



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
1	<p>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>	<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-bgtr.mrrb.bg/en/node/144</p>
2	<p>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> <p>Option 1: Withdrawal of a partner whose original functions are taken over by other partner within the partnership;</p>	<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>



	<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>
<p>3</p>	<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 project</p>	<p>The project's contribution to environmental protection can be assessed from various perspectives:</p>



	<p>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>
<p>4</p>	<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>
<p>5</p>	<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>
<p>6</p>	<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>



	<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>



		<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> <p>For Turkish partners, certain kind of installation of supplies may require permits from local authorities.</p>



	<p>What type of equipment does it apply to and who are the competent authorities?</p>	
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>



		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>
Part 2 – Questions received after 12.06.2024, including during the Info-day on 20.06.2024 in Haskovo		
18	Will there be required proofs for establishing the reached numbers of users of infrastructure, reconstructed or	For setting the targets of selected Programme Output and Result Indicators as well as for their future reporting at project lever, there has to be considered Attachment 5 “Programme Indicators Fiches”.



	<p>upgraded under the project in relation to the planned numbers in the output and result indicators?</p>	<p>For some indicators, e.g. RCR64 “Annual users of dedicated cycling infrastructure” a basic methodology is pointed out in the attachment for calculating the indicator’s target, which includes conducting of field surveys.</p> <p>To establish realistic and verifiable values for RCR 64, which measures the annual number of users of dedicated cycling infrastructure, candidates can consider additional methods. These methods should be planned and budgeted accordingly in the FPP.:</p> <ul style="list-style-type: none"> - Adoption of contemporary digital solutions, based on GPS data, either developed or adapted to the needs of the project; - Development of counting infrastructure/devices installed at the cycling route/path. This infrastructure can include (example, non-exhaustive list): existing/new video systems, which can incorporate automated or manual data check of automated video processing; manual counts from video images; pneumatic tubes, where an air pulse is generated when a cyclist passes over the tube; piezoelectric sensors, which emit an electrical signal as a result of pressure from bicycle wheels; inductive loop detectors, which emit an electrical signal when pressed by bicycle wheels passing through them; passive infrared, which detect infrared radiation (heat) emitted by pedestrians and cyclists. <p>In any case justification for the set target value/s in the FPP and the planned method/solution for establishing the reached values have to be properly described for each ERDF and INTERREG indicator to which the respective project contributes.</p>
<p>19</p>	<p>19.1. Is it needed for each investment site to be filled in Annex 8 and where should be obtained the information for filling in the Annex since some investment sites do not have part “Energy efficiency” of the works designs?</p> <p>19.2. If the applicants indicate in Annex 8 that the investment site does not have impact on energy efficiency, how will it influence the consecutive assessment of the project proposal?</p>	<p>Annex A8 “Climate proofing assessment” should be filled and submitted for each construction/infrastructure site included in the project proposal. Detailed instructions on how to perform the self-assessment of planned investments is provided in the Explanatory note published on the Programme website https://ipa-bgtr.mrrb.bg/en/node/152.</p> <p>19.1. Annex 8 – Climate proofing self-assessment should be presented for each investment site. The assessment is performed based on the type and scope of the investments and for the first part of it – phase 1 (screening) data from the technical/works designs should be used. Investments that are energy efficiency related or lead to reducing energy consumption falling within the eligible activities under the current call are described in part “Step 1 – Energy efficiency assessment process” of the Explanatory note. If national legislation and the nature and scope of investments do not require technical/works designs for the “Energy efficiency” section, applicants should choose the answer “No” or “N/A” and provide a general justification.</p> <p>Instructions for filling out Annex A8 “Climate proofing self-assessment” are published on the web-site of the Programme, at the following address: https://ipa-bgtr.mrrb.bg/en/node/152</p>



		<p>19.2. Full Project Proposals will not undergo an additional assessment process after their submission within the set deadline, since they have been included in the list of identified PO5 project ideas. Rather than that they will pass a process called “screening” - a ‘yes or no’ process without assigning scores to FPP. The screening of FPP is an integral part of the identification process of project proposals that most contribute to the achievement of the objectives of the Territorial Strategy. Its primary objective is to ascertain the eligibility of submitted FPPs for contracting. For a FPP to proceed to contract approval, it must successfully meet all eligibility and contracting criteria, as detailed in this Guide.</p>
<p>20</p>	<p>Programme output indicators are predefined in the JeMS system and are selected from a drop-down menu. In this respects how can the applicants provide definitions to their own, project specific outputs?</p>	<p>Based on the activities that the candidates plan to implement and the specific objective of the work package that needs to be achieved, there have to be defined and listed the project specific outputs that will be delivered during the implementation. In section “Outputs” of each Work Package the applicants have to add new output/s and define name of the output (numbering is automatic and is related to the number of the Work Package). The corresponding Programme Output Indicator is selected from a drop-down list and a measurement unit, target value, delivery period and output description are entered. Project specific outputs have to be formulated and selected in such a way that they correlate to concrete Programme Output Indicators and contribute to their achievement on Programme level.</p>
<p>21</p>	<p>In terms of the two-phase application process there is an inconformity in formulation of the specific objectives. In the Full project proposal each Work Package is related to one Specific objective in JEMS. During the stage of Concept Notes preparation there was no requirement to be formulated specific objectives related to the nature of work packages thus limiting the number of the specific objectives to the number of work packages. In some project proposals, for examples, there are formulated 10 specific objectives.</p> <p>The question is, to what extent is it admissible the specific objectives from the Concept note to be re-formulated so as to be aligned with the nature of the work packages. Is it considered also as a change in the project proposal in relation to the CN?</p>	<p>According to the general Interreg intervention logic, project-specific objectives are set at the work package (WP) level (please refer to p. 30 of the Contracting Guide). Since concept notes did not request WP-related information, the provided specific objectives were not linked with the project WPs. This linkage is established at the full project proposal (FPP) level, where candidates need to set out their specific objectives per WP. Therefore, specific objectives can be revised from the concept note to the FPP to fit its intervention logic. However, what clearly cannot be revised is the overall objective of the project idea, as stated in the concept note.</p> <p>The Contracting Guide contains provisions only for transferring the content of the project’s Overall objective from Section C.1, 'Project Overall Objective,' in the Concept Note's application form to the corresponding section in the AF of the FPP. In this regard it is essential to ensure that the narrative remains the same as it is in the concept note with slight rewording possible to ensure consistency with the FPP. Also ensure the FPP objective remains compliant with the programme specific objective under Priority 2.</p>
<p>22</p>	<p>Is it possible two project specific outputs to be related to one programme output indicator (which is pre-defined in the drop-down menu)?</p>	<p>Yes, it is possible. However, the target value of any selected programme output indicator is automatically defined on a cumulative basis, and its final value should not exceed the final value of the respective indicator as indicated in Attachment 5, "Programme Indicators Fiches," under the section "Type of use at project level."</p>



		<p>Outputs are defined on work package level. Project main outputs are those that can be captured by the Programme output indicators. Project output/s directly contribute to the achievement of the project result/s. Since one and the same Programme Output indicator can be selected in different Work packages it has to be taken care that the selected target values do not overlap and the total value of that indicator at project level is the one that can be achieved within the project duration with the budgeted financial resources.</p>
23	<p>Is it required the project management activities to be formulated as an activity in the work package/s, or they have to be described only in part C7. Project management of the AF? Is it required within part C7. Project management to be formulated concrete deliverables from the management activities?</p>	<p>As a general approach - project management should not be listed as separate activity or output in the WP. General provisions for project management, coordination, and internal communication are incorporated in C.7 Project management. Candidates are invited to specify their project-related communication objective(s), activities, deliverables, and target audience(s), which will contribute to achieving their project's specific objective, in each work package of the application form.</p> <p>Standardized and repetitive management and coordination activities may not be explicitly indicated in the project work plan, but in part C7 "Project management of the AF" due to which formulation of concrete deliverables may be possible in general terms.</p>
24	<p>There was presented as a good practice appointment of a communication coordinator. Is it necessary a separate position to be designated in the project team or another position, e.g. the project manager, can jointly perform that function?</p>	<p>BC 1 Staff costs is dedicated to costs related 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.). In this respect project partners can create positions within the project team that they deem necessary for reaching the specific and overall objectives of the project. There are two options to appoint a communication specialist to the project. The first option is to appoint someone from the partner's organization to handle this role under BC 1 staff costs. The second option is to select an external company or individual under BC 4 'External expertise and services costs' to perform the same role, following applicable national legal provisions.</p> <p>These costs can be reimbursed on the basis of flat rate of up to 20% of the eligible costs under BC 4, BC 5, and BC 6 from the respective partner's total project budget. The position of communication coordinator was given as a good practice and example for raising the importance of communication at project level.</p>
25	<p>Is it compulsory the market research that the nongovernmental organizations need to perform for purchasing certain equipment to be done according to the Bulgarian Public Procurement Act rules?</p>	<p>Usage of preliminary market consultations according to Art 44. of Bulgarian Public Procurement Act is an option and not an obligation. Whether the market consultation will be implemented is a matter left to the discretion of the contracting authority. The MA does not restrict the rules for market consultation and procurement solely to the Bulgarian Public Procurement Act since not all eligible applicants qualify as contracting authorities under this law.</p> <p>For the current Call for proposals, market analysis for the planned supply is required by all types of applicants, eligible under the Call. There are outlined three ways for conducting the analysis:</p>



		<p>1) The recommended approach for conducting this analysis is for the Lead or project partner to provide a minimum of three extracts from national/EU public procurements systems of a similar supply with identical technical specifications.</p> <p>2) In instances where evidence from a national/EU procurement system is unattainable (verifiable circumstances apply), the Lead or project partner is required to present soliciting offers (along with website references) from at least three independent providers. These offers should be comparable in terms of requested technical characteristics, and as such, they must be accompanied by a uniform request for offer. Expenditures included in the project budget derived from the market analysis should reflect an average of the price offers received or an average of the extracts from national/EU public procurement systems. In order to overcome the impact of future inflation and price instability, the expenditures included in the budget based on the above market analysis could be increased with the average rate of the national inflation of the last 3 years before the application submission, but not more than 10%.</p> <p>3) When there is a requirement to procure highly specialized equipment (with insufficient evidence in national/EU procurement systems) from a limited pool of suppliers, and conducting market research for the equipment cost is not feasible, upon exhaustion of the first two possibilities, historical data for concluded contracts from previous similar deliveries must be provided by applicants. This data serves to verify that the budgeted equipment costs are reasonable.</p>
26	Preliminary market consultations according to art. 44 of Bulgarian Public Procurement Act are not pointed out in the Contracting Guide as an option for conducting market analysis for the planned supply. Are they applicable under the Programme and the current Call and will this option be included in the Contracting Guide?	Please see the answer to the previous question.
27	What is the meaning of soliciting offers (along with website references) from at least three independent providers? In case screenshots are taken from providers' websites, then these cannot be considered as offers.	In instances where evidence from a national/EU procurement system is unattainable (verifiable circumstances apply), the Lead or project partner is required to present soliciting offers (along with website references) from at least three independent providers. These offers should be comparable in terms of requested technical characteristics, and as such, they must be accompanied by a uniform request for offer.
28	We have an Approved Works Design for our construction site and a construction permit is issued. A letter issued by the Regional Inspectorate for Environment and Waters stating that an Environmental Impact Assessment (EIA) for the project investment is not necessary is also issued. There is ex-officio exchange of information between	Bulgarian partners are required to provide a copy of a letter issued by the relevant competent body, clearly stating that the project proposal aligns with the current River Basin Management Plans and Flood Risk Management Plans. Turkish partners, likewise, should submit a copy of a letter serving the equivalent purpose from the Ministry of Agriculture and Forestry, Directorate General of Water Management (Tarım ve Orman Bakanlığı, Su Yönetimi Genel Müdürlüğü) stating that the project proposal is eligible according to the current River Basin Management Plans and Flood Risk



	<p>Regional Inspectorate for Environment and Waters and River Basin Management Directorate which presupposes that the necessary circumstances are checked by the Regional Inspectorate for Environment and Waters.</p> <p>In this case is it necessary to present for this construction site a statement by the relevant competent body, clearly stating that the project proposal aligns with the current River Basin Management Plans and Flood Risk Management Plans?</p>	<p>Management Plans and basin based management plans and documents via governorship in the provinces.</p> <p>If deemed necessary by the competent body, Bulgarian partners should also submit an explanatory note detailing the envisaged prevention measures for avoiding pollution of water bodies in emergency situations.</p> <p>In case the document issued by the Regional Inspectorate for Environment and Waters confirming that an Environmental Impact Assessment (EIA) for the project investment is not necessary states also that the project proposal aligns with the current River Basin Management Plans and Flood Risk Management Plans, then such a statement issued by River Basin Management Directorate is not required.</p>
<p>29</p>	<p>Are the cited in the Contracting Guide unit costs set for one-day events (14,00 EURO) and for multi-day events (60 Euro) just an example or they have to be adhered strictly in the FPP?</p>	<p>The cited in the Contracting Guide unit cost option is not an example, but obligatory basis for calculation of the events costs if SCO is selected.</p> <p>However, for event organization services, costs can be reimbursed also based on real costs. The choice between these two options is made by the applicants.</p> <p>Please see also the answer of question 8.</p>
<p>30</p>	<p>What documentation will be required for justification of expenditures which were budgeted using the unit cost option?</p>	<p>Documentation required to justify project expenses budgeted using SCO includes evidence proving the implementation of the project activity. For instance, if it is about a project event, the responsible project partner should present attendance lists, photos, videos, presentations, etc., to demonstrate that the activity was carried out and to verify the actual attendance. The programme authorities will not require financial documents for the event—such as transport contracts, hall and equipment rentals, tender procedures, catering contracts, invoices, and relevant accounting documentation for the aforementioned expenses. However, the use of simplified cost options should ensure that the expenses were incurred lawfully.</p>
<p>31</p>	<p>Since the unit costs for events organization include accommodation costs for participants, the host organization has to cover the accommodation of the participants from the partner country and also their transport.</p> <p>In this respect, the question is how a Bulgarian organization can rent a vehicle for ensuring the transport of participants from Türkiye?</p>	<p>Project partners themselves determine the scope of a SCO, ensuring full conformity with the eligibility of costs, described in the Contracting Guide (part 1.2.2 Section “Budget and co-financing from the Application Form”, section BC 4 External expertise and services costs).</p> <p>For event organization services, costs can be reimbursed based on either unit costs or real costs. The choice between these two options is made by the applicants.</p> <p>If the Beneficiary chooses to apply simplified cost options in the form of unit costs, as per answer to question №30 - Documentation required to justify project expenses budgeted using SCO includes evidence proving the implementation of the project activity - attendance lists, photos, videos,</p>



		<p>presentations, etc., to demonstrate that the activity was carried out and to verify the actual attendance. The programme authorities will not require financial documents for the event.</p> <p>It is in the discretion of the Beneficiary, that has chosen the option for unit costs, to determine the most suitable service provider while taking into account national and EU regulations. Please also see the answer to Question No 30.</p>
32	<p>Are the costs for issuance of visas of Turkish participants in events eligible in case of unit cost option and in the case of real cost option? In which budget category should be included these visa costs?</p>	<p>In both cases which applicants can select for budgeting and reimbursement of expenditures for organization of events located in the Republic of Bulgaria - based on unit costs or based on real costs - the costs for issuance of visas of Turkish participants (but not Turkish team members) in events and related compulsory insurance and entrance (departure) fees have to be budgeted in BC 4 “External expertise and services costs”.</p> <p>We would like to pay attention that according to part “1.2.2 Section ‘Budget and co-financing’ from the application form” the unit costs in BC 4 “External expertise and services costs” determined by the Programme based on the event's duration and the number of participants (14,00 EURO unit cost for one-day events and 60,00 EURO unit cost for multi-day events) do not include costs for visas of Turkish participants in events in the Republic of Bulgaria and the related compulsory insurance and entrance (departure) fees.</p> <p>Please see also the answer of question 8.</p>
33	<p>Does the English translation of documentation from the original language need to be done by a sworn translator?</p>	<p>There is no requirement set in the Contracting Guide that translation of documents from the original language into English should be carried by a sworn translator.</p> <p>Pre-defined applicants should mind that translated versions take precedence and are the ones considered for screening of the FPP. Therefore, they are strongly recommended to ensure the highest possible translation quality.</p> <p>Mind also that where a document is translated into English from the original language, the true original copy should also be provided.</p>
34	<p>Does the drawing designs need to be translated into English?</p>	<p>No translation from the original language into English is required for the entire package of works designs. An English translation shall be provided at least on the explanatory note of each part of the works designs, the bill of quantities and the letterhead/cover sheets (where applicable) of the drawings. Pre-determined applicants may submit an English translation of the rest of the investment projects as well, in case they believe this would contribute to a better screening of the FPP.</p> <p>In all cases where the document is translated into English, its original must also be provided.</p>
35	<p>Could you please provide guidance on how to fill the co-financing section of the Application form in JEMs?</p>	<p>Instructions for completion of Section “Co-financing” from the AF in JEMS is published on the web-site of the Programme at the following address - https://ipa-bgtr.mrrb.bg/en/node/157</p>



	When we define co-financing the system does not allow to enter the 100% intensity of the grand in the “Source” table. Shall the entered in the “Origin of partner contribution” amount be considered own contribution of the respective partner?	Please adhere to the description, depending on the case of your project proposal: a proposal without additional co-financing or with additional co-financing.
36	It is said in the Contracting guide that the project partners should elaborate their FPPs based on the recommendations from the assessment of the concept notes? Where can we find them?	Project partners can further elaborate on their project idea, consolidate their partnerships, and develop a detailed work plan in line with recommendations, if any , provided in the notification letters sent to the applicants with the outcomes of the concept note stage.
37	How should visa costs be budgeted? Is it right that Bulgarian project partners should pay expenditures for the visas of Turkish participants in events?	Please see the answer of question 32 and 8.
38	It is said in the Contracting guide that “If the official representative of the project partner also holds decision-making authority within the organization, this document must be signed by another authorized representative from the same organization”. Could you please clarify this requirement?	<p>The requirement relates to the decision from the managing body regarding the project development, implementation and ensuring the sustainability of the project results.</p> <p>In general, when the official representative of the project partner also holds decision-making authority within the organization, it means that the same individual is both the designated signatory for project-related documents and holds an internal position within the organization that grants them the authority to make decisions. The requirement is set in order to prevent any complications during the screening process that this dual role may generate due to the consolidation of external representation and internal approval into one individual.</p> <p>Please mind also that in the cases where the executive authority is different from the collective managing body (i.e. Mayor and Municipal Council), the decision has to be taken by the second one.</p> <p>Decision for project development and implementation has to be provided in all cases, no matter whether sole or collective managing authority takes the decisions in the organization.</p>
39	The table in section E.1. of the AF does not allow a different than 12 000 Euro amount to be entered for the lump sum for project preparation costs. The total amount of project preparation costs for our FFP shall be below this limit. How can we enter the exact amount spent?	For FPP, the PPC is capped at EUR 12,000 per project proposal and cannot be altered. The sum is determined based on historical data of previously funded projects by the programme and it refers to the application of the methodology named Simplified Cost Options (SCOs) which is part of the Programme’s approach to financial management and represents EU’s innovative way to reimburse grants and repay assistance. This lump sum must be distributed among all project partners in proportion to their involvement in the preparation and contracting of the proposal. Project partners have the discretion to decide from a broad scope of costs linked with the project preparation which expenditures totaling EUR 12 000 shall be covered by the PPC. This lump sum should be included in their Project Partnership Agreement, which is a mandatory document (Annex 1) attached to the FPP application and



		<p>must indicate the PPC share of each partner. Please, bear in mind that the use of SCO should ensure that the expenses are incurred lawfully.</p>
40	<p>Which is the applicable law for public procurement of Bulgarian Non-governmental Organizations, Community Centers (читалища) and Small and Medium Sized Enterprises?</p>	<p>For all indicated entities, the applicable legal provisions for procurement are set out in Decree No. 4 of January 11, 2024, Prom. SG 5/ 16 Jan. 2024, which outlines the rules for the consideration and evaluation of offers, as well as the conclusion of contracts in selection procedures with a public invitation from beneficiaries of grants from the European Funds under shared management. The Community Centers in Bulgaria, by their very nature, are organizations, governed by public law.</p> <p>Community culture centers act regulates the establishment, organization, management, activity, property, funding, upkeep and termination of community centers.</p> <p>As community centers fulfil the conditions of para 43 of the Additional provisions of the Bulgarian Public Procurement act (PPA) in relation to art. 5, paragraph 2, p. 14 they should award public procurements in accordance with the PPA.</p>
41	<p>Which are the supporting documents that Bulgarian Non-governmental Organizations, Community Centers (читалища) and Universities, since we see in the Contracting Guide that there are specific documents which have to be presented only by Small and Medium Sized Enterprises?</p> <p>Are NGOs required to submit documentation like NACE certificate, since some of them can also have economic activity?</p>	<p>41.2. Additional documents A3 “NACE code“, A4 “Annual Financial Statement” and A5 “Annual work unit” are required for the eligibility screening of SMEs as project partners.</p> <p>Though according to Bulgarian legislation non-governmental organizations (юридически лица с нестопанска цел) may have supplementary economic activities classified according to the NACE rev.2 there are not obliged to submit additional documents A3, A4 and A5 to prove eligibility compliance.</p>
42	<p>On the basis of which document, the Lead partner is obliged to transfer the lump sums which are verified with the First Request for verification?</p>	<p>As stipulated in the Contracting guide the project preparation costs are reimbursed to the Lead partner with the first financial report. Obligations of the parties within the cross-border partnership created in order to implement the project including those of the Lead partner regarding the transfer of project preparation costs after being reimbursed by the Managing Authority are set in the Partnership Agreement (§8, 1-5).</p> <p>The Project Partnership Agreement is a mandatory document under the current Call. A Project Partnership Agreement template stipulating the minimum engagements of each of the parties is available in the Application package as Annex 1. The clauses of the Project Partnership Agreement may not be limited to the minimum of rights and obligations specified in Annex 1, and could include</p>



		additional agreements regarding the project proposal preparation costs, as long as they do not conflict with the rest of the contract.
43	Is it admissible documents to be signed with electronic signatures by all partners, since during concept notes identification there appeared invalid signatures which required the documents to be signed on paper?	<p>The attached documents may be scanned signed versions of paper documents or electronically signed documents.</p> <p>Lead partners must ensure that the documents uploaded in JEMS are electronically signed and contain valid electronic signatures of all partners/institutions, accompanied by the respective signature certificate. The electronic signatures must belong to the legal representative of the project partner, ensuring they are not attributed to an individual without legal affiliations with the project partner.</p>
44	In which BL have to be classified the expenses for construction supervision in case there will be hired a physical person?	<p>Expenditures for construction supervision should be included in BC4 “External expertise and service costs”.</p> <p>For Bulgarian project partners: The services for construction supervision incl. assessment for conformity with the legislation requirements of the works designs and of the implementation of works, as well as control on the construction materials and products incorporated in the construction are performed by licensed by the Directorate for National Construction Control consultants for all construction sites from first to the fifth category, except of the sites under Art. 14, para. 2 of the Law on the Chamber of Builders.</p> <p>For Turkish partners please refer to Construction Guide of the NA (https://cbc.ab.gov.tr/sinirotesi/50676/sinir-otesi-isbirligi-programlari-insaat-rehberi?lang=tr) for supervision of the constructions. However, applicants are responsible for checking and implementing any amendments in the related regulations. This Guide is not exhaustive, and applicants must conform to both the legislation specific to their type of design and region, as well as the general legislation.</p>
45	Which type of supply is categorized as investment in JEMS?	<p>As stipulated in the Contracting guide “investments” refer to allocation of resources in equipment (defined as “supply” within this call) and/or investment in infrastructure (defined as “works” within this call). It is assumed that investments should lead to tangible and measurable outcomes in durable assets with the goal of achieving specific project objectives.</p> <p>Please mind that equipment that shall be supplied and used only for the implementation of indirect project activities (activities that are not directly linked to primary project deliverables such as project management and reporting) should not be determined as investments in the work packages.</p>
46	Team leader or leader of Work Package in which BL should be budgeted?	Remuneration of people involved in the management of project implementation is budgeted in BC 1 Staff costs. Such positions in the project team are project manager, coordinator, accountant, assistant, etc., including specific for some projects positions (provided as a good practice during the training), like Work package leader and Team leader. Within BC 1 can be reimbursed also remuneration of permanent staff of project partners engaged in soft project activities (e.g., trainings, studies, research,



		etc.). These costs can be reimbursed on the basis of flat rate of up to 20% of the eligible costs under BC 4, BC 5, and BC 6 from the respective partner's total project budget.
47	Which person or institution has to sign the Detailed Bill of Quantities – the Chief architect, the Mayor, the Chairman of the municipal council, or some other?	<p>The Bill of quantities (количествени сметки) should be stamped and signed by the certified designers of the relevant parts of the working investment designs.</p> <p>In case, Bill of quantities with unit costs (количествено-стойностна сметка) are elaborated as a separate part of the works designs as per the contractor's assignment (works designs contract) they may be signed and stamped by the designer of that specific part or the lead designer of the works designs.</p> <p>For Bulgarian project partners it is acceptable that Bill of quantities with costs (количествено-стойностна сметка) are prepared by qualified experts of the applicant in case there are structures for Investment control or relevant established in the partner's organization.</p> <p>In all cases Bill of quantities and Bill of quantities with costs should be signed by the legal representative of the project partner.</p>
48	In which cases is the explanatory note detailing the envisaged prevention measures for avoiding pollution of water bodies in emergency situations applicable?	<p>As stipulated in the Contracting Guide Bulgarian partners should provide a letter for alignment of the project proposal with the respective River Basin Management Plans and Flood Risk Management Plans. The competent authorities are the River Basin Directorate – East Aegean River Basin Directorate for the Haskovo and Yambol districts with headquarters in the town of Plovdiv and the Black Sea Basin Directorate for the Burgas district with headquarters in the town of Varna. In case the competent body has deemed necessary (expressed in the issued letter) Bulgarian partners should also submit an explanatory note detailing the envisaged project prevention measures for avoiding pollution of water bodies in emergency situations.</p> <p>Turkish partners, likewise, should submit a copy of a letter serving the equivalent purpose from the Ministry of Agriculture and Forestry, Directorate General of Water Management (Tarım ve Orman Bakanlığı, Su Yönetimi Genel Müdürlüğü) stating that the project proposal is eligible according to the current River Basin Management Plans and Flood Risk Management Plans and basin based management plans and documents via governorship in the provinces.</p>
49	Beneficiaries with a standing debt to the Programme Authorities can only sign Subsidy Contracts after they pay out all their debts. What will happen with a beneficiary which has a financial correction which is under court proceedings?	At the stage of contracting (before signing of the Subsidy contract) no one of the partner organization should have standing debt to the Programme Authorities.



50	Who is obliged to check whether some of the partners have standing debt to the Programme Authorities? Is it the Programme bodies or the partners themselves?	Programme authorities check ex-officio whether beneficiaries have any outstanding debt to the Programme before the Subsidy Contract is signed, including through communication with the National Authority from the Turkish side.
51	Within the table on the first page of the Project Partnership Agreement (Annex 1 to the Application package), in column “Represented by” the draft text refers to Annex B3-1 which is not found in the Contracting Guide (in the text: on the basis of the power of attorney dated , constituting the Annex B3-1).	The text in brackets should be read as follows: (on the basis of the power of attorney dated , constituting the Annex A2.1-n) in all four instances of the table on page 1 of Annex 1 - Project Partnership Agreement, where “n” refers to the number of the project partner, and LP is PP1.
52	<p>52.1. According to Bulgarian legislation, we are the contracting authority under DECISION No. 4 from January 11, 2024 that determines the rules for consideration and evaluation of offers and contracting in the selection procedure with a public invitation from beneficiaries of a grant from the European Funds in shared management. Through our profile in ISUN, it is only possible to publish procedures for contractor selection. When purchase of equipment is planned, according to page 23 of the Application Guidelines, there should be a market research process and collection of minimum three offers.</p> <p>In connection with the above, could you please give us an indication as to how the offers should be collected from the contracting authority under PMS No. 4/11.01.2024? Is it possible to make an inquiry and receive offers by email or by courier or received by hand?</p> <p>52.2. The second question we have is related to Section 2.2.1. Administrative and eligibility screening. Point 20 addresses the requirement of a Permit for installation of equipment or a detailed plan scheme. In the case of our project, we plan to purchase equipment such as furniture and computers. In the case of such equipment, Bulgarian legislation does not require a permit or plan/scheme. Is it still required to present such a document or is it only applicable for partners from Türkiye (since as far as we know their national legislation is slightly different and such</p>	<p>52.1. There are no different requirements set in the Contracting Guide for the supporting documents regarding the market analysis for envisaged supplies based on the type of the organization. All three means listed under the answer of question 25 may be used as far as they present comparable in terms of requested technical characteristics offers.</p> <p>52.2. In the case of supplies that are permanently installed – meaning that works are necessary for site preparation, leveling, connection to electricity/water supply/other networks/installations, etc. applicants should present detailed plans or schemes for positioning the delivered equipment, both outdoors in public spaces and indoors. These plans/schemes should be approved by the competent authority in accordance with national legislation, where applicable. These requirements are applicable both for Bulgarian and Turkish project partners.</p>



	<p>documents are required)? In case it isn't needed, do we still need to present a statement by the competent authority, declaring that the envisaged permit for installation is not required (as stated in point 20)?</p>	
<p>Part 3 – Questions received after 04.07.2024, including during the Info-day on 09.07.2024 in Kırklareli</p>		
<p>53</p>	<p>Could you provide a clarification on how Annex A7 has to be filled? Our project proposal foresees external expertise (BC4) related to a few different costs such as live translations, lecturers, information and publicity, event organization, production of short video ads, construction and author supervisions and other. Does Annex A7 need to be filled separately for each of these expenditures (in a sense that each expenditure will be a separate contract, each contract should have annex A7 filled)? Please provide further details as to what needs to be described in Annex A7 and the correct way to prepare it.</p>	<p>Project partners should provide filled and signed by the legal representative of the organization Annex A7 only for the expenditures under BC4 that are planned as a total amount per contract. Annex A7 is supposed to present detailed information and justification on how the costs for the external expertise and services under the respective contract have been estimated.</p> <p>In case there are more than one lines under BC4 planned as total amount per contract the justification table with detailed description in points 1-4 should be provided for each of them. It is left to the discretion of the beneficiaries if one assembly Annex A7 with the justification table repeated within the document as many times as necessary or separate Annexes A7 for each BC line shall be presented.</p>
<p>54</p>	<p>One of the partners at the stage of Concept note under the Territorial Strategy has omitted, for some reason, to foresee the lump sum for preparation costs. Is it possible these costs to be predicted at the stage of developing and submitting Full project proposals?</p>	<p>At the concept note stage only an indicative budget breakdown has been presented. In detailing the budget of the full project proposal changes may occur including project preparation costs to be included between the concept note stage and the full project proposal. While it is generally possible to amend the budget and include additional costs at the full project proposal stage, it is crucial to follow the specific rules of the call regarding the budgetary parameters and reflecting mandatory criteria as the minimum and maximum budget of the concept note and a minimum of 70% budget share allocated to the investment component. Please note that the total amount shall be included in the lead partner's budget. The lump sum must be distributed among all project partners in proportion to their involvement in the preparation and contracting of the proposal. The terms for distribution of the lump sum for project preparation should be included in the Project Partnership Agreement.</p>
<p>55</p>	<p>One of the partners within a Concept note has predicted costs for BC "Works and infrastructure", while most of the planned delivery is more equipment supply rather than works and infrastructure. Are transfers between budget categories allowed within the structure of the budget not affecting the total budget of the concept note at the stage of developing and submitting Full project proposals?</p>	<p>It is possible that when detailing the budget, changes may occur as long as the requirements of the call for the budgetary parameters and the mandatory budget allocation criteria are respected as well as the total budget of the full project proposal does not exceed the total project budget of the concept note. Applicants should mind also the restrictions for the eligibility and content elements of the concept note that cannot be changed in the full project proposal especially that the location and scope of the investment component cannot be altered and the mandatory requirement for each project proposal to include works only or works and supply.</p>



<p>56</p>	<p>In connection with filling in the budget in JeMS and the requirement that "The budgetary parameters of the concept note cannot be altered", I am asking for your advice on how to fill in the information for the budget categories "Staff Costs flat rate" and "Office and administrative costs flat rate based on direct staff costs", for which it should be noted what percentage to the allowable one is chosen by the respective partner. JeMS does not allow filling in fractional numbers, and rounding them invariably leads to altering of the total Project budget.</p>	<p>Both budget categories - BC1 Staff costs and BC2 Office and administrative costs, are automatically calculated in JeMS based on other project costs. BC1 Staff costs is up to 20% of the eligible costs under BC 4, BC 5 and BC 6 of the total project budget of the respective project partner and BC2 is up to 15 % of staff costs. In detailing the budget of the full project proposal changes may occur in the figures under the direct costs budget categories from those of the concept notes stage that implies the respective adjustment of the budget allocation of BC1 and BC2. The functionalities of JeMS allows input only of natural numbers (i.e. positive integers with no fractional or decimal parts).</p>
<p>57</p>	<p>Is it necessary to get a "No Debt" letter for our project for which we are preparing for the main application? If necessary, should we submit this document during the application or during the contract?</p>	<p>At the stage of application all project partners declare that they are not "in breach of obligations relating to the payment of taxes or social security contributions in accordance with the applicable law" (Annex 2 - Project Partners Declaration). The annex is mandatory document to the full project proposal and should be presented by all project partners.</p> <p>Before contracting, documents certifying the lack of obligations (taxes and social security duties) will be requested for Turkish project partners. For Bulgarian project partners MA requests issuing the certificates by respective authorities ex-officio.</p> <p>Applicants should mind that observing above mentioned obligations are a major eligibility criteria and falling in any of the situations listed in Annex 2 excludes them from participating in contracts.</p>
<p>58</p>	<p>How should be travel costs planned and what kind of documents shall be requested for reimbursement at the project implementation stage?</p>	<p>Expenditures for travel may be planned under BC3 Travel and accommodation costs and BC4 External expertise and service costs.</p> <p>BC3 Travel and accommodation costs covers expenses related to the travel exclusively for project staff engaged in project management and implementation. Costs under BC3 will be reimbursed as a flat rate of up to 15% of the staff costs and no further justification or supporting documents are needed from the project partners at the implementation stage.</p> <p>Travel costs for participants in events, lecturers or other individuals that are not part of the beneficiary's team or internal structure but are involved in project activities are budgeted under BC4 External expertise and service costs. If the case applicants may choose one of the options for reimbursement provided:</p> <ul style="list-style-type: none"> - Use the SCOs whereas travel expenses are included in the unit costs for the events, or - Use the real costs.



		<p>For the documents for verification of costs when unit costs option is chosen please refer to the answer of question 30.</p> <p>Real costs undergo verification before reimbursement and project partners are obliged to provide supporting documents on expenditures incurred.</p>
59	Could you please clarify what is one-day event?	<p>A one-day event is an organized activity designed to take place within a single day and there is no accommodation associated with it.</p> <p>When choosing unit cost applicants should mind the all costs associated with the participation of a participant. Please refer to the Contracting Guide, section “1.2.2 Section ‘Budget and co-financing’ from the application form“ page 21-22.</p> <p>Applicants should carefully plan the project events and consider that the event unit cost per participant cannot be claimed for an event consisting of only evening programme with a dinner or similar get-together, working meetings with contracted external experts when meeting only with a partner organisation, for example external project management, book-keeping, content expert, working meetings with programme bodies (Managing Authority, National Authority, Joint Secretariat), when meeting only with a partner organization.</p>
60	When choosing unit costs, should applicants provide justification for planned expenses for example by presenting offers for delivery of planned service?	<p>Market analysis is not required for justification of costs planned as unit costs. Neither is Annex A7 “Justification for expenditures planned as a total amount under Budget category 4”. When choosing the SCOs i.e. unit costs for events the budget allocation is calculated based only on the number of participants and the duration of the event.</p>
61	Should applicants pay the costs for project preparation before the submission of the application form?	<p>The project preparation expenditures should be carried out before or on the date of submission of the full project proposals at the latest. No supporting documents (such as invoices, acceptance protocols, lists, etc.) should be provided for reimbursement at the implementation stage.</p>
62	Are project partners obliged to present any documents evidencing that they are not in breach of obligations relating to the payment of taxes or social security contributions?	<p>Please see the answer of question 58.</p>
63	Is filling in the PIC code in JeMS mandatory?	<p>The Participant Identification Code (PIC) enables participation in a call for tenders with eSubmission. It is not a mandatory field in JeMS for the submission of the full project proposal but might be required additionally for performing specific checks under the screening process and before signing the subsidy contract.</p>



64	Can the number of the listed in the concept note activities be decreased or increased in the full project proposal?	<p>While at the concept note stage applicants were required only to outline the activities that shall be carried to produce the project solutions and achieve the desired results, for the full project proposal a detailed and coherent intervention logic should be developed. For ensuring clear consistency between Programme and project objectives, project deliverables and their contribution to outputs at programme level activities identified at the concept note stage should be tailored into work packages. To this end, project activities may be grouped and synchronized in order to be clearly defined with a specific outcome or deliverable.</p> <p>There is no requirement set that the number of activities should remain unchanged between the concept note and the full project proposal. Work packages should be organizing activities, resources, and time plan, ultimately contributing to the project objectives.</p> <p>Applicants should mind that indirect project activities (activities that are not directly linked to primary project deliverables such as project management and reporting, communication and visibility) should not be determined as separate work packages.</p>
65	Can applicants select different options for different event organizations – for example for one event the partner selects Unit Costs and for another real costs?	<p>There are no requirements set under the call that applicants should choose one and the same type of reimbursement for the costs for different event organization services. JeMS functionalities allow the type of reimbursement (event organization unit costs or NA) to be chosen separately for each budget line under BC4 External expertise and services costs.</p> <p>However, applicants should mind all costs associated with the participation of a participant in event deriving from the unit cost option and prevent any double disclosure of funds once in the hosting partner's budget and in the attending partner/s budget. To this end, it is recommended that when developing their detailed budgets all project partners work in close communication regarding the organization of common events.</p>
66	Should a letter stating that the project proposal aligns with the current River Basin Management Plans and Flood Risk Management Plans be presented for sites where supply of equipment shall be placed?	<p>A letter for alignment of the project proposal with the respective River Basin Management Plans and Flood Risk Management Plans for Bulgarian project partners and a letter serving the equivalent purpose from the Ministry of Agriculture and Forestry, Directorate General of Water Management (Tarım ve Orman Bakanlığı, Su Yönetimi Genel Müdürlüğü) for Turkish project partners stating that the project proposal is eligible according to the current River Basin Management Plans and Flood Risk Management Plans and basin based management plans and documents via governorship in the provinces should be provided for the investments sites incl. sites where supplies of equipment shall be places.</p>
67	Could there be changes in the project partner's budget from the concept note stage?	<p>It is possible that when detailing the budget, changes may occur. It should be minded that the total budget of the full project proposal should not exceed the total project budget of the concept note as well as all the requirements of the call for the budgetary parameters and the mandatory budget allocation criteria are respected.</p>



68	If during the concept note stage BC1 “Staff costs” was selected as 5%, can it be changed now to 10%?	As long as adjustments deriving from detailing the project budget from the concept note stage into a full project proposal are acceptable changes in the flat rate of BC1 Staff costs are also possible.
Part 4 – Questions received after 17.07.2024, including during the webinar held on 19.07.2024		
69	When we plan a joint event and envisage transport with a bus, meals and accommodation expenses for participants in the event, some of them are members of the implementation team, and the organization of the event for all the participants and the provision of all these three services will be performed by external experts, can we include these costs in budget category 4 External expertise and services?	<p>According to the Contracting Guide, expenditures for travel, daily allowances and accommodation of the Project staff engaged in project management and implementation are planned under BC3 “Travel and accommodation costs” and expenditures for travel, catering and accommodation of participants in events - in BC4 “External expertise and service costs”.</p> <p>The applicant shall have to make a clear distinction of the persons which are going to be present at the event – project staff which is responsible for organization and holding of the event and participants in the event, lecturers or other individuals that are not part of the beneficiary’s team or internal structure but are involved in project activities.</p>
70	Given the information on slide 11 from Presentation "02 Детайлизиране на идеята - Как да съставим работния план", where it is stated that "Не всеки работен пакет трябва да има един или няколко крайни продукти", please confirm that it is eligible to have a work-package with no output indicator.	The information in slide 11 of Presentation 02 “Detailing the project idea, How to build the Work Plan” in Bulgarian language is corresponding to the Contracting Guide, namely part C.4. Project work plan, C.4.1 Project intervention logic, Project outputs. This section provides definition of project outputs, according to which outputs are the direct products of the activities, they are defined on work package level, and directly contribute to the desired change and the achievement of the project result/s. There it is clarified also that not every work package must have one or several main outputs and, a project may have only one main output.
71	Which figure should be put in Annex 3 PARTNERSHIP AND CO-FINANCING STATEMENT - the sum corresponding to 15 % of the partner budget or 0?	In case the budget of the respective project partner envisages additional contribution from own funds – different than that from IPA and National co-financing funds, the amount of these funds should be filled in Annex 3 “Partnership and co-financing statement”.
72	Should Annex A7 be filled for all external expertise and services in the same Annex (events, lecturers, promotional materials etc.) or each type of external cost should be in a separate form (file)? If all envisaged activities are in the same file, wouldn't that cause confusion if there are too many of them?	Please see the answer of question 53.
73	Is there a need to carry out a market survey for the main investment in the construction, given that the bill of	No, there is no need to provide market research regarding the works. Planned expenses for works are justified with the Bill of quantities that should include types of work, units, price per unit in Euro and national currency and total amount of the bill. All elements are described at page 49 of the Contracting



	quantities has been signed and stamped by the designers? Thank you in advance for your attention!	<p>guide. The Bill of quantities is signed by the project designer/s and the legal representative of the project partner.</p> <p>Please refer also to the answer of question 45.</p>
74	With regard to the indicator of the number of visitors - have a methodology for measuring them in the implementation stage, which should also be consistent with the filling in and formation of the indicator at the application stage?	<p>According Attachment 5 “Programme’s Indicators Fiches” the indicators which target values are measured with number of people are RCO74 “Population covered by projects in the framework of strategies for integrated territorial development” and RCR77 “Visitors of cultural and tourism sites supported”. The applicants have to adhere strictly to the definition and the way of reporting at project level of the respective indicators, outlined in the attachment.</p> <p>In any case justification for the set target value in the FPP and the planned method/solution for establishing it have to be properly described for each ERDF and INTERREG indicator to which the respective project contributes. This is done in fields “Output Description” within page “Outputs” of the work packages for each Project Specific Output and corresponding Programme Output indicator and in field “Result description” of Section C.5 Project Results for each selected Programme result indicator.</p>
75	There is no energy certificate requirement for historical buildings in Turkey and therefore the building we will renovate in the project does not have a certificate. Is it mandatory to submit the requested EIA for every investment in the application?	<p>For Turkish beneficiaries: Building with a status of historical sites, fall within the scope of Article 2, paragraph d) of the Regulation on Energy Performance in Buildings. At this point, an energy efficiency document will be requested for obtaining a renovation licence for restoration. There are two options according to the situation:</p> <p>a) there is no need for an energy efficiency certificate from the Cultural and Natural Heritage Conservation Board,</p> <p>b) proceeding with the company that has Existing Structure authorisation from the authorised survey and project specialists at beptr.csb.gov.tr</p> <p>Letter issued by the relevant competent body clearly stating that an investment is not under the scope of Environmental Impact Assessment (EIA) for the project investment is not necessary. Alternatively, if the competent authority confirms the need for an EIA, a copy of a positive EIA should be provided for all investments.</p>
76	For RCR77 – could we write that we will achieve this indicator after the end of the project?	<p>According to the text in Attachment 5 “Programme’s Indicators Fiches” concerning Result Indicator RCR77 “Visitors of cultural and tourism sites supported”, reporting at project level of the indicator achievement is done up to one year after the completion of the intervention and the estimation of the number of visitors will be carried out ex-post one year after the completion of the intervention. In this regard the achieved value of the indicator is possible to be planned in the period after project completion, but not later than one year after project end.</p>



77	<p>What is the procedure in case that the part of the positions in the quality bill are not available in the Construction Price Guide?</p>	<p>For calculating the total amount of the works in the Bill of quantities each project partner should use construction prices guide stipulated in its own national legislation.</p> <p>Bulgarian project partners may use the Construction Prices Guide. In case there is no price for a certain type of works listed in the Construction Prices Guide applicants may 1) refer to certified project designers to calculate a unit price for the specified works based on the input of materials, labour and other related costs such as transport and storage, mechanization, etc. or 2) make a market research. Supporting documents justifying how the unit prices of works have been determined are not required to be presented with the AF.</p>
78	<p>In regards to the code for economic activity, is it possible to take from the annual report of the firm or is it necessary official document?</p>	<p>For applicants SMEs the main economic activity according to NACE rev. 2 is proved by a Certificate issued by the responsible authority in each country, verifying the business's start date and indicating the principal NACE activity and any complementary NACE activities.</p>
79	<p>For the planned supply, a market analysis is required, as it is recommended to present a minimum of three extracts from national/EU public procurements systems of a similar supply or soliciting offers (along with website references) from at least three independent providers, accompanied by a uniform request for offer. Is it possible to present only a minimum of three website references without offers and accompanied by a uniform request for offer? Is it possible to present a minimum of three prices - 2 extracts from national/EU public procurements systems of a similar supply and 1 from a soliciting offer? Is it required to present at least three prices for each planned item for supply?</p> <p>For the planned supply, a market analysis is required, as it is recommended to present a minimum of three extracts from national/EU public procurements systems of a similar supply or soliciting offers (along with website references) from at least three independent providers, accompanied by a uniform request for offer. Is it possible to present only a minimum of three website references without offers and accompanied by a uniform request for offer?</p> <p>Is it possible to present a minimum of three prices - 2 extracts from national/EU public procurements systems</p>	<p>For the current Call for proposals, market analysis for the planned supply is required by all types of applicants, eligible under the Call in order to verify that the budgeted equipment costs are reasonable. The Interreg Regulation, specifically Article 43, outlines all eligible types of equipment costs.</p> <p>The Contracting Guide outlines three approaches for conducting market analysis for supply of equipment:</p> <ol style="list-style-type: none"> 1) Providing a minimum of three extracts from national/EU public procurements systems of a similar supply with identical technical specifications. This is also the recommended approach by the Guide. 2) Presenting soliciting offers (along with website references) from at least three independent providers. These offers should be comparable in terms of requested technical characteristics, and as such, they must be accompanied by a uniform request for offer. 3) Historical data for concluded contracts from previous similar deliveries. This option is applicable only upon exhaustion of the first two possibilities in the case of procuring highly specialized equipment (with insufficient evidence in national/EU procurement systems) from a limited pool of suppliers, and conducting market research for the equipment cost is not feasible. <p>Concerning the questions raised for the possibility presenting only a minimum of three website references without offers and accompanied by a uniform request for offer, it has to be noted that the presented option does not refer to any of the approaches outlined in the Contracting Guide in its entirety. It is most close to the second approach, but the element of presenting minimum 3 soliciting offers is missing.</p> <p>The second question – whether a possibility exists for presenting a minimum of three prices - 2 extracts from national/EU public procurements systems of a similar supply and 1 from a soliciting offer, it has to</p>



	<p>of a similar supply and 1 from a soliciting offer? Is it required to present at least three prices for each planned item for supply?</p>	<p>be noted that the outlined way of market analysis is not compliant with the Contracting Guide since there will not be satisfied neither the first nor the second approach for conducting market analysis, outlined above.</p> <p>On the third question – whether it is required to present at least three prices for each planned item for supply, it has to be noted that it is required in the first and second options for conducting market analyses, outlined above. In any way applicants have to adhere strictly to the stipulated in the Contracting Guide three options for conducting market analysis and to fully implemented the selected one, i.e. present all the needed documentation for the selected approach in its entirety, without mixing the documentation from different approaches.</p> <p>Please see also the answer of question No 25</p>
<p>80</p>	<p>When planning the costs in Budget Category EXTERNAL EXPERTISE AND SERVICES COSTS, if we plan to elaborate a large number of different types of materials - for example, the production of 10 types of advertising materials, should we allocate them on 10 separate budget lines, or should we allocate them on one budget line "elaboration of advertising materials" with one total amount and fill in Annex A7 for justification to it?</p>	<p>Both approaches are possible depending on the complexity of the advertising materials to be supplied/produced.</p> <p>Please consider that the Contracting Guide requires Annex A7 to be prepared for justification of expenditures planned as a total amount under Budget category 4.</p> <p>Producing a certain type of advertising material, depending on its type and complexity can also constitute a total amount, since the process consists of elements like experts' input, requirements to the type, design and quality, methods of production, etc. In this regard applicants may have to provide detailed description of the expected outcomes from the activity for production of each advertising material, including information about the materials (type, number of copies, number of pages) and calculation of the price, calculation of the envisaged experts' input (if any), including number and type of experts needed, days/months of involvement and remuneration unit rate, etc. Usually this kind of clarification cannot be done on the basis of budgeting of the advertising materials as single budget lines and usage of Annex A7 is advisable.</p>
<p>81</p>	<p>About the co-financing part, if the relevant project partner has own co-financing, how it could show that will exceed the 15% national contribution? Do you think that in line with the structure of JeMS it will be better to add a new contribution origin - namely national co-financing and write that the partners contribution will be 0 - if there is no own co-fin. and in the new contribution line to write that this is automatically co-financing - 15 %?</p>	<p>Project partners may refer to the Instructions for filling the co-financing part of the Application form in JEMS available at the Programme's website at https://ipa-bqtr.mrrb.bg/en/node/145.</p> <p>Project partner that envisage additional contribution from own funds – different than that from IPA and National co-financing funds (i.e. private contribution) they are advised to contact the JS for further guidance on filling the “Co-financing” section of the AF in JEMS.</p>
<p>82</p>	<p>Can the number of people change, provided that the positions in the team we determined at the concept note</p>	<p>When preparing their budgets and section C.7 Project management of the FPP applicant should adhere to the requirements of the Contracting Guide concerning BC 1 Staff costs. These costs can be</p>



	<p>stage remain constant? Can the 1 position we defined in the management team be removed?</p>	<p>reimbursed on the basis of flat rate of up to 20% of the eligible costs under BC 4, BC 5, and BC 6 from the respective partner's total project budget</p> <p>At the stage of project implementation project partners are not required to provide documentation demonstrating that staff costs for project management purposes have been incurred and paid. However, they have to prove that the project team has been established. The proper appointment of the project team has to be in line with the respective national legislation and is responsibility of the beneficiaries themselves. Beneficiaries from the Republic of Türkiye which are public institutions should take into account that according to the national legislation of Republic of Türkiye, they are not allowed to pay any remuneration to the project team members (project staff) that are already working as civil servants. If a public institution plans to designate civil servants in project team, then 0% flat rate for BC1 must be selected.</p> <p>The Contracting Guide does not stipulate that full conformity has to exist between the facts outlined for the project team composition in the Concept note and Section C.7 Project management of the FPP. In this regard applicants have certain flexibility and are free to clarify or broaden their description on project management in the CN by stipulating positions in the future team, their exact number, responsibilities, duration of engagement, responsible partner/s, etc.</p>
<p>83</p>	<p>About the supply: it is written in guide – The recommended approach for conducting this analysis is for the Lead or project partner to provide a minimum of three extracts from national public procurements systems of a similar supply with identical technical specifications. In Türkiye this is mean that we could take screenshots of the DMO - office prices - of their online web site?</p>	<p>The Contracting Guide outlines three approaches for conducting market analysis for supply of equipment in Section 1.2.2 'Budget and co-financing', BC 5 Equipment costs (page 23). Applicants have to adhere strictly to the stipulated approaches and to fully implement the selected one, i.e. present all the needed documentation for the selected approach in its entirety, without mixing the documentation from different approaches.</p> <p>For Turkish beneficiaries it is not recommended to use first option (pls see the answer of question 79) as in Türkiye, Turkish public procurement procedure is not used for the procurements of the projects. The prices of the DMO may be different than the market prices which may cause difficulties in procurement process.</p>
<p>84</p>	<p>Can one person be responsible for more than one job or position specified in the concept note? For example, can the project assistant also be a sustainability expert?</p>	<p>Please see the answer to Questions 23, 24 and 82.</p>
<p>85</p>	<p>What other documents you will ask during the contracting stage?</p>	<p>During the contracting stage the MA may request documentation if necessary by applicants on a case by case basis. According to the Contracting Guide, before the contract is finalized, all project partners of the FPP will be required to submit 1) updated State Aid declaration (Annex 6) for the MA/NA/SWG to conduct the most recent state aid assessment (please, see Attachment 2), and 2) a Declaration in accordance with Article 5l of Council Regulation (EU) No 2022/576 dated April 8, 2022.</p>



86	In the Subsidy contract – art. 3. P. 3 – does this mean that the LP is responsible for the non-eligible expenditures of the partners or only of its?	In accordance to Article 23 5 from the Interreg regulation one of the project partners should be designated as a Lead Partner. The Lead Partner takes full financial and legal responsibility for the implementation of the entire project. The subsidy contract sets out lead partner's obligations incl. with regard to recoveries pursuant to Article 52 of the Interreg regulation.
87	Can we launch a procurement procedure „with unsecured funding“ prior of the signing of the Subsidy contract? That way we shall have more time if some appeals incurred for the procedures.	<p>Bulgarian project partners are permitted to launch procurement procedures even when funding is not yet secured, in accordance with Article 114 of the Public Procurement Act. Methodological instructions from the Bulgarian Public Procurement Agency regarding the implementation of this article are publicly available.</p> <p>However, applicants should be aware that the Joint Secretariat (JS) approves the procurement plan of the project. If the JS identifies discrepancies in the procurement plan and tender procedures have already been announced under Article 114, the responsible partner will need to bear the risk in such situations.</p> <p>For Turkish beneficiaries there is no such option.</p>
88	If decision of the Municipal council has been issued for approval of preparation and submission of the Concept note, is it necessary to be issued again for the FPP, in case the partnership, and the content of the project has not changed?	<p>All project partners are required to present a document from the decision making body of the organization regarding the development and implementation of the FPP, and ensuring the sustainability of the project results for five years after completion of the implementation period. The type of the document depends on the legal status of the project partner.</p> <p>A conclusive opinion on the matter cannot be expressed, as the adoption and implementation of such a decision by the organization's collective decision-making body are contingent upon numerous specific factors. These factors include the applicable national regulations and the internal governance rules of the organization.</p>
89	Who issues and signs the explanatory note for the protection of water bodies in cases of emergency? An authority, the LP or each PP that has planned investments?	<p>For Bulgarian project partners. The explanatory note for the protection of water bodies in cases of emergency should be presented for all cases when such measures are deemed necessary by the competent authority (River Basin Directorates) in the issued letters for compliance to the Basin Management Plans and Flood Risk Management Plans.</p> <p>For Turkish project partners the competent authority is Ministry of Agriculture and Forestry, Directorate General of Water Management (Tarım ve Orman Bakanlığı, Su Yönetimi Genel Müdürlüğü).</p> <p>These explanatory notes should be elaborated by experts that possess the necessary competence according to national law (i.e. technical experts with specialized knowledge in hydrology, environmental science, ecology or engineering; water resource managers who specialize in the management and conservation of water resources).</p>



<p>90</p>	<p>When filling out the state aid declaration, we encountered discrepancies in the information from the Yambol Municipality and the information published in the state aid register. Which values should we fill in - those submitted by Yambol Municipality or those in the register? Which values in euros should we give - those from the state aid register, which are not at the official rate of 1.95583 leva for 1 euro, or those calculated at the official rate of 1.95583 leva for 1 euro?</p>	<p>In general, a single undertaking can receive de minimis support of up to EUR 300 000 per Member State over any period of 3 years, prior to the date of grant. In order to ensure strict observation of the set maximum thresholds, in accordance to Art. 6(1) of Regulation (EU) 2023/2831 the Managing Authority requires Bulgarian partners to declare any de minimis aid received in any period of three years. The provided information shall be verified through the public Register of the de minimis aids, available on the webpage of the Bulgarian Ministry of Finance (http://minimis.minfin.bg/).</p> <p>Applicants who observe/experience inaccuracies in the information in The Register of De Minimis Aid concerning their organizations should contact the administrator of the respective grant directly (the body that has granted the aid) or the Bulgarian Ministry of Finance, which is the body that maintains the de-minimis Register.</p>
<p>91</p>	<p>How we can select a group of output indicators in JeMS?</p>	<p>Based on the activities, described as needed to be implemented to achieve the specific objective in a concrete Work Package, the applicants have to list the output/s that will be delivered during the implementation on a Work Package level. In order to do so, the applicant/s have to define a title of each project specific output and to select a Programme Output indicator to whose achievement it contributes, as well as a measurement unit, target value and delivery period, and to provide a description of the output. According to the specificity of JeMS, one Project Specific Output relates only to one Programme Output Indicator.</p> <p>In this regard, in case the applicants estimates that a concrete Work Package will lead to achievement of two or more Programme Output indicators (a group of Programme Output indicators) then the applicant has to define first corresponding project specific outputs that correlate to the respective Programme Output Indicator/s.</p>
<p>92</p>	<p>If some of the partners have to purchase only small IT equipment - as in our case it is one photo camera and one laptop and printer, do we have to make a separate Investment activity section in the system. Please, don't tell that we have to do, because it is not actually some infrastructure activity or any equipment that will be installed and actually is not responding to the meaning of the investment section's questions.</p>	<p>“Investments” refer to allocation of resources in equipment (defined as “supply” within this call) and/or investment in infrastructure (defined as “works” within this call).</p> <p>It is assumed that investments should lead to tangible and measurable outcomes in durable assets with the goal of achieving specific project objectives.</p> <p>Supplies that the applicant has described – photo camera and laptop - if used solely for indirect project activities (like project management and reporting) should not be classified as investments in the work packages.</p>
<p>93</p>	<p>Please, clarify the issue with the Tax debts of the Turkish and Bulgarian beneficiaries. Will you respect the written text in the guidelines or will ask for something else? Thank you!</p>	<p>Please see the answer to Question 57.</p>



<p>94</p>	<p>In JEMS, part E.1 - Project lump sums, in column "Split up" I cannot select "No" in order to write the preparation costs only for Yambol Municipality. We have planned costs only for Yambol Municipality, but there is option only "Yes" and in Column "Gap" is calculated 9 300 euro. How to solve this?</p>	<p>For FPP, the project preparation costs are capped at EUR 12,000 per project proposal and cannot be altered. In JEMS the total amount of EUR 12 000 should be allocated only in the budget of the Lead partner in the "Lump sum" section of the Application Form. The "YES" option in the "Split up" menu is predetermined and relates to the fact that project partners may add in their partnership agreement how the total costs of EUR 12 000 are distributed among project partners.</p> <p>In order to assist project partners JEMS functionalities show discrepancies in the budget elaboration in the "GAP" section (meaning that the only values the lump sum field accepts are "0" or "12 000").</p>
<p>95</p>	<p>Is it permissible to change any of the actions in the project, provided that they will not lead to a change in achieving the goals and results?</p>	<p>Please see the answer to Question No 64.</p>
<p>96</p>	<p>We envisage installation of autonomous photo solar street lighting units. Is Energy efficiency report required in this case?</p>	<p>For Bulgarian project partners: According to Energy Efficiency Law energy efficiency measures should be planned in all investment works designs for:</p> <ul style="list-style-type: none"> - construction of new buildings; - reconstruction of buildings, which change energy characteristics; - renovation or major repair of a building, when it covers more than 25 % of the area of the external enclosing structures and elements of the building that change the energy characteristics. <p>The energy characteristics of new buildings are certified with a certificate of energy characteristics. The energy efficiency certification of buildings in operation and of parts of buildings in operation is carried out on the basis of a survey for energy efficiency.</p> <p>Public service buildings in operation with a built-up area of more than 250 sq. m and the buildings in operation are subject to mandatory examination and certification, with the exception of:</p> <ol style="list-style-type: none"> 1. the prayer houses of legally registered religious denominations; 2. temporary buildings with a planned use time of up to two years; 3. non-residential buildings with low consumption of energy used for agricultural activity 4. production buildings and parts of buildings with production purpose 5. residential buildings that are used as intended for up to 4 months annually or alternatively during a limited period of time in the year and are with expected energy consumption, less than 25 percent of the expected at year-round use; 6. separate standing buildings with extended built-up area up to 50 sq. m.



		<p>Energy efficiency survey is also mandatory for systems for outdoor artificial lighting located in settlements with more than 20 000 inhabitants.</p> <p>For Turkish project partners:</p> <p>There is no energy efficiency report/audit requirement for the installation of autonomous photo solar street lighting units in Turkey.</p> <p>The Energy Efficiency Law (EE Law) introduced energy audits, energy management program, establishment of energy efficiency companies and financial support schemes. The EE Law targets industrial facilities, building and service sectors, transport sector and also power plants; generation, transmission and distribution networks.</p> <p>Pursuant to the EE Law and the Regulation on Increasing Efficiency in the Use of Energy Resources and Energy, obliges to conduct energy audits in:</p> <ul style="list-style-type: none"> ○ Industrial plants with a consumption of more than 1 000 toe per year, ○ Buildings in the services sector with a total built area over 20 000 m² or with an annual energy consumption above 500 toe, ○ Public buildings with a total construction area over 10 000 m² or with an annual energy consumption above 250 toe, <p>The audits need to be renewed every four years for industrial plants and every seven years for buildings.</p>
<p>97</p>	<p>Since, according to Turkish legislation, to be able to get construction permit, firstly a tender must be launched and finalized, a contractor must be selected and after that the contractor should applies for a construction permit. Although there is a construction activity, can we submit a declaration instead of the Building Permit (page 46) in the A8.2 Permits section of the guide when submitting the FPP?</p>	<p>According to Turkish Legislation, Public Procurement Communiqué Article 53.4.1. as mentioned in your question, if the contractor will be determined by a tender procedure for implementation or project design, instead of the supporting document A8.2 Construction Licence, a declaration approved and signed by the official of the institution that will provide the licence can be submitted, clearly stating the project information and that the construction permit will be provided.</p> <p>We would like to remind you that if the project designs are provided by your public institution and the contractor will be determined by the tender only for the implementation and the zoning status meets the conditions, a construction permit can be obtained with the preliminary project without determining the contractor authorisation document number according to Article 56.2 of the Planned Areas Zoning Regulation and Article 37 of the Unplanned Areas Zoning Regulation. The tender is launched after the contract as in the Programme Guide. For the implementation of this option, you can contact the institution where you will obtain the licence, the applications may differ according to the plan notes.</p>



98 We are still on progress for the budget details of our investment activity of our Municipality. In this investment we have a building restoration activity. Today we have received the prices from our technical operation office which is over our project budget. At that point we ordered them to take out some units of the works, to decrease the budget amount. However we are not sure if they can succeed on this.

Our question is that: If we have a higher budget than we have requested in the concept note and if the total budget our common project is more than 1.000.000 euros, can we make municipal financial contribution to our project and continue our project? If there is a financial contribution possibility, is there a limit for this contribution percentage or amount?

While contributions from partners' own resources are not mandatory, applicants have the option to provide their own co-financing, which should be explicitly outlined in the project budget and will undergo verification.

Please note that the grant amount of the full project proposals should not exceed the envisaged grant amount of the concept note.

There is no maximum limit to the funds a partner can contribute towards the project.

In case you plan to include own co-financing, the entire budget must be well justified and detailed.

Any own-contribution should be specified by a partner in Annex 3 – Partnership and co-financing statement, as well as in the Application form.