

Draft rules for funding national projects

Fleet Cards Europe regularly launches projects with a national scope. These initiatives typically require local support, whether for legal advice, public affairs engagement, or both. The following rules define the criteria and process for determining the appropriate funding mechanism for such national projects, with the aim of ensuring fair, transparent, and efficient use of resources, in alignment with the association's overall objectives and the interests of its members.

It is important to note that the **FCE Secretariat will be involved in all projects**—regardless of the funding mechanism—and will be responsible for providing administrative support, except in cases where an explicit exemption is granted.

1. Criteria for funding national project through FCE general budget

A national project may be financed from FCE general budget **when all the following conditions are met:**

1.1. Strategic Relevance: a project is considered strategically relevant **if it meets three or more of** the following criteria:

- **1.1.1. Industry-wide impact:** the project has the potential to bring benefits (regulatory, reputational, commercial, operational, etc.) to a majority of members or to the industry as a whole.
- **1.1.2. Alignment with FCE mission:** the project supports the overarching goals defined in the association's statutes or multi-year strategy (e.g., competitiveness, legal clarity, sustainability, innovation, etc.).
- **1.1.3. Policy influence:** the project seeks to change, influence, or interpret legislation, regulation, or public policy in a way that improves the operating environment for members.
- **1.1.4. Cross-border or multinational significance:** the project has a scope or impact that spans more than one country or can serve as a precedent or pilot for broader EU or international implementation.
- **1.1.5. Risk mitigation:** the project addresses a legal, regulatory, or reputational risk that could materially affect FCE or its members if left unaddressed.

1.2. Inclusivity: participation in the project must be open to all members at any time. Additionally, the project's outcomes and deliverables must be accessible to all members, regardless of their level of direct involvement.

1.3. Mandate: the project must have generated interest from at least **one third of FCE members**, and—following consultation—must be formally approved by the **Board** as a strategic initiative eligible for general budget funding.

1.4. Budget availability: sufficient funds must be available in the general budget to support the project **without compromising other core activities**.

2. Criteria for national projects to be funded entirely by members

A project should be funded through additional contributions from participating members (shared equally shared among them) when one of the following applies:

2.1. Limited scope: the project is intended to benefit only a specific subset of members (e.g., members active in a particular country, market segment, or activity).

2.2. Voluntary participation: participation in the project is limited to members who explicitly express interest and agree to share the associated costs. Similarly, access to the project's documents and deliverables is restricted to those members who actively participate.

2.3. Specialized interest: The project focuses on highly specific or technical issues not relevant to the broader membership.

2.4. Outside general budget: the project is not included in the annual general budget or was initiated after the budget was approved.

3. Special consideration for projects not meeting member threshold or lacking available budget

In certain cases, a project may fulfill all the criteria for funding under the FCE general budget except for:

- **Criterion 1.3:** Fewer than one-third of members have expressed interest, limiting participation despite the project's strategic value in influencing legislation, regulation, or policy.
- **Criterion 1.4:** Insufficient budget availability.

In such situations, the Board may decide to grant a **hybrid funding status** to the project, provided the following conditions are met:

3.1. Industry-wide relevance: the legal or regulatory change targeted by the project is expected to benefit the majority of members, directly or indirectly.

3.2. Capacity limitation, not lack of interest: limited participation is due to a lack of financial or human resources—particularly among smaller members—and not due to a lack of interest or relevance.

3.3. Voluntary support exists: a core group of members (e.g., at least four full members) commit to actively supporting the project through in-kind contributions, legal expertise, drafting, representation, or similar efforts.

3.4. Strategic Classification: The Board formally classifies the project as *strategic* due to its potential long-term impact on the association or the broader sector.

In these cases, the Board may approve **partial funding from the general budget up to 50%**, of the total project cost. The remaining costs would be covered by voluntary contributions from the most active and engaged members, to be shared equally among them (hybrid model).

It is noted that, as these projects benefit—at least partially—from FCE general budget funding, participation must remain open to all members at all times. Additionally, all project outcomes and deliverables must be made accessible to all members, regardless of their level of direct involvement.

4. Decision-making procedure

To ensure transparency and alignment with FCE's strategic goals, the following procedure is suggested for the approval of any new project. A standard process is outlined below, along with an option for an accelerated procedure in urgent cases.

4.1. Members consultation: any member or working group may propose a project by circulating a brief written project outline to all members. If needed, a preliminary meeting may be held. Based on this initial input, the Secretariat will gauge the level of interest among members. At this stage—especially for projects that may qualify for hybrid funding—the Secretariat should ask non-participating members whether their decision is due to capacity constraints (e.g., limited human or financial resources) or fundamental opposition to the project's aims and objectives. Any member proposing a project is expected to take an active role in guiding its launch and, if the project moves forward, in supporting its implementation.

4.2. Proposal submission: if the initial consultation yields positive results, the working group—supported by the Secretariat—should submit a detailed project proposal to the Board. This should include:

- project outline and objectives
- expected outcomes
- estimated costs
- proposed funding mechanism (e.g., general budget, hybrid, or member-funded).

To ensure alignment with the annual budgeting process, proposals should ideally be submitted no later than the end of August so they can be considered in the planning of the following year's budget.

- 4.3. Review and assessment:** the Secretariat, in collaboration with the Treasurer, the President, and the Vice-President, will assess the proposal against the funding criteria outlined in sections 1, 2 and 3.
- 4.4. Board approval:** projects must be approved by the Board with confirmation of the appropriate funding mechanism.
- 4.5. Cost sharing for member-funded projects:** for projects requiring voluntary or member-specific funding, the Secretariat will provide participating members with a clear cost-sharing formula and an estimate of the total expected cost before the project is launched.
- 4.6. Accelerated procedure for time-sensitive projects:** in cases where urgent industry developments or strategic opportunities arise, and the standard process would unduly delay project launch, the Secretariat—upon consultation with the President, Vice-President and Treasurer —may initiate an exceptional written procedure for approval. Under this accelerated pathway:
- A short-form proposal (with essential elements only: objectives, timeline, cost estimate, funding model) is circulated to Board members by email.
 - Board members are given a defined deadline (e.g., 5 working days) to provide feedback or raise objections.
 - If no objection is received within the deadline, the proposal is considered approved by tacit consent.
 - Any project approved through this fast-tracked procedure will be reported and reviewed formally at the next Board meeting.

All projects—regardless of the funding source—will be subject to **periodic reporting** to the Board to ensure transparency and accountability.