

Interreg



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Greece – Bulgaria

Frequently Asked Questions:

1ST OPEN CALL FOR COMMON PROJECTS
PROPOSALS OF THE CBC INTERREG VI-A GREECE-
BULGARIA 2021-2027 PROGRAMME

Cross-border Cooperation Programme
Interreg (VI-A) CBC “Greece – Bulgaria 2021-2027”

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1. Budget – Eligibility of Expenditure & Financing

Q 1.1. Which are the minimum and maximum budget limitations of a proposed project?

A. 1.1. A Project Proposal should have a minimum budget of 1.000.000€ and a maximum budget of 2.500.000 €.

Q 1.2. Which is the minimum budget limitation of a single beneficiary to participate in a project proposal?

A. 1.2. A Beneficiary may participate in a Project Proposal with the minimum budget of 150.000 €.

Q 1.3. We represent a small nonprofit organization with limited financial resources. In case of the approval of the project proposal in which we will participate, are we entitled to receive a pre financing and up to which amount?

A. 1.3. All types of Beneficiaries are entitled to receive a pre financing after signing the Subsidy Contract and the Partnership Agreement.

The Beneficiaries from Greece will receive pre financing from the Public Investment Programme.

A pre-financing up to 80 % of the national co-financing will be given to Bulgarian partners after the proposal in which they participate is approved and the relevant contract is signed.

Q 1.4. We represent a small nonprofit organization with limited financial resources. In case of the approval of the project proposal in which we will participate, are we obliged to cover the national co financing from our own budget? If not, who will be responsible to cover the national co financing?

A. 1.4. All types of Beneficiaries are entitled to receive the national co financing, during the Project Implementation and after signing the Subsidy Contract and the Partnership Agreement.

The Beneficiaries from Greece will receive the national co financing from the Public Investments Programme.

Beneficiaries from Bulgaria will receive the 20% national co-financing from the state budget. Beneficiaries shall ensure the needed own contribution (public and/or private), if applicable. The Bulgarian partners can find the needed documents for National co-financing contract and payment request documents at the website of the Ministry of Regional Development and public Works:
<https://www.mrrb.bg/bg/infrastruktura-i-programi/programi-za-teritorialno-sutrudnichestvo-2021-2027/interreg-vi-a-gurciya-bulgariya-2021-2027/dokumenti/>

Q 1.5. Are the preparation costs eligible? What is the limitation? Does the limitation apply on Beneficiary or on a Project level? They will be calculated on Real Cost or on Simplified Cost bases?

A. 1.5. Costs within the budget lines “staff costs, travel and accommodation costs and external expertise and services”, which have been incurred for the preparation of the project, are eligible for funding if they do not exceed the amount of €30.000 at project level and should be calculated on Real Cost basis.

Q.1.6. Do preparation costs need to be declared in a separate Work Package or in a specific Deliverable? Can invoices for preparation costs be issued after the project is approved?

A.1.6. The provision for the preparation costs are 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.

Q 1.7. Does the State Aid legal framework apply for Interreg Projects? If yes, what will be the consequences if a specific activity of a Project Partner will be considered as State Aid?

A. 1.7. The ERDF co-financing to beneficiaries may be reduced in case of State aid relevance of project activities, in compliance with relevant rules on State aid (see PPIM p.25-29). In such a case State aid is granted under the de minimis regime or GBER within the project.

Q 1.8. What is project expenses eligibility period?

A. 1.8. The expenses eligibility period starts at January 1st, 2021, and after the signature of the Subsidy Contract.

Projects' activities which have started being implemented before the signing of the Subsidy Contract, and in any case after 1/1/2021, should not have been concluded before the application for funding at the present Call for Project Proposals.

The last date for the expense's eligibility period is December 31st, 2029.

Q. 1.9 What is the difference between 'Equipment' and 'Infrastructure & Works' budget lines?

A. 1.9 The budget line 'Equipment costs' refers to expenditure for the financing of equipment purchased, rented or leased by a partner, necessary to achieve objectives of the project.

The budget line 'Infrastructure & Works costs' refers to expenditure for the financing of infrastructure and construction works related to investments in infrastructure that do not fall into the scope of other budget lines.

Q. 1.10 Is it possible to create additional budget lines?

A. 1.10. No, Project budgets must be structured according to the following predefined six (6) budget lines:

- 1) Staff costs
- 2) Office and administrative expenditure
- 3) Travel and accommodation costs
- 4) External expertise and services costs

- 5) Equipment expenditure
- 6) Infrastructure and works

At STAGE A, for the Submission of Concept Note on MIS, there is an additional Budget Line 'Cost based on Concept Note', which you need to select ONLY ON MIS Application Form. This is required solely for technical reasons at STAGE A and applicants should fill in the total budget of the proposed project in this Budget Line. For more information, please consult MIS Guides.

Q.1.11 Is VAT an eligible expense?

A.1.11 VAT is eligible expense for all projects with budget under 5.000.000€ for all types of beneficiaries.

Q. 1.12 Are there any limitations regarding the distribution of budget among the Work Packages?

A.1.12 Specific budget limits are defined in the Terms of Reference of the 1st Call for Project Proposals and in Programme & Project Implementation Manual/ Section B: Project Development and must be respected by all Project Beneficiaries.

Q.1.13. Are there any travel, accommodation and daily allowance rates per country that need to be taken into consideration when developing the project budget?

A. 1.13. These rates are defined by the national law in each country participating in the Greece - Bulgaria Programme and may vary according to the legal status of each Project partner.

Q. 1.14 An institution located outside the eligible area can participate under conditions. Can it include deliverables of "equipment" and "infrastructure" in its budget? Or no equipment and no infrastructure can take place outside the eligible area?

A. 1.14 Regarding the "infrastructure" please check par. 1 of the ToR and the Programme & Project Implementation Manual page 53 "Infrastructure located outside the

Programme area, even if it is directly related to the project either for the development or for implementation, shall not be eligible”.

“Equipment” may be considered as eligible if it will be used in favor of the programme’s area.

Q. 1.15 Which will be the documentation needed in this call for the justification of the land and/or buildings property (in the 2nd phase)?

A. 1.15 During the 2nd Stage and taking into consideration the input of the project proposals Concept Notes, further instruction will be provided.

Q. 1.16 According to page 54 of the P&PM “Purchase of land (over 10% of total eligible cost) is not eligible”. What is the exact meaning and how this rule applies on the project level?

A. 1.16. According to article 64 para 1 (b) of EU Regulation 1060/2021 ARE NOT ELIGIBLE *“the purchase of land for an amount exceeding 10 % of the total eligible expenditure for the operation concerned; for derelict sites and for those formerly in industrial use which comprise buildings, that limit shall be increased to 15 %; for financial instruments, those percentages shall apply to the programme contribution paid to the final recipient or, in case of guarantees, to the amount of the underlying loan”*

Meaning that the cost for land purchase is eligible if this cost does not exceed the 10% of the eligible TOTAL PROJECT’S COST.

Q. 1.17 Are Digital platforms, ICT tools and software development, counted as equipment / infrastructure?

A. 1.17. The development of platforms ICT tools and software is considered as an external expertise cost. If the IT hardware and software are purchased, then they are considered as equipment. Please refer to the Programme and Project Implementation Manual (v. Project Budget Categories (Budget Lines), p.51) for details and exhaustive lists of items that are considered eligible under each category. The above items cannot be declared under the category “infrastructure”.

Q.1.18. Can the digitization of a space, such as a museum, be in the cost calculation of the equipment?

A.1.18. It depends on the way this digitization will be implemented. It may belong to external expertise cost or equipment cost or both. Moreover, it could also include staff costs in case of in-house development.

Q.1.19 (For Greek Beneficiaries only) Are spin off companies that are registered in the Greek National Startup Registry considered eligible? If not, can you inform us if there will be an opportunity for such companies to participate in an open call of the Greece-Bulgaria Programme?

A.1.19. Spin off companies are not considered eligible for the 1st Call for Project Proposals. In the future there is a plan to launch a call for small scale funds however, the Terms of Reference are not drafted yet.

Q.1.20 Is there a percentage of expenses for actions outside the eligible area? I am interested in participating in exhibitions in Europe and case visits of good practices.

A. 1.20. There is no percentage of expenses set in the Call, for actions outside the eligible area. However, these actions should be well justified and approved by the MA.

Q. 1.21. Which one should be considered as correct?

a) 1st-Call-for-common-Projects: Page 8, Paragraph 7.13. Communication' costs cannot exceed 8% of the total project budget and no more than 100.000€, without limits at beneficiary level.

b) Implementation Manual V1 GR BG: Page 65, Communication' costs cannot exceed the 15% of the total project budget, without limits at beneficiary level.

A. 1.21. The implementation Manual provides guidance and information for all Calls for Project Proposals. If the

Terms of Reference of the Call sets other limitations, then those prevail.

Therefore, the first limits (a) apply to the Project proposals of the present Call.

Q.1.22. 1st-Call-for-common-Projects: Page 8, Paragraph 7.14 It is strongly recommended that the total Budget of expenditures in categories 2,4,8 and 10 (soft measures), cannot exceed the amount of 600.000€ per Project.

Given that technological and digital platforms, software development, ICT tools etc are counted in category “10”, a project must purchase equipment and/or invest in infrastructure for the rest of its budget?

A.1.22. In the context of present Call, it is preferable for the projects to include costs not only in categories 2,4,8 and 10 but also in categories 6 or/and 12.

Q.1.23. Will de minimis ceiling be applied according to the amended EU Regulation from 13 December 2023 according to which the ceiling for a company was increased to 300 000 EUR? (in force as of 1 January 2024).

A.1.23. Yes the de minimis ceiling will be applied according to the amended EU Regulation.

Q.1.24. The advance payment is not part of the published documentation of the call and we highly recommend that it should have been included, so that the candidates are aware of the financial conditions of the projects. During the previous info day it was clarified that the Greek partners will have access to up to 100% advance payment, and the Bulgarian partners – only to 80% of national co-financing, which is appr. only 12% advance payment. Is there any possibility for increase of the percentage of the advance payment also for the Bulgarian partners, since this low rate is restricting and puts beneficiaries into unjustified unequal position, especially when the projects are supposed to be

implemented in parallel and introduce joint activities and solutions. This problem is highly important for the non-government organizations, which usually do not have significant own funding and rely on the bridge program financing. Most of the national programs also have significantly higher rates of advance payment, reaching the level of 50%.

A.1.24. The advance payment was not included in the call as it is not part of the Terms of Reference of the Call. However, the relevant information is included in present document (see above Q1.4 & Q1.3). This matter concerns the implementation of the project. The amount of pre-financing is decided and provided by the state budget of each country.

Q.1.25. What kind of supporting documents do we need to present to justify the specific budget lines? At Stage A Concept note and at Stage B Project Proposals?

A.1.25. No supporting documents are required at this stage (Stage A). All needed supporting documents will be submitted in Stage B according to the relevant information which will be given analytically in the relevant Call for Project Proposals.

Q.1.26. Staff can be calculated as 20% of the direct costs. Which are they? Travel are included in direct costs?

A.1.26. Staff costs calculated on flat rate basis should be up to 20% of the direct costs. These are the budget lines “external expertise and services”, “equipment” and “infrastructure and works” costs of the beneficiary’s budget. Travel and accommodation budget category is not included in the direct costs.

Q.1.27. Is it possible to apply all categories of flat rate into one project?

A.1.27. Yes, you may use flat rate in the 3 categories (staff costs, office and administration costs and travel and accommodation costs) into one project.

It is possible to use flat rate to all 3 categories - staff costs, office and administration and travel and accommodation - within one project, per beneficiary and within the relevant category limit set in the Call. In this case, first the calculation of the flat rate for staff costs should be made (up to 20% calculated on the budget lines "external expertise and services", "equipment" and "infrastructure and works" costs of the beneficiary's budget) and then the flat rates for "office and administrative costs" and the "travel and accommodation costs" applied on the "staff costs".

Q.1.28. If an organization prefers in one project the flat rate for travel, can it choose a real cost methodology in another project at the same time?

A.1.28. The flat rate for "travel and accommodation" costs applies per project and per beneficiary. The same beneficiary can choose flat rate option for "travel and accommodation costs" in one project and real cost option in another project for the same budget category of costs.

Q.1.29. The choice of flat rate or real cost has to be applied to the whole partnership or at partner level?

A.1.29. The choice of flat rate or real costs under specific budget lines is declared per beneficiary for each project.

Q.1.30. What is the limit for Staff if it is Real costs? If the staff costs is Flat rate, what is it meant by: "up to 20 % of the direct costs other than the direct staff costs of the operation". What does "direct staff costs mean"?

A.1.30. No limit is set in the Call for project proposals for real costs budgeted under the budget line “Staff costs”. However, the budget of each beneficiary and project should be well balanced in terms of budget lines and activities.

If flat rate is used for staff costs, the percentage should be up to 20% and is calculated on the budget lines “external expertise and services”, “equipment” and “infrastructure and works” costs of the beneficiary’s budget.

Direct staff costs are those costs that are directly related to the implementation of the project (see above Q1.26)

Q.1.31. Can the PBs create a project website?

A.1.31. Project websites are not eligible under this call and for the programming period 2021-2027 in general. Instead, each project will have a dedicated page on the programme website where all project news, events and deliverables will be uploaded/published. In addition, all Project Beneficiaries should provide on their official website a short description of the project, including its aims and results and highlighting the financial support of the Programme (Regulation (EU) 2021/1059: Interreg Regulation/Article 36).

Q.1.32. Separate project webpage for the interreg project on the official page of the beneficiary,
this applies for all beneficiaries or only for the LB?

A.1.32. According to Regulation (EU) 2021/1059: Interreg Regulation/Article 36:

“Each partner of an Interreg operation or each body implementing a financing instrument shall acknowledge support from an Interreg fund, including resources reused for financial instruments in accordance with Article 62 of

Regulation (EU) 2021/1060, to the Interreg operation by: providing on the partner's official website or social media sites, where such sites exist, a short description of the Interreg operation, proportionate to the level of support provided by an Interreg fund, including its aims and results, and highlighting the financial support from the Interreg fund".

If the project consortium decides that only the LB (or any other PB) will create this page dedicated to the project on their official website, then the least all other PBs have to do is: add on their official website a banner with the project logo which will be an active link redirecting the user to the page dedicated to the project on the website of the LB (or in general on the website of the PB who was in charge to create the page dedicated to the project on their official website).

Q.1.33 *Is it eligible for a PB to have all budget categories with real cost and budget category "office and administration" with the flat rate option? if yes, office and administration shall be up to 15% of direct staff costs and should not exceed 4% of PB's total budget?*

A.1.33. Yes, as it is mentioned in the Call §7.10 there is an option to choose flat rate in one or more of the categories Staff Costs, Office and Administration and Travel and Accommodation. As for the O&A costs both restrictions mentioned in the question above apply.

Q.1.34. *Point 7.14. It is strongly recommended that the total Budget of expenditures in categories 2,4,8 and 10 (soft measures), cannot exceed the amount of €600,000 per Project." This recommendation sets disproportionate restrictions for project proposals whose budget approaches the maximum allowable limit of 2,500,000 euros. Is there any chance it will be revised before the submission*

deadline? In due course, it would be beneficial to document this option.

A.1.34. The Terms of Reference of the 1st Call have been approved by the Monitoring Committee Members of the Programme and it is not foreseen to be altered.

2. Eligibility of Beneficiaries

Q 2.1. Who can be considered as an eligible partner and participate in a project proposal?

A. 2.1. The following categories of Beneficiaries may be considered as eligible:

- national, regional or local public bodies
- bodies governed by public law (as defined in Article 2(4) of Directive 2014/24/EU)
- non-profit bodies governed by private law,
- international organizations
- European Grouping of Territorial Cooperation (EGTC).

Q 2.2. Under which conditions an EGTC may be considered as eligible?

A. 2.2. An Eligible EGTC must be governed by the law of one of the participating countries where the EGTC has its registered office. EGTC located outside the Programme area and not registered in one of the Partner states participating in the cross-border Programme is not eligible for funding. An EGTC cannot be a sole beneficiary of a project proposal.

Q 2.3. Under which conditions an International Organization may participate in this Call for Proposals?

A. 2.3. International Organizations, registered under the national law of the Partner States of the Programme, can be considered as eligible if they fulfil the criteria foreseen for the nonprofit bodies governed by private law. International Organizations operating under international law are not eligible.

Q 2.4. We are representing a nonprofit organization, oriented to environmental issues. Are we eligible to participate in this Call for Proposals?

A. 2.4. The Potential Beneficiaries, before participating in a Project Proposal, should check if they are eligible to participate in the Call. For this they should take into consideration the categories of the eligible partners as described in the Call and the legal form of the Potential Beneficiary (e.g. statute, establishment act, tax registration documents and other legal operating documents). In any case, the Potential Beneficiary holds the full responsibility of the decision to participate in a Project Proposal as the eligibility check is a part of the evaluation procedure and will be performed by the MA / JS. In case of non-eligibility during the evaluation procedure, the Project Proposal will be rejected.

Q 2.5 Which is the level of eligibility for universities?

A.2.5. Universities may participate in Greece-Bulgaria Programme at University level.

Q. 2.6. Is the 20% rule from the project budget for entities not established in the eligible region still applicable? Such a limitation is not specifically highlighted in the call documents. Can Bulgarian universities (research organisations), state institutions, NGOs, etc., from Sofia, Plovdiv, etc., participate in the partnerships without limitations to their budget as a percentage of the overall project budget?

A. 2.6. The rule of 20% from the project budget for entities not established in the eligible area does not apply in the present Call.

Organizations/Bodies that are located outside the Programme area and wish to participate as Beneficiaries should demonstrate that they fall into the eligible beneficiaries set in the Call. All beneficiaries should take

into consideration the requirement that 'in principle, all activities of a project should take place within the Programme area'.

Q. 2.7. ONLY FOR GREEK BENEFICIARIES - Can Municipalities, Universities and other bodies conclude Programming Agreements (προγραμματικές συμβάσεις) in Greece-Bulgaria Programme?

A. 2.7. The case of assuming responsibility for the implementation of a Project instead of the owner of the project, by another body, is provided for in Article 8, point 3 of the YPASYS of INTERREG Programmes 2021-2027 (Government Gazette 3281/Issue B'/17.05.2023), as follows:

"In the cases of actions for which the responsibility for the implementation of the action is assumed by another entity as beneficiary instead of the project owner on the basis of a programming agreement, in accordance with article 44 of Law 4412/2016, as it applies each time, the eligible costs are paid for the act by the project owner or by the beneficiary, depending on what is specified in the programming contract,...".

Furthermore, the YPASYS lists in detail (points a to h) the conditions that must be met in order the relevant Programming Agreement and the costs derived from it to be eligible.

In addition, article 44 of Law 4412/2016 states that:

"Article 44. Technical competence of contracting authorities in public works contracts and studies

1. The contracting authorities who judge that they do not have technical competence, or their technical competence is incomplete, may in particular:

a) enter into programming agreement, within the meaning of paragraph 6 of Article 12, for concluding,

supervising, and overseeing a public procurement for work or study,

b) conclude contracts for the provision of technical services within the meaning of article 52

and

c) be supported by the EKAA of par. 1a of article 41 in the context of its exercise of ancillary purchasing activities.

3. The contracting authority is responsible to the project owner for the proper performance of its duties and to third parties it is jointly and severally liable with the project owner. If the programming agreement does not specify otherwise, it represents the project owner in court and out of court against third parties during the exercise of its duties until the end of the contract. The ruling bodies are determined by the programming agreement."

Therefore, from the above it is clear that the conclusion of Programming Agreements is allowed only in cases in which conditions of Article 44 of Law 4412/2016 are met and exclusively for the services described in paragraph 1a of Article 44.

More specifically, the following should apply cumulatively:

a) documented non-existence or inadequate existence of Technical Competency of a Contracting Authority/potential Beneficiary,

b) assumption of responsibility by another body, exclusively for the services referred to in Article 44 par.1, i.e. "for concluding, supervising and overseeing a public procurement for work or study", and not for the provision of other services.

The potential Beneficiary should document, during the submission of the proposal in Stage B, the need to conclude a Programming Agreement in the context of the above.

In Project Selection Criteria for the evaluation of project proposals for funding are included criteria concerning the ability of the potential Beneficiaries to respond to the

implementation of the projects, in which case the above approach should be taken into account during the process of submitting the proposals that will include Programming Agreements.

Q. 2.8. Can an NGO with relatively low balance sheets participate in the Greece-Bulgaria Programme as Beneficiary?

A. 2.8. Each Project Beneficiary must submit specific documents to prove its eligibility, administrative and financial capacity. The partnership scheme and the administration and financial capacity of the Project Beneficiaries are part of the evaluation procedure at STAGE B.

Q. 2.9 Are there any specific criteria, in order to appoint a Lead Beneficiary?

A. 2.9. A Lead Beneficiary will be designated by all partners participating in a project to ensure implementation of the entire project (carry out the tasks laid down in Article 26 of Interreg Regulation) and will sign a Subsidy Contract with the Managing Authority.

The Lead Partner must be located either in Greece-Bulgaria:

- be a legal entity.
- hold a dedicated bank account for the project.
- be legally able to transfer funds to foreign countries.
- have a technical and financial capacity and competency to manage the proposed common project.

Q 2.10 If a project partner is registered outside of the Programme's eligible area but has an officially registered branch inside the Programme Area is it considered an eligible partner for this call?

A.2.10. In the Terms of Reference of the 1st Call for Common Project Proposals: Paragraph 5. ELIGIBILITY OF APPLICANTS: Organisations located outside the Programme area but having local/regional subsidiary/branch office established in the Programme area are eligible **only for Greek Project partners**.

Bulgarian partners must have their legal registration located in the eligible Programme area.

Q.2.11. An "EGTC allows public entities of different Member States to come together under a new entity with full legal personality. Through an EGTC Member State public authorities can set up a single joint structure to implement projects, investments or policies in the territory covered by the EGTC, whether co-financed by the EU budget or not."..."The EGTC is unique in the sense that it enables public authorities of various Member States to team up and deliver joint services, without requiring a prior international agreement to be signed and ratified by national parliaments."

(https://ec.europa.eu/regional_policy/policy/cooperation/european-territorial/european-grouping-territorial-cooperation_en).

In the context of the Calls for Project Proposals of the Interreg Territorial Cooperation Programmes EGTCs are foreseen as a distinct category of the invited beneficiaries (category: e). Moreover, It is additionally foreseen: "An EGTC cannot be a sole beneficiary of a project proposal".

Taking into consideration that:

- The establishment and operation of an EGTC is governed by the European Regulations 1082/2006 and 1302/2013, the Covenant amongst its members, and its Statute.

Specifically, in Article 3 of the Statute of each of the three EGTCs based in Greece (EFXINI POLI, Amphictyony, and ELIKAS) it is foreseen: "...the territory on which the EGTC

can exercise its duties and organize cooperation among its members, is that which is determined by the total territorial extent of the administrative – spatial responsibility or jurisdiction of its individual members."

- "... EGTCs act on behalf of their members, especially the regional and local authorities that constitute them, and consequently their duties and, therefore, their competencies are defined within a Covenant, in accordance to the European and national legislation." (Article 3 - 'EGTCs Purposes and activities', Ministry of Interior Guideline 28/13-10-2017 'Clarifications on the interpretation and application of articles 108-114 of Law 4483/2017 (A' 107) related to European Groupings of Territorial Cooperation (EGTCs)').

- Within the context of the aforementioned Calls it is foreseen: "In principle, to become a project beneficiary, the legal address of the beneficiary's organisation has to be located in the eligible area of the Programme with the exception of:- organisations located outside the Programme area but inside the Member states participating in the cross-border Programme if their participation in the project brings added value and expertise to its implementation and benefits the Programme cooperation area".

Please confirm the following:

1. EGTCs located outside the Programme area but registered in one of the Partner States participating in the cross-border Programme are eligible beneficiaries, due to their unique nature, mission and objectives.
2. Activities implemented by an EGTC anywhere within the Partner States' Programme area are eligible for funding.

A.2.11 In response to your question concerning the eligibility of EGTCs in the 1st Call of the Programme, please take into consideration the following:

As stated in par.5 of the Call European Groupings of Territorial Cooperation (EGTC) fall within the eligible types of applicants under certain conditions. "Eligible EGTC must

be governed by the law of one of the participating countries where the EGTC has its registered office. EGTCs located outside the Programme area and not registered in one of the Partner States participating in the cross-border Programme are not eligible for funding. An EGTC cannot be the sole beneficiary of a project proposal”. In addition, “EGTCs should have at least completed one accounting year of operation before the launching of the Call for proposals”.

In general, the territory of the Programme area on which the EGTC has the competency to implement activities, is foreseen in its Statute.

Based on the references to the legal framework that is highlighted in the above question, we may conclude that as for the EGTC’s EFXINI POLI, AMPHICTYONY and ELIKAS, applies the Art. 3 of their Statutes where the territory on which they may exercise their duties is determined by the total territorial extent of the administrative-spatial responsibility or the jurisdiction of the individual members of the EGTC.

In any case, the competence of the applicants in the eligible area will be checked thoroughly in Stage B taking into account the submitted official documentation for each potential beneficiary.

Moreover, please take into consideration the restrictions set in the Call concerning the financing activities located outside the eligible area.

3. Project Development – Rejection of Proposals

Q 3.1. What is the limitation for a Beneficiary to participate in project proposals? Does this limitation apply for a specific category of Beneficiary e.g. Lead Beneficiary or Beneficiary?

A. 3.1. A potential Beneficiary may participate up to five (5) Project Proposals in total for this Call. The above limit applies to all types of Beneficiaries, Lead Beneficiary or Project Beneficiary.

Q 3.2. Does the limitation for a beneficiary to participate in five (5) project proposals apply on Priority of Specific Objective base?

A. 3.2. The limitation of maximum five (5) participations apply at Call level – not at the Priority of Specific Objective level.

Q 3.3. If we will participate in more than five (5) project proposals, which will be the consequences? Will all the project proposals in which we will participate be rejected?

A. 3.3. In case a potential Beneficiary will participate in more than five (5) proposals, not all the Project Proposals will be rejected. The first five (5) Project Proposals submitted via MIS will be assessed, the other will be rejected before the evaluation. If all the proposals are submitted during the same day then the time of submission will be the essential criterion for the acceptance or rejection of the proposal.

Q 3.4. In case a Project Proposal is rejected after the evaluation procedure, is there a legal administrative complaint procedure to submit our complaints?

A.3.4. During the Evaluation Procedure an administrative "Complaint Procedure" is foreseen:

- After the completion of the Stage A' / Concept Note Evaluation
- After the completion of the Stage B' - Phase B1 & B2 / Administrative & Quality Assessment
- After the completion of Stage B' – Phase B3 / Eligibility & State Aid check

Q.3.5. Do we have to select only one Specific Objective or can we submit a proposal in more than one?

A.3.5. Project applicants are invited to submit their Project application under one of the Specific Objectives of the Programme. The Project objectives and the proposed activities shall be clear and in-line with the Programme Priorities and both shall have an impact on the Greece-Bulgaria area. Each Project is asked to select those indicators that will fit best to the particular planned results and outputs of the Project. Therefore, a Project applicant can apply a Project proposal only under one Specific Objective.

Q.3.6. Are the submitted project proposals evaluated per Priority or per Specific Objective?

A. 3.6. The submitted project proposals are evaluated and ranked per Specific Objective. Beneficiaries may submit more than one project proposal at the same Specific Objective. In this case, in which the same organization is participating in more than one project proposal, the proposals are competitive.

Q.3.7. Is it eligible as a capitalization action to widely implement already co-funded tools demonstrating added value and transfer potential?

A. 3.7. Capitalization is welcome. However, there must be no double-financing.

Q.3.8. Are SME's/ Profit-making Organizations eligible?

A.3.8. SMEs/ Profit-making Organizations are not eligible for direct financial support in this Call.

Q.3.9. Is it mandatory the Project proposal to contribute to all Programme Output Indicators for the relevant Specific Objective?

A. 3.9. Project applicants are invited to submit their Project application under one of the Specific Objectives of the Programme. The Project objectives and the proposed activities shall be clear and in-line with the Programme Priorities and both shall have an impact on the Greece-Bulgaria area. Each Project is asked to select those indicators that will fit best to the planned results and outputs of the Project. Therefore, a Project applicant can apply a Project proposal only under one Specific Objective and select only the best suitable indicators (see Programme Output & Result Indicators Guide). In any case, each Project is treated as a whole and shall be evaluated as such.

Q. 3.10. Is there a minimum or maximum requirement for the number of output and result indicators a project must have? Are there expected target numbers for each project?

A. 3.10. There are no maximum or minimum requirements for the number of the selected indicators that a project proposal must have.

However, the output and result indicators selected and analyzed by the potential beneficiaries are crucial for the successful assessment of the project proposal and in particular:

During the evaluation of the Stage A – see Concept Note Evaluation Grid, criterion 11, and during the evaluation of the Stage B – see Quality Assessment Phase B2, part A2 criterion (a) & (b)

4. Other

Q.4.1 Is there any limitation of words or characters in the Concept Note Document?

A.4.1 As far as the length of the Concept Note is concerned, there is no word or character limit on the length of the Concept Note. Nevertheless, in general, all parts in the Concept Note must be answered concise and comprehensive.

Q. 4.2. Should all beneficiaries be registered in MIS?

A. 4.2. For the submission of the Concept Note, only the Lead Beneficiary is necessary to be registered in the MIS. However, for the submission of the Application Form – at the STAGE B’ of the procedure – all the Beneficiaries should be registered in the MIS. We strongly recommend, all Potential Beneficiaries to be registered in the MIS from the beginning of the procedure.

Q. 4.3. The proposal is prepared by all beneficiaries and is submitted by the Lead Beneficiary. Should it be signed only by the lead beneficiary?

A. 4.3. The project proposal should be signed only by the legal representative of the Lead Beneficiary

Q. 4.4. What is the preferred number of beneficiaries? Is the participation of local or central governmental bodies compulsory or highly recommended?

A. 4.4. The minimum number of participants in a project proposal is (2) – one of each partner country – and the maximum number of participants in a project proposal is five (5). The number and the type of participants within this

limits depends of the scope of the project, the activities proposed for financing and the authorization of the participating organizations and will be evaluated during the evaluation procedure.

Q. 4.5. The goals of the circular economy also involve utilizing waste for clean energy (e.g., heating from agricultural residues). We don't see to have an intervention category for these actions. Can such initiatives by municipalities be incorporated into any existing intervention field?

A. 4.5. In general if the relevance of each project proposal fits the aim of the specific objective given at the Programme Document is subject to assessment. We advise you to consult the Programme Document (pg.37-48) to judge if your project proposal is relevant.

Q. 4.6. Taking into account the recommendation for budget of soft measures up to 600 000 EUR per project, is it possible to submit a completely „soft” project, containing only soft actions and measures ? If yes, how is it supposed to comply with the minimum project budget of 1 000 000 EUR? This question is highly important for Specific objective: RSO4.2, which in fact contains only soft indicative actions and it is logical that projects under this objective should be soft projects, and adding investment actions to them will most probably be artificial and will put into question the effective usage of programme funds?

A. 4.6. According to the Terms of Reference of the 1st Call for Project Proposals paragraph 7.14 “It is strongly recommended that the total Budget of expenditure in categories 2,4,8 and 10 (soft measures), cannot exceed the amount of 600.000€. Nevertheless, we will accept projects exceeding the amount of 600.000€, if well justified, in these categories. However, RSO 4.2 does envisage actions which would result to the purchase of equipment or even expenditure related to infrastructure according to the Programme Document (page 74). Please **don't** declare any “artificial” actions to your project as it will be easily

detected by the assessors and will result to the rejection of your proposal. Please read pg.73 of the Operational Programme for more information regarding specific objective 4.2. The aim is to receive project proposals that would leave tangible results and that their sustainability would be ensured after the lifetime of the project.

Q. 4.7. In RSO 4.2 Life-long learning we still have the limitation of 600.000 ?

A. 4.7. There is no limitation in the ToR of the 1st Call regarding this issue. It is a recommendation. Please see question 4.6 for more information on this issue.

Q. 4.8. Since there are 4 potential beneficiaries tables in the concept note - can we remove the unnecessary ones if there are only two partners (for example...)? Or do we write N/A in the tables?

A. 4.8. You may add or omit tables if necessary in this section of the concept note depending on the number of partners you have in your project proposal.

Q. 4.9. If someone from one unit of an organization creates a new account, will he/she be able to "see" and submit all the proposals made by the organization? Is it possible to modify and submit only one proposal?

A. 4.9. The user with "Submit AF" role can see (and submit) all proposals.

The user without "Submit AF" and access to all proposals of the organization can see his proposal at any status and all proposals after their approval by the MA. The user without "Submit AF" and access only to his projects can see only his proposals/projects.

Q 4.10. When you refer to household waste (intervention 067), do you mean only waste from homes or does it include all types of municipal waste (such as waste from businesses, hospitals, parks, etc.)? Many municipalities also have agricultural waste, are they exempt?

A. 4.10. The main emphasis regarding the intervention field 067, is given in the household waste. Other urban waste (by public buildings for example) may be included if they have the same typology or similar composition to household waste.

Q 4.11. Could you publish the evaluation grid and application guidelines for the second phase of the call?

A. 4.11. The evaluation procedure for the 1st Call for Project Proposals will be conducted in two (2) stages. Stage A' which concerns the evaluation of the submission of the concept note and Stage B' which concerns the evaluation of the analytical project proposal performed in three distinct (3) phases. The evaluation grid and application guidelines regarding Stage A' are included in the applicant's package (Submission of the Concept Note). Therefore, we consider that the necessary material for the submission of the concept note has been provided and no other material will be published at this point (other than the FAQ) on the programme's website.

Q 4.12. A Bulgarian NGO with a seat in Sofia and a branch in the eligible area, was beneficiary under the Greece-Bulgaria 2014-2020 Programme and for that reason the organisation already has a Bodycode and MIS registration. As no Bulgarian branches are eligible under the current call for proposals, we would like to participate in a consortia under the exception provided in the Eligibility Criteria that "organisations located outside the Programme area but inside the Member states participating in the cross-border Programme if their participation in the project brings added value and expertise to its implementation and benefits the Programme cooperation area" with our main organisation that is based in Sofia.
Having in mind that:
- the only normative difference in the registration of the main organisation and the branch, is the address (including

the NUTS code) and the additional text in the name of the branch, specifying it is a branch and its location and

- all the rest, including the national identification number and the official representative, are the same,

- Please advise if we shall change our data in the MIS; proceed with deactivation of current MIS profile and then creating a new Bodycode/MIS registration; or else?

A. 4.12. If you already have a Bodycode is not necessary to create a new account. You should, of course, update your organization’s data according to the guidance given in the relevant annexes of the Applicant’s Package.

Q 4.13. Please, provide answers to these questions for the following sections in the Application form section in MIS 2021-2027 Greece-Bulgaria:

Section A

Classification – Our relevant codes are RSO4.6 and 165, but there are also available Categories with codes 33, 01, 26 displayed. Are they relevant and if they are what percentage should be entered?

Section B

Location – Is it only for the location of the lead beneficiary or for the other partners, as well. And how the percentages should be defined?

Section C

Partnership – Do all partners have to be entered or only the lead beneficiary?

Section D

Budget – Is it Budget Annual Allocation section need to be filled?

A.4.13. The answers for the questions regarding the Section A, B, C & D of the MIS are:

Section A: The Code 33 refers to the Territorial delivery mechanism and territorial focus, the Code 01 refers to the Form of financing and Code 26 refers to ECO. All three

codes should remain (not be deleted) and in case a percentage is needed it should be 100%.

Section B: It concerns the location of the project activities. The total percentage should be 100%

Section C: Only the Lead Beneficiary according to the guidance of Annex 16 of the Applicant's Package.

Section D: The Budget Annual Allocation does not need to be filled at this stage.