

QUESTIONS and ANSWERS

CALL 1 FOR IDENTIFIED APPLICANTS TO DEVELOP AND SUBMIT FULL PROJECT PROPOSALS

in the framework of the Territorial Strategy of the

(INTERREG VI-A) IPA Bulgaria – Türkiye Programme 2021-2027

CCI Number: 2021TC16IPCB005

| No. | Question | Answer |
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| 1 | Should the pre-defined applicants from the reserve list start drafting the full proposal without any other notification as the Monitoring Committee (MC) of the Programme approved to invite all concept notes under Decision No 3/07.11.2023 for full project proposal? | <p>The identified project ideas are categorized into main project ideas/concept notes, ranked until the disposable call's budget is exhausted, and reserve project ideas/concept notes, which fall below the disposable call's budget.</p> <p>All applicants from the main and the reserve list (as specified in the respective table in part "Introduction" of the Contracting guide) are invited to prepare and submit their full project proposal.</p> <p>The requirement stems from Decision No 3/07.11.2023 of the Monitoring Committee meaning that applicants from the reserve list can develop and submit their full project proposals under equal conditions with the concept notes from the main list.</p> <p>Applicants from the reserve list should mind that reserve full project proposals proceed to the contracting stage if a full project proposal from the main list is not submitted, drops out or does not meet all eligibility criteria for contracting. The order of proceeding is according to the prioritization, approved by the Strategy Board and published on the Programme's web site at https://ipa-bqtr.mrrb.bg/en/node/144</p> |
| 2 | Regarding partnership composition, it is stated that..."In general, it is preferable for the partnership composition described in the concept note to remain unchanged in the FPP stage. However, in justifiable cases, a change in partners between concept note and FPP is permitted " (p. 13). It is also highlighted that partner change is allowed under two options: | <p>According to the Guidelines for Applicants modification in the partnership between the concept note and the full project proposal are allowed only for partners that contribute to the Interreg indicators RCO84 "Pilot actions developed jointly and implemented in projects", RCO116 "Jointly developed solutions" and RCR104 "Solutions taken up or up-scaled by organizations".</p> <p>As the investment component/s of the concept note cannot be altered, their scope, location and the responsible partner/s should remain the same. Changes of the Lead partner (irrespective if bears the investment component) are also not allowed.</p> |

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| | <p>Option 1: Withdrawal of a partner whose original functions are taken over by other partner within the partnership;</p> <p>Option 2: Withdrawal of a partner whose original functions are taken over by a new partner.</p> <p>In this regard, second option might be considered for our consortium because of disconnection in communication. Is there a number limit (for example, only one or two?) for changing the partners? Is it possible to add new partner(s) to the consortium without withdrawal of any existing partners to share responsibilities in original functions to establish a strong consortium? If a partner needs to be replaced, do we need to obtain a signed-withdrawal or resign document from the leaving partner although we cannot reach the partner? Is the leading partner of the consortium authorized to exclude - without any approval from the partner- any partner from the consortium as we cannot reach some of our partners at this stage?</p> | <p>There are two options available (as described in part 1.2.1 “Section “Project partners” from the application form” of the Contracting guide)</p> <p>Option 1: Withdrawal of a partner whose original functions are taken over by another partner within the partnership.</p> <p>Option 2: Withdrawal of a partner whose original functions are taken over by a new partner.</p> <p>Requirements, set in the Guidelines clearly define that the functions of a particular partner that withdraws from the project should be taken over exclusively by 1) another partner within the partnership of the concept note or 2) a new one that meets all eligibility requirements (outlined in section 1.1. “Eligibility and content elements of the concept note that cannot be changed in the full project proposal”) as well as the new partner should prove the expertise and legal rights necessary to fulfil the proposed responsibilities.</p> <p>In this regard, changing the partnership with proposing new partner/s that have not been involved at the concept note stage is allowed only if project partner/s is/are withdrawing from the partnership and the above mentioned options 1 and 2 requirements are met. Overall, expanding the project consortium can potentially enhance its contribution to the project's and programme's objectives. However, it is important to consider the potential risks, such as the likelihood of disrupting the partnership balance (refer to "Section 2 - Partnership Relevance Criteria") and increasing administrative challenges during project implementation. Adding more than one new partner can sometimes negatively impact the quality of the partners' work due to the complexities involved in managing a larger consortium. This is the main reason we have not provided the option for adding more partners to projects that were initially encouraged to build multi-sectoral partnerships.</p> <p>In the event that a project partner decides to withdraw, it is essential to handle the situation appropriately. Candidates should justify the need for changing partner/s in the full project proposal. This approach will facilitate a consistent review and screening process for the full project proposal. There is no requirement for the withdrawing partner to sign formally any application documents because it is no longer part of the project consortium. All aspects of the partnering are a subject to discussion and agreement between project partners themselves. The MA/NA should not be held accountable for any disputes between past and present partners.</p> <p>You may refer to point 1.1 “Eligibility and content elements of the concept note that cannot be changed in the full project proposal” and point 1.2.1 “Section “Project partners” from the application form” in order to better understand the options for project partner withdrawal.</p> |
| 3 | <p>The elements of a concept note that cannot be changed are listed in part 1.1. “Eligibility and content elements of the concept note that cannot be changed in the full</p> | <p>The project's contribution to environmental protection can be assessed from various perspectives:</p> |

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| | <p>project proposal”. One of the compulsory elements is “Mandatory contribution to the protection of the environment and/or provision of green and digital solutions to boost cross-border territorial potentials. Project actions must be in full accord with the DNSH principle”</p> <p>How will we prove this contribution?</p> | <p>1) The project should contain actions that mirror or are aligned with the monitoring measures of the SEA report, provided in attachment 4;</p> <p>2) Annex 8 also assists project partners in avoiding actions, particularly on infrastructure sites, that could have a negative impact on the environment;</p> <p>3) It is also expected that project partners will incorporate elements in their actions aimed at protecting the environment and preserving biodiversity.</p> |
| 4 | <p>It is stated in the Guidelines that “All the information provided in the sections of the concept note in JeMS will automatically transfer to the FPP application. Therefore, applicants do not need to rewrite the entire project proposal in the FPP AF. Instead, they only need to fill in the sections of the FPP AF that were not part of the concept note application. However, since the application form for the concept note was offline (in Word format) and attached to the JeMS application, applicants must now transfer the content of the offline concept idea’s application form to the JeMS application form of the FPP.”</p> <p>It is not clear which sections of the concept note are automatically transferred and which are not.</p> | <p>During the concept note submission stage only Sections A and B of the Application Form were filled by the applicants in JeMS. The full Application Form had to be submitted as per the off-line template as an attachment to the concept note proposal.</p> <p>The information from sections A “Project identification” and B “Project partners” will be automatically transferred into the application form of the full project proposal. The remaining sections of the Application Form should be filled in JeMS by the applicant in full in accordance with the information provided at the concept note stage and the requirements listed under point 1.2 “Developing a full project proposal” of the Guidelines.</p> <p>During this process, project partners can further elaborate on their project idea, consolidate their partnerships, and develop a detailed work plan.</p> <p>The summary of the project proposal (section A.2 “Project summary” of the full project proposal form) needs to be updated to reflect any modifications made at the full project proposal stage.</p> |
| 5 | <p>Section ‘Project partners’ from the application form</p> <p>The two sentences “However, in justifiable cases, a change in partners between concept note and FPP is permitted.” and “This means that partner/s responsible for the project investment/s cannot be altered.” contradict to each other. It is not clear whether a change of partner is permitted or not.</p> | <p>The Guide provides a comprehensive overview of the options for modifications in the partnership composition in a dedicated section. Overall, changes in partners from the concept note to the full project are not encouraged. However, if there are justifiable needs for such actions, candidates are presented with options to choose the one that best fits their needs.</p> <p>In any cases the Lead partner and the project partners responsible for the project investments cannot be altered between the concept note and the FPP stages.</p> <p>Please, refer to the answer to question 2 within this table.</p> |
| 6 | <p>It is said in the Guidelines that “the eligible and ineligible costs are set out in the Regulation (EU, Euratom) 2018/1046 of 18 July 2018 (Financial Regulation), the Regulation (EU) 2021/1058 of 24 June 2021(ERDF Regulation), the CPR Regulation and the Interreg Regulation.”</p> | <p>CPR is used in the meaning of “common provisions regulations” (Regulation (EU) 2021/1060 of the European Parliament and of the Council of 24 June 2021 laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, the Just Transition Fund and the European Maritime, Fisheries and Aquaculture Fund and financial rules for those and for the Asylum, Migration and Integration Fund, the Internal Security Fund and the Instrument for Financial Support for Border Management and Visa Policy). These are regulations established to</p> |

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| | <p>Regulation (EU) 2021/1058 of 24 June 2021 is amended by Regulation (EU) 2024/795 of 29 February 2024.</p> <p>The abbreviation “CPR Regulation” to be specified.</p> | <p>govern the eight EU funds whose delivery is shared with Member States and regions. More information can be obtained at https://commission.europa.eu/</p> |
| 7 | <p>According to the Guidelines the following costs are ineligible and therefore cannot be reimbursed: Project expenditure split among project partners (i.e. sharing of „common costs”)</p> <p>Can you explain what these costs are and an example of them?</p> | <p>By definition, „shared costs” are expenses that are incurred jointly or allocated among multiple entities. Costs are shared when more than one party pays towards the total costs accounted across activities or projects.</p> <p>The most common example of shared costs is the office space and utilities expenses for a co-working space shared by several users. The rent, electricity, water, and internet costs are shared among all tenants and each of them pays a portion based on the square footage occupied or the number of using the space.</p> <p>Shared costs are not eligible under the current call for proposals.</p> |
| 8 | <p>According to the budget template and types of costs “BC 4 External expertise and services costs</p> <p>The unit costs are determined based on the event's duration and the number of participants. The unit costs for event organization are as follows:</p> <ul style="list-style-type: none"> • 14,00 EURO unit cost for one-day events; • 60,00 EURO unit cost for multi-day events.” <p>On our opinion these limits are extremely insufficient, considering what types of expenditures are included in them, it is necessary to be increased.</p> <p>Costs for entry visas and fees for participants from Turkey are not included here, nor in Article 42 of the Interreg Regulation (Regulation (EU) 2021/1059. In which budget category shall they be planned?</p> | <p>According to the Guidelines for applicants (part 1.2.2 Section “Budget and co-financing from the Application Form”, section BC 4 External expertise and services costs) service costs related to events organization can be reimbursed based on either unit costs or real costs. The choice between these two options is made by the applicants.</p> <p>The unit costs specified in the Guidelines are based on a programme’s methodology for determining expenditures for project events. This methodology has been developed by averaging historical data on reported and certified project expenditures related to events from projects funded during the previous programme period. Additionally, adjustments for inflation have been incorporated to address current economic changes.</p> <p>According to Regulation (EU) 2021/1059 of the European parliament and the Council of 24 June 2021 on specific provisions for the European territorial cooperation goal (Interreg) supported by the European Regional Development Fund and external financing instruments services for entrance visas and departure fees of Turkish participants (different than the project team) in events located in Bulgaria may be related to expenditures under Article 42, para g) for external expertise and services for the organisation and implementation of events or meetings.</p> |
| 9 | <p>According to the Guidelines all project partners must fill in and submit Annex 6 ‘State Aid Declaration’</p> <p>Is it mandatory to submit this Annex if the partner will not generate revenues during the implementation period of the project? If not, to be specified.</p> | <p>According to the rules of the call the public support provided to undertakings will adhere to the de minimis rule. A definition for “undertaking” is provided in the Guidelines (footnotes of part “State aid”). For applicants falling under other categories project activities will be subject to examination for compliance with state aid regulations.</p> <p>Please, note that state aid is “any aid granted by a Member State or through state resources in any form whatsoever which distorts or threatens to distort competition by favouring certain undertakings or</p> |

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| | | <p>the production of certain goods shall, in so as it is affecting trade between Member States be incompatible with the internal market”.</p> <p>In this regard, if an entity is not profit-oriented state aid rules will apply as long as it competes with companies that are profit-oriented. Therefore, not only private companies are subject to state aid rules but also public authorities or other organisations if they carry out an economic activity on the market. In this case within the screening process checks of compliance shall be conducted on a case-by case basis, meaning that the presence or absence of activities relevant to state aid depends on the specific details of the project.</p> <p>Annex 6 “State Aid Declaration” is a mandatory supporting document for all applicants.</p> <p>For more details, please see Attachment 2 “De minimis factsheet” that shall provide additional information about the de minimis Regulation.</p> |
| <p>10</p> | <p>According to the Guidelines Section ‘Project description’ from the application form, C.7 Project management, Joint Staffing (optional):</p> <p>“Team members should not have duplicate functions on either side of the border.”</p> <p>It should be eligible to duplicate some of the functions, such as an accountant, which is needed on both sides of the border.</p> | <p>According to Interreg regulation (Art. 23, para 3) “partners shall cooperate in the development and implementation of Interreg operations, as well as in the staffing or financing, or both, thereof.”</p> <p>According to the Guidelines project partners from the two participating countries have to cooperate mandatory in at least both joint development and joint implementation and, additionally, one or both of the other two cooperation criteria: joint financing and/or joint staffing. Requirements related to joint staffing are described in section C.7 Project management of the Guidelines. In case there is a justified need of duplicating functions of some of the project team members (described in full in section C.7 Project management of the Application Form) applicants may apply the joint financing cooperation criteria rather than joint staffing.</p> |
| <p>11</p> | <p>According to the Guidelines:</p> <p>“Additional documents on the basis of which eligibility screening of the FPP is carried out:</p> <p>A8.4 Supply of equipment</p> <ul style="list-style-type: none"> - A valid permit for installation, whose validity period is not expired at the time of FPP submission as per national legislation, is required. It can be provided after FPP submission but no later than 45 calendar days from the receipt of the notification about the Decision of the Monitoring Committee for financing the project. Alternatively, a statement from the competent authority confirming that the intended installation does not necessitate a permit must be provided.” | <p>The requirement relates to all supplies that need to be permanently installed meaning that the respective supplies cannot be used if certain works (such as ground levelling, permanent attachment to structural elements of buildings, stable terrain positioning on a land property, etc.) and/or permanent connection to networks of the technical infrastructure (such as electricity, water supply, sewerage, cable networks, etc.) are not carried out. Furthermore, the placement and/or removal of the relevant supplies should not change the substance or manner of use of the land and /or of the object on which it is placed.</p> <p>For Bulgarian partners the procedures for issuing permit for installation are determined by an ordinance of the municipal council responsible for the respective administrative territory.</p> |

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| | What type of equipment does it apply to and who are the competent authorities? | |
| 12 | <p>Pages 10-11 of the Guidelines it is said that “Project partners must also be registered and operational in the programme area for a minimum of 2 years before the submission of the concept notes. In cases where new partner/s become project partner/s to the FPP, this rule applies to them proportionally. Therefore, the new project partners are required to be registered and operational in the programme area for a minimum of 2 years before the submission of the respective concept note.</p> <p>Is it eligible to add new partners?</p> | <p>Yes, the text of the Guide specifies: “Therefore, the new project partners are required to be registered and operational in the programme area for a minimum of 2 years before the submission of the respective concept note.” New partners, when applying either of the two options for partner modifications, must meet all the same eligibility criteria as the original partners outlined in the partnership set-up of the concept note. It is important to highlight that this condition requires the new partner to be registered 2 years before the submission of the concept note, not the submission of the full project proposal.</p> <p>According to the Guidelines there are certain elements of the project proposals which cannot be altered between the concept note and the full project proposal stages. For detailed description please, refer to section 1.1. “Eligibility and content elements of the concept note that cannot be changed in the full project proposal”.</p> |
| 13 | <p>On Page 12 of the Guidelines it is stated that “the summary of the project proposal (section ‘A.2 Project summary’ of the FPP form) needs to be updated to reflect any modifications made at the FPP stage.”</p> <p>Are modifications allowed, what kind of modifications?</p> | <p>All acceptable modifications arising from the development of the project idea/concept note stage to a full project proposal are described in part 1. “Part A – From concept note to full project proposal” of the Guidelines for applicants.</p> <p>Applicants are strongly recommended to avoid making significant changes, especially such that could jeopardize the eligibility of the proposal. Modifications could arise from changes in partners, expanding existent or adding new activities related to the imperative requirement for the candidates to address environmental monitoring indicators (please, see Attachment 4), as well as to include provision of green and digital solutions (p. 10 of the Guide).</p> |
| 14 | <p>On Page 18 of the Guidelines it is written for BC 1 Staff costs: “these costs relate to remuneration of people involved in the management of the project implementation, such as the project team (manager, coordinator, accountant, assistant, etc.) and permanent staff of project partners engaged in soft project activities (e.g., trainings, studies, research, etc.).”</p> <p>How will be the staff contracted? Is it possible to use external expertise in this category?</p> | <p>BC 1 Staff costs consist of gross employment costs of staff employed by the partner in one of the following ways:</p> <ul style="list-style-type: none"> (a) full time; (b) part-time with a fixed percentage of time worked per month; (c) part-time with a flexible number of hours worked per month; or (d) on an hourly basis. <p>You may further see article 39 of the Interreg regulation (Regulation (EU) 2021/1059 of the European Parliament and of the Council of 24 June 2021).</p> |

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| | | External expertise costs are to be foreseen under BC4 External expertise and services costs. Staff contracting should be based on the relevant national legislation. |
| 15 | <p>There is a unit cost set for one-day events (Pages 20-21 - 14,00 EURO unit cost for one-day events).</p> <p>This amount looks very low for an event. This may reduce the quality of events.</p> | Please see the answer of question 8. |
| 16 | <p>Page 24 (BC 6 Costs for infrastructure and works - The Interreg Regulation, Article 44, specifies all eligible types of costs for infrastructure and works. It is important to note that the purchase of land and buildings is not eligible. The Programme will reimburse costs related to infrastructure and works based on real costs supported by relevant documentation)</p> <p>What documents are to be submitted to prove the planned budget?</p> | Documents that are required to justify the full project proposal budget are described in detail in the Guidelines point 1.2.4 Additional documents supporting the full project proposals incl. documents that are required for BC6 Infrastructure and works. |
| 17 | <p>On Page 32 in the Guidelines it is said that: “All outputs and results need to contribute to the Programme’s output and result indicators that applicants have selected in their concept notes. The values of the indicators in the FPP should not be lower than those in the respective concept note. When such deviation occurs reasonable justification shall be presented.”</p> <p>What changes are allowed?</p> | <p>Neither lowering nor increasing the values of indicators is encouraged in order to avoid both underachievement and overachievement of programme indicators. Please consult the JS when finalizing the values of the project indicators</p> <p>All acceptable modifications arising from the development of the project idea from the concept note stage to a full project proposal are described in part 1. “Part A – From concept note to full project proposal” of the Guidelines for applicants.</p> <p>Modifying the object of the investment as outlined in the concept note (please, refer to section 1.1. Eligibility and content elements of the concept note that cannot be changed in the full project proposal) is not allowed as it alters the essence of the project idea and affects its assessment outcomes. The only possible change regarding the output and the result indicators of the full project proposal is the adjustment of the values pointed at concept note stage. If the case, these values should not be lower than the ones in the concept note and in case of deviations reasonable justification is required by the applicant.</p> |