Interreg

Greece – Bulgaria

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Frequently Asked Questions

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6TH CALL _CALL FOR TARGETED PROJECT PROPOSALS_ SMALL PROJECTS FUND UNDER PRIORITY 1 & RSO2.6

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The category Budget does not have any FAQs

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5TH CALL _CALL FOR TARGETED PROJECT PROPOSALS_ SMALL PROJECTS FUND UNDER PRIORITY 3 & RSO4.6

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4TH CALL_CALL FOR TARGETED PROJECT PROPOSAL _ PROJECT OF STRATEGIC IMPORTANCE IN IMPROVEMENT OF MOBILITY

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1ST CALL_CALL FOR COMMON PROJECT PROPOSALS - STAGE B

Application (Procedure & Documents)

Criterion_Project Maturity

Please confirm that criterion “B3 Maturity of the project” will be applied only to activities related to equipment and infrastructure, and it will not be applied to activities related to external expertise and services.

As it is stated in Annex 15b “This criterion applies specifically to infrastructure and equipment-related activities.”

Maturity_Scoring Methodology

Regarding the maturity-related criteria in Annex 15b – Evaluation Grid Phase B2, we noted that: • Projects whose physical content require studies, design solutions, surveys, procurements receive maximum 10 points, and projects that do not require studies or procurement preparation receive maximum 5 points; • Projects requiring licensing procedures receive 5 points, and those who do not require licenses receive maximum 3 points. In the case of a project where: • The Lead Beneficiary implements infrastructure requiring procurement and permits, and • A Project Beneficiary implements only delivery of equipment not requiring any studies or permits, we kindly request clarification on the following: 1. How is the maturity score calculated in this case? o Is the score averaged across all beneficiaries? o Or is one maturity score applied to the entire project based on the most demanding component (e.g. infrastructure)? 2. Would the presence of a Project Beneficiary with no maturity requirements reduce the total maturity score, or is this handled separately for each part of the partnership? This clarification is important to ensure fair expectation-setting across different types of beneficiaries during project planning and application. In projects where certain partners implement infrastructure works or equipment purchases, the scoring of these criteria will be based solely on the maturity level of those specific actions. In such cases, the soft activities of the other partners will not affect the score.

Maturity is assessed at the project level, not at the partner level; therefore, a project beneficiary implementing equipment or infrastructure works without sufficient maturity will impact the overall score.

Annex 15b provides a detailed explanation regarding the scoring methodology for criteria B3a and B3b. In cases where all project partners implement only soft activities (i.e. the project includes exclusively staff costs, office and administrative costs, travel and accommodation costs, and external expertise costs), the scores for these criteria will be 5 and 3 respectively.

State Aid Declaration _clarifications

I would like to request clarification regarding the State Aid Declaration that must be submitted by each Beneficiary as part of the application package. The statement reads: "In the fiscal year in progress and in the two previous fiscal years the organisation I represent and all other entities belonging to the same company group did not benefit / benefited (as stated below in the table) from De minimis funding." In this context, we would like to ask: Which database should be used as the official source for verifying the De minimis aid received? Should the information be taken from the BG De minimis Register, the Greek national register on state aid (SOREFSIS), or another specific database designated by the Programme?

Beneficiaries should refer to the official national register of De minimis funding applicable in their country when verifying and declaring De minimis aid. Specifically:

• For Bulgarian entities, the BG De minimis Register should be used. https://minimis.minfin.bg/

• For Greek entities, the relevant source is the Greek national register on State Aid (SOREFSIS).

MIS/ AF/ Additional information

MIS/ AF/ Additional information/ question 30: Please clarify the meaning of each of the available options: Direct payment/ Indirect payment – Funding / Indirect Payment – Special Account.

Please note that this field is not required at this stage. It will be compulsory in case of approval. It concerns ONLY the Greek partners and refers to the way the payments are executed, selecting the appropriate value from the available list. More particular:

Direct payment: The payment by the Accountable Entity / Project Officer is made by paying the corresponding amount via e-PDE directly to the contractor’s bank account.

Indirect payment – Grant: The indirect payment – grant shall be made by the Accountable Entity / Project Officer by transferring a credit to the specific blocked bank account of the beneficiary. The release of the funds for making the final payments (payment of suppliers, transfer of credits directly to the beneficiary) shall be made in accordance with the respective institutional framework applicable in each case.

Indirect Payment – Special Account: the payment without an accountable entity is made by transferring credit to a Special bank Account (it concerns Special Accounts for Research Funds of eg. Universities, Regional Health Authorities,..) In case “other kind or combination of payments” is selected, analytical description per each Greek partner has to be provided in the comments.

MIS – Project Duration

What date should we enter in MIS as a start date?

At Stage B you can edit the start and end date of the project. You may indicate 01/10/2025 as

the estimated start date. This start date is not binding.
In case your project is approved for funding, the start and end dates may be adjusted during the contracting phase, if needed.
In any case, it is crucial that the project duration does not exceed 24 months.

Budget

Activity (staff or external costs)

A state forest enterprise is among selected partners and it possesses licenses for afforestation, since it is part of their activity. Can it implement afforestation by itself, following the internal procedures, and not outsource this activity using public procurement?

If the state forest enterprise is a project partner and afforestation is part of its allocated tasks under the project, it may implement the activities by its own means, using its own resources following the Bulgarian Legal Framework and the necessary decisions imposed by its internal procedures, without public procurement. In this case, those expenditures are to be budgeted in staff cost budget category, but still bear in mind that according to REGULATION (EU) 2021/1059 form 24.06.2021 Staff costs shall be limited to the following: (a) salary payments related to the
activities which the entity would not carry out if the operation concerned was not Undertaken. In that sense, please justify in your application the activities which the entity would not carry out if the operation concerned was not Undertaken.
In cases where the activity requires the purchase of materials or of equipment or external expertise services from third parties, national and EU public procurement rules must be followed accordingly.

Costs for verification

Please clarify whether Bulgarian applicants should envisage costs for verifications in their budgets.

In the Greece–Bulgaria Programme 2021–2027, costs for verifications are not applicable for beneficiaries from either country.

Preparation Costs clarifications_2

Please clarify if the preparation costs will be eligible even if they are not fully paid before the deadline for application in Stage B. The question concerns cases in which beneficiaries put clauses with responsibilities to contractors which go beyond the deadline for application to Stage B – for example, revision of project documents in case of evaluators recommendations, etc. Additionally, the beneficiaries can put clauses of payments which are due after the project

is approved, etc.

The provision for the preparation costs is set out in the Programme & Project Implementation Manual.
Preparation cost must be included in the **Application Form/Stage B in the Deliverable 1X1 “Preparation Activities”** (where X is the number of the beneficiary).
The services or activities must be implemented and there must be at least a commitment decision for them between 1st of January 2021 and the date of submission of the Application Form. The related invoices and payments could be issued and made after the project is approved. The payments for preparation costs should be included preferably in the first request for verification.

Preparation Costs_clarifications 1
About the Preparation Cost, in the implementation manual pages 65 pointed out the sentence "If the services or activities were implemented and there is at least a commitment decision for them between 1st of January 2021 and the date of submission of the Application Form". The commitment decision should be prepared under any specific legislation, or its according to the body that will apply for the preparation cost. Also in the pages 65-66 it states that: the following external expertise costs and/ or staff costs for the preparation of the application documents are eligible: c) cost analysis and preparatory research reports for the project activities Programme and Project Implementation Manual d) costs for the preparation of technical design studies, compliance reports, licenses fees, environmental impact assessment studies, technical assessment reports. Can the Project Beneficiary to use the costs for the preparation of the Annex 7:The 'Project Analysis Report' and the Annex 8:The 'Climate Endurance Validation Report' during the preparation of the project proposal.

Yes, the above costs may be considered as preparation costs, provided that all other applicable eligibility conditions are met.

VAT recovery
For an organization with “partially recoverable” VAT status, and considering Law 3281, 17/05/2023/ art. 24, please clarify if the VAT, in the context of the Programme, will be completely eligible for them. In the AF / Partnership section, how should they fill in the VAT condition question?

VAT is eligible expense for all projects with budget under 5.000.000€ for all types of beneficiaries.
In the AF / Partnership section, each beneficiary is required to declare their applicable VAT status, irrespective of whether VAT is considered eligible or not.

Eligibility of Activities

Project Changes in Stage B

Please confirm that changes of projects at Stage B are possible compared to the content of Concept Notes, when they derive from received comments and recommendations included in the evaluation results at Stage A.

Yes, this is correct.

Eligibility of Beneficiaries

Partner Change in Stage B

I would like to know if we can make a change of partner at this stage, as with some changes that are being made in Bulgaria, we have been contacted with this question. If we can't at Stage B' is there a possibility that it can be done afterwards or is there no such possibility?

In the context of the present 1st Call for Project Proposals – STAGE B, are invited EXCLUSIVELY the Partnership Schemes of the relevant positively assessed proposals as approved to participate in Stage B.
The composition of the partnership, as approved in Stage A, shall be maintained without modifications **under penalty of disqualification.**
During the Implementation phase, there are in duly justified cases provision for the Modification of the composition of the partnership. For more information, please check the Programme & Project Implementation Manual/Modifications/Modifications approved by the MC

Eligibility of Expenditures

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Eligible Area

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3RD CALL_CALL FOR TARGETED PROJECT PROPOSAL _ CAPITALIZATION OF PROJECT "FLOOD PROTECTION" OF THE 2014-2020 PROGRAMMING PERIOD

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