

## Application Guide for the Energy Export Initiatives Grants Program 2022

### Content

1. Introduction.....	2
2. Application process .....	2
2.1. What projects are eligible for funding? .....	2
2.2. Who can apply? .....	5
2.3. How to apply.....	8
2.4. Deadlines .....	10
2.5. Assessment of applications .....	8
2.6. Announcement .....	10
2.7. Project changes after approval.....	10
2.8. If you have further questions .....	13
3. Disbursement of funds .....	13
4. Right to complain.....	15

Energistyrelsen

Carsten Niebuhrs Gade 43  
1577 København V

T: +45 3392 6700  
E: ens@ens.dk

## 1. Introduction

This is the application guide for the Energy Export Initiatives Grants Program 2022<sup>1</sup>.

The purpose of the Energy Export Initiatives Grants Program is to support projects that can promote green energy related export initiatives while strengthening Denmark's government-to-government cooperation on new growth markets through public-private partnerships. This application guide outlines the application requirements and process, and requirements for the disbursement of the grant.

This application guide is an unofficial translation of "*Vejledning til ansøgning om tilskud fra tilskudspuljen til fremme af energieksporthandlingen 2022*". The Danish Energy Agency (hereafter DEA) does NOT answer for the validity or correctness of the translation. Only the Danish guidelines and executive order ("*Bekendtgørelse om tilskudspulje til fremme af energieksporthandlingen*") have legal validity.

All deadlines in relation to the application process will be published on [DEA's](#) and [Statens Tilskudspuljers](#) webpages.

## 2. Application process

### 2.1. What projects are eligible for funding?

Projects within green energy with the potential to promote energy export efforts while strengthening Denmark's government-to-government cooperation on new growth markets through public-private partnerships are eligible for funding.

The projects must support the promotion of the UN Sustainable Development Goal 7 (SDG7) by focusing on **green energy** and contributing in making the world independent of fossil fuels by which today's energy demand can be met without compromising future generations' abilities to meet their own demands. Green energy covers, amongst other things, renewable energy (solar energy, wind energy, hydropower), energy efficiency, district heating, sustainable biomass and biofuel as well as hydrogen energy.

Projects concerning Carbon Capture and Utilization (CCU) are eligible for funding if the technology is used to create green energy.

Carbon Capture and Storage (CCS), however, is not eligible for funding because the technology does not create green energy. For CCS it is recommended to investigate the possibilities for funding through the Energy Technology Development and Demonstration Programme (EUDP).

### **Objectives**

The projects are assessed based on the following objectives (see chapter 2.5 for more information):

- 1. Potential for growth in export of energy technology and solutions within green energy.**

---

<sup>1</sup> BEK nr. 1108 af 30/06/2020 from the Ministry of Climate, Energy and Utilities.

2. **Strengthening Denmark's existing government-to-government cooperation on energy or exploring new potential government-to-government cooperations in new growth markets.**
3. **Increased knowledge of new markets for export of green energy technology and solutions.**
4. **Engagement of partners in the projects.**

### **Activities**

Funds are awarded in accordance with the EU regulation for de minimis aid. Thus, only projects related to a **new growth market** are eligible for support. A new growth market is defined as a geographic area where the private actor(s) has not established a physical presence in the target country. This applies regardless of whether the country in question is divided into states or regions, as is the case for China, the United States or Germany. This means, that a private actor with a presence in a state or region in the country in question does not comply with the requirements of a new growth market if it takes part in a project with activities in another state or region in the same country.

Sectoral organizations and public authorities may be physically present in the country as long as they do not sell products in this country. If one acquires consultancy services from a private business with physical presence on the chosen market, this party may not be a beneficiary. For more information about the distinction between beneficiaries of support and consultants, see section 2.2.

Eligible projects must include at least one of the following activities:

- 1) **Analyses, including analyses on feasibility, practicability, barriers and project maturation.**
- 2) **Clarification of technical support to projects, for example for test centers, sector cooperations, platforms, including the collection of knowledge and analysis.**
- 3) **Collection and evaluation of data as well as dissemination of knowledge.**
- 4) **Assessments and/or calculations of export potentials.**
- 5) **Other activities with the purpose of supporting concrete business opportunities and models to promote energy export and the strengthening of government-to-government cooperation.**

Activities related to the preparation of information as well as the reporting of results can also be eligible for support as long as these supplement one or more of the abovementioned activities.

According to the Commission Regulation (EU) No 1407/2013 of 18 December 2013 on the application of Articles 107 and 108 of the Treaty on the Functioning of the European Union to de minimis aid (hereafter "de minimis regulation"), grants cannot be given to export-related activities towards third countries or EU Member States, directly linked to the quantities exported, to the establishment and operation of a distribution network or to other current expenditure linked to the export activity<sup>2</sup>.

---

<sup>2</sup> See de minimis regulation preamble 9 and article 1(d).

It is implied in the wording of the de minimis regulation that there can be no funding for activities “directly linked to the quantities exported, to the establishment and operation of a distribution network or to other current expenditure linked to the export activity.”<sup>3</sup>

### **Expenses**

The following project expenses are eligible for support:

- **Salary of staff involved in the project and hired in a private entity (Grants cannot cover the wages of staff hired in the public sector).**
- **Travel and hotel expenses that are necessary to carry out the project.**
- **External services, including consultancy and similar services related to the project activities.**
- **Expenses for making awareness raising and market-oriented activities on the targeted growth market, including presentation catalogues and other marketing materials.**

The expenses must be necessary for and directly related to the completion of the project. An application must contain a coherent project. As an example to this, it is not possible to apply for grants only to cover air tickets for participating in a conference.

Travel costs must be made up in accordance with standards set by the Danish Ministry of Finance. These can be found here (in Danish only): [Finansministeriets Tjenesterejseaftale](#) and [Medarbejder- og Kompetencestyrelsens Cirkulære om Satsregulering pr. 1. januar 2021 for tjenesterejser](#).

There is no maximum amount to apply for within each application round. In theory, one project could apply for all funds in an application round. Each actor included in the de minimis regulation is eligible for a maximum of EUR 200,000 in the course of a three-year financial reporting period.

### **Calculation of Expenditure on Wages and Salaries for Beneficiaries**

Expenditures on wages for the staff of beneficiaries who are engaged in the project may be calculated as the actual hourly wage multiplied with the number of hours spent on the project. Hourly wage for staff members paid by the month is calculated as the actual annual gross wage divided by 1642. Gross wage appears on the salary statement and includes salary used as a basis for calculating holiday payment, employer-funded expenditures on pension and the Danish Labor Market Supplementary Pension Scheme (ATP). The salary used as a basis for calculating holiday payment includes basic salary (including private pension contribution) and bonuses specified in the agreement(s) with trade unions. If the private pension contribution is not included in the basic salary but is included in the salary used for calculation of holiday payment, the salary used for calculating the holiday payment consists of: basic salary, bonuses specified in the agreement(s) with trade unions, and private pension contribution.

---

<sup>3</sup> See de minimis regulation article 1(d).

In the absence of agreement to the contrary in the commitment, overhead may maximally consist of 18 percent of the direct payment. Only the percentage may be included in the accounts. Items like electricity, water, heating, insurance, rent, and office expenses may not be included in the accounts.

It is the responsibility of the project partners to make sure that the in-house hourly wages are true so that the support only covers actual expenditures. The calculation above is instructive for beneficiaries in all countries. It is meant as a help to calculate which parts of the salary that may be included in the expenditures on wages and salaries. Project partners are welcome to send their own calculations to the Danish Energy Agency if in doubt.

External actors who supply consulting services to the project partners calculate hourly wages in accordance with own prices.

If the above leaves room for doubt, more information may be found in the Danish version of the application guide.

## 2.2. Who can apply?

### *Public-private cooperation*

The applying party must have entered a **public-private partnership** when submitting the application. A public-private partnership is defined as a group of at least one private actor and one public actor with a common wish of establishing and running a joint project on green energy, which can promote the export effort through the elaboration of Denmark's government-to-government cooperation on a new growth market. The partnership can consist of more than two actors.

The public actors in the partnership can be either Danish or non-Danish.

Danish public actors are defined by definitions set in the Danish administrative law (det offentlige myndighedsbegreb). An actor, which is covered by the Danish law on access to administrative documents (lov om aktindsigt), is defined as a public actor under the Energy Export Initiatives Grants Program. Note that publicly owned utility companies, including heat- and water companies, are in some cases defined as private actors under the Energy Export Initiatives Grants Program, if the day-to-day operation is separated from the municipality's day-to-day operation. If an applicant is in doubt of whether or not they are considered a public actor under the Energy Export Initiatives Grants Program, the DEA can be contacted in due time before the application deadline at [eksporttilskud@ens.dk](mailto:eksporttilskud@ens.dk).

Non-Danish public actors must sign a declaration that states that they are considered as a public institution in accordance with relevant legislation in their own country. The template for the declaration can be found [here](#).

A volunteer-based association or an actor, whose organizational structure is already build on a private-public partnership, are both considered private actors under this scheme.

Public universities are considered public partners. Private universities are considered private partners.

Examples of actors that are considered public actors:

- UNEP - United Nations Environment Programme
- GEUS - Geological Survey of Denmark and Greenland
- Innovation Centre Denmark
- AffaldVarme Aarhus
- Enterprise Europe Network (EU)

An embassy might be the public partner of the project. The funds may not be used to purchase services from the Trade Council under the Ministry for Foreign Affairs of Denmark if an embassy is a partner in the cooperation.

A private or public actor is allowed to take part in several projects that are applying for (and possibly granted funds) via this scheme, but the projects cannot overlap each other.

The signing actors in the partnership **cannot deliver commercial services to one another** as part of the project. This means that the private actor(s) in the partnership must not use funds from this scheme to purchase services by the public actor(s) in the partnership and vice versa. The partnership actors must instead use an external consultancy. The purchase of services by public actors must comply with public procurement rules.

### ***The applicant***

**One partner must apply on behalf the partnership** to be taken into consideration. The application must include a signed declaration of cooperation (the DEA's application template must be used), which will serve as letter of attorney from the other actors in the partnership to the project's main applicant, **after which the main applicant can apply on behalf of partnership and represent all actors to DEA while the project is carried out. The obligations under this scheme apply for all actors in the partnership.** The main applicant can be a public or a private actor. The project partnership is welcome to enclose an appendix, which specifies in more detail the division of responsibilities and organization of the project partnership. However, this is not a requirement.

Both private and public actors may submit the application. The applicant will be the primary contact for the Danish Energy Agency in all relevant communications regarding the project. To a limited extent, the other project partners will be able to access the application portal, on which they will be able to monitor the application (for more information, see [the guide to the correct use of the portal](#), in Danish). Only the applicant will be directly informed of either the approval or rejection of the application and the related payments. The applicant is to construct a budget that concerns all project partners who are in the

application, and who uses the funds. The budget is to be divided into expenditures per applicant and project partner in accordance with the expenditures in the cooperation agreement.

### ***The beneficiaries must comply with the de minimis regulation***

The funds are awarded in accordance with EU regulation for de minimis aid. The regulation states that one individual actor can only receive public funding up to EUR 200,000 over a three-year period without requiring that the support is reported to the European Commission. The de minimis regulation also imposes the demand for a new growth market as project scope.

According to the definition of in the de minimis regulation, a business includes the whole of the business group. Therefore, the rules, such as the de minimis amount limit apply to both parties in a joint venture. Thus, a parent company and subsidiary companies combined must be below the limit stated in the regulation (EUR 200,000 within the last three financial years). Likewise, joint venture projects must be set in a new growth market.

In order to be entitled to a grant, all involved project actors must therefore fill out and sign a de minimis declaration and a declaration on new growth market. Exempted from this requirement are a number of public actors, including ministries, governmental agencies, municipalities, and diplomatic representations. No matter the type of ownership (public or private), TSO's and DSO's are subject to the de minimis regulation and must sign a de minimis declaration. If an applicant is in doubt of whether or not they are subject to the de minimis regulation, the DEA can be contacted in due time before the application deadline at [eksporttilskud@ens.dk](mailto:eksporttilskud@ens.dk).

The maximum funding for each actor awarded under the de minimis regulation is EUR 200,000 over a three-year period. The amount of de minimis aid is calculated from the date the grant is awarded, not the date of disbursement. It is the duty of the main application to ensure, that all declarations are filled out correctly before submitting the application to DEA.

The declaration templates can be found on the [DEA's website](#). The DEA must be informed if the project is granted any kind of other public support.

### ***Different roles: Project partner, other beneficiary and consultant***

Subsidies are generally distributed to the applicant and the project partners in accordance with the distribution stated in the cooperation agreement. However, it is possible to channel funds from project partners to other beneficiaries who are not part of the project partnership if these beneficiaries defray expenditures related to the project and derive advantages from the project. Expenditures defrayed by beneficiaries must appear clearly from the budget and account of the project.

The role as project partner covers both applicant and all other actors who sign the cooperation agreement. Whether or not a project partner receives support, depends on the distribution in the cooperation agreement. Other beneficiaries are actors who receive funds channeled from project partners, since they

have expenditures related to the project and derive advantage from the project. An example of other beneficiaries are businesses who derive advantage from participating on a trade fair arranged by the project partners.

Consultants are actors who supply the project partners with services, which are owned by the project partners afterwards. Examples are translation, scheduling of meetings, and assistance with travelling documents. The project partners are the sole holders of the rights to the results of the external consultancy services that are financed through the funds. When public actors acquire services, these must adhere to current public procurement rules.

**Table 1. Conditions for different roles in the project**

<b>Role</b>	<b>Project partner</b>	<b>Other beneficiary</b>	<b>Consultant</b>
<b>Is the actor a beneficiary?</b>	Not necessarily	Yes	No
<b>Signing of cooperation agreement</b>	Yes	No	No
<b>Signing of de minimis declaration</b>	Yes, if beneficiary	Yes	No
<b>Signing of declaration of new market</b>	Yes, if beneficiary	Yes	No
<b>The salary expenses that the funds may cover</b>	Only actual expenses for private actors. Public actors cannot receive payment from the funds.	Only actual expenses for private actors. Public actors cannot receive payment from the funds	May invoice in accordance with consultant price.

### **Project period**

The applicant must state the project period in the application. The project period can be multiannual, if the purpose of the project and project activities depend upon it.

### **2.3. How to apply**

Applications must be submitted via [the DEA's grant portal \(tilskudsportal\)](#). The link to the portal can also be found on [DEA's website](#). Applications in either Danish or English are accepted.

The DEA has developed a user guide for the application portal that can be found [here](#). The user guide outlines how the different spaces should be filled out and what the applicant needs to pay attention to. The DEA asks that the applicant does not unsubscribe to notifications concerning the application from the DEA.

The other partnership actors can get limited access to the application portal where the sent application can be accessed (see the [user guide for the application portal](#)). Only the main applicant will be directly informed on whether the project has been granted funds (or if not) and will also receive payments related

to the project. The main applicant needs to make a budget for the project that includes all relevant actors that will use funds from the grant.

Applicants must use NemID when logging onto the application portal and create a user profile. Note that applicants can only apply for the Energy Export Initiatives Grants Program with a NemID for Business connected to the applicant's CVR number. This applicant becomes the primary contact person for the project. If a foreign applicant does not have a NemID for Business and needs access to the portal, the applicant should contact DEA on [eksporttilskud@ens.dk](mailto:eksporttilskud@ens.dk) in due time before the application deadline. The DEA will then assist in creating a user profile for applicants that cannot access the portal with NemID for Business. Note that it is only possible to exempt foreign applicants from the requirement to use NemID for Business.

Other project participants can get limited access to the application portal, where they can see the application (see the guide [here](#)).

### **Mandatory information**

The following information must be included in the application:

Project leader:

- First and last name
- Position
- E-mail and phone number

Partner(s)

- Number of partners
- Name of partner(s)
- Type of partner(s): private or public
- Country and city
- Name, position, phone number., e-mail and project role of the contact person
- Signed partnership agreement
- Non-Danish public actors must sign a declaration that states that they are considered a public institution in accordance with relevant legislation in their own country. The template for the declaration can be found [here](#).

Project:

- Project title
- Selected country
- Selected market
- Potential transit countries
- Description of the selected market
- Project abstract

- Description of planned activities
- Description of expected results
- Time frame, including start and end date for the project
- Objectives

Budget:

- Applied amount
- Overall budget for the project
- The budget allocated to each partner
- Detailed budget based on DEA's budget template. If the project involves other beneficiaries, then their expenses must be apparent in the total budget. The template can be found [here](#).

De minimis regulation:

- De minimis declaration and the declaration of new market. The declaration templates can be found on [the website of the Danish Energy Agency](#).
  - The declarations must be signed by all actors subject to the de minimis regulation as described in section 2.2.

Each actor in the partnership must fill out both declarations, if they are not exempted by the de minimis regulation.

The information can be written in Danish or English.

#### 2.4. Deadlines

The deadline for submitting applications will be published on [DEA's website](#).

The applications must be sufficient and feature all information and documentation that is necessary for further processing. The time of submission is counted from the time that a sufficient application has been received by DEA. Applications can be changed up until the deadline.

#### 2.5. Assessment of applications

After the deadline, DEA will go through the submitted applications. The projects must live up to all requirements mentioned in this user guide, including how the applicant will achieve the expected results. If an application does not include all relevant information or if the applicant applies for non-eligible expenses, DEA has the right to reject the application. DEA can also request further information from applications for the assessment of the application within a set deadline.

### Basis of evaluation

The projects are individually assessed on the basis of an objective review criteria model. The objectives, that are described in section 2.1, forms the basis for the assessment where the projects are evaluated and given scores based on the following scheme

**Table 2. Objectives for assessment of projects**

<b>Objectives</b>	<b>Points</b>
<p><b>1. Potential for growth in export of energy technology and solutions within green energy</b></p> <p>The DEA gives priority to projects that create possibilities for export of Danish energy technology and energy solutions. Furthermore, the DEA gives priority to projects that aim to increase foreign demand for information and knowledge concerning green Danish energy technology and energy solutions. Projects in which foreign businesses participate are of high priority.</p>	From 0 to 4
<p><b>2. Strengthening Denmark's existing government-to-government cooperation on energy or exploring new potential government-to-government cooperations in new growth markets.</b></p> <p>The DEA gives priority to projects that include participation of foreign public authorities. The DEA also gives priority to projects that take place in countries in which the Danish state has established energy cooperations with relevant public authorities.</p> <p>Currently, the DEA has bilateral cooperations with 19 different countries: Egypt, Ethiopia, France, India, Indonesia, Japan, Kenya, China, Mexico, the Netherlands, Poland, the United Kingdoms, South Africa, South Korea, Turkey, Germany, Ukraine, the United States of America, and Vietnam. Furthermore, applications targeted Brazil, Colombia, and Pakistan, which are part of the Danish Energy Transition Initiative, are prioritized. In addition, applications targeted Estonia, Latvia, and Lithuania, which take part in the Green Growth Pool, are prioritized. Finally, projects within the initiative, climate frontrunner under the Ministry of Foreign Affairs of Denmark, are prioritized. Climate frontrunner includes, in addition to the countries mentioned above, the United Arab Emirates and Italy.</p>	From 0 to 4
<p><b>3. Increase knowledge of new markets for export of green energy technology and energy solutions.</b></p> <p>The DEA gives priority to projects that increase knowledge of the targeted market(s) among the Danish actors.</p>	From 0 to 4
<p><b>4. Engagement of project partners in the project</b></p> <p>The DEA takes the engagement of project partners into consideration. This means that a high number of active project partners is of high priority.</p>	From 0 to 3

All projects are awarded a final score between 0 and 15. A project must get a score of 7 to be taken into consideration for grants.

### **Ranking the applications**

After all the projects have been awarded a final score, DEA ranks the incoming projects based on their overall score.

DEA will give grants to projects from the top of the list until all funds have been granted or until all projects with an overall score of 7 or more have been granted funds. If the overall applied amount exceeds the funding from this grant, DEA will award projects with the highest score full funding as far down the list as possible. Only applications that live up to all formalities will be taken into consideration.

If a project cannot be awarded full funding for the applied amount due to insufficient funds, DEA will assess whether it is relevant to award the project a partial grant. This assessment will primarily depend on the difference between the applied amount and the remaining funding.

If awarded partial funding, the applicant will be given a deadline to decide if the project can be carried out as planned either in a downscaled version or with self-financing or co-financing from other parties due to the reduced grant. If an applicant chose not to accept the reduced grant, DEA will move to the next project in the line and offer a full or reduced grant depending on the size of the applied amount and the remaining funds.

If several projects are awarded the same overall score and there are insufficient funds to award funding equivalent to the full-applied amount, the applicants will have the opportunity to carry out the projects with reduced funding where the funds will be distributed between the projects with the same overall score. If one or several applicants chose not to accept the reduced funding, the remaining funds will be distributed between the applicants with the same score who chose to carry out their projects with reduced funding.

When the Energy Export Initiatives Grants Program funds are distributed, the remaining applicants will receive a rejection letter.

### **2.6. Announcement**

DEA will send out decisions as soon as possible after the application deadline via the application portal. The deadlines in this process will be posted on [DEA's website](#).

Once a project has been granted funding, and the granted funding has been accepted by the applicant, the project can begin. Chapter 3 outlines the reimbursement procedures, including accounting requirements.

The DEA logo must be placed on all joint brochures and presentation materials that are used in relation to the project as well as on backdrops, roll-ups etc. in accordance with the regulations for the use of the logo. The logo and the guidelines for the use of it will appear in the letter of approval.

### 2.7. Project changes after approval

DEA must approve changes in the project made after the funds have been granted. These changes include:

- Significant changes in the project and project scope
- Changes in participants
- Changes of project period and time of project completion
- Budget changes

Requests for project changes cannot be met if DEA assesses that these changes would entail that the project would not have been granted funds in the first place.

Project changes made by the grantee can lead to a reduced fund if the updated project has a smaller budget. The awarded funding can never be larger to what was originally granted.

Requests for changes in the project must be submitted to DEA as soon as possible and no later than two month before the stated completion date in the project application. If the project is not carried out as agreed upon, and if DEA cannot approve a given project change, DEA can annul the entire or parts of the grant.

DEA must be informed if the project is granted any kind of other public support.

DEA must also be informed as soon as possible in case of significant organizational changes and changes in capital situation amongst the project partner. The grantee must inform to what extent the changes will affect the project. If the DEA evaluates that the project cannot proceed under such changed conditions, the grant to the activities that have not been carried out yet will be cancelled.

Lastly, DEA must immediately be informed if the partners decide to terminate the project.

### 2.8. If you have further questions

All information about the grants program can be found on the [DEA's website](#).

Questions can be sent to [eksporttilskud@ens.dk](mailto:eksporttilskud@ens.dk). DEA will regularly update the FAQ on its webpage with relevant questions and answers deemed to have a general interest.

## 3. Disbursement of funds

The main applicant can request disbursement of funds by the end of the project. The disbursement will be made to the main applicant who will then be responsible for redistributing funds to the project partners. The disbursement request and other relevant information must be submitted to DEA no later than 30 days after the project completion date stated in the application/updated completion date approved by DEA. It is possible to apply for a postponement of the deadline until 90 days after the conclusion of the project.

The disbursement request must be sent to DEA on [eksporttilskud@ens.dk](mailto:eksporttilskud@ens.dk) **and** via the application portal by using a disbursement form available on the grants portal.

Besides the disbursement request form, the following documents must be submitted:

- Final accounting for the project signed by the applicant
- List of vouchers
- Vouchers or audit statement: if the awarded amount is lower than DKK 250,000, all accounting documents/vouchers must be included. If grant amount is equal or bigger than DKK 250.000, a certified auditor must audit the accounts.
- Final report: the applicant must assess the results of the projects, and compare them to the objectives included in the application. A template of the final report will be available on the [DEA's website](#).
- In the event that multiple actors in the cooperation are to receive funds, the applicant must include a declaration stating that the applicant is distributing funds to other beneficiaries. A template can be found on [the DEA's website](#).

If requested, all partners in the project have the obligation to provide additional information to DEA. The grant may be cancelled in whole or in part if an issue has been detected; therefore it is very important to respond promptly and thoroughly to the requests for additional information.

All projects will be subject to possible random checks.

DEA has prepared an audit instruction that determines how the audit should be carried out. The audit instruction must be provided to the auditor. The audit instruction will be available on the [DEA's website](#).

### ***Cancellation and disbursement of funding***

DEA can cancel the funding to a project, if the applicant has given wrong information to DEA, or if the project is not carried out in accordance with the application (with potentially approved budget or project changes) or if the guidelines and conditions stipulated in this guide have not been followed.

Cancellation of funding can take place during the project period or after the completion of the project.

DEA reserve to right to determine whether to annul the full or parts of the fund and whether already disbursed funds must be returned.

#### **4. Right to complain**

Complaints over decisions made by DEA can be sent to the Ministry of Climate, Energy and Utilities on [kefm@kefm.dk](mailto:kefm@kefm.dk). Complaints must be submitted within two weeks after the decision has been sent to the applying party.