



Public Hearing: Prequalification for SPA 2027-2031

Questions and responses

26 organisations have sent consultation responses to the public hearing of the prequalification material for SPA 2027-2031.

There are significant variations to the consultation responses provided by the organisations. Some had a very technical nature, others with suggestions to specific wording, and yet again others of a more general or forward-looking nature. MFA responses are divided between the ones that pertain to the prequalification material and those that will be part of the work towards developing the full proposal material. Consultation responses listed below have been anonymised and grouped according to specific themes.

Question	MFA Response
Information note	
Introduction 1.1 Civil society organisations are named as eligible applicants. Danish labour market partners should be named specifically.	Response/Changes to prequalification material 1.1 Eligibility requirements in Annex 1 – Part B state that Trade Unions and Business Member Organisations are included. The wording will remain as is in current prequalification material.
Aim and Nature of SPA 2027-2031 1.2 We seek further clarification as to how the multi-stakeholder approach concretely will support joint interventions between civil society and other actors such as private companies, and whether	Response/Changes to prequalification material 1.2-1.4 The remark is noted. Priorities including thematic focus areas and overarching approaches will be further elaborated in the material for the full proposal.

<p>this only includes Danish actors or also international companies and stakeholders.</p> <p>1.3 The information note fails to also include the aim which is stated clearly in MFAs own 'How to note' that states “...Strengthening diverse and independent civil societies is an important goal in its own right, as civil society’s capacity and space for action is the foundation for fostering democratisation and popular participation”.</p> <p>1.4 To interlink development cooperation and economic diplomacy closer - the integration should also be reflected in the prequalification material.</p>	
<p>Indicative priorities for SPA 2027-2031 – Indicative thematic focus areas</p> <p>1.5 Suggest adding "people discriminated because of their religion or belief" under thematic focus areas no. 4.</p> <p>1.6 We recommend that future SPAs actively promote job creation through youth engagement and technical skills development in retail, energy, and manufacturing, and green and digital transition, where Danish businesses can contribute with technology and expertise – such as energy security, access to affordable energy, and gov-tech.</p> <p>1.7 Suggestion to add sixth thematic focus area on civic diplomacy or people-to-people engagement.</p> <p>1.8 Ensure wording that recognizes the importance of a nexus approach under bullet 2 in the indicative thematic focus areas.</p> <p>1.9 The reference to media development in section 3, as an important part of the democracy and human rights agenda, should</p>	<p>Response/Changes to prequalification material</p> <p>1.5-1.6 The remark is noted. Priorities including thematic focus areas and overarching approaches will be further elaborated in the material for the full application.</p> <p>1.7 People-to-people engagement has now been included into Annex 1 – Part C under Strategic Capacity and under Annex B – Part C under Strategic Capacity.</p> <p>1.8-1.11 The remark is noted. Priorities including thematic focus areas and overarching approaches will be further elaborated in the material for the full application.</p> <p>1.12 Youth engagement has now been included to align with emphasis in the development strategy.</p> <p>1.13 Will be further clarified in full application.</p>

<p>reflect the broader framing in annex D, where free media is mentioned with reference to the role of free media to stimulate open debates.</p> <p>1.10 Support to social movements and informal actors should be explicitly included under the Democracy and Human Rights theme, recognizing their capacity to organize, innovate, and drive change even amid shrinking civic space and attacks on NGOs and formal institutions.</p> <p>1.11 We commend that the Strategic Partnerships continue to support civil society engagement, long-term development and humanitarian action with flexible programming and budget framework. We therefore hope that the information note for the full proposals will reflect this flexibility and be conducive for the applicants' own ways of working with the thematic focus areas of the Danish development strategy and overarching approaches.</p> <p>1.12 Propose to incorporate the voices of young people into focus area 4) Democracy and human rights, so that it is amended to 4) Strengthen democracy and meaningful youth engagement. This would make it clear that there is also a particular focus on youth.</p> <p>1.13 Clarify whether the focus areas are guiding priorities or formal partnership categories and ensure flexibility for applicants to work across several areas.</p> <p>1.14 Recommend the MFA to refer to high-integrity Nature-based Solutions, which is an umbrella term encompassing ecosystem-based approaches incl. management, restoration, and protection, all aimed at addressing societal challenges while delivering positive outcomes for both people and biodiversity.</p>	<p>1.14 The remark is noted. Priorities including thematic focus areas and overarching approaches will be further elaborated in the material for the full application.</p>
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<p>Indicative priorities for SPA 2027-2031 – Indicative overarching approaches</p> <p>1.15 “Equal partnerships and local leadership” are one of the overarching approaches. This is highly relevant. However, this is not very clear in the eligibility approach.</p> <p>1.16 Suggest to add wording on persons with disabilities: “Equal partnerships and local leadership, including a strategic partnership approach, financial transfers to local partners, capacity strengthening and -sharing, representation and leadership of local partners, <i>including representative organisations of marginalised groups, such as persons with disabilities.</i>”</p>	<p>Response/Changes to prequalification material</p> <p>1.15 The importance of equal partnerships and local leadership is reflected in the capacity assessment in Annex 1 Part C. Priorities including thematic focus areas and overarching approaches will be further elaborated in the material for the full proposal.</p> <p>1.16 The remark is noted. Priorities including thematic focus areas and overarching approaches will be further elaborated in the material for the full proposal.</p>
<p>Indicative priorities for SPA 2027-2031 – Geographical focus</p> <p>1.17 The focus on Ukraine and the neighbourhood region could be seen as focusing more on security than poverty reduction. If this should be done, it should come with additional funding for the SPAs for poverty reduction not to be relatively under-prioritized in the future.</p> <p>1.18 Could the MFA please clarify whether it expects to retain the minimum of 50% of programme activities earmarked to the named priority areas in total or if it is expected to increase (..), and/or whether additional earmarking to specific geographies is expected (e.g., min. 40% Africa, 10-20% Ukraine and the European eastern neighbourhood and the Middle East). In addition to this, we would like the MFA to clarify whether there will no longer be a fragility focus in the SPA.</p>	<p>Response/Changes to prequalification material</p> <p>1.17 The remark is noted.</p> <p>1.18 This will be further clarified in the material for the full proposal.</p>
<p>Assessment procedures and scoring</p> <p>1.19 Request that the calculation of organisations’ budget ceilings is shared in a transparent manner and as early as possible in the application process, ideally as part of the prequalification material.</p>	<p>Response/Changes to prequalification material</p> <p>1.19 The rationale behind calculation of ceilings will be shared as part of the invitation to submit a full proposal.</p>

1.20 The upcoming grant amounts should be adjusted for inflation. When adjusted for inflation, the proposed minimum of 15 million DKK in 2025 is equivalent to approximately 13 million DKK in 2021—the year the SPA2 information note was issued. Maintaining the real value of SPA grants is essential to ensure continuity and impact in long-term development partnerships.	1.20 The remark is noted. Allocation to Strategic Partners is expected to have a lower limit of DKK 15 million per year. The paragraph has been rephrased.
Timeline for the prequalification process 1.21 MFA is asked to share the detailed timelines for this exercise at the earliest convenience.	Response/Changes to prequalification material 1.21 The remark is noted, and indicative timeline will be shared with the launch of the prequalification.
Annex 1 – Application Form	
Part B - Membership 2.1 Include additional component c addressing number of members in organisation’s global alliance and outreach.	Response / changes to the prequalification material 2.1 The remark is noted, the criteria will remain as is. The aim of the assessment criterion is to document that the applicant is anchored in Denmark. Furthermore, it is possible to address the organisation’s outreach and engagement through global alliances etc. in Annex 1 – Part C – under Strategic Capacity.
Part B - Programme management and country presence 2.2 The delimitation of the programme budget should include ODA, funds from private institutions, and funds collected in Denmark. It is requested that this is clarified. 2.3 It should be clarified whether the amount of 2 million DKK is annual or over both years. 2.4 Asia as a region is not included, despite countries with extreme fragility. Is it correct that Myanmar and Afghanistan cannot be included?	Response / changes to the prequalification material 2.2 The country programme budget may be comprised of different funding sources. Furthermore, “ODA programmes” is now rephrased to “development and/or humanitarian programmes”. 2.3 Budget should be minimum two million DKK annually in each country. This is now clarified in the Annex 1 and Annex B. 2.4 Countries in Asia are not included in the criteria for programme management and country presence. As stated in the Information Note, beyond the geographical weight of SPA 3 being expectedly in Africa, Ukraine and the European eastern neighbourhood and

<p>2.5 Exempt organisations with strong engagement in the Indicative thematic focus area - “A just, sustainable, and green transition, including climate adaptation, green solutions, restoration of ecosystems and forest conservation” - from the Africa country presence requirement.</p>	<p>the Middle East, engagements can be in all OECD DAC eligible countries including Asia, the Pacific Region and Latin America.</p> <p>2.5 There will be no exemptions from the geographical priority of countries under the criteria for programme management and country presence.</p>
<p>Part B - Budgetary volume and annual turnover</p> <p>2.7 Align the description of the indicator with the goal description and rephrase “turnover of ODA” to “budgetary volume for development and humanitarian action (from MFA or other sources)”.</p> <p>2.8 The use of the term ODA seems unclear. Can only official donors (ODA) be included? Or can large foundations with reporting requirements similar to the MFA be included (e.g. Novo Nordisk Foundation)?</p> <p>2.9 Certain assessment criteria – particularly those related to historic ODA volumes and large-scale programme implementation – may be a disadvantage to organizations operating at a more modest scale. The Ministry is encouraged to allow flexibility in assessing consortia, particularly when partners offer strong institutional capacity and the ability to rapidly develop systems and competencies to deliver on SPA objectives.</p> <p>2.10 Change budgetary volume of 25 million DKK from average in 2023-2024 to average of all the audited SPA2 years (2022-2024), as turnover varies considerably for smaller organisations.</p> <p>2.11 The increased requirement of the total turnover (from DKK 15 to 25 million yearly) could discourage and make it very difficult for new innovative organisations to apply.</p>	<p>Response / changes to the prequalification material</p> <p>2.7-2.10 The requirement is now rephrased. Annex 1 – Part B and Annex B – Part B has been rephrased from “turnover of ODA” to “budgetary volume of development and/or humanitarian action (from MFA or other sources) in at least one of the following years; 2022, 2023 or 2024.”</p> <p>2.11 The remark is noted. The Strategic Partnership modality is targeting Danish civil society organisations with significant capacity, including the capacity to manage larger programmes.</p>

<p>Part B - Own-financing</p> <p>2.12 Strongly recommend to replace the requirement for 25% own-financing with the SPA2 requirements of 15%+5% own-financing.</p> <p>2.13 Request to remove own-financing as an eligibility criterium and include it as an administrative requirement for SPA3.</p> <p>2.14 Request for own-financing to be in addition to main SPA- or CISU-grant rather than other channels than the MFA to enable organisations to pursue top-ups and other MFA grants without compromising requirement for own-financing.</p> <p>2.15 Definition of ODA-turnover sourced from other channels than MFA remains unclear. If this is only referring to state donors or the EU, it is contradicting the ambition of SPA 3 to gear resources and attract funds from other donors or alternative financing sources. Own-financing should thus not be limited to ODA funding only.</p> <p>2.16 For smaller and medium-sized organisations, there may be significant variances and fluctuations from one year to the next. Especially for smaller organisations that does not already have a Strategic Partnership Agreement with the MFA, but considers applying.</p> <p>2.17 Given Danida's support for localization, can program funds raised and implemented by legally independent federation members in DAC countries where organisations work be counted as own-financing provided they advance the same change goals? The revised guidelines risk disincentivizing localization efforts, if they only recognize funding that is on the books or under direct control of Danish NGOs.</p> <p>2.18 Is the full consortium ineligible if one of the members fails to meet all the eligibility requirements in Part B or can the lead</p>	<p>Response / changes to the prequalification material</p> <p>2.12-2.16 The requirement is now rephrased. The headline "Own-financing" is now rephrased to "Annual turnover" and the description is rephrased from "The organisation declares having at least 25% of annual ODA-turnover sourced from other channels than the MFA" to "The organisation declares having at least 25% of annual turnover sourced from other channels than its MFA-sourced main grant (e.g., SPA main grant, CISU main grant etc.)". For consortia the requirement will only apply for the lead-organisation. Furthermore, the expected own-financing requirement for applicants who will receive funding as part of SPA3 is now included in the Information Note.</p> <p>2.17 All funds to be accounted for as eligible for annual turnover should be documented in audited accounts of the applicant.</p> <p>2.18 In case where a consortium submits an application, where one partner turns out to be ineligible, the MFA will engage in dialogue with the remaining partners of the consortium.</p>
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organization in that case continue in the process but now as a single applicant?	
<p>Part B - Organisational policies</p> <p>2.20 For organisations applying in a consortium, the current formulation of the material implies that the consortium develops joint policies in all areas. Can this be avoided?</p> <p>2.21 Suggestion to make requirement for PSEAH, complaints handling mechanism, anti-terror policies mandatory for the lead organization in a consortium, who would then in return be responsible for the consortium members meeting these in practice.</p> <p>2.22 Request to include the formulation “requested documentation in forms of policies etc. may include several themes/policies in one document i.e. a code of conduct may include both PSHEA and anti-child labour policies” is applied across the annexes and that a section for comments is included under each policy requirement to allow for applicants to elaborate on how the different issues are integrated across policies and/or addressed through targeted processes.</p>	<p>Response / changes to the prequalification material</p> <p>2.20 For consortia it will be possible to submit individual policies, when there is no joint policy on a given thematic.</p> <p>2.21 The requirement to submit the identified policies will remain applicable to all consortium members.</p> <p>2.22 The remark is noted. It is already stated in Annex 1 that requested documentation in forms of policies etc. may include several themes/policies in one document. No further adjustments will be made to the material.</p>
<p>Part B - Core Humanitarian Standards</p> <p>2.23 For organisations mainly engaged in development work, would it be possible to have more flexible requirements regarding humanitarian assistance?</p> <p>2.24 Request for clarification of "the Danish organization itself specifically is part of the audit scope and oversight" and overall provide clearer guidance on this requirement. A different interpretation of the requirement than under SPA2 will increase cost and add bureaucracy to organisations without necessarily improving quality and accountability. In addition, the CHS certification cycle runs over three years, so it will be important</p>	<p>Response / changes to the prequalification material</p> <p>2.23 To receive humanitarian funds from the MFA, CHS certification or verification will be required.</p> <p>2.24 To receive humanitarian funds from the MFA, the requirement for Danish organisations to be CHS certified or verified either independently or as part of an international alliance will remain. It must be clearly demonstrated that humanitarian funding received from MFA is covered in the CHS audit scope. If adjustments to the audit scope are required, these should be carried out at the next Renewal Audit within the on-going CHS audit</p>

<p>with flexibility to accommodate different timing, rather than ‘by end of 2026’. This will allow several of the existing SPA organisations to adjust to the new requirement in the most cost-effective manner by timing it with their respective alliance CHS certification cycle.</p> <p>2.25 Suggestion to utilise the CHS audit as evidence for the following topics: Anti-corruption, PSHEA, Code of Conduct, complaints handling system, human resource management, safeguarding, environmental and carbon footprint to decrease administrative burden.</p> <p>2.26 The eligibility criteria related to the CHS unclear. It is stated that all requirements must be answered with a clear “yes” or “no” and with full compliance. It is recommended that organizations not intending to engage in humanitarian action with humanitarian funds from MFA are given the option to declare this explicitly and thereby be exempt from completing the CHS-related section while still being eligible to apply for SPA3.</p>	<p>cycle. Organisations should engage with the MFA on the matter if further clarification is required.</p> <p>2.25 The documentation requirement for requested policies will remain as is. The utilization of CHS audit during SPA3 will be addressed in the SPA 3 guidelines.</p> <p>2.26 For organisations replying “no” to intending to engage in humanitarian action with MFA funds, the section on Core Humanitarian Standards can be disregarded.</p>
<p>Part C – Programmatic and Operational Capacity</p> <p>2.32 Suggestion that it is the Programmatic and Operational Capacity of the lead organization that should be described and assessed, while cases could include examples from other consortium members.</p> <p>2.33 Request that required documentation should include latest example of Global Results Framework and a Country/Programme Results Framework as SPA partners have revised frameworks from 2025</p> <p>2.34 Request for clarity on what programme strategy and defined minimum criteria refers to (e.g., organisations own, SPA2 or DANIDA).</p>	<p>Response / changes to the prequalification material</p> <p>2.32 The criteria will remain for consortia as a whole.</p> <p>2.33 The documentation requirement has been adjusted to “Global Results Framework and a Country/Programme Results Framework from either 2024 or 2025”.</p> <p>2.34 The programme strategy and defined minimum criteria refers to the programme strategy and defined minimum criteria that the applicant applies in their programming unrelated to the donor of the program.</p> <p>2.35 The remark is noted, the criteria will remain as is.</p>

<p>2.35 Recommendation that climate change adaptation and resilience will be explicitly included across the assessment criteria and thematic areas, and that space be given for long-term programming on climate, WASH and nutrition as essential components of health, education and livelihoods outcomes.</p>	
<p>Part C – Partnership Capacity</p> <p>2.36 Please clarify what is meant with “quality of financial transfers” to local partners.</p> <p>2.37 It is noted that the prequalification package has an increased focus on the applicant’s capacity to conduct Due Diligence and oversight of transfers to local partners and no focus on risk-sharing. What is MFA’s appetite for shared risk-taking when it comes to developing equitable partnerships?</p> <p>2.38 Does recent examples of financial monitoring reports of local partners and financial capacity assessment of a local partner only apply to SPA funded partners can it be examples related to local partners more broadly?</p> <p>2.39 Recommendation that the prequalification material also emphasise proportional and risk-based due diligence requirements for local partners and country offices, to avoid creating excessive administrative burdens that could undermine local ownership and programme efficiency.</p> <p>2.40 Does partnership strategies include partnerships with Danish and international partners, or is "partnership capacity" primarily aimed at the ability of an organisation to work with national and local actors?</p>	<p>Response / changes to the prequalification material</p> <p>2.36 Please refer to current SPA2 guidelines section 7 and section 8.1.</p> <p>2.37 The remark is noted, reference is made to current SPA2 guidelines.</p> <p>2.38 It does not apply to SPA-funded partners only, but may also be other examples.</p> <p>2.39 The remark is noted, and will be taken into consideration when formulating guidelines for SPA3.</p> <p>2.40 The partnership strategy may address both Danish, local and international partners. The full criterion on Partnership Capacity is reflecting the applicant’s ability to work with Danish, local and international partners.</p>

<p>Part C – Financial Management Capacity</p> <p>2.41 Request confirmation that the latest review report will suffice if the review (which also includes elements of financial monitoring) was carried out subsequent to the most recent financial monitoring visit.</p>	<p>Response / changes to the prequalification material</p> <p>2.41 Both the latest review report and latest financial monitoring report of the applicant should be attached.</p>
<p>Annex A – Preparation of Cases</p>	
<p>3.1 On IPE cases, the requirement to use examples from the last five years and only from DAC countries raises uncertainty about how to present a relevant IPE case. Clarify how this requirement applies in practice, and whether flexibility will be applied.</p> <p>3.2 It is unclear if the ‘sub-criteria’ regarding the cases refer to the three capacity-criteria - strategic, programmatic, partnership – or other criteria.</p> <p>3.3 Will the final application include cases? If so, we would like to know whether it will be permissible to re-use cases, or parts of cases, from the prequalification in the full application.</p>	<p>Response / changes to the prequalification material</p> <p>3.1 IPE-related examples could also take place in a Danish context but should be related to programming in an ODA eligible-country.</p> <p>3.2 The wording in Annex A has been adjusted to clarify the meaning.</p> <p>3.3 Organisations are free to reuse cases or parts of cases in the full proposal.</p>
<p>Annex B – Assessment and Scoring</p>	
<p>Part C - Strategic Capacity</p> <p>4.1 IPE accounts for 30% of the strategic capacity score. We acknowledge the importance of outreach and public engagement as an integrated element of Danish development aid. However, the relative size of the IPE budget should be considered when assessing applications to ensure that the 30% weighting for IPE does not give an advantage to organisations with larger SPA budgets. The 30% weight for IPE is high compared to the 40% weight for track record on ODA results, being the core of the</p>	<p>Response / changes to the prequalification material</p> <p>4.1 The weight of the criterion has been adjusted and updated in Annex B – Part C under Strategic Capacity.</p>

application. Also, it's high increase from IPE being weighted by 5% in the last SPA application.	
Part C - Programmatic and Operational Capacity 4.2 For the sake of accountability and transparency it is suggested that the material includes the scoring weight between the various sections in Part C: Capacity Assessment, and that it is taken into consideration that section 2 Programmatic and Operational Capacity includes substantial documentation that previously was covered in the full application and therefore needs to be given sufficient attention.	Response / changes to the prequalification material 4.2 The scoring weight between the various sections in part C has been included in Annex B – Part C.
Part C - Partnership Capacity 4.3 Suggest adding a point 3.4 describing the organisation/consortium's international alliance and outreach. 4.4 suggests that the assessment criterion 3.3 in Annex B (weighted at 50%) is clarified or complemented to capture the value of activities that enable local and national duty-bearers to assume their responsibilities, even if they entail limited to no funds transfer, as this assessment criterion currently indicates a narrower focus on local civil society actors. 4.5 Under 3.1 it is unclear whether detailed requirements on roles, added value, and feedback systems apply equally to Danish partners, as such systems are mainly developed with international and local partners. Please clarify the scope of the criteria and adjust scoring to reflect realistic practices.	Response / changes to the prequalification material 4.3 This is covered in the current sub-criteria for Strategic Capacity 1.1. 4.4 The remark is noted. Local and national duty-bearers are already included in the definition of Local Partners (see Annex C) and should be captured under the current description of the assessment criterion. The assessment criterion will remain as is. 4.5 The full criterion on Partnership Capacity is reflecting the applicant's ability to work with Danish, local and international partners.
Annex C – Local Partner Definition and Transfers to South	
5.1 Applicants are asked to provide “Total turnover of ODA and full international engagement” Which one is correct? The ODA is	Response / changes to the prequalification material

<p>only one part of the full international engagement due to a variety of funding sources.</p> <p>5.2 The MFA’s commitment to locally led development is highly appreciated, and the SPA should of course, mirror this. We want to point out that while increased direct transfer of funds to partners is highly important, it is not the only tool to drive a more locally led development. Furthermore, we want to point out that a higher administrative burden and due diligence can be counterproductive to increased localisation.</p> <p>5.3 Recommend including a clear definition outlining the difference between reaching and transferred directly to a local partner. Also, in cases where local partners implement activities, it is unclear how to report figures in row two (“reaching”).</p> <p>5.4 We work with civil society in all its diversity, supporting actors at different levels, including regional and global networks, as a way to leverage impact at scale. Will such actors fall under the definition of Local Partners?</p> <p>5.5 The “annual turnover” in rows two and three should apply only to international engagement, as some organisations also run domestic programs in Denmark.</p> <p>5.6 For the level of transfers that reaches local partners, we would like clarity as to what counts as reach: is it direct financial transfers only, or do activities benefiting the local partners directly such as capacity strengthening, tools and resources etc. also count?</p> <p>5.7 For the level of transfers directly to local partners (with no alliance or intermediary entity in the fund flow), we assume that Country Offices form part of one legal entity of the Strategic Partner and as such, are not considered intermediary entities?</p>	<p>5.1 The wording has been rephrased from “Total turnover (DKK) of Official Development Assistance” to “annual budgetary volume for development and/or humanitarian action”.</p> <p>5.2 The remark is noted.</p> <p>5.3 Annex C has been updated to give a clearer definition of transfers to local partners.</p> <p>5.4 Please refer to the current definition of local partners in Annex C.</p> <p>5.5 The wording has been rephrased from “Total turnover (DKK) of Official Development Assistance” to “annual budgetary volume for development and/or humanitarian action (from MFA or other sources)”.</p> <p>5.6 Annex C has been updated to give a clearer definition of transfers to local partners.</p> <p>5.7 Please refer to the current definition of local partners in Annex C.</p> <p>5.8 The remark is noted. This is expected to be included in the application under Annex 1 – Part C on Partnership Capacity.</p> <p>5.9 There are no intentions of weighing different types of local partners in the prequalification assessment.</p>
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<p>5.8 While financial transfers to local partners is an important means of driving localisation, we would like to stress the importance of also considering other aspects of local leadership in the assessments of partners, such as: 1) Level of nationalisation at country offices 2) Quality of partnerships 3) Support to establishment and maturation of new local entities for driving local innovative solutions that were not available in the context prior to the programme engagement.</p> <p>5.9 Request clarity on the weighing of different local partners, such as local government, civil society and private sector partners</p>	
Annex D – Thematic Focus Areas and Volume	
<p>6.1 The significance of Annex D for the process is unclear. The MFA is asked to provide a clear and transparent justification to the necessity and use of this annex in the prequalification. If the MFA's intention is to map and assess the capacities of partners to deliver on the SPA thematic areas, it would be more fruitful to request this information directly and clarify how the information is used towards the prequalification rather than a percentage of costs spent on these thematic areas which may imply focus but not capacities.</p> <p>In addition to this, the mapping is based on previous programming where applicants would have aligned with the previous development strategy with different themes and focus areas. Hence, the mapping might not be fully indicative of the direction applicants are going in for a new SPA period based on newly developed organisational strategies for applicants to adopt to the rapidly changing world.</p>	<p>Response / changes to the prequalification material</p> <p>6.1-6.3 Annex D has been removed from the prequalification material.</p>

<p>6.2 The mapping of volume per thematic focus area is an exercise that will require considerable efforts in a short period of time. We therefore ask the MFA to provide further elaboration of the purpose of the exercise.</p> <p>6.3 Clarify whether Annex D reflects past focus or anticipated SPA III. Appears forward-looking but relies on past data (2023–2024), creating uncertainty about its purpose. This is especially relevant for DFPA, which is developing a new SPA rather than continuing SPA II. The MFA should also ensure flexibility so it does not privilege continuity over innovation. Annex D appears forward-looking but relies on past data (2023–2024), creating uncertainty about its purpose.</p>	
<p>General comments</p>	
<p>7.1 We recommend revising the current rule that NGOs must have Danish-funded interventions in a country to be eligible for top-up grants. For federated organisations, programmatic presence is often delivered through other offices within the same federation. Allowing this broader definition of presence would ensure fair access to top-up funding, make better use of existing capacity, and avoid fragmentation of programming.</p>	<p>Response / changes to the prequalification material</p> <p>7.1 The remark is noted, and will be taken into consideration when formulating guidelines for SPA3.</p>