

2016 ANNUAL REPORT



EEB

European
Environmental
Bureau

EUROPE'S LARGEST NETWORK
OF ENVIRONMENTAL CITIZENS
ORGANISATIONS



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Foreword

Last year saw some huge changes for Europe. Brexit represents a huge change for the the political landscape of Europe and for environmental protection. The European Environmental Bureau (EEB) is preparing to take on these challenges.

When it comes to protecting the natural environment, the air we breathe, our rivers, our beaches, Europeans want to see more action at European level.

This is the message that comes through again and again from surveys taken for the Eurobarometer. In March of this year, three out of every four citizens questioned wanted more to be done at European level to protect the environment. This is a really substantial majority.

Faced with the rise of nationalist anti-EU sentiments around Europe, one would expect those politicians who believe in the value of a strong, well-integrated EU to push for the EU to do more where this is popular, and less where it is not popular, if only to counter Euroscepticism.

One would expect them to insist that we talk not so much about absurd examples of unnecessary EU regulation (whether real or imaginary) on the length of cucumbers or the curvature of bananas but rather about those EU laws that, for example, protect Europeans from excessive levels

of pesticide residues in cucumbers and bananas.

And yet we have seen precisely the opposite. We have seen supposedly pro-European politicians put on the defensive by a crude narrative that presents all EU regulation as 'Brussels interference' – even if it saves lives, prevents abuse in the workplace, protects nature and delivers a range of other benefits to ordinary citizens.

The EEB, together with its partners in the Green 10, has given a clear signal that future access by the UK to the EU single market must be strictly conditional upon its willingness to be bound by the EU's environmental legislation, present and future. We have conveyed this message directly to the EU's chief negotiator Michel Barnier in a meeting in late March. Since then the European Parliament has call for the continued use of EU standards, including climate change and environmental regulations, as part of the conditions of a deal with the UK.



Jeremy Wates
Secretary General

Jeremy Wates has served as Secretary General of the European Environmental Bureau, Europe's largest network of environmental citizens' organisations, since May 2011.

EEB ACHIEVEMENTS

- Climate & Energy
- Circular Economy
- Nature & Agriculture
- Health & Industry
- Global Policies & Sustainability



ACTIVITIES

The EEB collaborated throughout the year with other NGOs on the 2030 perspective addressing various letters and publication to the Commission and legislators.

The EEB engaged through the Coalition for Higher Ambition and further initiatives in April on the upcoming Effort Sharing Regulation and in July on the LULUCF proposal. These further included in April 2016 a joint letter to the Commission, in May 2016 an infographic on loopholes, in July 2016 joint letter to President Juncker, in October 2016 a joint letter and infographic on the loopholes of the Effort-Sharing regulation and the LULUCF proposal. The organisation of a public event on 2030/2050 perspective is postponed as part of the EEB's ongoing position taking process on bioenergy.

The Agriculture and Bioenergy policy manager organised a bioenergy meeting for national partners in February 22-23. This meeting allowed for discussions and exchanges on national contexts and also served as a platform for presenting the post 2020 context. She also set up and participated in a meeting with the French

Environment Ministry and the agriculture cabinet to discuss the ILUC implementation and post 2020. During the period the EEB met on a regular basis with the other Environmental and development NGOs (BirdLife Europe, WWF, FERN...) to share intelligence on the post 2020 discussion. It also got interviewed for a French TV documentary on biofuels (FR 5 channel)

(foreseen to be out in the coming months). In addition to this meeting; a dedicated meeting of the EEB bio-energy working group was organised in June to take forward EEB internal discussions.

With the announcement of the "Clean Energy for all Europeans" package the EEB focussed much of its work on the preparations and participation in the legislative processes.

The proposals for the new Effort Sharing Regulation (ESR) and the LULUCF Regulation introduced further loopholes and weakened the already insufficient 2030 GHG target and was heavily criticised by the EEB and its network members for ignoring the Paris Agreement and lacking a ratchet mechanism. The fact that the impact assessment of the ESR includes a scenario with 30% energy efficiency strengthened the case for more ambitious proposals for the energy efficiency revisions of the winter package, namely the Energy Performance of Buildings Directive (EPBD) and Energy Efficiency Directive (EED). In late 2015 the EEB had responded to the EPBD consultation. The EEB collaborated on the Energy Efficiency Directive (EED) consultation response within the Coalition for Energy Savings, prepared a separate response to the consultation with its members by the end of January and organised a joint workshop with CAN-E on 18 and 19 January totaling 26 participants. In addition, the EEB participated in the consultation on the Renewable Energy Directive, focusing on the sustainability aspects of bioenergy. For the preparation of the EED, the EEB developed a joint policy paper on the EED revision and participated in a number of stakeholder meetings.

Climate & Energy

Building on the work with the national members the EEB contributed to the stakeholder workshops of the European Commission and mobilised support for an ambitious position as part of the European Parliament's report on the implementation of the EED, adopted in June 2016. The report included key asks of the EEB, including a 40% energy efficiency target as part of the EED review, a continuation of energy savings obligations (Art. 7) beyond 2020, the removal of loopholes and the objective of a nearly zero emissions buildings (nZEB) building stock by 2050 in renovation strategies.

As contribution to activity 4 the EEB carried out capacity building activities with its members and other Brussels-based NGOs and published a study Navigating the Better Regulation Maze on the implications of the better regulation package for the 2030 energy and climate package. The EEB focussed on the participation in the TEN-E process of projects of common interest, participating in the EU Sustainable Energy Week in June with a presentation of the EEB policy director and EEB members as well as the Regional Group meetings throughout the year in May, September, October and December, discussing the developments in media articles, joint letters and participation in the activities of the Renewable Grids Initiative. The activity was mainly carried out.

The EEB bioenergy policy officer and contributed to the EEB's internal discussions on bioenergy. Since these discussions took longer than planned for, further activities by the EEB were delayed or carried out by partner

organisations including Bird Life Europe and Central Asia. The activities were therefore only partially carried out.

Further scenario building and modelling studies which require external resources. The EEB together with partners of the Coolproducts campaign contributed to get provisions for a dynamic A to G scheme and a database to enhance market surveillance and monitoring. But we could not achieve a stronger focus on absolute energy consumption as we were calling for, though we managed to anchor a formulation to consider possible higher stringency of energy efficiency requirements for larger appliances (art 12.3 indent I). As new labels should start with empty class at the top, this will act as a driver for innovation and market transformation, even if a clear reference to a top performer approach is not included in the legal text.

We notably monitored the development of measures on displays, lighting, smart appliances, white goods, servers, motors during the preparatory study stages and the early draft of regulations.

A new ecodesign work plan on 30/11/2016, reminding the already achieved savings and the remaining potentials linked to energy performances requirements, and stating the strengthening of ecodesign policy towards resources conservation and circular economy.



Circular Economy

ACTIVITIES

The EEB remains a key entry point to the NGO community working on the Circular Economy for the EU Commission, the EU Parliament, and we have regular contacts with national delegations through their permanent representations and national experts coming to Brussels.

These contacts with the EU institutions and the broad community dealing with waste policy were instrumental to closely follow up the revision of waste policy. We met several times with the European Parliament rapporteur and shadow

rapporteurs offices during the elaboration of the ENVI committee position and suggested amendments notably on waste prevention and reuse, separate collection of biowaste, producers responsibility schemes. We met Perm Reps and contacted national experts of the Council working party on waste, monitoring closely the development of the Council position and issuing warning message directly or through our members as required. For example, together with several partners, we called for maintaining

Circular Economy

recycling targets when they were once under threat. We took part to public consultations related to waste policy (e.g waste to energy roadmap) and to numerous related events and conferences at EU and national levels, organised by the Commission or by NGOs or industry stakeholders.

The EEB also has a seat in the different consultation forums and advisory boards related to product policy (Ecodesign, GPP/Ecolabel, PEF/OEF) and took part to all consultations related to waste policy (e.g waste to energy roadmap). We have published our opinion and briefing on Environmental Footprint methodologies for products in September 2016. We have provided input on options for improvement of the implementation of the Ecolabel Regulation. We have also submitted comments for the different Ecolabel and GPP product groups and criteria revision or development in 2016. All our publications and positions targeting EU decision makers can be consulted here.

Through our helpdesk, circulation of information, working groups and call for actions, we are routinely reaching out to our members and liaising to the broad NGO community working on CE (e.g taking part to the waste coalition of NGO, taking part to the EU alignment on Plastic). Most of 2016 was dedicated to prepare the consultations now opened in 2017, notably on plastic strategy, interfaces between chemical, waste and product legislation.

To raise awareness the Make Resources count campaign has continued in 2016 and we produced articles and quotes for media to raise awareness on CE and EU policy (see for example the blogs produced here: <http://makersourcescount.eu/blog/>). By the end of 2016, it's been decided to give a new spin to the campaign in order to target the large public beyond policy makers and media at European level. This will be concretely implemented in 2017/2018.



Nature & Agriculture

ACTIVITIES

Agriculture

Two working group meetings took place, one in February and one in September. The meeting in February coincided with a high-level conference organised by the EEB in partnership with BirdLife Europe on the CAP and Rural Development programmes which saw around 200 participants (including decision makers, civil society representatives, and farmers) taking part. The meeting in September was held jointly with the EEB's biodiversity working group and coincided with a conference on nature organised by the EEB's Senior Policy Officer for Biodiversity and Ecosystems at which the EEB's Agriculture Policy Manager intervened.

At the September agriculture working group meeting the EEB also agreed on a post-2020 agriculture vision accompanied by some policy principles. A fully-fledged position paper is now being drafted on the basis of these two documents.

As part of the European Citizens Initiative (ECI) on soil, the EEB's Soil Policy Officer took part in part of the agriculture working group meeting in September and garnered support for the ECI amongst the agriculture members. The EEB, together with a few other NGOs (BirdLife Europe, Greenpeace, Slow Food, Friends of the Earth Europe and IFOAM) organised two meetings of the platform, one in March and one in September. Besides updating the members of the platform on different aspects of CAP reform and other related files, these meetings also led to the adoption of internal principles

around the food and farming system.

At least 15 meetings were organised with ENVI MEPs and their assistants as well as political groups' coordinators. A workshop titled 'UnCAP the Truth' chaired by MEP Sirpa Pietikäinen (EPP, FI) was organised as well. It was meant to take place in March but had to be postponed due to the Brussels terrorist attacks and eventually took place in May. Representatives from the health sector, animal welfare organisations, and an academic from the Centre for European Policy Studies (CEPS) spoke at this event. A video produced by the EEB and BirdLife was also unveiled at the beginning of this event, as was a leaflet which summarises the CAP's impact on the environment, health, animal welfare and the subsidies regime. In addition to this event, a separate breakfast briefing was organised targeting permanent representations on the same topic.

The EEB, together with BirdLife Europe, commissioned a study looking at the potential impact on biodiversity of the implementation of the Ecological Focus Areas measure (part of CAP greening). This study was published in October and was circulated to decision makers in the following weeks/months. It completed a series of studies denouncing the ineffectiveness of greening implementation for the environment.

The EEB chaired for one extra year the CDG on environment and climate in 2016. In doing so, it tried to set up a structured dialogue on climate and agriculture in order to improve the level of exchanges. The EEB Agriculture Policy Manager was re-elected vice chair (the maximum mandate for the Chair position is two years) for 2017.

Nature

A key objective of the EEB was achieved in relation to biodiversity as the Nature Directives were declared to be fit for purpose and should not be rewritten and weakened. It also announced the preparation and adoption of a Better Implementation Action Plan in the first half of 2017. The clear positioning of the European Parliament and a majority of Member States in the Council in favour of legal certainty and better implementation as a follow up to the Nature Directives Fitness Check can be in part credited to EEB's advocacy work. At the end of 2016 there was new momentum in the implementation of these two pieces of legislation that form the cornerstone of the EU's nature conservation efforts.

The EEB had numerous meetings with Members of the European Parliament and their assistants in order to get the Parliament to develop and adopt an ambitious report on the Commission's Mid-Term Review (MTR) of the EU's Biodiversity Strategy. Effective advocacy work ahead of the vote in the ENVI Committee in December and the plenary vote in February 2016 allowed the report's level of ambition to be increased. A particular success was that the report adopted by a very large majority in the European Parliament calls for EU and Member State level action to be stepped up in various areas, including through new initiatives corresponding to long-standing EEB asks (e.g. environmental inspections, access to justice, further greening of the European semester), and puts emphasis on the need to phase out environmentally-harmful subsidies and further integrate biodiversity into other policy areas, clearly singling out agriculture. The EEB organised a conference titled 'Actions for Nature' which was held in the Committee of the Regions on 14 September 2016. 20 speakers and 14 panellists from NGOs, the European Commission, Member States, and the private sector discussed what policies were needed in order for the EU to meet its target of halting biodiversity loss by 2020. Over 200 people

participated, and the conference report was downloaded 132 times.

EEB also participated in other relevant meetings allowing for a constant exchange with decision-makers from the Commission and Member States: In March and September 2016, the EEB participated in the meetings of the Co-ordination Group for Biodiversity and Nature (CGBN). In April and November 2016, the EEB participated in the European Habitats Forum (EHF) meetings with the Commission. The EEB also participated in the Nature Directors' meeting in Slovakia in October 2016 (there was no Nature Directors meeting during the Dutch Presidency first half of 2016).

With regards to the biodiversity working group meeting in 2016 (activity 4) the first meeting took place in the Netherlands in April and the second meeting took place in Brussels, back to back with the Nature Conference organised by EEB in order to allow interested members to participate in the conference. Throughout the year regular updates were sent to members of EEB's biodiversity working group. biodiversity consideration was not achieved as of late 2016. However, importantly, the Commission's Fitness Check conclusions recognised the need to improve the coherence of sectoral policies with Europe's nature conservation objectives and the Commission's Better Implementation Action Plan is being prepared with this objective in mind.



ACTIVITIES

Chemicals

During 2016, the EEB has been active at the OECD's Ad Hoc Group on Substitution of Harmful Chemicals and provided concrete proposals on the future work on substitution and alternatives assessment of the group as well as proposed aim, target audience and activities.

We have also collaborated with and provided concrete proposals to the University of Massachusetts Lowell, Lowell Center for Sustainable Production, in charge of the study for ECHA on needs and opportunities to enhance substitution efforts within the context of REACH. The EEB also collaborated closely with ECHA on the development of a website, compilation of case studies, videos and webinars on substitution.

The EEB actively participated in all the activities and coordinated NGOs participation. We organised NGO meetings and monthly calls to coordinate activities. We prepared a draft template with answers to the public consultations that were shared with other NGOs welcoming the initiative.

We also held meetings with the cabinet of Elżbieta Bieńkowska, Commissioner for Internal Market, Industry, Entrepreneurship and SME, Lowri Evans, Director General of the same DG (Grow) and with Geert Dancet, ECHA's Executive Director to raise our concerns over the intentions of the REFIT process.

Mercury

The EEB has contributed to accelerating the adoption of the EU mercury regulation and therefore the EU's ratification which is however expected for 2017.

The EC proposal for a revised mercury regulation was published in February 2016. The EEB

had been already advocating for over a year in view of accelerating its publication. The EEB followed very closely the process while the EC proposal was discussed at ENVI as well as in the Council. More specifically detailed input was provided to decision makers as early as in May 2016 addressing all mercury issues and with a special focus towards phasing out mercury from dentistry, including a technical memo on the advantages of mercury free dentistry.

Further position papers were sent to ENVI in July 2016 both overall as well as on dental amalgam. In preparation for the first reading vote in ENVI (October 2016) more specific position paper was sent, including voting recommendations. Letters were also addressed to the Council addressing all mercury issues as well as dental amalgam. In preparation for the trialogue negotiations letters were addressed to EU Commissioners and EU Environment Ministers.

A special effort was made on advocating the dental amalgam phase out in different Member states addressing the Ministers of Environment and Health, including Germany, as well as the Commissioners. In parallel meetings were held with EU MS permanent representations, the EC and Members of the European Parliament towards advancing our position and explaining technical matters arising from the discussions. At the end, an agreement was reached among the three EU institutions in December 2016, during a trialogue.

Air pollution

In 2016, the EEB continued to closely monitor the revision of the National Emission Ceilings Directive which was going through the final stages of adoption between the European Parliament and Council. We provided input to representatives of all three EU institutions, through over 15 meetings and through written



input such as NGO open letters. We also gave presentations on this topic at several workshops and events throughout the year: European Respiratory Society air pollution workshop, air quality conference organised by Anne Hidalgo in Paris, conference of the LIFE “Soot Free for the Climate” project, and the closing event of the SEFIRA FP7 Project.

The EEB organised 5 events on air pollution throughout the year:

- An evening workshop on how to cut methane emissions on 23 February.
- An evening workshop on how to address ammonia emissions from agriculture on 29 February.
- A workshop on air pollution from domestic heating on 2 December with around 40 participants from local authorities, member states, NGOs and industry.
- 2 Clean Air Working Group meetings for EEB members and partner NGOs.

The first meeting took place on 24-25 February and the second one on 1 December.

More than 30 EEB members’ representatives participated in each meeting, coming from organisations from more than 12 different EU countries. At the meetings, EEB members were updated on ongoing EU policy developments related to air quality in particular the revision of the National Emission Ceiling Directive, the implementation of the Ambient Air Quality Directive, real-driving emissions from road vehicles, emissions from shipping, domestic heating, industry and agriculture.

Industrial Emissions

The EEB has been an active participant in the Sevilla Process to develop new Best Available Technique Reference Documents (BREFs) and has pushed for more ambition to be taken up in these documents. The objective was not fully achieved because of the imbalance between

industry and NGO/citizen representation in the Sevilla Process and unclear rules on derivation of the upper emission levels associated with BAT, which limits the resulting ambition due to compromising of economic concerns for operators over environmental protection objectives.

The EEB managed to table many amendments to achieve this objective through the Minamata Convention package (e.g. strict and binding mercury emission limits for the key industry sources based on BAT). However due to no support from the European Commission and opposition from Member States the amendments were not secured at the later stage.

A report: “Burning the Evidence: How EU Member States share information about large scale combustion and other industrial activities” will be published in the coming months. The active engagement of EEB member organisation in researching the information required for this report (carried out in the last quarter of 2016) has directly led to increased public participation and a raised awareness of available IED permitting information across Europe. This achievement will be amplified further upon publication of the report.

Industrial Policy working groups were held in June and November 2016. Another dedicated workshop on the Sevilla Process with Member States took place in January 2017.



Global Policies & Sustainability

ACTIVITIES

The EEB played a leading role, even at global level, in representing and coordinating NGO input into the aforementioned global environmental and sustainability policy processes and in advocating for progressive outcomes.

Former Director of Global Policies and Sustainability Leida Rijnhout served as Global Organising Partner for the Major Group of NGO up until July 2016 and thereafter as Regional (European) Organising Partner.

The EEB continued its activities aimed at promoting better environmental policies in the countries neighbouring the EU and strengthening collaboration with and empowerment of NGOs working in those regions. We monitored developments regarding the accession negotiations with candidate countries in South-East Europe and Turkey through our work within the project called ENV.net.

The EEB has also continued work with our members and other interested NGOs in the countries within the ENP and Eastern Partnership. The priority for the upcoming period is to explore possibilities of raising funds for support of the EaP and its environmental priorities.

The EEB was a member of the working group preparing the UN High-Level Political Forum on Sustainable Development (HLPF) 2016 and we participated in monthly webex meetings and provided written input on several documents during the preparatory process, as well as participating in the HLPF itself. We provided advice on and participated in the programme

of a high level meeting the Dutch Presidency organised on SDGs at the end of May. In relation to UNEA-2, the EEB played a leading role in organising the GMGSF where we managed to have more than 50 speakers on the programme coming from Member States and major groups. We also organised a welcome training that same weekend, facilitated the major group strategy meetings every day during UNEA-2 and co-organised the high-level multi stakeholder dialogue during UNEA-2 where the Secretary General participated. We coorganised an EU high level meeting with major groups at UNEA involving Environment Commissioner Vella and Dutch Environment Minister Dijksma representing the EU Presidency. We also organised a Green Room event on Principle 10, with UNEP's attempt (ultimately unsuccessful) to adopt a new stakeholder engagement policy at UNEA-2 being a key point of discussion.

We had a dialogue with EU member states at meetings of the EU Council Working Party on International Environmental Issues (WP/IEI) on UNEA/HLPF expectations and stakeholder engagement policy (SEP) and other issues in May and September.

The EEB continued to facilitate participation of NGOs from throughout the OECD region in OECD's environment-related processes, having a formal agreement with OECD to play this role. This involved participation by the EEB Secretary General in the EPOC Ministerial meeting in September 2016.

The EEB played a central role in organising the NGO participation in the Batumi EfE-8 conference, raising dedicated funding to cover

travel and accommodation costs of NGO participants and helping to shape the substantive outcome, including a European ECO Forum declaration.

As regards our work in relation to enlargement and neighbourhood countries, we have been monitoring key selected topics/pieces of national environmental legislation with a view to their approximation to the EU acquis (including specific laws on climate change, water quality). We have also been undertaking capacity building with NGOs in EU candidate and potential candidate countries in monitoring and advocacy on the approximation process to the environmental acquis. Specific activities included the following:

- A special training session on the EU horizontal legislation was organised by the EEB and Environmental Ambassadors in Belgrade, Serbia (March 2016);

- A special training session on the Environmental Impact Assessment (EIA) was organised by EEB and Balkan Bridges in Skopje, Macedonia (June 2016);

- A special training session on the industrial pollution-related EU policies and practice was organised by EEB and Co-Plan in Tirana, Albania (October 2016);

- A website for the Monitoring Matrix on the approximation process to EU environmental acquis in the Western Balkans and Turkey was established;

- A Toolkit on Climate Change and the Challenges of Enlargement was developed and disseminated.



EEB Organisation

- Members
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EEB Members

The EEB is pleased that by the end of 2016 it represented more than 141 member organisations in over 30 countries.

The full membership meets once a year in the configuration of the General Assembly, the highest-level decision-making body, to adopt long-term strategies and annual work programmes and budgets.

We have a dedicated Working Group for many of the environmental issues that we cover. Most Working Groups meet once or twice a year to develop EEB policies and strategies and for debates with policy makers and invited experts. The EEB works to promote our members' demands at European and global level. In between meetings, we use mailing lists to facilitate information exchange, discussions, monitoring of policy developments and the organisation of campaign and lobby work.

Governance

Board and Executive Committee

Consisting of some 30 national members, up to 10 European network representatives and up to three other individuals, the full Board meets three to four times a year to provide oversight and direction in between the meetings of the General Assembly. The Executive Committee, consisting of the President and Vice-Presidents, provides direction in between the Board meetings.

EEB Staff

Global Policies and Sustainability Team

PATRICIA HEIDIGER
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ALIKI KRIEKOURI
Technical Officer - Industrial Production

GUILLERMO GEA
Industrial Production Intern

Annual Accounts

One of the main focuses for the coming years is to reduce the detrimental impact of the lowering of the ceiling of the LIFE core grant funding from 900k to 700k – a change in the rules which affected only two of the existing beneficiaries, but most of all the EEB.

This and successful project fundraising has led the EEB to reduce its dependency on the core grant from 44.2% in 2011 to 25% in 2016, but despite efforts to reduce the negative impact of the lowering of the core grant ceiling, the EEB will close its 2016 accounts with a significant deficit. This was a foreseen and managed situation that was mandated by the EEB General Assembly, which approved the one-off possibility to draw on the financial reserve in order to allow for a 'soft landing'.

In 2016, the EEB continued to work towards its objectives and activities as described in the full fundraising strategy, for instance by setting up an internal fundraising team to further strengthen coordination and research various funding opportunities and by adopting a new membership fee structure for 2017-2021. Options for a donations system have

been explored as part of the setting up of the new website and new funding models for the Annual Conference were piloted as part of the collaboration agreement with the 2016 co-organizer (EEB member Umweltdachverband). Concerning strengthening the fundraising skills of EEB staff and members, a capacity building workshop was organized in connection with the 2016 Annual Events. Unfortunately, it has not yet been possible to secure funding for a full-time Grants and Donor Manager. New membership material has been developed as part of the rebranding, and the new EEB website will include a membership portal with information to help current members to recruit new members. In 2016, the EEB also started to explore the possibilities to establish an EEB Ambassadors' scheme/high-level advisory group – a concept that will be further developed in 2017.

Final Financial Statement - Summary			
Core Grant			
Part A: Eligible expenditure/costs categories	€	Part B: Income and revenues	€
a) Personnel	1.853.998,74	a) Contribution requested from the Commission by the present application	700.000,00
b) Travel and subsistence	271.599,47	b) Contribution of the applicant (beneficiary)	120.007,41
c) Equipment and depreciation	31.061,41	c) Membership fees	179.742,87
d) Rental	107.546,73	d) Co-financing from member organizations	92.466,94
e) External assistance / Subcontracting	212.041,62	e) Other sources of co-financing	1.540.337,23
f) Other direct costs	267.316,17	f) Other revenues	111.509,69
TOTAL	2.744.064,14	TOTAL	2.744.064,14
Non-core grant			
Part C: Ineligible expenditure	€	Part D: Income outside the work programme	€
a) Costs assigned for activities outside the work programme		a) Financing outside the work programme	
b) Costs covered by other EU financing	466.606,20	b) Other EU financing	466.606,20
c) Reserve		c) Sources of the reserve	
d) Other ineligible costs	48.152,41	d) Other sources of income	48.152,41
TOTAL	514.758,61	TOTAL	514.758,61



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