

FAQs (v.4) on the 5th Call_Date: 20/05/2019

Q.89) Is there any restriction concerning the location of an enterprise; should it be located within a public building? Normally, there will be a lease (e.g. in a hospital or a city hall). Moreover, are construction works in this location considered eligible?

A.89) There is no such restriction foreseen by the Call. Construction works are eligible, unless there is a different provision in the lease agreement, which must be long-term (Annex II, point 2), and in that case the necessary authorizations should be ensured.

Q.90.a) Is the purchase of a commercial vehicle (car with a trolley) - to be used by the seller of the company - eligible? (The trolley is necessary for the transportation of the sample products that are marble tiles).

A.90.a) The purchase of vehicles is eligible if the vehicles are linked to the main activity of the enterprise (NACE code) for which the aid is claimed.

Q.90.b) Concerning the offer for the construction of a warehouse by the Bulgarian company, which has already issued the building permit, what documentation is required?

- A technical report with a detailed project budget, signed by an engineer?
- For the calculation of the cost, are there any parameters the engineer should take into account? Are there any caps on unit prices of construction works which should be taken into account?

A.90.b) The beneficiary, should submit the documentation that is foreseen by his country's national institutional framework. The formal supporting documents to be submitted are listed in Annex VII of the Call document.

Q.91) In Paragraph 12.2 of the Call (page 36) it is stated that: "Stage B evaluation is done on the basis of groups of criteria. Each group contains several criteria against which each application is scored. The total scoring for each group is the sum of the individual scores weighted by specific coefficients. It is mandatory that each application receives a minimum score for each group of criteria." **QUESTION:** Is there a minimum score per group of criteria that should be reached by a project proposal? Should a project proposal receive a minimum score in all 3 groups of criteria in order to be approved and if yes, which is this score?

A.91) There is no such requirement foreseen by the Call. Please refer to Annex V of the Call document, in which it is stated that: “Minimum acceptable total score: 40%”.

Q.92) Do you plan to publish the Declarations which have to be submitted together with the project proposal in an editable format? Is there a CV template the applicants should follow?

A.92) Annexes IV and VIII have been uploaded in a word format on the Programme website: http://www.greece-bulgaria.eu/call-for-proposals/6_5th-CALL-FOR-PROPOSALS-OF-THE-CP-INTERREG-V-A- .

Q.93.a) Is the consultant's fee for submitting an application form eligible? In the Call document it is written that: “Expenses for services related to the implementation and monitoring of the investment plan (e.g. submission of progress reports, grant payments, etc.)”; and that “Expenses for preparatory activities such as costs for feasibility studies”.

A.93.a) Please refer to the Call document (latest version of the Call document_09.05.2019):
- point 8.2.7: “Expenses for services related to the **preparation, submission, implementation and monitoring of the investment plan (e.g. submission of progress reports, grant payment claims, etc.)**” → **These are eligible**
- paragraph 8.3. NON ELIGIBLE EXPENSES: “iv. Expenses for preparatory activities such as expenses for feasibility studies” → **These are not eligible**

Q.93.b) Is the consultant's fee invoiced by the Lead Beneficiary?

A.93.b) The consultant’s fee, if required, is invoiced by each beneficiary of the proposal.

Q.93.c) For the Greek beneficiary’s expenditures, one bid per expenditure is required, while for the Bulgarian beneficiary’s expenditures three offers per cost are required. Which bid will be selected from the three; the most economical one?

A.93.c) The bids describe the claimed expenditure. The Bulgarian enterprise, according to the national institutional framework of Bulgaria, is following an award procedure.

Q.93.d) In case of a warehouse construction, the offer will include a technical description as well as a detailed budget with measurements signed and sealed by an engineer? Is anything else required?

A.93.d) The above as described.

Q.93.e) Concerning the enterprise's installation and operating license document: if an enterprise has 2 NACE Codes and the investment concerns one of them e.g. wholesale; but the enterprise has an installation and operating license for its second NACE Code, e.g. manufacturing, will this license be submitted?

A.93.e) The enterprise must meet the operational criteria, as they are defined by the institutional framework of the two countries, for the NACE Code for which the aid is requested. You should check if you need an installation and operating license for wholesale trade. Please note that the investment should concern the enterprise's main activity NACE Code.

Q.94) Regarding the 5th call for proposals, paragraph 5D: *"Intended strategic partnership agreements (i.e. a binding agreements committing the companies to specific future cooperation terms) which can take any of the forms described under the following bullets; this is a pre-requisite for all new enterprises applying for financial support; invoices are not obligatory for new enterprises, but if they exist, they could add points to the evaluation score"*.

If invoices are not obligatory for new enterprises, do we need to provide any sort of past invoices of intended agreement in the case of existing enterprises?

A.94) Yes, existing enterprises must submit invoices of intended agreement. Only the new established enterprises are not obliged to submit invoices in case of non-existence.

For existing enterprises, also the 3rd bullet of Paragraph 5.D applies: "Documentation of existing strategic integration partnerships/"bundling" agreements (i.e. two or more companies cooperating to offer a streamlined service to customers; e.g. cooperation between a PC producer with a software developer in order to offer a computer loaded with software to the market) and corresponding cost-sharing/profit-sharing documentation and/or invoices."

Q.95.a) Which documents are annexed under p.18 from Annex VII REQUIRED APPLICATION DOCUMENTATION in case the owner of the newly registered company (applicant and/or partner) is a legal entity?

- General information regarding the qualifications of the enterprise owners/legal representatives
- Curriculum Vitae describing the relevant experience, including experience in the implementation of similar business investments.
- Education Degrees (e.g. Post-Graduate Degree, University Degree, Baccaureate). If from a foreign Institution, then the Degree must be recognized by a proper National Body.
- Proof of other training received (e.g. certificates from seminars completed).
- Employment record certificates/employer recommendations (if applicable). The certificates should mention the duration of the employment and the duties performed

A.95.a) The legal entity will have a legal representative even in the case of a newly registered company. His documents have to be submitted.

Q.95.b) Is it necessary to attach documents (CV and all supporting documents) for the legal representative/s of the applicant/ partners (as mentioned in p. 18 of Annex VII), bearing in mind that the in Annex V Evaluation Criteria, as well in Annex I_2, par. 2.1.7., 1st GROUP OF CRITERIA: «Human assets guaranteeing investment success», p. 4, Do the combined skills/know-how of the enterprise owners cover the required for the planned investment skills and competences? (Annex I_2, par. 2.1.7) refer only to owners and do not include the legal representatives?

A.95.b) Yes, they are necessary and they are included in the check list of ANNEX VII : REQUIRED APPLICATION DOCUMENTATION.

Q.95.c) Are the declarations/ documents mentioned in Annex V Evaluation Criteria, which are not listed in the Annex VII as mandatory to attach, such as:

- i. Decision by the appropriate board to submit the application for funding (for enterprises other than sole proprietorships)
- ii. Declaration that the beneficiaries are going to cover their own contribution OR appropriate documentation demonstrating the availability of own funds.
- iii. Non-coverage of expenses incurred before the expenditure eligibility start date of the Call. Is there a declaration signed by the legal representative of the beneficiary enterprise?
- iv. Description of new jobs to be created and documentation of necessary personnel costs (if investment plan includes personnel expenses)
- v. Free format or the Programme will publish templates? Are these declarations/ documents attached via the SA MIS?

A.95.c)

- i. The Programme does not provide applicants with a template for this document. It's an internal document of each enterprise. Each applicant has to compose it, get the approval of its board of shareholders and submit it.
 - ii. It is included in Declaration A of Annex VIII, point A.xix.
 - iii. It is included in Declaration A of Annex VIII, point A.v.
 - iv. The Programme does not provide applicants with a template for this document. Each applicant has to prepare and submit this document on his own and according to his investment plan.
 - v. Annexes IV and VIII have been uploaded in a word format on the Programme website: http://www.greece-bulgaria.eu/call-for-proposals/6_5th-CALL-FOR-PROPOSALS-OF-THE-CP-INTERREG-V-A- . The applicants have to fill them in according to the call guidelines and upload them on SAMIS.
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Q.95.d) Please, confirm that the *“Description of new jobs to be created and documentation of necessary personnel costs (if investment plan includes personnel expenses)”* is a separate document, which is mandatory to attach to the project proposal via the SA MIS?

A.95.d) Yes, the Programme does not provide applicants with a template for this document. Each applicant has to prepare and submit this document on his own and according to his investment plan. In case the investment plan includes personnel expenses, this document is mandatory to be attached on the SA MIS and be included in the physical folder containing all the required documentation.

Q.95.e) Will the Programme provide editable templates of the Declaration, which the applicant and the partner have to fill in and submit with the project proposal?

A.95.e) Annexes IV and VIII have been uploaded in a word format on the Programme website: http://www.greece-bulgaria.eu/call-for-proposals/6_5th-CALL-FOR-PROPOSALS-OF-THE-CP-INTERREG-V-A- .

Q.95.f) Since there are plenty of other documents and declarations, which have to be submitted with the application form and which are not listed in Annex VII REQUIRED APPLICATION DOCUMENTATION but are listed in the Annex V Evaluation Criteria, does the MA plan to publish an updated Annex VII, which includes all the necessary attachments (incl. for example an ID/passport photocopy of legal representatives).

A.95.f) All required declarations are included in Annexes IV and VIII of the Call. Please refer to the latest revised version of the Call document (09.05.2019).

Q.95.g) Is it necessary the documents issued by Commercial Register, National Statistic Institute or license documents, to be presented in English?

A.95.g) No, they can be submitted in the Beneficiary’s official language (Greek/Bulgarian).

Q.96) According to the index for the required documentation, sequence number 6, *“ If a license/permit is not required/applicable, a Declaration or Affidavit (whichever is legally binding in each country) by the legal representative of the enterprise “that no license/permit is required according to legal procedures in the country of business installation”.*
In case of several linked enterprises, for which no obligation for license/permit is applicable, could this be stated in the same paper of Affidavit or should an Affidavit of the same context be issued for each enterprise separately?

A.96) Only the enterprises that apply an investment plan (submit an Application Form) under the 5th Call should submit the Declaration or Affidavit.

Q.97.a) At the Info days, organized for the 5th Call rent of premises was declared as eligible expenses. In the Direct assistance guidelines, there is no information where these expenses should be planned in the budget. In Budget break down - p.9.4 the rent is not mentioned.

A.97.a) The question has already been answered in FAQ1_Q/A No.6: *“In the context of the 5th Call, operating and consumable costs have not been included in the eligible costs and therefore are not eligible”*. (Paragraph 8.3. NON ELIGIBLE EXPENSES: point v. Operational expenses and consumables)

In the Info days as well as in the Call document*, a reference was made to the property status of the land or building where the investment will take place.

*ANNEX VII: REQUIRED APPLICATION DOCUMENTATION - Point 13: *“Property Status of the land or building where the investment will take place (whichever is applicable) such as: Rental agreement or concession agreement for use of property legally signed, notarized and/or registered at the appropriate legal entity as per the National Legislation of each country. The duration of the rental agreement or concession agreement must fulfill the conditions stated in these Guidelines”*.

Q.97.b) ANNEX VII: REQUIRED APPLICATION DOCUMENTATION, p.16 requires: *“For the Bulgarian beneficiary: from at least 3 separate suppliers/contractors offers for all promotion actions (e.g. exhibitions, etc.). Please specify what the offers for exhibition should include – logistics or participation fee, or something else in particular? It is not possible three offers to be collected for the participant fee of one and the same event? What other kind of promotion actions are expected to be proved by three offers? Does this category /promotion action/ include printing materials, internet advertising, logos, travel and lodging expenses of staff, etc.?”*

A.97.b) ANNEX VII: REQUIRED APPLICATION DOCUMENTATION - Point 16: *“For Bulgarian beneficiaries three (3) price offers or pre-invoicing are requested, from at least 3 separate suppliers/contractors for each new asset included in the investment plan (such as machinery, equipment, vehicle, IT equipment and software) and for all promotion actions (e.g. exhibitions, etc.)”*.

Footnote 39: *“Please note that especially in the case of construction works one (1) offer (or Bill of Quantities and costs) is enough for the Bulgarian Beneficiaries and in case of*

promotion actions, one (1) offer (print-screens from websites of relevant operators are accepted) is enough for the Bulgarian Beneficiaries”.

Q.97.c) Please clarify the score given for STAGE B EVALUATION, First group of criteria, Criteria 4 – the last description.

A.97.c) The rating refers to the relevance of an entrepreneur’s skills/competences, in relation to the investment plan submitted. These skills can be proved through his training, knowledge and experience.

Q.97.d) If the investment and the enterprise activity do not require obtaining of patent or exclusive right for any EU or other world country, by principle what is the score given in Second Group, Criteria 2 and 5.

A.97.d) Please refer to ANNEX V: EVALUATION CRITERIA of the Call document. According to the scheme of the project consortium, define the category your scheme belongs to and check the corresponding evaluation criteria and their rating.

Q.97.e) Are employer recommendations enough to prove the duration of the employment and the duties performed by the person(s), designated as responsible for the investment as well as for enterprise owners?

A.97.e) Please refer to the Call document, ANNEX VII: REQUIRED APPLICATION DOCUMENTATION -points 17 and 18, for the required documentation regarding the qualifications of the person(s) designated as responsible for the investment and of the enterprise owners/legal representatives.

Q.97.f) Please clarify what exactly is meant by the requirement: the person designated as responsible for the investment to have implemented at least 3 similar investment plans?

A.97.f) The person designated as responsible for the investment plan (project manager) should have implemented at least 3 projects supporting the SMEs at national and/or European level.

Q.98.a) In the guidelines p.8.2.4 concerning Personnel expenses is explained that Eligible expenses include: *“Expenses for personnel services rendered under external contracts (e.g. R&D, other specialized services, etc.), if such staff is necessary for the implementation of the investment plan”.*

We understand that it includes also services like technical project development, consultancy on production technology plans, etc. If these services will be contracted with external

experts /as explained above/, how is expected the beneficiary to meet the requirement from the remark of the same point namely: IN THIS CASE, ALL PERMANENT JOBS (NEW AND EXISTING) ASSISTED MUST BE MAINTAINED IN THE BENEFICIARY ENTERPRISE AND IN THE ELIGIBLE ENTERPRISE FACILITY/SITE OF OPERATION FOR A PERIOD OF AT LEAST THREE YEARS AFTER THE COMPLETION OF THE INVESTMENT.

We understand that contracts with external experts are not permanent jobs but the Guidelines in the same point categorise it as staff. Please clarify.

A.98.a) The above mentioned requirement applies only for permanent staff.

Q.98.b) p.8.2.7 regulates the eligible expenses, related to the provision of technical/consulting services by external consultants, necessary for the achievement of the investment goals– and are incurred over the eligible investment period. According to this point for all these services the beneficiaries must have a valid contract (drafted and registered according to National Legislation) with the external consultant and invoices for all expenses claimed - are these required /the contract and the invoices/ at the stage of application submission or it concerns the investment period.

A.98.b) It concerns the implementation period of the investment plan.

Q.98.c) Since the rent of premises is eligible expenses as it was explained in the Info days, please advise in which budget category it should be included.

A.98.c) The question has already been answered in FAQ1_Q/A No.6: **“In the context of the 5th Call, operating and consumable costs have not been included in the eligible costs and therefore are not eligible”.** (Paragraph 8.3. NON ELIGIBLE EXPENSES: point v. Operational expenses and consumables)

In the Info days as well as in the Call document*, a reference was made to the property status of the land or building where the investment will take place.

***ANNEX VII: REQUIRED APPLICATION DOCUMENTATION - Point 13:** *“Property Status of the land or building where the investment will take place (whichever is applicable) such as: Rental agreement or concession agreement for use of property legally signed, notarized and/or registered at the appropriate legal entity as per the National Legislation of each country. The duration of the rental agreement or concession agreement must fulfill the conditions stated in these Guidelines”.*

Q.98.d) p. 8.5.2 concerning the Period of completion says: *"The time period for the completion of any investment supported through this Call shall be three (3) years"*. Is this sentence saying that it is obligatory the Projects duration to be 3 years?

A.98.d) The time period for the completion of any investment supported through this Call shall be three (3) years. The start date of each investment project can be specified in each beneficiary's application but the start date cannot be prior to the announcement of the Call (21/12/2018) and the completion date cannot exceed 3 years from the grant approval date.

An extension – up to six (6) months - may be given after a well-documented application is submitted to the Managing Authority/Secretariat at least two (2) months before the completion date. After the extension is approved the grant approval decision must be amended.

Also, p.8.1 *"...The maximum allowable period for the completion of the investment is three (3) years..."*

Q.99.a) If, for the previous three consecutive fiscal years, we had of EU project by "de minimis" aid for 20.000,00 euros and now we want to build a building for approximately 500.000 euros and one machine for 100.000 euros in INTERREG V-A program, how much will be the maximum aid granted of INTERREG V-A ?

A.99.a) The threshold of the de minimis rule is EUR 200.000,00 (for the current financial year plus the two preceding years) per enterprise and per Member State at the level of a single undertaking.

Q.99.b) Should we have 3 offers for the building?

A.99.b) Footnote 39 of the Call document: *"Please note that especially in the case of construction works one (1) offer (or Bill of Quantities and costs) is enough for the Bulgarian Beneficiaries and in case of promotion actions, one (1) offer (print-screens from websites of relevant operators are accepted) is enough for the Bulgarian Beneficiaries"*.

Q.100.a) In Annex I_2 Application Form Part 2 and in Table 2.1.5.A, in Section 2.1.5 COST-REVENUE FORECASTS, financial forecasts (revenue and expenses) for the implementation period (3 years) and 3 years after the implementation investment. Question: The data to be filled in, will concern the branch or the whole of the enterprise?

A.100.a) The inserted financial data will concern the whole enterprise (VAT) that submits the proposal.

Q.100.b) Similarly, Table 2.1.5.B of Section 2.1.5, includes the beneficiary's revenues and the expenses for the last three years. Question: The data to be filled in, will concern the branch or the whole of the enterprise?

A.100.b) Same as above, the inserted financial data will concern the whole enterprise (VAT) that submits the proposal.

Q.101) A Bulgarian enterprise wants to include in its budget construction works for a warehouse. In Bulgaria, an engineer can make detailed measurements of materials rather than costs. So he can estimate the materials that will be needed to build the warehouse but not the cost. The budget/cost, is estimated by the company that will take over the project after sending their own engineer on the spot. Also, according to the Bulgarian law there is no upper limit in construction works. What should be submitted along with the Application Form, for building a warehouse in Bulgaria? A bid or more (how many?); detailed material measurements; analytic budget from potential supplier - manufacturer?

A.101) Please refer to:

- Point 14 of ANNEX VII: REQUIRED APPLICATION DOCUMENTATION of the Call document: *"If construction works are included in the investment plan, Technical Design documentation duly signed by a Registered Engineer and Construction Permit (or decision/statement that a permit is not needed) from the Responsible National Authority as per Legal Requirements in each country. These documents must be submitted in hard copy or in scanned version on a CD/DVD/Flash drive. The original documents must be submitted if the project proposal is approved."* Footnote 38: *"Otherwise the Building permit must be submitted before the request for advance payment OR before the 1st request for payment if no advance payment has been given"*.

- Footnote 39: *"Please note that especially in the case of construction works one (1) offer (or Bill of Quantities and costs) is enough for the Bulgarian Beneficiaries ..."*

- Par.8.2.2: *"All construction and installation works should be performed according to a duly completed and officially approved technical design as the respective national legislation in the participating country - where the enterprise site of operation is located – demands. The works should be performed only after the issuing of the relevant permits. Otherwise, the expenses are not eligible."*

Q.102) Should the Declaration that no operation license is required, it be an official Statement of Law 1599/1986 or it could be a simple declaration such as those included in Annex VIII? Should the declaration be in English? Should it have an original signature verified by an Authority?

A.102) If a license/permit is not required/applicable, a Declaration or Affidavit (whichever is legally binding in each country) by the legal representative of the enterprise “that no license/permit is required according to legal procedures in the country of business installation”. The Declaration or Affidavit can be submitted in the official language of each project beneficiary and it will be signed by the legal representative of the enterprise.

Q.103) Are NACE codes 56101912 /56101300 /46371015 /47292104 eligible under the 5th Call?

A.103) Please refer to ANNEX VI: ELIGIBLE NACE CODES of the Call document.

Q.104) Which are the required documents an applicant has to submit for the following documentation listed in **ANNEX VII: REQUIRED APPLICATION DOCUMENTATION**

1. Documentation No. 4: do we present a document issued by the tax office (i.e. taxisnet for Greek beneficiaries) with the enterprise’s data and main activity changes declared?
2. Documentation No. 7: Branch revenue, we provide Accounts (70, 71, 73) Quadrant Analysis?
3. Documentation No. 9: do we present a (E4) Staff Statement and Supplemental for 2018?
4. Documentation No.16: do we submit 1 offer for each expenditure of the investment plan that concerns the Greek beneficiary and 3 offers for each expenditure of the investment plan that concerns the Bulgarian beneficiary?
5. Documentation No.17: which documents should we submit for the following:
 - a. Employment record certificates/employer recommendations. The certificates should mention the duration of the employment and the duties performed
 - b. Social Security Registration (specifying the duration of registration) and certification that all insurance contributions have been paid
6. Documentation No.18: which documents should we submit for the following:
 - a. Employment record certificates/employer recommendations (if applicable). The certificates should mention the duration of the employment and the duties performed
7. Documentation No.19: do we submit a tax clearance certificate?

A.104)

1. Documentation No. 4: Yes.
2. Documentation No. 7: Any supporting documentation resulting from the institutional framework of each country and substantiating this condition.
3. Documentation No. 9: Any supporting documentation resulting from the institutional framework of each country and substantiating this condition.
4. Documentation No.16: Yes.
5. Documentation No.17: Any supporting documentation resulting from the institutional framework of each country and substantiating this condition.
6. Documentation No.18: Any supporting documentation resulting from the institutional framework of each country and substantiating this condition.
7. Documentation No.19: Yes.

Q.105.a) In the case that two companies receive the grant and one recipient completes the project and the other recipient does not complete his project (for any possible reason). Does the first recipient bears any responsibility for the second recipient? How do you treat the first recipient's project? What happens in a case like this?

A.105.a) We are examining the issue. You will be informed accordingly once we reach to a conclusion.

Q.105.b) In the case that a potential beneficiary is a new enterprise under establishment, what kind of paperwork you need for this enterprise? What kind of proof you need for such enterprise to apply for the programme?

A.105.b) If the question concerns the required documents for the establishment of an enterprise, then: *“New enterprises must state the relevant NACE that corresponds to their main activity and the eligible geographic area where they conduct business activities, and are requested to proceed in the establishment of the company up to 3 months from the date of approval of the grant application, after which the Subsidy contract will be signed”.*

For the rest of the documentation that needs to be submitted, please refer to ANNEX VII: REQUIRED APPLICATION DOCUMENTATION of the Call document (as it was reviewed on 09/05/2019).

Q.106) Is an enterprise with NACE Code 72.19 - further analysed as 14.03_Research Services in Food Chemistry and specialized in the research of Dairy and Cheese Products (Category: MATERIALS – TECHNOLOGY) - eligible to participate in the Call with a partner- enterprise with NACE Code 10.51 _Operation of dairies and cheese making (Category: AGROFOOD). The

two companies will cooperate on dairy production, by developing prescriptions and laboratory tests as well as evaluating the organoleptic characteristics and applications that the product may have.

A.106) Yes, as long as the cooperation can be justified/documentated.

Q.107) A Bulgarian beneficiary wants to buy a machine for which there are three suppliers around the world. The problem is that one of suppliers does no longer produce the machine in the capacity that the company wants. So the beneficiary can submit only 2 offers. How is this issue addressed?

A.107) Three (3) offers must be submitted and their technical specifications must meet a minimum of technical specifications, necessary for the proposed investment plan. The offers can be obtained either by manufacturers or by commercial companies. In any other case, specific justification/documentation is required

Q.108) On behalf of a Greek enterprise, are the expenses made within the EU territory eligible? The question is made under the circumstance that both companies have a valid for the VIES system VAT number.

A.108) Please refer to paragraph 8.ELIGIBLE EXPENSES – BUDGET of the Call document. In any other case, there is no restriction regarding the place of origin of the equipment.

Q.109) I would like to expand my premises in Greece and the two engineers - one from Greece and the other from Bulgaria - disagree whether the costs of engineers are eligible or not in the Call.

A.109) According to Paragraph 8.3.NON ELIGIBLE EXPENSES (point ii) of the Call document:

*“The following expenses are **NOT ELIGIBLE**:*

ii. All expenses associated with construction works which took place before the issuance of necessary building permits and/or other necessary permits as per the national legislation of the country where the investment takes place.”

Q.110.a) An investor already rents a property in Bulgaria, in which he will implement the investment. The renting contract has a period of 8 years from January of 2019 (but not from the grant contract agreement – which of course we do not know). The investor will install in this property, through the investment, a Photovoltaic Park and he will not construct a

building. The PV parks in Bulgaria need a construction license (in Greece PV parks need a smaller approval). The park will include the following construction expenses:

- Foundation of the PV panels
- A small prefabricated building for the switch boards and
- Fence

Questions:

i) For the above mentioned investment, the renting contract needs to have a duration of 3 years or 8 years from the date the Grant Contract is Signed?

ii) Is it necessary for the submission of the proposal, to submit the rental agreement with its full duration (3 or 8 years from the Grant Contract)? Or a Preliminary Agreement for the Rent of the property is enough? The guidelines mention the preliminary agreement in case of property selling but not for property renting. Does this exclude the preliminary agreement for renting?

iii) Does the rental agreement need to be a notary document? In Greece, a rental agreement for a small duration is not obligatory to be a notary document.

iv) If we submit a rental agreement with duration less than the required and a preliminary rental agreement covering the required duration extension, are we ok? The costs for prolonging the rental agreement prior to the proposal submission will be lost if the proposal is not approved.

A.110.a)

i) The existing contract will be submitted, which in case of approval of the investment plan, should cover the minimum limit set by the Call.

ii) Please refer to point 13 of ANNEX VII: REQUIRED APPLICATION DOCUMENTATION of the Call document.

iii) Please refer to point 13 of ANNEX VII: REQUIRED APPLICATION DOCUMENTATION of the Call document and whatever foresees the legislative framework of each country.

iv) See the answer given to your 1st question: *“The existing contract will be submitted, which in case of approval of the investment plan, should cover the minimum limit set by the Call.”*

Q.110.b) In Annex I.1 field 2.1.4, we have to complete the implementation duration. In Annex I.2 fields 1.1.7 and 1.1.8, we have to complete the investment plan start date and the investment plan end date. Also in field 1.1.9 we have to complete the duration (months). In

Annex I.2 field 2.1.2, we have to complete the plan start and end date of each working package.

Questions:

i) How the duration is measured? For example if I need 12 months to implement a project but I start the implementation 3 months after the approval does the duration of the implementation is $12 + 3$ months = 15 months?

ii) About the investment planned start and end date. We cannot have a precise planned start and end date, because the investor will start the implementation after the approval. Can we hypothesize the dates (the duration will be the one actually needed) and after the approval to modify the dates?

iii) If the actual duration of the project implementation differs from the one that is declared in the submission but it does not exceed the maximum duration specified by the project (3 years from the grant approval date) will that be a problem?

A.110.b)

i) The duration of the implementation period is calculated from the date the subsidy contract will be signed.

ii) Yes you can.

iii) No, please refer to paragraph 14 of the Call document.

Q.111.a) If the company is presented by 2 legal representatives, who represent the enterprise 'Together and Separately', do we need to present all the supporting documents for both representatives and will both be subject to evaluation?

A.111.a) One of them will be appointed as representative and will sign/submit the necessary supporting documents.

Q.111.b) We are planning to designate the legal representative as the person responsible for the investment. Please, confirm that one person will be evaluated accordingly for the two different criteria.

A.111.b) Yes, if the legal representative of the enterprise is also the person responsible for the investment plan, the same person will be evaluated for both cases.

Q.111.c) Our enterprise in planning to participate into an international trade fair in the sphere of renewable energy and according to Annex VII: Required application documents, "the Bulgarian beneficiary are required to present at least 3 separate suppliers/contractors for each new asset included in the investment plan (such as machinery, equipment, vehicle, IT equipment and software) and for all promotion actions (e.g. exhibitions, etc)". As the participation costs are fixed, how should we refer to the requirement for providing 3 independent offers?

A.111.c) Please refer to point 16 and Footnote 39 of ANNEX VII: REQUIRED APPLICATION DOCUMENTATION of the Call document (as it was revised on 09/05/2019).

Q.111.d) Please, clarify the technical mistake on page 97 of the Direct Assistance Guidelines_v3- 3rd Group of Criteria, p.3 'Is the investment budget realistic and well-documented? (Annex I_1_par. 3.5.1 and p.4 "Is the investment budget well- balanced? (Annex I_1_par. 3.5.1), p. 7 and p. 8 as well. They all refer to be wrong, but it is very crucial for the evaluation of the project proposal.

A.111.d) ANNEX V: EVALUATION CRITERIA of the Call Document has been corrected in order to: (a) correspond to the correct required application documents and (b) be in accordance with the modifications made in the Call document. Please see the latest version of the Call document uploaded on the Programme website (09/05/2019).

ANNEX I_1, was shared as a template of the Application Form, prior to the operation of the SAMIS system. The submitted proposals will be evaluated based on the AF that is generated by SA MIS system and NOT based on ANNEX I_1, which is a helping tool and does not have to be submitted.

Q.111.e) In Annex VII. Required application documents- index 8 *"In the case of «linked» enterprises (as defined in Article 3, par.3 of Annex I of EU regulation 651/2014) all required above financial statements (index 6) and applicable corporation documents (index 4) will be submitted for all the «linked» enterprises with the lead beneficiary or the project beneficiary enterprise of the application, together with a Sworn Declaration signed by the legal representative of the lead beneficiary and/or the project beneficiary enterprise (whichever is applicable), the template of which is provided in Annex IV."*

Please, confirm that index 6 "Valid business operating license/permit or equivalent certificate (as per legal requirements in each country)..." and index 4 "Certificates issued by the Responsible Legal Entity in each country verifying the start date of the business, the activity NACE code(s)....".

A.111.e) Point 4 of Annex VII refers to start date of the business and the NACE code/s activity/ies (main and complementary) and point 6 of Annex VII refers to the Valid business operating license/permit or equivalent certificate.

Q.111.f) Referring to Annex VII: REQUIRED APPLICATION DOCUMENTATION, General information regarding the qualifications of the «person(s) designated as responsible for the investment», the Project Beneficiaries should present "Security Registration (specifying the duration of registration)". Could you please clarify which document should be provided for the Bulgarian partners?

A.111.f) Please refer to point 17 of ANNEX VII: REQUIRED APPLICATION DOCUMENTATION of the Call document. You should submit the corresponding document as it is foreseen by the national legislation of Bulgaria and demonstrates the duration of employment.

Q.112) At page 13, point 5A it is stated that "*As «Eligible potential beneficiary» is defined a legal entity (...)*", while at point 5C it is stated that "*«Eligible Potential Beneficiaries» (...) any entity engaged in an economic activity, irrespective of its legal form (...)*". As a sole proprietorship company is ordinary not considered as a legal entity, please kindly advise if such type of organisation (sole proprietorship) is eligible to participate as project partner in a proposal under Call 5.

A.112) Certainly, a sole proprietorship is eligible to participate as a project partner in a proposal under Call 5, as long as it meets the requirements/conditions set in the Call document.

Q.113.a) Annex VII: REQUIRED APPLICATION DOCUMENTATION, point 16 states: "*Price offers or pre-invoicing as following: For the Bulgarian beneficiary: from at least 3 separate suppliers/contractors for each new asset included in the investment plan (such as machinery, equipment, vehicle, IT equipment and software) and for all promotion actions (e.g. exhibitions, etc.)*"

And the footnote provides additional information that: "*Please note that especially in the case of construction works one (1) offer (or Bill of Quantities and costs) is enough for the Bulgarian Beneficiaries and in case of promotion actions, one (1) offer (print-screens from websites of relevant operators are accepted) is enough for the Bulgarian Beneficiaries*"

Please, clarify if the Bulgarian applicant needs to provide, and if yes, how many offers for the following expenditure:

- i. Development of a web-page, which will be a front-end to access a specialized booking platform, which the project will create. The platform itself will be subcontracted by the Greek partner. It's one of the joint products both partners will develop to support the business growth.
- ii. Services associated with the preparation, submission, implementation and monitoring of the investment plan.
- iii. Social media advertising/promotion expenses

A.113.a) Please refer to point 16 and Footnote 39 of ANNEX VII: REQUIRED APPLICATION DOCUMENTATION of the Call document, as it was revised on 09/05/2019.

- i. Platform: subcontracted by the Greek beneficiary what applies for Greek beneficiaries: Price offers or pre-invoicing from at least 1 separate supplier/contractor.
web-page: subcontracted by the Bulgarian beneficiary: Price offers or pre-invoicing from at least 3 separate suppliers/contractors, since it is not a construction work or a promotion action
- ii. It does not concern construction works and/or promotion action, therefore the footnote does not apply in this case. The Bulgarian beneficiary should submit price offers or pre-invoicing from at least 3 separate suppliers/contractors.
- iii. If it concerns promotion actions, as it is indicated by the description "Social media advertising/promotion expenses", then whatever is written in the footnote applies: "in case of promotion actions, one (1) offer (print-screens from websites of relevant operators are accepted) is enough for the Bulgarian Beneficiaries".

Q.113.b) In Annex I_3, Table "Eligible expenses" on sheets "Total", "Firm1" and "Firm 2" is different from the table given in sheet2. Will you please clarify the role of sheet2?

A.113.b) The table of sheets "Total", "Firm1" and "Firm2" is the one that applies and it is the one included in the Call document "Direct Assistance Guidelines" (par. 8.2 Types of expenses, page20).

There was an inconsistency in the numbering of the expenditures 1.6-1.10 (1.7 was missing), in the excel file and the Call document. Annex I.3 has been corrected and re-uploaded on the Programme website with the date 20.5.2019.

The table on sheet2 of ANNEX_I.3 should not be taken into consideration. You just fill in sheets 'Firm1' and 'Firm2', following the instructions included on the 1st sheet "Total".

Q.113.c) On the other hand, project expenses have to be listed in Table 7.1. "Eligible Expenditure" of Annex I_1 by selecting options from a drop-down menu.

The codes of expenditure in Annex I_3 and in Annex I_1, table 7.1. are not matching. For example, expenditure 1.8“Expenses associated to real estate transactions” in Annex I_1 is expenditure 1.7.“Expenses associated to real estate transactions” in Annex I_3.

Will you please, clarify which codes to follow since there will be discrepancies between Annex I_1 and Annex I_3. Is it acceptable to have different codes in both Annexes?

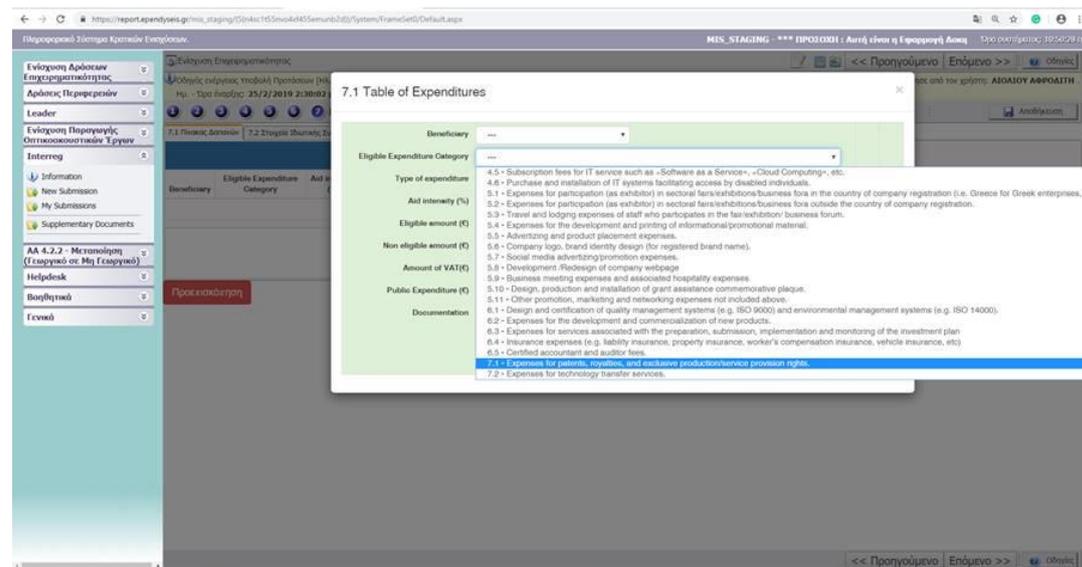
A.113.c) As announced on the Programme website, ANNEX I_1, was shared as a template of the Application Form, prior to the operation of the SAMIS system, in order to facilitate the applicants in the preparation of their investment plans.

The submitted proposals will be evaluated based on the AF that is generated by SA MIS system and NOT based on ANNEX I_1, which is a helping tool and does not have to be submitted.

Q.113.d) In addition, the drop- down menu in the system does not include the expenditure 7.1. “Expenses for patents, royalties, and exclusive production/service provision rights” and 7.2. “Expenses for technology transfer services”. Will you please, clarify where to include these expenses in Annex I_1, Table 7.1.

A.113.d) The SAMIS system includes the expenses 7.1 and 7.2 (see print screen below).

If you still don’t see them on the system, make a helpdesk via SAMIS system.



Q.113.e) In Annex VII: REQUIRED APPLICATION DOCUMENTATION, point 7 states: “For existing enterprises: ... /For new enterprises: ...”. Also, signed declaration indicating if this

enterprise is stand- alone or part of a larger enterprise group, and if the latter, what part of the enterprise group revenue the new enterprise is projected to earn.

Please, clarify if the Declaration mentioned in p.7 of Annex VII is different from the Declaration and its attachment included in Annex IV.

A.113.e) No, it is the same Declaration included in Annex IV.

Q.113.f) In Annex VII, point 20 states: *“Signed Declarations: i.e. Annex V, Annex VIII (A, B & C) by the Legal representative of: (a) the Lead beneficiary enterprise and (b) the project beneficiary enterprise”*. Please, clarify do you mean Annex IV instead of Annex V, since Annex V includes the EVALUATION CRITERIA.

A.113.f) Yes, it should be Annex IV instead of V. However, please note that you should submit all declarations according to your proposal’s scheme (existing, new or under establishment enterprise) and as described in the whole call document.

Q.113.g) Is it advisable to submit the project once it’s ready or we should wait till the very last moment because more changes in the Guidelines may occur? What will happen with the already submitted projects if the changes are substantial and require significant changes in the application form and supporting documents?

A.113.g) As it has already been announced on the Programme website and is stated in the Call document: *“In case an applicant has already submitted an AF in SAMIS and wants to modify it because of the Call extension, s/he has to follow the steps indicated on page 34 (at the bottom) of the Call document “Direct Assistance Guidelines” (revised and uploaded on the website on 09/05/2019): “Cancellation of an application that has been submitted is allowed up until two (2) working days before the Call deadline. The cancellation request can be submitted through the State Aid Information System at www.ependyseis.gr/mis. This action allows the beneficiary to submit another application – if desired – within the remaining time until the Call deadline.”* The applicant cannot re-open and edit the submitted AF. S/he has to cancel the old AF and create a new one from scratch.

Applicants are advised to submit their AFs as soon as they are ready.

The core body of the Call document has not changed. The minor modification made occasionally concern clarifications that derive from the questions the applicants submit; and are incorporated in the Call document in order to facilitate the applicants in the application/submission procedure.

Q.114) Are existing enterprises and their branches more appraised than the newly established ones?

A.114) The criteria are not categorized accordingly. Each combination has a specific set of criteria. Please refer to ANNEX V-EVALUATION CRITERIA of the Call document.

Q.115.a) Whose experience / business activity, in the same field as the investment plan, is evaluated: (a) the partners' ; (b) the manager's / business representative's; (c) the manager's of the investment plan?

A.115.a) The experience / training of the individual to be designated as the manager of the investment plan (person(s) designated as responsible for the investment) and the investors (the enterprise owners) will be evaluated. Please refer to ANNEX V: EVALUATION CRITERIA - 1st GROUP OF CRITERIA: «Human assets guaranteeing investment success».

Q.115.b) Please specify when it is possible to replace the designated persons (partner, manager / representative of the enterprise, manager of the business plan): a) after the application, b) after the last disbursement of the aid?

A.115.b) Designated persons are declared when submitting the proposal. If these persons are evaluated, according to the criteria set out in Annex V, and are changed/ replaced after the approval of the investment plan, the proposal will be reassigned to the above criteria in order to determine whether it remains eligible or not.

Q.115.c) In case the applicant is an under establishment enterprise, which means that there will have no evidence of the above persons (partners, manager / representative of the enterprise, manager of the business plan), is it enough to state their names without providing any further information about them, or it is not necessary to specify the names of these persons as the company has not yet been established and no appointment has yet been made with regard to these persons?

A.115.c) A reference should be made to the above, in accordance with the evaluation criteria set in Annex V of the Call document.

Q.115.d) If the sole partner in the company being set up is a foreign legal person, what information should we provide for him when submitting the application OR at a later stage OR at the stage of completion / verification?

A.115.d) The required information/documentation is listed in ANNEX VII: REQUIRED APPLICATION DOCUMENTATION of the Call document and should be submitted along with the application form. The application form is submitted via the information system SA MIS and the supporting documents of Annex VII are attached.

Q.115.e) The manager of the investment plan ("Person Designated as responsible for the investment"), should be hired as an employee when the enterprise is established, or s/he can be an external contractor?

A.115.e) The selection is open.

Q.116) Please specify when the Greek or the Bulgarian beneficiary is allowed to modify his NACE Code: a) after the submission of the application; b) after the completion / control request; c) after the last disbursement of the aid.

A.116) Eligible enterprises must have their main business activity belong to the specified NACE codes before submitting an investment proposal to this Call.

Q.117) We would like the budget allocation among the two partners to be 75% (GR) -25% (BG). During the Info days it was mentioned that the 60% -40% budget allocation, indicated in the Call document, is indicative and a larger deviation could be accepted, but not as high as 10% - 90%. The Bulgarian partner worries that our proposal will be rejected because of the desired 75% - 25% allocation. Could you please confirm that this distribution (75% - 25%) is allowed and is not a reason for rejection?

A.117) The budget allocation of 60-40% is the one that is recommended. In any case, the budget allocation among the two enterprises should be balanced, documented and it should demonstrate the cross-border nature of the investment plan.

Q.118) In order to register as a new user to SAMIS and submit an investment plan, we need to fill in a Tax Identification Number (VAT ID). We also have to submit the Declarations of Annexes IV, VIII (A, B & C) of the Call document, signed by a company representative. Will the proposal pass the completeness of application check if:

a) We submit the VAT ID of the investment plan's manager? Will he also be the signatory of the above mentioned Declarations OR the enterprise's manager who is likely to be another person?

b) We do not submit a Tax Non-encumbrance certificate, since the enterprise that will submit the proposal is under establishment?

A.118)

a) The Application form and the declaration have to be signed by the legal representative(s) of the enterprise(s). As far as it concerns the procedure for registering to SAMIS, it can be carried out either by the legal representative of an enterprise or by another person designated as the manager of the investment plan.

b) In case of an under establishment enterprise for which a Tax Non-encumbrance certificate does not exist, then this document will be evaluated as not applicable.

Q.119) Will the rate be low if the shareholder of the under establishment enterprise is a holding company and not a natural person; taking into consideration that it is de facto that it cannot have experience in the subject of the investment plan? If so, can this score be recovered from the experience of the investment plan manager and the Bulgarian partner?

A.119) Please refer to ANNEX V: EVALUATION CRITERIA of the Call document, and in particular, the 1st GROUP OF CRITERIA: «Human assets guaranteeing investment success».

Q.120) Regarding the supplier bids, technical reports, market surveys, etc., should they submitted in English or in the language of each partner submitting them, as it is also allowed for the invoices to be submitted for approval at the inspection stage?

A.120) They can be submitted in the native language (Greek / Bulgarian) of each beneficiary-enterprise.

Q.121) Is the submission of "Letters of expression of interest from venture capital or bank loan approvals" evaluated or not? During the Info Days, it was mentioned that proof for the own-contribution is not required, whereas proof is needed for the reimbursement of expenses during the completion/control of the investment plan. Even though it is not rated, it does not cease to be an item/proof if it can be delivered.

A.121) The submission of "Letters of expression of interest from venture capital or bank loan approvals" is not evaluated; however it is an extra element in case it can be produced/submitted.

Q.122) Regarding the *"Exclusive Product Promotion / Sales Contracts"* and the *"Strategic Partnership Contracts and any other documentation supporting the revenue projections"*, please inform if these "contracts" refer to the cooperation between a Greek and a Bulgarian partner, or potential customers of the market that will emerge after the new product is put into industrial production. If it refers to potential customers, please confirm if it is enough to produce letters of intent, as at this stage it is impossible to make binding contracts with prospective potential customers for a new product that has not yet put in industrial production.

A.122) Intentions of cooperation between the partners can be presented, and in any case, for new/ under establishment enterprises, it is necessary to submit the *"Intended Strategic Partnership Agreement"*.

Q.123) Regarding the offers to be submitted by the Bulgarian partner for the construction of a photovoltaic station on the roof of its building; three (3) offers must be submitted or just one is sufficient? Also, these offers should concern each item / component of the photovoltaic station OR the whole photovoltaic station (in total)?

A.123) The Bulgarian Partner has to submit three (3) offers. In any case, the bids should include a detailed description of the categories of expenditure for which the partner is applying for aid. Also, refer to point 16 of ANNEX VII: REQUIRED APPLICATION DOCUMENTATION of the Call document, and Footnote 39: *"Please note that especially in the case of construction works one (1) offer (or Bill of Quantities and costs) is enough for the Bulgarian Beneficiaries and in case of promotion actions, one (1) offer (print-screens from websites of relevant operators are accepted) is enough for the Bulgarian Beneficiaries"*.

Q.124) In the case of a long-term lease, is it sufficient to provide the property title with a topographic plot accompanied by a private lease agreement with a genuine signature (certified by an Authority) or a notarial pre-agreement is needed? What is the minimum duration of the preliminary agreement lease?

A.124) Please refer to point 13 of ANNEX VII: REQUIRED APPLICATION DOCUMENTATION of the Call document.

Q.125) Will the investment plan be negatively assessed by the impossibility of issuing permitting decisions for the installation of 2 photovoltaic stations? It should be noted that the authorization for the development of a photovoltaic station takes a lot of time to be issued.

A.125) The process of licensing the stations concerns the institutional framework of the two countries and completes their full installation and operation. The rating score concerns the maturity and readiness of the investment proposals and varies according to their degree of readiness.

Q.126) The Summary Financing Application Form - Part 2 - ANNEX I.2 (paragraphs 2.1.1, 2.1.4, 2.1.5), includes a list of documents that should be submitted. Please clarify if for these documents a descriptive statement and a financial estimation of the results for the period of 3 years after the completion of the business plan are sufficient, without making any reference to specific economic indicators, since the company that will submit the proposal is under establishment and no other proof/evidence exists.

A.126) The description will relate to an estimation of the financial outcomes, which is also advisable, to take into account some indicators and sectoral studies, as well as other evidence that could substantiate the forecasts.
