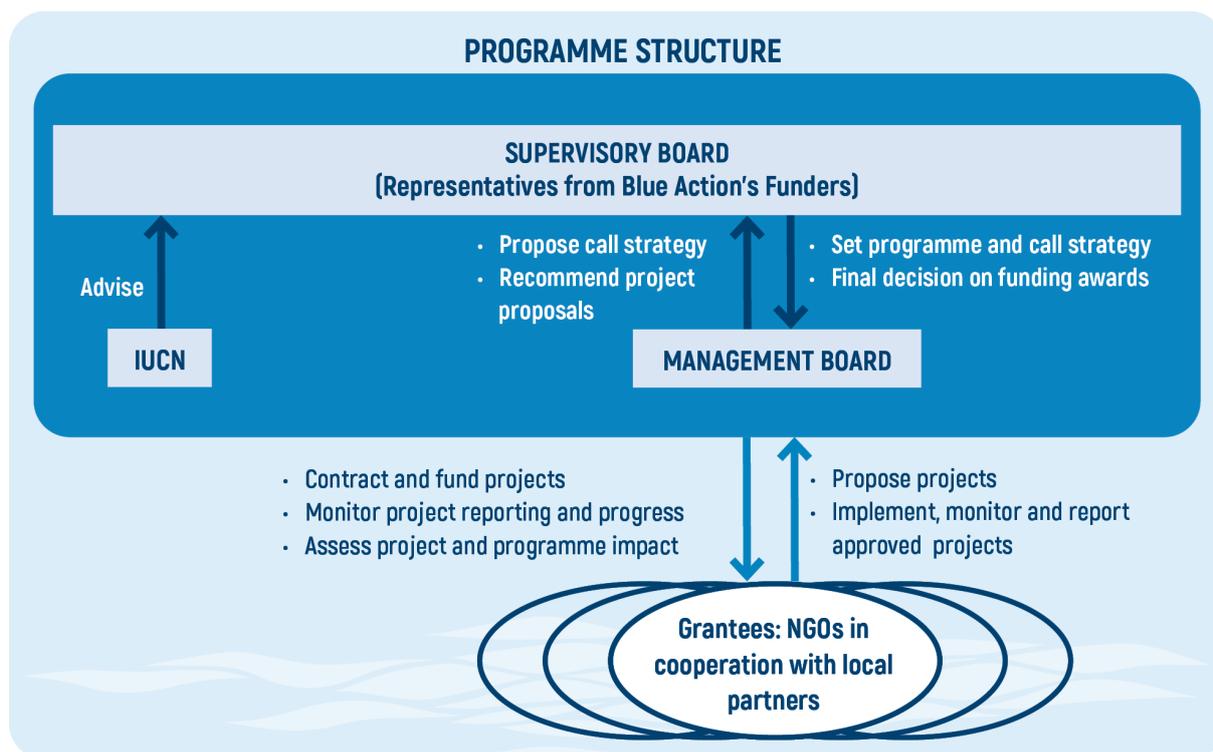
The Management Board is responsible for the general representation and administration of Blue Action. This includes making recommendations on Calls for Proposals themes, reviewing and recommending Grant Applications for development into Full Proposals in response to Calls, awarding approved grants, monitoring project reporting and progress and assessing overall Grant Programme impact.

The Supervisory Board sets the Grant Programme's strategy, approves individual Calls for Proposals, reviews the Management Board recommendations and makes the final decision on funding awards.

**The International Union for the Conservation of Nature (IUCN):** IUCN provides strategic advice to Blue Action's Supervisory Board.

---

<sup>1</sup> Respectively through the Swedish Ministry for Foreign Affairs (SE MFA), the Agence Française de Développement (AFD), the Norwegian Agency for Development Cooperation (Norad) and Irish Aid.



**Figure 1** Programme structure

## 2 Blue Action Funding Eligibility Requirements

### General Requirements - Who, What and How

Blue Action's grant eligibility requirements concern the implementing organisation ('who'), project content ('what') and project approach ('how'). Applicants should consider carefully if they fulfil the requirements and have the capacity to offer and implement projects of this nature.

#### 2.1 Who

##### NGOs<sup>2</sup> that...

- are registered as charitable organisations;
- have a strong presence in the target country and area of implementation;
- have experience with the proposed project type;
- can prove successful management of public grants of a similar size and have sufficient implementing capacity to allow for professional and timely project implementation;
- have experience in applying Environmental & Social Safeguards (see Section 4.7);
- have a sufficiently large annual budget, i.e. the annual income of the NGO applicant should be about twice the proposed annual project budget or more<sup>3</sup>;
- have strong financial management and internal control systems. This includes adequate provisions for planning and budgeting, internal control and accounting, as well as funds, cash flow and assets management; and

<sup>2</sup> Intergovernmental organisations, such as UN bodies are not regarded as NGOs. In case of doubt about eligibility, please contact Blue Action.

<sup>3</sup> The financial requirement relates to the contracting party only, i.e. the consortium lead (grantee). Nevertheless, sub-grantees should as a general rule not receive more than 50% of their annual average income per year from the grant.

- are able to fund at least 25% of the total project costs ('match funding'). This match funding can be in the form of their own resources ('own contribution')<sup>4</sup> and co-financing<sup>5</sup>. Grantees and subgrantees may include public funding<sup>6</sup> they receive for parts of the proposed project as co-financing. However, this may not include any resources from German public funders due to existing budget law. Match funding can be provided by the grantee and subgrantees. It is part of the total project budget and needs to be reported, i.e. the expenditures reported need to be traceable in the bookkeeping system of the grantee or subgrantee contributing.

Blue Action welcomes applications from consortia of NGOs - in particular consortia including local partners - that clearly demonstrate the task sharing and synergies between the consortium members. At latest during Full Proposal development (see Section 3.5), consortia are required to submit a signed letter of intent of collaboration that designates the consortium lead (grantee), who assumes full responsibility for the project implementation.

The roles of the different partners within a Blue Action project are defined as follows:

**Grantee:** The NGO signing and receiving the grant from Blue Action. The grantee has the overall responsibility for the financial and technical implementation of the project.

**Subgrantee:** A third party/organisation (usually not-for-profit organisations) identified by the grantee in the project proposal<sup>7</sup> (i) who has agreed with the grantee to participate in and perform part of the project and (ii) whose respective expenditures are outlined in detail in the project proposal and overall budget. Subgrantees will have to comply with all terms of the Grant Agreement and will be subject to financial reviews, monitoring and evaluations.

**Subcontractor:** A third party (usually commercial companies) who, on behalf of the grantee or subgrantee, take over one or more well-defined tasks within the project. The subcontractor owes a service or product and issues an invoice for it, i.e., the subcontractor needs to be able to issue invoices and comply with the applicable tax law. The selection of subcontractors is subject to Blue Action's Procurement Policy. In exceptional cases, and only if the subcontractor has been identified and approved by Blue Action within the Full Proposal, the contracting party will not be subject to tendering under Blue Action's Procurement Policy (see Section 4.2 for more information on Procurement and Subcontracting).

**Project Partner:** Any organisation that is involved in or associated with the project and is externally communicated in that capacity. Project partners do not necessarily need to be involved financially.

## 2.2 What and How

### What: projects that...

- support sizable conservation of areas with significant biodiversity, such as Ecologically or Biologically Significant Marine Areas (EBSAs, Hope Spots or other internationally recognised classification systems for marine biodiversity) that make a meaningful contribution towards effective conservation of at least 30 per cent of marine and coastal areas by 2030;
- are realised in an area (including buffer zones) that already is or will be recognised as an MPA or OECM<sup>8</sup> within the project duration;
- are focussing on a single site, or a small number of sites that form a network of MPAs;

---

<sup>4</sup> 'Own contributions' include cash and in-kind contributions such as direct financial co-funding, costs for staff working on the project, provision of operational facilities such as office/vehicles, etc.

<sup>5</sup> Co-financing refers to funding from other donors that is also contributing to the project.

<sup>6</sup> e.g. World Bank, European Commission, National Ministries

<sup>7</sup> Project proposal refers to both the Grant Application and Full Proposal.

<sup>8</sup> To be eligible, an OECM must be at least 'Minimally Protected' in terms of 'Levels of Protection' as defined in the [MPA Guide](#). Further references to MPAs in this Manual also include OECMs for the sake of conciseness.

- have an integrated approach and contribute to marine protection as well as sustainable livelihoods;
- contribute to the Blue Action's Project Logframe set forth in Annex 1 to this Manual including equitable decision-making and community empowerment, gender equity and climate adaptation; and
- if applicable - fulfil additional Call-specific criteria and priorities announced with each Call for Proposals.

#### **How: projects that...**

- are located in the marine waters (territorial waters and/or exclusive economic zones) of one country eligible to receive official development assistance (ODA)<sup>9</sup>. For projects targeting transboundary MPAs, a multi-country approach is eligible;
- are tested and scalable;
- contribute to capacity building of local communities, NGOs and MPA administrations;
- include significant field investments for sustainable livelihoods and infrastructure;
- show a measurable impact within the project duration;
- include a component to establish long-term financing mechanisms that support MPA management beyond the project duration itself, or foresee strong cooperation with existing financing mechanisms that can provide such support;
- demonstrate cooperation with relevant governmental organisations and civil society;
- require a Blue Action contribution that is within the range specified in the Call for Proposals, generally between EUR 2 - 4 million, in exceptional and well justified cases up to EUR 5 million; and
- have a duration of three to five years.

### **2.3 Eligible Measures**

Only costs that meet the criteria outlined in this section are eligible for Blue Action funding. Ineligible measures must not be part of the project, irrespective of the exact funding source (Blue Action contribution or match funding). Questions on eligibility should be discussed with Blue Action either during the development of the Grant Application, or at latest, during Full Proposal development (see Section 3.5).

#### General Eligibility Requirements<sup>10</sup>

For all of its grants, Blue Action expects that:

- Projects focus on both marine conservation and sustainable livelihoods activities.
- A substantial share of the funding will be used for field investments such as equipment for MPA management, equipment for communities and direct payments to communities.
- Costs for project management outside the target region (Cost category group 3) must not exceed 5% of Blue Action contribution.

Blue Action differentiates between **direct and indirect costs**.

Direct costs are costs that can be directly and clearly attributed to the implementation of project activities, i.e. these are costs that are only incurred if the project takes place. They have an identifiable link to the project and must be documented.

Indirect costs are indirectly linked to the project implementation, i.e. these costs are necessary to support the overall functioning of the grantee's or subgrantee's organisation. They are calculated as a fixed percentage of 10% of total direct costs (i.e. 10% of Blue Action contribution and 10% of match funding) and do not need to be supported by receipts.

---

<sup>9</sup> A list of ODA countries can be found [here](#).

<sup>10</sup> In addition to the requirements that address the project's content, more standard requirements generally applicable to grants are included in the Grant Agreement (see Section 4), e.g. costs must be incurred by the grantee during the project duration, comply with the requirements of applicable tax and social legislation, and be reasonable, justified and comply with principles of sound financial management.

The project budget is structured according to three cost category groups - with each group further subdivided into cost categories. All direct costs of Blue Action contribution and match funding need to be allocated into the correct cost category within the appropriate cost category group. Please refer to Table 1, Table 2 and Figure 2 for further guidance.

- Cost category group 1 ‘Field implementation’ (1.1-1.4): includes direct costs benefitting the communities and MPA and its management authority. It is expected that a significant part of the budget is allocated towards this group 1.
- Cost category group 2 ‘Project management in target region’ (2.1-2.4): includes direct costs of the NGOs (grantee and subgrantees) necessary to implement the project in the target region.
- Cost category group 3 ‘Project management outside target region’ (3.1-3.2): includes direct costs of the NGOs (grantee and subgrantees) which are incurred outside the target region and are necessary to implement the project. These costs must not exceed 5% of Blue Action contribution.
- Contingency: This amount is a reserve for unforeseen expenses and/or possible fluctuations in exchange rates. It is a fixed percentage of 5% of the subtotal direct costs of Blue Action contribution.

**Table 1** Outline of project budget structure

DIRECT	<b>1</b>	<b>Cost category group 1 ‘Field implementation’</b>
	1.1	Field investments
	1.2	Operational and maintenance costs (field)
	1.3	Capacity building, trainings and workshops
	1.4	External services
	<b>2</b>	<b>Cost category group 2 ‘Project management in target region’</b>
	2.1	Staff in target region
	2.2	Travel for staff based in target region
	2.3	Assets (project management)
	2.4	Operational and maintenance costs (project management)
	<b>3</b>	<b>Cost category group 3 ‘Project management outside target region’ (must not exceed 5% of Blue Action contribution)</b>
	3.1	Staff outside the target region
	3.2	Travel for staff based outside target region
<b>4</b>	<b>Subtotal direct costs (Cost category group 1 + 2 + 3)</b>	
5	Contingency (5% of subtotal direct costs of Blue Action contribution)	
<b>6</b>	<b>Total direct costs (Subtotal direct costs + contingency)</b>	
INDIRECT	7	Indirect costs (10% of total direct costs, i.e. 10% of Blue Action contribution to total direct costs and 10% of match funding to total direct costs)
	<b>8</b>	<b>TOTAL</b>

Note: Blue Action will share a detailed budget template with NGOs invited to prepare Full Proposals, for the Grant Application (i.e. first step) please use the budget structure as provided in the [Grant Application Template](#).

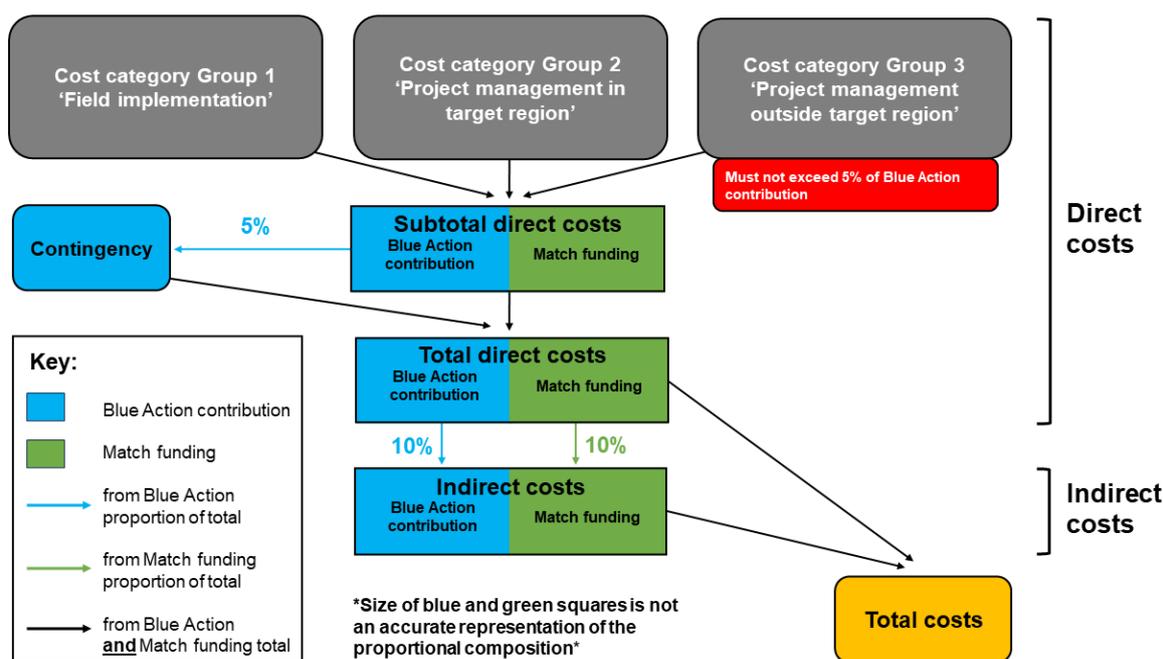


Figure 2 Composition of project budget

Table 2 Overview of cost categories including examples of eligible measures and costs.

Cost Category	Examples of Eligible Measures and Costs
<b>Group 1</b>	<b>Field implementation</b>
<b>1.1 Field investments</b>	<p>Field investments consist of two components:  <u>Equipment</u> for project beneficiaries (e.g. the MPA management authority or the communities). These are <u>items or infrastructure</u> purchased or constructed for the establishment of a MPA, better MPA management or the implementation of livelihood initiatives. Examples include equipment for monitoring, control and surveillance, surveillance posts, buoys for demarcation, data collection devices (e.g. BRUVs), safety equipment, investments into cold chains, fishers' meeting facility improvements, mobile phones, IT equipment, motorcycles, materials for mangrove nurseries, seedlings, equipment and infrastructure for development of livelihoods activities (e.g. equipment for agriculture and aquaculture), awareness raising sign boards and visibility material.</p> <p><u>Financial support</u> for the project communities. Examples include savings and credit schemes, livelihood-support funds, provision of micro-credits, seed funding for small and medium enterprises, compensation for community work for monitoring trips, surveys, beach management units or mangrove planting, payments to fishers for data collection, patrols or guards from the community.</p> <p>Any equipment required by the implementing NGOs (grantee or subgrantees) to carry out the project should be listed under '2.3 Assets (project management)'.</p>
<b>1.2 Operational and maintenance costs (field)</b>	<p>Temporary support for operational and maintenance costs of MPA management bodies or livelihoods initiatives.                      Examples include fuel, maintenance and insurance for vehicles and boats to conduct patrols or community monitoring trips, boat rental, maintenance of diving equipment, share of running costs of MPA park authority office, maintenance of community infrastructure, etc.</p> <p>Any operational and maintenance costs of the implementing NGOs (grantee or subgrantees) should be listed under '2.4 Operational and maintenance costs (project management)'.</p>
<b>1.3 Capacity building, trainings and workshops</b>	<p>All costs surrounding events, trainings and workshops (e.g. capacity building for communities or park rangers, stakeholder engagement events, awareness raising workshops). This includes transport and accommodation of participants, venue hire, catering</p>

<b>Cost Category</b>	<b>Examples of Eligible Measures and Costs</b>
	or refreshments, event materials, etc.  Any travel costs for staff of the implementing NGOs (grantee or subgrantees) should be listed under '2.2 Travel for staff based in target region'.
<b>1.4 External services</b>	Any costs derived from external services over the course of the project. These might be consultancy contracts (e.g. for development of management plans, business plans, tourism development plans, feasibility studies and livelihood diversification plans, ESMS support, surveys, analyses or assessments) as well as contracts for works (e.g. for constructions or renovations) or other services (e.g. design and printing of environmental education or awareness raising material, design of campaigns, translations). Costs for the external financial reviews of the project are also included in this cost category.
<b>Group 2</b>	<b>Project management in target region</b>
<b>2.1 Staff in target region</b>	Salaries for technical and administrative staff directly contributing to the project and based in the target region. This should include a dedicated full-time project manager.
<b>2.2 Travel for staff based in target region</b>	Travel costs including transport, accommodation and daily allowances or food for staff based in the target region.
<b>2.3 Assets (project management)</b>	Assets required by the implementing NGOs (grantee and subgrantees) to ensure a smooth implementation of the project (e.g. vehicles, motorcycles, diving gear, IT equipment, field equipment, furniture, etc.).
<b>2.4 Operational and maintenance costs (project management)</b>	Direct operational and maintenance costs of the implementing NGOs (grantee and subgrantees) to ensure a smooth implementation of the project (e.g. fuel and repairs for project vehicles/motorcycles, running costs for field office at project site, etc.)  Shared costs for the operation of a field office might be eligible as direct costs if supported with a well-explained calculation and a reasonable allocation system that considers only the portion of the costs which corresponds to the rate of actual use of the existing infrastructure by project staff. <sup>11</sup>
<b>Group 3</b>	<b>Project management outside target region</b>
<b>3.1 Staff outside the target region</b>	Salaries for any staff working on the project who are based outside the target region.
<b>3.2 Travel for staff based outside target region</b>	Travel costs including transport, accommodation and daily allowances for staff based outside the target region.
<b>Contingency</b>	This amount is a reserve for unforeseen expenses and/or possible fluctuations in exchange rates. It is a fixed percentage of 5% of the subtotal direct costs of Blue Action contribution.
<b>Indirect costs</b>	A fixed percentage of 10% of total direct costs (i.e. 10% of Blue Action contribution and 10% of match funding). This lump sum helps cover indirect costs for the overall functioning of the implementing NGOs (e.g. running costs for head, regional or country offices, facility management, stationary, insurances, organisational audits, cross-cutting functions such as HR, operations, accounting or high-level management).

#### Disfavoured measures and costs (only eligible with prior approval)

The following measures or costs will generally not be considered appropriate for Blue Action-funded projects. If, however, such a measure or cost is considered indispensable to the project, the grantee may propose it with due justification.

- salaries of government officials;
- research other than that for the establishment of socioeconomic and ecological baselines, establishment of MPAs, data collection for the Environmental & Social Safeguard development or pilots for innovation testing;
- import Duties. Import duties generally cannot be paid with Blue Action contribution and, if part of

<sup>11</sup> If unsure, please contact Blue Action.

the value of a contract for goods or services, must be stated separately in the contract and the related invoices and covered with other resources (e.g. match funding). If a significant share of goods and services must be imported, e.g. into a small island developing state, and NGOs are not in a position to fund import duties using their match funding, they can request an exception.

#### Ineligible Measures

As described in Section 4.7, Blue Action maintains an [Environmental and Social Management System \(ESMS\)](#). The ESMS sets forth a list of measures or actions, such as those that would result in the destruction of critical habitats, that are ineligible (without exception) for funding by Blue Action. Potential grantees must ensure that their project proposals do not include any such ineligible measures or actions.

## **3 Grant Award Process**

Blue Action's grant award process is based in principle on open Calls for Proposals. As further described below, each Call for Proposals may set a strategic and geographic focus that will need to be considered in addition to the general requirements of this Manual. The award process follows the steps described in this section.

### **3.1 Formulation of Strategy and Focus Areas**

The Management Board presents the strategy and focus area(s) of each Call for Proposals to the Supervisory Board for approval. The Supervisory Board determines the budget foreseen for the Call.

### **3.2 Specification of Selection Criteria and Launch of Calls**

The thematic focus, target region and other relevant criteria of a particular Call for Proposals are defined in the Call document. Blue Action launches each Call by publishing the Call document on Blue Action's website. Subscribers to Blue Action's [Funding Alert](#) will be informed of such an occurrence. Usually within the first two to three months after the launch, Blue Action offers a Q&A session for potential grantees (NGOs).

### **3.3 Preparation of Grant Application**

Prior to the deadline specified in the Call document, potential grantees prepare and submit Grant Applications using the 'Grant Application Template' found on Blue Action's website.

### **3.4 Appraisal and Shortlisting of Grant Applications**

Grant Applications and potential grantees are evaluated by the Management Board with the help of external evaluators using standardised evaluation tools. Projects proposed in the Grant Applications are screened for basic eligibility and subsequently evaluated. The evaluation includes, among other things, an assessment of Theory of Change, underlying assumptions, the expected outcomes and the capacity of the applicants to deliver the project's results (as described in Section 3.6). Ultimately, the Management Board prepares a shortlist of Grant Applications for approval by the Supervisory Board. Upon the Supervisory Board's decision about which projects to pursue for Full Proposal development the Management Board informs all potential grantees of the results<sup>12</sup>.

---

<sup>12</sup> The following information of NGOs invited to develop Full Proposals will be shared with all NGOs that submitted Grant Applications: Name of NGO and partners, project title and target country/countries of the proposed project.

### **3.5 Development of Full Proposal**

Potential grantees whose Grant Applications are to be pursued (hereafter ‘proposed grantees’) are invited to develop a Full Proposal and are provided with the relevant documents and templates.

The process of Full Proposal development is divided into phases and will follow an individually agreed timeline. The proposed grantee and Blue Action will agree on a workplan for finalisation including well-defined milestones and deliverables per phase. Meetings and exchanges will allow for the further clarification of questions and to assess whether sufficient progress is being made towards finalisation.

During Full Proposal development, the proposed grantee will start the process of identifying and assessing environmental and social (E&S) risks and potential impacts of the proposed project and will start developing suitable safeguard tools. At each step throughout this process, Blue Action will assess the information provided and ultimately determine the E&S risk level of the project (see Section 4.7 for further information). Proposed grantees can request a grant of up to EUR 75,000 to support Full Proposal development.

The purpose of this preparatory grant would be to cover costs that arise from, for example, conducting any necessary assessments such as E&S or gender assessments, holding stakeholder meetings, working on baselines or travelling of local NGOs to participate in preparation meetings.

The Full Proposal must have the endorsement of the appropriate authority/authorised body (including at national level) with a signed letter of consent indicating such endorsement and with the agreed cooperation presented.

### **3.6 Appraisal and Approval of Full Proposals**

As described above, the Full Proposal development process is based on an agreed workplan that includes defined milestones and deliverables per development phase. At the end of each phase, Blue Action and – if deemed appropriate - other external evaluators will provide feedback. After satisfactory completion, approval to advance to the next phase will be given.

Once all phases are successfully completed, the Management Board presents the Full Proposal to the Supervisory Board. Taking the Management Board’s recommendations into account, the Supervisory Board makes the final funding decision. Upon the Supervisory Board’s decision, Blue Action informs the proposed grantees of the results and signs a Grant Agreement with the chosen NGOs (see Section 4 for further information).

### **3.7 Grantee Vetting/Due Diligence**

With respect to each proposed grantee, Blue Action will conduct a due diligence process, which will include among other procedures:

- requesting relevant documents concerning the organisation (registration certificate, statutes) and financial documents (e.g. financial statements of the past three years), as well as verifying an ID document of the project leader or the CEO of the grantee’s organisation;
- obtaining a list of board members as well as private contributors exceeding 15% of the annual income of the grantee; and
- verifying the absence of respective persons from relevant financial sanctions lists.

This due diligence process will be finalised at latest prior to the signature of the Grant Agreement.

## **4 Implementation, Monitoring and Evaluation of the Projects**

This section provides an overview of the most important regulations that will govern Blue Action’s relationship with grant recipients of which potential grantees should be aware as they consider whether to

apply for a Blue Action grant. In addition to its standard form Grant Agreement, Blue Action also maintains a Grant Implementation Guide intended to provide practical support to grantees in their implementation of the project and compliance with the terms of the Grant Agreement. The full standard form Grant Agreement and Grant Implementation Guide are available on Blue Action's [website](#).

#### 4.1 Grant Agreement

Blue Action will sign a contract with the grantee using a standard form Grant Agreement. The Full Proposal is an attachment to this Grant Agreement. Subsequent significant changes altering the Full Proposal (e.g. due to changing circumstances after approval) need to be approved by Blue Action and – depending on the nature of the changes – may result in an amendment to the Grant Agreement. The current version of Blue Action's Grant Agreement is available on Blue Action's website at the above link. Key provisions of the Grant Agreement are summarised below.

#### 4.2 Procurement and Subcontracting

Blue Action's Procurement Policy is an integral part of the Grant Agreement. Potential grantees are advised to read Blue Action's Procurement Policy before applying for a grant to ensure that they are able to comply.

As part of the Full Proposal approval process (outlined in Section 3.6), the grantee has the option to obtain 'pre-approval' of subcontracts valued between EUR 20,000 and EUR 100,000<sup>13</sup> (excl. VAT). Eligibility for pre-approval requires the involved costs to have been assessed as economically viable and to be based on a transparent presentation of clearly defined terms of references (including defined roles, responsibilities and the related budget for the subcontract in the Full Proposal).

A grantee has two options when subcontracting out to a third party: the grantee can either use Blue Action's standard contract templates for consulting services, non-standard goods and construction works, or use its own organisation's standard contract templates. If a grantee chooses to use its own templates, these must be no-objected by Blue Action before being used. The procurement of highly standardised (off-the-shelf) goods is exempt from the requirement to use a Blue Action contract template or no-objected contract template.

#### 4.3 Reporting

**Progress report:** On a semi-annual basis, the grantee has to provide a progress report consisting of a technical and a financial part. The financial part is a Funding Advance Request in which expenditures to date, the remaining grant balance and the planned expenditures for the next six-month work period are reported.

**Annual report:** Once a year, the progress report is accompanied by three additional annexes: A) Log-frame update, B) ESMS update, and C) Transaction list. These additional annexes combined with the usual components of the progress report (financial and technical part) serve as the annual report.

**Final report:** At the end of the project, a final report covering the entire project duration and consisting of a technical and a financial part will summarise the project achievements, lessons learned and relevant financial information.

---

<sup>13</sup> In exceptional cases also above EUR 100,000.

#### **4.4 Financial and Technical Project Reviews**

Grantees are required to arrange at least a midterm and a final financial review by an independent audit company. The financial reviews will be conducted in accordance with an agreed upon procedures methodology specified in terms of reference included as an annex to the Grant Agreement. Expenditures for the financial reviews are to be included in the project budget.

In addition, each grant requires a midterm and a final technical review performed by independent evaluators, exact dates for which will be agreed. The technical reviews will be contracted and<sup>14</sup> paid for by Blue Action outside the project budget.

#### **4.5 Monitoring and Evaluation**

Blue Action regards monitoring of the grant activities as essential to effective grant implementation. Grantees have the main responsibility for monitoring at project level and for timely and responsive reporting as previously outlined in this section. Blue Action's own monitoring and internal evaluation will mainly be done through review of the grantee's reports, and the financial and technical reviews.

Blue Action may also conduct project visits to learn from the project successes and challenges within Blue Action's portfolio.

#### **4.6 Communications**

The grantee is required to acknowledge Blue Action's support by adding the logo of Blue Action to all publications, reports, banners, press materials and other products that the grants help produce. If appropriate, Blue Action should also be acknowledged on the grantee's social media posts and website.

The grantee is also required to provide Blue Action with electronic copies of any photographs, video material, articles, reports, media interviews or other publications directly relating to activities covered under the Grant Agreement.

The Grant Agreement also gives Blue Action the right to copy, distribute and publish derivatives of the work, in particular photographs, for non-commercial use.

#### **4.7 Environmental and Social Safeguards**

Blue Action's Environmental & Social Management System (ESMS) defines procedures, tools and responsibilities for assessing, managing and monitoring E&S risks and impacts associated with projects supported by Blue Action throughout the entire project lifecycle. Risk management begins during Full Proposal development with the identification and assessment of risks and potential impacts as well as the development of corresponding safeguard instruments. This process is divided into a number of steps: first, there is an initial screening of risks which determines if further assessments are necessary. If so, a scoping will be done to prepare the assessment, followed by the assessment itself. Once the risks and potential impacts are known, safeguard instruments will be developed to reduce risks and mitigate potential impacts throughout the project duration. Assessing and addressing risks or impacts is an integral part of all Blue Action's grants and will be agreed upon in the Grant Agreement. The ESMS, including all relevant templates and guidance, is available on Blue Action's [website](#).

---

<sup>14</sup> Grantees are expected to cover up to EUR 1,500 from their budget for incidental costs, such as costs for local transportation or translations, occurring during the conduction of the technical review.

## Annex 1: Project Logframe Template

The logframe is a core component of the Grant Application, outlining the specific objectives of the project. All projects should include Goal indicators G.1 and/or G.2 and G.3. Outcomes and Outputs and their corresponding indicators should be defined by the applicant. However, Blue Action requires all projects to include indicators that demonstrate they are significantly contributing to:

- Equitable decision-making and community empowerment
- Climate adaptation
- Gender equity

To the extent feasible, grantees are also encouraged to include ecological indicators.

	Indicators
<p><b>Goal (Impact/Overall Objective)</b></p> <p>Contribute to the Global Biodiversity Framework agreement by establishing and strengthening globally significant Marine Protected Areas (MPAs) in close cooperation with relevant stakeholders and promote sustainable livelihoods.</p>	<p>G.1: At the end of the project, the area under protection has increased through establishment of new MPAs or expansion of existing ones.</p> <p>Measured in km<sup>2</sup> of additional area under protected area status.</p> <p>G.2: At the end of the project, the management effectiveness of existing MPAs has significantly improved.</p> <p>Measured in METT or similar instrument.</p> <p>G.3: At the end of the project, human well-being indices of affected communities have improved<sup>15</sup>.</p> <p>Measured by suitable indices such as Basic Needs Survey (BNS) or Social Progress Index (SPI). (sex disaggregated)</p>
<b>Outcome 1</b>	
Output 1.1.	
Output 1.2.	
Output 1.3	
<b>Outcome 2</b>	
Output 2.1.	
Output 2.2.	
Output 2.3.	
<b>Outcome 3</b>	
Output 3.1.	
Output 3.2.	
Output 3.3.	
<b>Outcome 4</b>	
Output 4.1.	
...	

<sup>15</sup> Blue Action understands human well-being as a broad way to look at quality of life. Besides material well-being (e.g. income, assets, food security), we invite our grantees to also consider relational (e.g. social cohesion, community engagement) and/or subjective well-being (e.g. cultural values, levels of satisfaction).