

Record of questions

in the framework of the

INTERREG-IPA Bulgaria – Turkey CBC Programme, CCI Number: 2014TC16I5CB005

CALL FOR PROPOSALS: 2014TC16I5CB005-2015-1

| No | Question | Answer |
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| 1 | <p>Are expenditures for preparation of detailed works design eligible under the two priority axes? For example, if the applicant has a conceptual design can he envisage costs for preparation of detailed works design? After preparation of the detailed works design, the specified investment to be implemented in the required ratio for soft and investment measures?</p> | <p>Submission of an Approved detailed works design issued not later than 2 years prior to the submission deadline of the call is a compulsory annex to the application (Annex B6.5) in case such is required by the national legislation of the respective partnering country for the object of intervention. In this respect the absence of such an annex, if required for the object of infrastructural intervention, is a reason for direct elimination of the project proposal without possibility for additional supplementations. According to p. 2.5.3 Eligibility of Expenditures in Guidelines for applicants, expenses for project preparation (meetings between partners, consultancy, studies, feasibility studies, technical surveys, works design, certificates, permits, translation of documents, taxes and other charges arising from preparation of project proposal) are eligible provided that all other conditions for eligibility of expenditure for project preparation are met. The project preparation expenditures should be carried out before or on the date of submission of the project proposals at the latest.</p> |
| 2 | <p>Are the expenditures for project preparation under BL6 eligible if they are reported by civil contract with an individual?</p> | <p>The project preparation expenditures have to be assigned according to the procurement rules mentioned in p. 2.3 of the Guidelines for Applicants. Current version of PRAG allows for contracts below or equal to 2500 Euro a payment to be made against invoice without prior acceptance of a tender.</p> |

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| 3 | Is it possible project partners pay project preparation costs to sub-contractors after signature of the subsidy contract with the MA? | The project preparation expenditures should be carried out before or on the date of submission of the project proposals at the latest. It means that all supporting documents as invoices, acceptance protocols, lists, etc., should be issued before or on the date of submission of the project proposal to the Managing authority at the latest. The expenses for project preparation should be requested for reimbursement and verified only in the first request for reimbursement of the respective project partner and in accordance with the guidelines from the Managing Authority. |
| 4 | How many investment projects one applicant can submit? | There is no specific limitation on the number of investment projects an organization may participate in. Under the current call for proposals an institution/organization may submit maximum one project proposals as a Lead Partner. In case an institution/organization has submitted more than one project proposal as a Lead Partner, all these submitted (as Lead partner) proposals will be eliminated. Under the current call for proposals an institution/organization may participate in no more than 3 (three) project proposals as a partner (i.e. if an organization/institution has submitted a proposal as a Lead Partner, it can be a partner in no more than 2 other projects, and if it has not submitted a project as a Lead Partner it can participate as a partner in no more than 3 projects). In case an institution/organization participates in more than 3 (three) project proposal, all submitted proposals will be eliminated. |
| 5 | Regional Centre for Distance Learning Haskovo is a general service body of the University of National and World Economy Sofia. Is it eligible RCDL to apply under the INTERREG CBC Bulgaria – Turkey Programme 2014-2020? | The criteria for eligibility of applicants under the Programme are described in point 2.5.1.1 of the Guidelines for applicants. Please, note that these criteria are cumulative and must be fulfilled all together. Particular attention should be paid to the requirements the applicants to be legally established organizations (legal persons) according to the national legislation of the state on whose territory they are located and to be registered in the eligible cross-border region between Bulgaria and Turkey. |
| 6 | Does the requirement for registration or organizations at least 12 months before the deadline for submission of project proposals concern only the Lead partner? | The Lead Partner must be registered within the eligible border region between Bulgaria and Turkey at least 12 months before the deadline for submission of project proposals under the current call for proposals. This term does not apply for other project partners except the LP. |
| 7 | Which part of the Application Form has to be filled in 3 languages? | Project summary should be filled in English, Turkish and Bulgarian. In case of inconsistency between the three versions, the English version shall prevail. |

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| 8 | <p>The Guidelines for Applicants contain list of supporting documents for investment projects. It is indicated that in the absence of any of them, the project may be rejected. Are all listed supporting documents required?</p> | <p>All supporting documents for works activities are described in point 3.2 of the Guidelines for applicants and should be submitted together with the Application form.</p> |
| 9 | <p>In case the project envisages supply of hardware/software, what shall its type - investment or soft project?</p> | <p>When the project envisages delivery of already developed software products, existing on the market, the expenditure should be considered as supply. In case the project envisages elaboration (programming) of custom/new software, the expenditure should be considered as service. Supply of hardware should be considered as investment cost and depending on the percentage of the investment costs in the project, it should be set as "investment" or "soft measure". In case of "investment" projects the amount of eligible expenses of budget line 5 should be at minimum 70 % of total eligible project costs. In case of "soft" projects the amount of eligible expenses of budget line 5 should be maximum 50 % of total eligible project costs.</p> |
| 10 | <p>Isn't the evaluation criteria "Background of the applicant in relation to the Programme" a discriminatory one?</p> | <p>The criterion for technical evaluation "The project partners have implemented contract(s) under the Bulgaria – Turkey IPA CBC Programme 2007-2013 with a good financial execution rate (60%)" is one of the five criteria intended to assess the managing capacity of the applicants.</p> |
| 11 | <p>The Guidelines for Applicants stipulate that the financial agreement between the EU and the Republic of Turkey has not been signed at the date of publication of the First Call. Is the situation at present the same?</p> | <p>The Financing Agreement between the European Commission and the Government of the Republic of Turkey for allocation under the Programme has not been signed at the date of publication of the present version of the answers to questions from potential applicants.</p> |
| 12 | <p>In which budget line shall be envisaged the expenditures for author supervision?</p> | <p>According to section 2.5.3. of the guidelines for applicants Expenditures for supervision (if necessary) including authors supervision – in compliance with the relevant national legislation are eligible under BL 5, Sub-line "Small scale construction".</p> |

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| 13 | Is the amount of the team members' remuneration bound to the amount of the implemented activities? Is it possible to delay their payment due to verification of the costs? | The amount of the salary of each member of the project team is determined in the relevant contract concluded between the beneficiary and the member of the project team. The payment of the salary is an obligation of the employer and is due according to the relevant national legislation. The reimbursement of these amounts is done by the MA as a flat rate which is a percent from the verified direct costs requested for payment by the beneficiary. |
| 14 | Is it possible an organization member to perform investment supervision under the project and a civil contract for services to be concluded with this person? | According to section 2.5.3. of the Guidelines for applicants the expenses for contracting of employees of the partner organizations as external experts, e.g. as freelancers shall not be eligible. |
| 15 | Is it possible an organization's car to be rented under the project and are the related expenditures for fuel eligible? | A vehicle of the organisation cannot be rented for the project but expenditure for fuel of personal vehicle or vehicle of the organization are eligible and is budgeted in kilometres (maximum 0, 21 euro per kilometre). It has to be taken into account that only expenses for fuel of vehicle used for project activities shall be budgeted. |
| 16 | Is it possible an organization's member who is not a team member to execute services and to be paid by the project? | According to section 2.5.3. of the Guidelines for applicants the expenses for contracting of employees of the partner organizations as external experts, e.g. as freelancers shall not be eligible. |
| 17 | Could NGOs be beneficiaries under Specific objective 1.1? | The criteria for eligibility of applicants under the First Call for proposal are described in point 2.5.1 of the Guidelines for applicants. Please, note that these criteria are cumulative and must be fulfilled all together. The list of potential beneficiaries under each specific objective is indicative. |
| 18 | Are there any limitations concerning the number of team members? | According to the Guidelines for applicants there are no limitations concerning the number of team members. |
| 19 | Is there a requirement for lack of obligations of applicants to the state budget and National Insurance Institute? If there is such a requirement, what documents must be submitted? | At the application stage, the LP on behalf of all partners should sign a "Declaration of eligibility" (Annex A3), declaring that all project partners including Lead Partner, do not fall into any of the exclusion situations described in part "2.5.1.1 General Criteria for Eligibility of Applicants", one of them is not fulfilled obligations of each project partner relating to the payment of debts to the consolidated state budget. Submission of certificates for lack of obligations (taxes and social security duties) is not required at the time of application, but will be required before signing the subsidy contract. Please also note that the Evaluation Committee can request additional documents or explanations, for clarification or justification of information/documents submitted in the project proposal. |



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| 20 | <p>1. Is it eligible a project proposal to include only one of the activities listed under Priority Axis 1 specific objective 1.1?</p> <p>2. Is it possible reforestation to be carried out in an area different from a riverbed, wetland, and floodplains? For example a terrain which needs afforestation / recreational events as a result of fires, but different from the above listed.</p> <p>3. What is meant by "small scale investment" - is there a percentage limit for these costs against the total project budget, or the rule BL 5 'Equipment Works' to be from 50% to 70% applies?</p> <p>4. Is it eligible a project proposal to include one activity from Priority Axis 1 - Specific objective 1.1 and one activity under Priority Axis 1 Specific objective 1.2?</p> | <p>1. The number, nature, scope and contents of the activities have to be decided by the project partners. Detailed description of the eligible activities under this call for proposals are given in section 2.5.2.3 "Eligible Activities". Please note that the provided list of activities is not exhaustive.</p> <p>2. The provided list of activities is not exhaustive and other activities within the scope of the respective Specific Objective may be eligible if properly justified.</p> <p>3. "Investment" projects mainly include investment activities (works, supply, etc.). Such projects may also include "soft" measures. In the "investment" projects expenditures for investment activities should form at least 70 % of total eligible project costs.</p> <p>4. A project proposal may be submitted for financing under only one Specific objective which must be clearly indicated in the application form. This is obligatory condition. If the project includes activities from two or more different specific objectives it will be ineligible.</p> |
| 21 | <p>While filling the application form, some problems occur:</p> <ul style="list-style-type: none"> - The budget items cannot be filled, the document asks you to remove the page protection, and when you try to do that it asks for a password. - In some part of the AF, for example item 3.4 (description/specification) when you write something long, full paragraph appears when you click on that column twice. It means that those parts will not be readable in the hardcopy. | <p>Potential applicants are reminded that modifying the standard application form or Annexes will result in the rejection of the submitted application.</p> <p>The budget tables except "T2-B (PP1)" ... "T2-B (PP5)" and small part of "Table 5-Sources" are programmed to be filled in automatically and it is normal the AF to ask for password when applicants are trying to fill in information in protected cells. There are also write-protected cells in budget tables "T2-B (PP1)" ... "T2-B (PP5)" and "Table 5-Sources" which protection should be preserved. Applicants should not try to unprotect the AF in any case because it may lead to serious mistakes and inequalities in the final AF. The issue in the second question - the function "wrap text" does not function in some cells - is caused by older versions of office suites like MS Office v.2007 and lower. Applicants are advised to use MS Office v.2010 or higher or contemporary editions of other similar office suites.</p> |



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| 22 | <p>Will the financial support under INTERREG - IPA Bulgaria - Turkey Programme be considered as De-minimis aid?</p> | <p>Due to the fact the funds granted by the Interreg IPA CBC Bulgaria – Turkey Programme are of a public nature, all projects financed under the Programme shall be subject to state aid assessment.</p> <p>The grant under INTERREG - IPA Bulgaria - Turkey Programme constitutes State aid if all of the following conditions are met:</p> <ol style="list-style-type: none"> 1. Presence of Public resources. 2. The measure granted confers an economic advantage (a benefit) to an undertaking, which it would not have otherwise received. 3. The measure granted by the State is selectively favouring certain undertakings or the production of certain goods. 4. The grant distorts or threatens to distort competition. 5. The grant affects trade between Member States. <p>If one of the State aid criteria is not met, the grant in question does not constitute State aid.</p> <p>Public support given by the Programme to undertakings from Bulgaria for activities of economic character will be granted under the de-minimis rule. This implies that Bulgarian undertakings will receive grants only if they have not received public aid under the de-minimis rule with a total more than 200,000 EUR within three fiscal years from the date of granting the aid. This ceiling is reduced to 100,000 EUR in the road transport sector.</p> <p>Detailed information concerning application of the state aid rules under the Programme is provided in section 1.5. of the Guidelines for applicants.</p> |
| 23 | <p>We are an NGO from Yambol. We were at the meeting in Edirne on 21.01.2016 looking for a partner organization in a project under the CBC Programme. We would like to ask for access to the partner database. Thank you in advance!</p> | <p>The partner search database is available online at the address: http://www.ipacbc-bgtr.eu/partners?country=45&term_node_tid_depth=45&field_priority_tid=All.</p> |
| 24 | <p>Is the branch of a legal institute (Foundation, registered in Sofia, with the branches in the eligible area with a legal statute (legal entity with legal personality) eligible according to the provisions of the Applicant's Guide (page 18)?</p> | <p>The criteria for eligibility of applicants under the First Call for proposals are described in point 2.5.1.1 of the Guidelines for applicants. Please, note that these criteria are cumulative and must be fulfilled all together. Particular attention should be paid to the requirements the applicants to be legally established organizations (legal persons) according to the national legislation of the state on whose territory they are located and to be registered in the eligible cross-border region between Bulgaria and Turkey.</p> |

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| 25 | <p>What type of expenditure is the elaboration of a website designed specifically for the project – supply or service delivery? Can it be a separate activity as it will play an important role in the project? (We are asking because in the Guidelines it is in the examples of expenditure under BL 4).</p> | <p>According to part 2.5.3 Eligibility of expenditures in case the project nature necessitates development of unique software application or web site its development should be considered as service and the respective expenditure should be planned in BL4. External expertise and services costs of the respective project partners' budget Detailed description of the indicative eligible activities under the First call for proposals are given in section 2.5.2.3 Eligible Activities. Justification of each separate activity planned for implementation should be in compliance with the description in section 3.5. Project activities.</p> |
| 26 | <p>What should be regarded as an "undertaking" in relation to the "de minimis" rule? Are municipal enterprises undertakings?</p> | <p>Under the programme as an undertaking will be considered any entity engaged in an economic activity, regardless of its legal status and the way in which it is financed (an undertaking can be a public body (incl. Municipality), a charity, a NGO, an association, an university etc.). The application of the State aid rules as such does not depend on whether the entity is set up to generate profit, as also non-profit entities can offer goods and services on a market too. The only relevant criterion is to decide whether or not the entity carries out an economic activity in the context of the project. It is important whether the aid is giving an economic advantage (a benefit), which an undertaking would not have obtained under normal market conditions, including the potential possibility for development of economic activity as a result of the project and whether as a result of the project the market will be changed. Public support given by the Programme to undertakings for activities of economic character can be granted under the de minimis rule.</p> |
| 27 | <p>Is it possible a waste collection equipment (machine) to be purchased under Specific objective 1.2, priority axis 1?</p> | <p>A list of activities is present in section 2.5.2.3 "Eligible Activities" of the Guidelines for Applicants, though it is not exhaustive but indicative. Planned activities should lead to achievement of the objectives of the project, which on their side should lead to achievement of the selected Specific objective of the Programme.</p> |

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| 28 | What is the deadline for payment of expenses for project preparation? Can they be paid before the submission of the project proposal? | According to Guidelines for Applicants part 2.5.3 Eligibility of expenditure and the List and description of Eligible Expenditures under Budget line 6 - Project preparation, the project preparation expenditures should be carried out before or on the date of submission of the project proposals at the latest. It means that all supporting documents as invoices, acceptance protocols, lists, etc., should be issued before or on the date of submission of the project proposal to the Managing authority at the latest. The respective payment could be performed before or after the date of submission of the project proposal to the Managing Authority. The expenses for project preparation should be requested for reimbursement and verified only in the first request for reimbursement of the respective project partner. |
| 29 | In "soft" measures maximum 50% of total eligible project costs may include either supply or works activities? | For "Soft measures" projects, the amount of eligible expenses under sub-line "Supply" must not exceed 50 % of total eligible project costs and there should be no expenditures foreseen under sub-line "Small scale construction". |
| 30 | Is it necessary for the investment projects the submission of an approved works design, if such is not obligatory according to the Bulgarian law? | According to the Guidelines for Applicants part 3.2 one of the supporting documents concerning works activities is B6.5 - Approved detailed works design issued not later than 2 years prior to the submission deadline of the current call (if applicable according to the relevant legislation). In case of construction works, for which the relevant legislation does not require approval of a works design, the applicants have to present a letter issued by the relevant body clearly stating that approval of the works design is not required. |
| 31 | Is it obligatory the translation of the explanatory note of the investment projects to be verified with the stamp of the designer? | According to the Guidelines for Applicants part 3.2 the English translation of the Supporting documents must be stamped and signed by respective organization as true copy or at least the relevant parts of these documents, proving the partners' eligibility must be translated in English. It is possible the translation to be provided by the designer but in any case it must be verified as true copy by the partner organization. |



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| 32 | How the Turkish design papers/drawings can be scanned regarding their length and volumes and the visibility of signatures? | <p>In the Guidelines for Applicants part 4 “Where and How to Send the Application” a table with description of File formats of the documents is provided.</p> <p>The documents have to be scanned by conventional scanning machine and not photographed by camera, mobile phone or other picture taking device. The documents should not be in jpeg format except the ones in Annex B.6.6. Annexes and Supporting documents have to be provided in separate files, as described in the table. They should not be provided all in one file. If some of the scanned files becomes too large and difficult to handle by regular computers it is acceptable the same file to be divided into several files clearly noting which part of the respective annex they contain, e.g. B6.5_PP1_en.pdf can be separated in two parts as follows: B6.5_PP1_en-part1.pdf and B6.5_PP1_en-part2.pdf.</p> |
| 33 | Can the branches of organizations apply for the Programme? | <p>According to the Guidelines for Applicants, part 2.5.1.1 “General Criteria for Eligibility of Applicants” Lead Partner and its partners must comply cumulatively with all general eligibility criteria. Particular attention should be paid to the requirements to “be legally established organizations (legal persons) according to the national legislation of the state on whose territory they are located and to “have their headquarters established within the eligible cross-border region between Bulgaria and Turkey. Exception is made for national/ regional public authorities whose area of competence, established by legal acts, extends to the eligible area of the programme, or structures of central public authorities located in the eligible cross border region which cannot be registered as legal entities – in this case the central authority is a project partner”.</p> |
| 34 | How placement of temporary prefabricated buildings is considered by the Programme - as supply or construction? | <p>Any item that is supplied fully constructed, does not need ground works, is not fixed in an irremovable manner to the surface or the technical infrastructure (like electricity, water and sewage and etc) and does not need construction permit or any type of approval of construction works (like pavilions, trailers, kiosks and etc.) can be treated as supply. Such objects according to Article 80 of the Bulgarian Law for Spatial Planning are determined as removable objects and are not construction sites according to Article 38 of the same regulation.</p> |

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| 35 | In which budget line shall be envisaged the expenditures for preparation of investment projects? | If it is a case of claiming the expenditures for preparation of an investment project that will be submitted for financing under the present call for proposal these expenditures have to be claimed under budget line 6 "Project preparation". If it is a case of preparation of an investment project that will be implemented in the future or under other source of financing but not within the project submitted under the current call, then these expenditures have to be included in budget line 4 "External expertise and services costs". |
| 36 | Shall the eligible expenditures be reduced by the net revenue generated after the implementation period of the project? | According to Article 65, (8) of REGULATION (EU) No 1303/2013 the eligible expenditure of the operation shall be reduced by the net revenue generated only during the project implementation. |
| 37 | Should the costs for project preparation (such as consulting services, design, translations and others.) be performed/made/assigned under the Public procurement rules or under "Practical Guide for Procurement and Grants for European Union external actions" (PRAG)? | The project preparation expenditures have to be assigned according to the procurement rules mentioned in p. 2.3 of the Guidelines for Applicants. Applicants must refer to and use the guidelines and templates of the "Procurement and Grants for European Union External Actions – a Practical Guide" document (PRAG). |
| 38 | Can the members of the project management team be engaged in the project on the basis of a civil contract (service contract)? | The appointment of the staff by the beneficiaries has to be made in accordance with the European and national legislation. The proper appointment of the project team is on the responsibility of the beneficiaries themselves. |
| 39 | When and with what rates the approved projects will be financed? | The procedure for requests for payment and reimbursement of the expenditures is described in Article 8 in the Subsidy contract differentiated by types of payments – advance, interim and final and by types of projects – soft or investment. |
| 40 | Is it eligible if the project preparation is done by consultancy company specialized in preparation, implementation and management of European projects? If the answer is "yes" - in which budget line should the expenditure be envisaged? | There is no requirement, stated in the Guidelines for Applicants, about the type of organization which may elaborate the project proposals. In case of sub-contracting project preparation activities, procurement rules should be observed in order for the costs to be eligible for reimbursement under the Programme (point 2.3 of the Guidelines for Applicants). The project preparation expenditures cannot exceed 3% of total project direct costs and should be envisaged in BL6 of the respective project partners' budget. |

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| 41 | Will the implementation of some activities such as preparation of tender be considered as eligible if done by a consulting company specialized in the preparation, implementation and management of European projects? | The expenditures for tender procedures development/preparation of tender documentation have to be assigned according to the procurement rules mentioned in p. 2.3. Applicable law and public procurement of the Guidelines for Applicants, observing all requirements of the respective type of tender procedure. As it is underlined in p. 2.3., Beneficiaries under this Call for Proposals must refer to and use the guidelines and templates of the “Procurement and Grants for European Union External Actions – a Practical Guide” document (PRAG). |
| 42 | Can it be considered eligible if the project team has two coordinators - one for the Lead partner and one for the Project partner(s)? | According to the needs of the project identical positions under BL1 of two or more project partners could be planned. The number of the project team members, their specific positions in the project, duties and responsibilities should be clear enough to guarantee smooth project implementation and reporting. |
| 43 | When subcontracting services and expertise, as well as supply of equipment, which is the applicable law - Bulgarian (Public tendering law) or European procedures and PRAG? | The subcontracting of expenditures under the project has to follow the procurement rules mentioned in p. 2.3. Applicable law and public procurement of the Guidelines for Applicants, observing all requirements of the respective type of tender procedure. As it is underlined in p. 2.3., Beneficiaries under this Call for Proposals must refer to and use the guidelines and templates of the “Procurement and Grants for European Union External Actions – a Practical Guide” document (PRAG). |
| 44 | Related to our application under the program INTERREG CBC Bulgaria-Turkey would like to ask whether the Executive Agency for Fisheries and Aquaculture is an eligible partner? | The criteria for eligibility of applicants under the Programme are described in point 2.5.1.1 of the Guidelines for applicants. These criteria are cumulative and must be fulfilled all together. |
| 45 | Our NGO is registered outside the eligible region in Bulgaria, but the organisation has a branch which is registered in the eligible area. Is the branch eligible applicant under the first call for proposals No. 2014TC16I5CB005 – 2015 | The criteria for eligibility of applicants under the Programme are described in point 2.5.1.1 of the Guidelines for applicants. These criteria are cumulative and must be fulfilled all together. Particular attention should be paid to the requirements to “be legally established organizations (legal persons) according to the national legislation of the state on whose territory they are located and to “have their headquarters established within the eligible cross-border region between Bulgaria and Turkey. Exception is made for national/ regional public authorities whose area of competence, established by legal acts, extends to the eligible area of the programme, or structures of central public authorities located in the eligible cross border region which cannot be registered as legal entities – in this case the central authority is a project partner”. |

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| 46 | I would like to ask if an institution is involved in three projects - one as a Lead partner in two as a project partner is it possible an employee or civil servant to be entitled to participate in two of the projects. Thank you in advance! | The appointment of the staff by the beneficiaries has to be made in accordance with the European and national legislation. The proper appointment of the project team is on the responsibility of the beneficiaries themselves. |
| 47 | Is the Association of mayors in Dimitrovgrad ", registered in Haskovo district court, ID 176381010 an eligible applicant under Priority Axis 1 Environment: Specific Objective 1.1. Preventing and mitigating the consequences of natural and man-made disasters in the cross-border area? | According to the Guidelines for applicants the First call for proposals is open to all potential beneficiaries that meet the eligibility criteria set in section 2.5 Eligibility criteria: eligibility of applicants (defined in section 2.5.1), eligibility of activities (defined in section 2.5.2) and eligibility of expenditures (defined in section 2.5.3). The list of potential beneficiaries under each specific objective in section 2.5.1.1 of the Guidelines for Applicants is indicative.. |
| 48 | What are the guarantees that NGOs will be treated equally with governmental and municipal organizations in the assessment of the project under the Programme? | Assessment of all project proposals is made solely on the basis of the selection criteria approved by the Joint Monitoring Committee and announced in the Guidelines for Applicants. The technical and quality evaluation of the project proposals is performed by independent external Bulgarian and Turkish assessors. The projects are approved for funding by the Joint Monitoring Committee of the Programme, in which wide range of Programme stakeholder is represented. |
| 49 | Is the purchase of containers for biological and green waste an eligible activity under the Call? | A list of activities is present in section 2.5.2.3 "Eligible Activities" of the Guidelines for Applicants, though it is not exhaustive. Planned activities should lead to achievement of the objectives of the project, which on their side should lead to achievement of the selected Specific objective of the Programme. |
| 50 | Is the requirement one organization to participate in one project as a lead partner and two project as a partner valid for the current Call for Proposals or for the whole Bulgaria - Turkey Programme for the period 2014 -2020 | The specified rule applies only for the current Call for proposals. The rules for participation in future calls for proposals under the INTERREG CBC Bulgaria - Turkey Programme 2014 -2020 will be specified in the respective calls. |

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| 51 | Is the Social Cares Directorate an eligible applicant for projects under the specific objective concerning tourism? | The criteria for eligibility of applicants under the Programme are described in point 2.5.1.1 of the Guidelines for applicants. Please, note that these criteria are cumulative and must be fulfilled all together. Particular attention should be paid to the exceptions to the rule the applicants to be legally established organizations (legal persons) according to the national legislation of the state on whose territory they are located, which is done for subsidiary structures of local/regional/national authorities, and to be registered in the eligible cross-border region, which is done for national/regional public authorities whose area of competence, established by legal acts, extends to the eligible area of the Programme. |
| 52 | The site which is envisaged for interventions falls under NATURA 2000. Is it necessary the investment project to have additional approvals in this respect? | In case of investment activities within territories/objects with special status (National parks, environmental and architectural reserves, cultural monuments, protected areas, areas included in Nature 2000 etc.) the respective project partner has to include in the project proposal package relevant documentation (permits, approvals, certificates, statements, etc.) required by the respective national applicable law - certified copy and English translation stamped and signed by respective organization as true copy. |
| 53 | Is only the LP eligible to perform investment activities? Is it compulsory the activities from both sides of the border to be mirror activities? | The number, nature, scope and contents of the activities have to be decided by the project partners. According to the guidelines for applicants from the indicative lists of activities there are no specific activities that can be assigned only to the LP. Activities on both side of the border may not be "mirror activities" but they have to contribute to achievement of the selected Specific objective of the Programme. |
| 54 | Are the costs for project preparation by specialized consulting company eligible under the Programme? | There are no restrictions, stated in the Guidelines for Applicants, related to the type of organization which may elaborate the project proposals. In case of sub-contracting project preparation activities, procurement rules should be observed in order for the costs to be eligible for reimbursement under the Programme (point 2.3 of the Guidelines for Applicants). The project preparation expenditures cannot exceed 3% of total project direct costs and should be envisaged in BL6 of the respective project partners' budget. |
| 55 | How the Joint development of the project can be justified? | According to the Guidelines for Applicants part 2.1 Cross-border impact, "Joint development" criterion means that the project must be designed in close cooperation of the partners from both sides of the border. This means that project proposals must clearly integrate the ideas, needs, priorities and actions of stakeholders on both sides of the border. The Lead Partner is the coordinator of this process but should include |

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| | | <p>other partners from the beginning of the development process. Justification of the cooperation criteria depends on the approach used by the respective project/partners. The applicants are advised to be more convincing by describing what has been the exact role of each partner organization in the project development.</p> |
| 56 | <p>In the indicative list of potential beneficiaries under Specific Objective 1.1 in the guidelines following potential applicants are listed: 1. All levels of local/ regional authorities; 2. Central and regional offices and structures of relevant national and governmental institutions/ administrations and 3. Regional and sector development agencies. As NGOs are not included in this list, is it eligible NGOs to apply as project partner by implementing soft measures?</p> | <p>The criteria for eligibility of applicants under the First Call for proposal are described in point 2.5.1 of the Guidelines for applicants. These criteria are cumulative and must be fulfilled all together. The list of potential beneficiaries under each specific objective is indicative.</p> |
| 57 | <p>Is it possible Ahtopol town to be a partner in project funded under the current Programme and is it possible a primary school in Ahtopol to be a partner in a project as well?</p> | <p>The criteria for eligibility of applicants under the Programme are described in point 2.5.1 of the Guidelines for applicants. These criteria are cumulative and must be fulfilled all together. In the particular case, special attention should be kept if the candidate is a legally established organization (legal person) according to the Bulgarian legislation. The composition of the partnership depends on the specifics of the project proposal. Relevance of the partnership to the proposed project is a subject to technical evaluation.</p> |
| 58 | <p>Is it required all the documents to be translated in English – statute of the NGO, registration, etc.? If yes, is it required the notary stamp and signature for official translation?</p> | <p>According to section 2.6.2 "How to fill in the Application Form and its Annexes" of the guidelines, the supporting documents issued by national/ local authorities or other bodies shall be attached in the original language accompanied by a translation in English. According to section 3.2 "Supporting documents (B)" of the guidelines: - unless stated differently, all supporting documents must be presented either in original (when it is possible) or in the form of copies, certified "True to the original" by the legal representative or an authorized person from the respective partner or by the Lead partner or an authorized person from the Lead Partner. No notary certifications are needed at the stage of application;</p> |



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| | | <p>- supporting documents must be supplied also in English translation stamped and signed by respective organization as true copy or at least the relevant parts of these documents, proving the partners' eligibility must be translated in English. The translated version will prevail for the purposes of evaluation of the application. According to section 6.2 of the guidelines, additional clarification concerning administrative and eligibility compliance of the project proposals could be requested. The Assessment Working Group may request submission of certified translation in English of any Supporting Document in case the presented translation is considered as not convincing.</p> |
| 59 | <p>What is the meaning of the term "undertaking" in the current Call for proposals?</p> | <p>Under the programme as an undertaking will be considered any entity engaged in an economic activity, regardless of its legal status and the way in which it is financed (an undertaking can be a public body (incl. Municipality), a charity, a NGO, an association, an university etc.). The application of the State aid rules as such does not depend on whether the entity is set up to generate profit, as also non-profit entities can offer goods and services on a market too. The only relevant criterion is to decide whether or not the entity carries out an economic activity in the context of the project. It is important whether the aid is giving an economic advantage (a benefit), which an undertaking would not have obtained under normal market conditions, including the potential possibility for development of economic activity as a result of the project and whether as a result of the project the market will be changed. Public support given by the Programme to undertakings for activities of economic character can be granted under the de minimis rule.</p> |
| 60 | <p>How many target groups can be envisaged in a project? Can the target groups be different on Bulgarian and on Turkish territory?</p> | <p>Target group(s) and final beneficiaries of your project proposal have to be specified by types and numbers. Project partners may define different target groups on Bulgarian and Turkish side. The number of the groups who will be positively affected by the project is not limited but it has to coincide with the planned activities and the specific overall aim of the project. The applicants are advised not to overestimate the numbers and to be as realistic as possible.</p> |
| 61 | <p>What statute has to have the property of the site, envisaged for intervention - "public governmental"/"public municipal" or it can be "private governmental"/"private municipal".</p> | <p>According to the Guidelines for applicants all works activities should be implemented on municipal or state-owned property. For the present call for proposals the specific status of the state and municipal property (that according to Bulgarian legislation can be either public or private) is of no importance.</p> |



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| 62 | How shall be described the activities for formation of the team and preparation and conduction of tender procedures? | According to section 2.6.2 of the Guidelines for applicants "Formation of the project team", "Project team meetings", "Project reporting", "Preparation of tender documentation", "Project Accounting" etc., are not to be described as separate activities since they could be incorporated within almost all project activities. |
| 63 | In which cases the Bulgarian and Turkish partners shall have to list the expenditures in the budget VAT included and VAT excluded? | According to section 2.6.2 of the Guidelines for applicants before filling the application form each project partner should clarify its VAT status for each activity and determine the VAT as recoverable or non-recoverable from other sources. In case the VAT is non-recoverable from other sources it is eligible for financing by the programme and should be included by the partner in the respective unit rates. Turkish partners receive a general exemption from VAT payment after signing of the Subsidy contract. That is why they shall not include VAT in the respective unit rates. |
| 64 | In relation to the fixed % rate of BL 1, in case the amount of direct expenditures of the project becomes lower in the process of project implementation, what will happen to the labour contracts of the project staff, since lowering of the wages is not permissible according to the Labour Code. | The proper appointment of the project team is on the responsibility of the beneficiaries themselves. When the beneficiaries are appointing the project team members, they have to respect the national legislation in all aspects including payment of the salaries. |
| 65 | Can personal cars be rented under the project and will these expenditures be eligible? | According to section 2.5.3 of the Guidelines for applicants personal vehicles or vehicles of the organization cannot be rented for the purposes of the project activities. |
| 66 | Is it possible the project staff under BL 1 to be hired on the basis of "civil contracts"? | The appointment of the staff by the beneficiaries has to be made in accordance with the European and national legislation. Proper appointment of the project team is on the responsibility of the beneficiaries themselves. |
| 67 | Can additional documentation be requested on the stages of administrative and technical evaluation? | According to section 6.2 of the Guidelines for applicants, additional clarification concerning administrative and eligibility compliance of the project proposals could be requested. In all cases the additional information / clarification must not lead to the improvement of the project proposal. |

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| 68 | What is understood under "joint team"? Is a team composed of 2 coordinators, 2 accountants and so on, a joint one? | Joint staffing means that the project should not duplicate functions on either side of the border. The basic characteristic of the joint team is the participation of representatives from both sides of the border in it and that regardless of where the person is located there should be a joint project management, responsible for project activities on both sides of the border. |
| 69 | Is it possible one of the partners to envisage investment activity and the other partner - on the other side of the border to envisage only soft activities? | According to the Guidelines for applicants there are no restrictions on the distribution of the activities among the project partners in the manner described in the question. On the other hand the limits for the investment activities estimated for the "soft" and "investment" projects are for the whole project not for the single partner. In this respect there are no restrictions of the described type as well. In any case the applicants have to bear in mind that the distribution of the budget between the project partners, participation of project partners in the activities and intervention logic are part of the criteria for the technical evaluation of the project proposals. |
| 70 | Is a consultancy service of Bulgarian organization provided to a Turkish organization and paid by the Turkish organization an eligible expenditure under a project? | In the Guidelines for applicants there are no restrictions based on the nationality of the subcontractors. The award of contracts to them is subject to the procurement rules indicated in section 2.3 Applicable law and public procurement. |
| 71 | In which cases the depreciation costs are eligible expenditures? | According to section 2.5.3 of the Guidelines for applicants only the depreciation costs for the period of project duration are eligible. The depreciation rate has to be in line with national rules. Only the proportionate sum of the depreciations costs according to the use of equipment for the project is eligible. The amount (percentage used and time duration) has to be properly clarified (auditable). The depreciation costs of equipment can never exceed the purchase price of the equipment. |
| 72 | Is purchase of software an investment activity or not? | When the project envisages delivery of already developed software products, existing on the market, the expenditure should be considered as supply. In case the project envisages elaboration (programming) of custom/new software, the expenditure should be considered as service. Supply of software should be considered as investment cost and depending on the percentage of the investment costs in the project, it should be set as "investment" or "soft measure" project. In case of "investment" projects the amount of eligible expenses of budget line 5 should be at minimum 70 % of total eligible project costs. In case of "soft" projects the amount |

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| | | of eligible expenses of budget line 5 should be maximum 50 % of total eligible project costs. |
| 73 | Which body or organization can be contacted for technical issues or questions? | Potential applicants may benefit from the information and consultation services of the Joint Secretariat: main office, located in Haskovo, Bulgaria and antenna office located in Edirne, Turkey. |
| 74 | In what way will be the VAT of Turkish partners included in the project? | Turkish partners receive a general exemption from VAT payment. After signing of the Subsidy contract the Turkish partner has to apply for that exemption to the National Authority. |
| 75 | Is there a possibility for purchase of a vehicle under a project by the Turkish partner? Will the purchase be VAT exempt? | Purchase of vehicles is eligible provided that they are mandatory for achieving the project objective (i.e. specialized vehicles for interventions in case of disasters). Turkish partners receive a general exemption from VAT payment. After signing of the Subsidy contract the Turkish partner has to apply for that exemption to the National Authority. |
| 76 | We are preparing the project budget of state forest departments in Bulgaria and Turkey and we are not aware if VAT shall be included in the prices? The departments are VAT registered but VAT might not be recovered if there isn't an agreement with the Ministry of Finance. | According to section 2.6.2 of the Guidelines for applicants before filling the application form each project partner should clarify its VAT status for each activity and determine the VAT as recoverable or non-recoverable from other sources. In case the VAT is non-recoverable from other sources it is eligible for financing by the programme and should be included by the partner in the respective unit rates. Turkish partners receive a general exemption from VAT payment and after signing of the Subsidy contract. That is why they shall not include VAT in the respective unit rates. |
| 77 | Is it possible the elaboration of GIS application to be a separate activity and not just one of the costs envisaged in BL5, as it will play an important role in the project? | It is up to the project partners to define all project activities and to describe how they will contribute to achievement of the project objectives and the respective Programme specific objective. When defining each of the project activities, the partners should take into consideration their notability for the project, not the budget line where they are envisaged. The envisaged expenditures should be filled in the respective Budget lines as described in point 2.5.3 Eligibility of expenditures of the Guidelines for applicants and they have to correspond with the already proposed in section 3.5 activities. |

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| 78 | Which is the Authority that gives the consent regarding public state property given for use to the Municipality? | In case a public state property is given for use to a municipality on legal grounds according to the relevant national legislation the Municipal Council has to take a Decision regarding the project development and implementation (Supporting document B2) and Consent clearly stating that the assets are given for free right of use for the purpose of the project at least for 5 years after end of the project (Supporting document B6.1). Taking into account that the actual owner of the property is the state, consent (Supporting document B6.1) by the relevant state body administering this property according to the act of state property should be given as well. Consent of the owner is necessary in all cases even when the partner is the owner of the assets. In case the assets are owned by a partner the consent can be given in the same act (document) as the one containing the Decision for project development and implementation described in section B3. |
| 79 | What document a school has to submit in order to participate in a soft and in an investment project (is there a difference in the two types of projects) - Decision of Municipal Council, Decision of the Inspectorate of Education or Order from Headmaster of the school? | From the question we assume that the property of the Bulgarian school (school building and school yard) is municipal property. In this case for the Bulgarian partner the Decision regarding the project development and implementation (Supporting document B2) for both soft or investment projects has to be given by the Headmaster of the school. In case of investment project when the investment activities will be performed on municipal property for the Bulgarian partner the Municipal Council has to give consent clearly stating that the assets are given for free right of use for the purpose of the project at least for 5 years after the end of the project (Supporting document B6.1). |
| 80 | Whether elaboration of works design for rehabilitation of green areas within the settlement can be considered as eligible activity under Specific Objective 1.2. - soft projects, taking into consideration that in the list of eligible expenditures under BL4 (page 37 of the Guidelines for Applicants) expenses for elaboration of works design are considered as eligible expenditure? | The number, nature, scope and contents of the activities have to be decided by the project partners. It should be justified how the activities will contribute to achievement of the project objectives and the respective Programme specific objective. Detailed description of the eligible activities under this call for proposals are given in section 2.5.2.3 "Eligible Activities". Please note that the provided list of activities is not exhaustive. List and description of Eligible Expenditures (section 2.5.3.) can be applied to activities which are eligible for the respective Priority axis and Specific objective. |

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| 81 | Whether under Specific Objective 1.2. - Investment measures, would be eligible to propose both design and works for the rehabilitation of the above-mentioned urban green areas? | Small-scale investment activities and parallel elaboration of works design (for the same investment activities) cannot be considered eligible. Submission of an Approved detailed works design issued not later than 2 years prior to the submission deadline of the call is a compulsory annex to the application (Annex B6.5) in case such is required by the national legislation of the respective partnering country for the object of intervention. In this respect the absence of such an annex, if required for the object of infrastructural intervention, is a reason for direct elimination of the project proposal without possibility for additional supplementations. |
| 82 | Is the University of Architecture, Civil Engineering and Geodesy Sofia eligible to participate as project partner in the Programme? We have already received an invitation from a University in Turkey. | The criteria for eligibility of applicants under the Programme are described in point 2.5.1.1 of the Guidelines for applicants. Please, note that these criteria are cumulative and must be fulfilled all together. In the particular case, special attention should be paid to the requirements the applicants to be registered in the eligible cross-border region between Bulgaria and Turkey and to have their headquarters established within the eligible cross-border region between Bulgaria and Turkey. |
| 83 | 1. Is it necessary the project partners of the lead partners from Bulgaria and Turkey to be registered in the eligible areas? If yes, what registration is required? 2. What are the responsibilities of the partners and is their financial co-financing obligatory? | 1. Project partners have to meet all criteria listed in section 2.5.1.1 of the guidelines for applicants. All criteria must be fulfilled together. Three of these criteria are directly related to the question: - be legally established organizations (legal persons) according to the national legislation of the state on whose territory they are located; - be registered in the eligible cross-border region between Bulgaria and Turkey; - have their headquarters established within the eligible cross-border region between Bulgaria and Turkey. 2. According to section 2.6.2 "How to fill in the Application Form and its Annexes" of the guidelines, the Lead Partner and the project partners should draft and sign a Project Partnership Agreement, which clearly defines the roles and responsibilities of each partner. Template of a Project Partnership Agreement is annexed to the Guidelines for Applicants (Annex A2). Partners' own co-financing is not obligatory. |
| 84 | Is it acceptable Association and/ or foundation registered under Bulgarian Law for Non-profit organizations to be a Lead partner or Partner in a project of Interreg IPA Cross-Border Cooperation Bulgaria - Turkey Programme, First Call? | There are no specific restrictions for participation as project partners of Associations and/or Foundations registered under Bulgarian Law for Non-profit organizations as long as they meet all other general and specific criteria for eligibility of applicants listed in the Guidelines for applicants. |

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| 85 | <p>What is the explanation of the following text from the guideline, page 51: „Approved detailed works design issued not later than 2 years prior to the submission deadline of the current call (if applicable according to the relevant legislation) - certified copy.“ 2.„IMPORTANT Please note that missing of approved works design issued not later than 2 years prior to the submission deadline of the current call (when applicable) is a reason for direct elimination without possibility for additional supplementations.“</p> | <p>The request for the detailed works design to be issued not later than 2 years prior to the submission deadline is related to the up-to-date status of the investment projects. In case the national legislation allows re-approval of expiring works design - the date of the re-approval by the respective authority will be treated as the date of their issue.</p> |
| 86 | <p>We wish to apply with project proposal under the Specific Objective 1.2. "Improving the capacity for nature protection, sustainable use and management of common natural resources through cooperation initiatives in the cross-border area". In the Guidelines for Applicants, on page 10, bullet 1 it is written "....nature protected sites...". Does it mean that the site for which an investment project will be prepared should be only nature protected one? And if the site is not nature protected, the project proposal cannot be applied and/or defined as ineligible?</p> | <p>The text cited in the question refers only to indicative activity "Environmental friendly small-scale investments for improving accessibility of / to nature protected sites (e.g. walking paths, cycling routs, small road sections leading to protected areas, etc) and does not refer to all the investment activities under Specific Objective 1.2. A list of activities is present in section 2.5.2.3 "Eligible Activities" of the Guidelines for Applicants, though it is not exhaustive but indicative. Planned activities should lead to achievement of the objectives of the project, which on their side should lead to achievement of the selected Specific objective of the Programme.</p> |
| 87 | <p>How can the activities with economic character and those without economic character be distinguished?</p> | <p>The criterion the activities with economic character and those without economic character to be distinguished is to decide whether or not the entity carries out an economic activity in the context of the project. It is important whether the aid is giving an economic advantage (a benefit), which an undertaking would not have obtained under normal market conditions, including the potential possibility for development of economic activity as a result of the project and whether as a result of the project the</p> |

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| | | <p>market will be changed.</p> <p>All project proposals proposed for financing will be subject to check for compliance with the state aid rules. The assessment will be made case by case, taking into consideration all the information included in the Application form.</p> |
| 88 | What will be the amount of the grant under the Call for proposals? | <p>Minimum and maximum eligible grant amounts and project duration according to Priority axis, specific objective and type of project are specified in section 2.5.2.1 Project duration and grant amounts of the Guidelines for applicants.</p> <p>Please note that no grant may exceed 85% EU financing of the total eligible costs of the project (see also section 2.5.3). The remaining grant amount (15%) is financed from the national budgets of the partnering countries as national co-financing. Contributions from the partners' own resources are not obligatory. However the applicants may provide own co-financing which should be reflected in the project budget and it will be a subject of verification.</p> |
| 89 | According to the Guidelines, the applicants have to be registered within the CBC region. Are there any exemptions from that rule? | <p>The criteria for eligibility of applicants under the Programme are described in point 2.5.1.1 of the Guidelines for applicants. Please, note that these criteria are cumulative and must be fulfilled all together. Exceptions are made for 1) Subsidiary structures of local/regional/national authorities. In case a structure of local/regional/national authority is not and cannot act as a legal entity, its legally established central organization, if such exists, shall be the project partner and 2) National/regional public authorities whose area of competence, established by legal acts, extends to the eligible area of the programme, or structures of central public authorities located in the eligible cross border region which cannot be registered as legal entities – in this case the central authority is a project partner.</p> |
| 90 | Is it possible an activity of a project applying under PA 1 to cover the whole Black Sea region? | <p>The project activities should be implemented in the eligible cross-border area specified in the cross-border cooperation programme. In accordance with article 44 (2) of the implementing regulation (EU) No. 447/2014 and following the provisions of the Programme it is possible up to 20 % of the respective beneficiary's budget to be spent for the activities implemented outside of the programme eligible area under the conditions described in part 2.5.2.2 of the Guidelines for Applicants.</p> |
| 91 | Is the Regional Forest Directorate, with main office located in Sliven, an eligible applicant? | <p>According to the Guidelines for Applicants, part 2.5.1.1 "General Criteria for Eligibility of Applicants" Lead Partner and its partners must comply with the general eligibility criteria. In the particular case, special attention should be paid to the requirements the applicants to be registered in the eligible cross-border region between Bulgaria and Turkey and to have their headquarters established within the eligible cross-border</p> |



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| | | region between Bulgaria and Turkey. Exception is made for national/ regional public authorities whose area of competence, established by legal acts, extends to the eligible area of the programme, or structures of central public authorities located in the eligible cross-border region which cannot be registered as legal entities – in this case the central authority is a project partner”. |
| 92 | What are the reasons for the relatively high weight of the methodology of the project in the assessment process? | The reason for the relatively high weight of the evaluation of “Methodology” in the technical and quality evaluation grid is to ensure financing of projects with clear cross-border impact, sustainable results, with respect to consistency between the project activities and outputs and the related target groups, projects which will guarantee the visibility of the Community funding, etc. |
| 93 | According to part 3.8 of the Application Form what has to be the duration of one activity? Can it be longer or shorter than 3 months? | Project partners should define the activities planned to achieve the objectives of the project. Activities should be organized by types chronologically and to demonstrate their interconnection. All activities described in section 3.5 will automatically be filled in the table 3.8 Duration and Action Plan. You have to specify in which trimester/s they are going to be implemented. Implementation of separate activity is not limited by 3 months period, but in all cases the duration has to coincide with its specificity, its relation with other planned activities and with the duration of the project. |
| 94 | In relation to filling point 3.5 of the Application form – Project activities. This point includes 4 sections: 1) Brief description; 2) Who will be the responsible partner for implementation and reporting of the activity; 3) What methods/resources will be used for implementation of the activity; 4) What will be the outputs of the activity. The Guidelines state that minimum 500 and maximum 1500 characters are required per activity. Does that mean that 500-1500 is the total number of characters for a whole Activity, including all the sections form 1) to 4) or is 500-1500 the number of characters for each of the separate sections within one | The limitation for entering text with length of minimum 500 characters and maximum 1500 concerns the description in sub-section “1. Brief description of the activity” in part 3.5. “Project activities - description and methods of implementation”. The text in the other sub-sections 2. “Who will be the responsible partner for implementation and reporting of the activity?”; “3. What methods/resources will be used for implementation of the activity?” and “4. What will be the output(s) of the activity” is limited by the space of each field. |



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| | activity? | |
| 95 | I have the following question regarding Eligibility of Applicants for Priority Axis 2, specific objective 2.2.: Could you please explain the term “in the field of tourism”? What should NGO in the field of tourism present in order to be eligible for application? | The field/s of operation of the organization – applicant shall be demonstrated by the document/s indicating the legal status of the organization. The document on the recent legal status should indicate also the date of establishment of the organization, the place of establishment (registration) and scope of territory competence (if applicable), and it should prove the eligibility of the organization in accordance to all criteria stated in section 2.5.1. In case the issued document does not justify all of the above circumstances, other documents could be provided, like the act of establishment or certificates from superior authorities (Ministries, Agencies, District governments, Inspectorates). |
| 96 | We plan to develop a project for river cleaning and purchase of required equipment. In order to preserve cross-border effect of the project is it sufficient activities to be focused on a single basin, but not on the same river? We saw a similar project implemented in the period 2007-2013 in your database, where activities implemented in the same basin have visible cross-border effect, although not done on one common river. Did we interpret correctly the requirements in the guidelines for eligibility of activities or not? Thanks in advance for your cooperation! | The nature, scope and contents of the activities have to be decided by the project partners. Planned activities should lead to achievement of the objectives of the project, which on their side should lead to achievement of the selected Specific objective of the Programme. Detailed description of the eligible activities under this call for proposals are given in section 2.5.2.3 "Eligible Activities". Please note that the provided list of activities is not exhaustive. For cases of flood preventing investment activities the Guidelines for applicants do not envisage any specific rule restricting the intervention to a single river or even a common water basin. |
| 97 | When you write something long, full paragraph appears only when you click on that column twice. Regardless of the version of MS Office, those columns cannot be extended. We use Office 2010 and we cannot make it. Since those parts will not be readable in | The cells' sizes cannot be changed due to attached and linked additional buttons in the sheet with the project identification information. Potential applicants are reminded that any attempt to resize the cells is forbidden since it may lead to significant changes in the application navigation and may cause additional problems. Exceeding the prescribed limit of texts within cells will not cause problems to the Information system but will limit visibility within certain cells. |



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| | the hardcopy, the beneficiaries are concerned about it. When the AF is loaded to the Information System, I am not sure whether it will be readable or not. | |
| 98 | For conducting of event under the project we plan purchasing of wooden kiosks/pavilions. Which budget line, should the expenses be allocated? | As long as the wooden kiosks/pavilions cannot be treated as ordinary materials or consumables for preparation of events they have to be included in budget line 5 "Equipment and works". |
| 99 | In case the project documents are signed by an authorized person (not by the legal representative of the organization) which data should be provided with the project proposal - of the authorized person or of the authorizing person? | In all sections of the application form containing information about the project partner legal representative, the official legal representative must be pointed out. The data related to the authorised person should be pointed out only in the sections that have to be signed and stamped. |
| 100 | During the Info day in Burgas was mentioned that all activities concerning Project management - meetings, communication and tender documents should be envisaged as a part of the other project activities, not as a separate one. What about the Activity for Information and Publicity should be included in the list of activities in section 3.5 as a separate one or as a part (like sub activity) of the other project activities? | As long as Information and publicity activities cannot be determined as usual activities related to project management and reporting there are no restrictions to envisage them as a separate activity. |
| 101 | Can an organisation that has been registered for more than three years and that during these three years has conducted periodic and termination activity to be a leading partner? For three years the company has worked a total of 3-4 months. | The Lead Partner must be registered within the eligible border region between Bulgaria and Turkey at least 12 months before the deadline for submission of project proposals under the current call for proposals. |

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| 102 | What exactly does it mean the term organizations that do not generate profit? | One of the general criteria for eligibility of applicants which should be satisfied cumulatively with the other pointed out in part "2.5.1.1 General Criteria for Eligibility of Applicants (Lead Partner and Partners)" of the Guidelines for Applicants is the organization to be non-profit making. |
| 103 | When trying to fill out the logical framework, it shows that the cells are protected and therefore are read-only files. It does not allow us to write in the cells. What can we do to solve this problem? | There is no protection of the cells in file "Annex A1 Logical Framework.xls" and the potential applicants should be able to edit the content of the document. |
| 104 | What information should be filled in the column "Turnover" of table 2.2 Financial status? | Column "Turnover or equivalent (in EUR)" in table "2.2. Financial status, capacity and equipment" within sheets "PP1" ... "PP5" of the Application Form should contain information for the amount of the total turnover or the equivalent to the turnover of the organizations, depending on their type and the national legislation of the countries where they are registered. Information should be provided for the years of 2014, 2013 and 2012. |
| 105 | There is a problem in the Application form of the INTERREG Bulgaria - Turkey Programme related to writing the date in the Partnership and co-financing statement. Besides this the statement is not printed for each partner separately, but part of the title remains on the previous page. | The date in Partnership and co-financing statement should be filled in by hand. The Partnership and co-financing statement of each partner should be printed on separate pages and no overlapping with the statement should be allowed. This can be achieved through the regular "Print" menu of Excel and the function for printing a selection from the document. |
| 106 | We would like to make approximate cost, feasibility and reconnaissance work as a part of project preparation. We want to get technical assistance from independent firms. How should we conduct this service procurement? How many offers do we need? Would an offer from a single company be enough? Is there a standard request form for the procurement of this kind of services? Should we use national | Beneficiaries under this Call for Proposals must refer to and use the guidelines and templates of the "Procurement and Grants for European Union External Actions – a Practical Guide" document (PRAG). When sub-contracting the activities in order to achieve the project objectives, including activities for project preparation the contracting must be done by a transparent tendering procedure. The tender procedure to be applied varies according to the amount of the tender. You may use this link to PRAG documents: http://ec.europa.eu/europeaid/funding/about-funding-and-procedures/procedures-and-practical-guide-prag_en |

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| | procurement rules or PRAG rules? | |
| 107 | How should we proceed in order to get the project preparation study done without resulting in any expenses for our institution? | <p>When sub-contracting the activities in order to achieve the project objectives, including activities for project preparation, the contracting must be done by a transparent tendering procedure. The tender procedure to be applied varies according to the amount of the tender. You may use this link to PRAG documents: http://ec.europa.eu/europeaid/funding/about-funding-and-procedures/procedures-and-practical-guide-prag_en.</p> <p>Project preparation cost is reimbursed only to applicants awarded subsidy contracts. Otherwise, these costs cannot be recovered. For the partners from Turkey the starting date for the eligibility of expenditures for project preparation is the day after the date of submission of the Programme to EC (September 22, 2014). The starting date for eligibility of project preparation expenditures for the Bulgarian beneficiaries is the starting date of the programme period, namely January 1, 2014. The project preparation expenditures should be carried out before or on the date of submission of the project proposals at the latest and this condition applies to all applicants. According to this rule, all supporting documents such as invoices, acceptance protocols, expenditure list, etc. should be registered before or at the date corresponding to the project submission.</p> |
| 108 | What is the maximum percentage allowed for the feasibility conducted at the stage of preparation within the total project budget? | At the stage of preparation of the budget, project preparation expenditures should not exceed 3% of total direct project costs (BL 3+BL4+BL 5). |
| 109 | Should the name or any reference number of the project from the new period be included on the supporting documents (council decision, EIA report, etc?) | Since the supporting documentation is to be delivered with the application form, specifying the project reference number is not possible at this stage. However, it would be proper to include the name of Interreg – IPA Bulgaria-Turkey Cross-border Cooperation Programme and the specific projects on the supporting documents. |
| 110 | We could not find any explanation on the debts regarding social security and taxes. Is there any change on this issue and how can we learn if there is a related clarification? | At the application stage, the Lead Partner on behalf of all partners should sign a "Declaration of eligibility" (Annex A3), declaring that all project partners including Lead Partner, do not fall into any of the exclusion situations described in part "2.5.1.1 General Criteria for Eligibility of Applicants", one of them is not fulfilled obligations of each project partner relating to the payment of debts to the consolidated state budget. Submission of certificates for lack of obligations (taxes and social security duties) is not |

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| | | required at the time of application, but will be required before signing the subsidy contract. Please also note that the Evaluation Committee can request additional documents or explanations, for clarification or justification of information/documents submitted in the project proposal. |
| 111 | We need a clarification about the Annex B3 - Legalized Mandates. Is this document a necessity or could we submit our project directly without it? | The legalized mandate should be submitted only if the Application Form and all annexed commitments are not signed by the legal representatives of the Lead Partner and Project Partners. Otherwise it is not necessary. |
| 112 | We need a clarification related to annex B5 "Letter of Support". What is its definition, function and what does it include? | In case the project proposal envisages strategy development, the letter of support prepared by the authorized office should be presented concerning implementation of this strategy. As an example, regarding a strategy to be developed on environment, this letter of support should be considered as a consent letter from the Ministry of Environment and Urbanization of Republic of Turkey indicating the viability of the project and its consistence with the national environmental strategies. |
| 113 | What would you suggest if the total project costs are above the upper budget limit and our organization commits to undertake the exceeding budget? Would it be enough to include a document indicating that this amount will be disbursed by our institution, plan to compensate for the activities corresponding to this amount, and prove this situation after the implementation by necessary documentation? | If an institution contribute to the project from its own budget in cases such as budgets exceeding the upper limit, the said amount should be written on the own co-financing column in the AF and a signed partnership and co-financing statement including this amount must be provided . Also all the committed activities and expenditures should be proved afterwards in order to receive reimbursement of the subsidy. |
| 114 | We need a clarification related to the payments that can be made to the Turkish civil servant staff involved in the project we are preparing for the new call for proposals. | Staff costs shall be reimbursed by the Managing authority to the beneficiaries as a flat rate. In the verification process the beneficiaries do not need to present the supporting documents that the expenditure has been incurred and paid. The proper appointment of the project team is on the responsibility of the beneficiaries themselves, and it has to be made in accordance with European and national legislation. Statement of the National Authority: According to the Turkish national legislation, no salary payment including fees can be made to the civil servants subject to the Civil Servants Law No. 657, permanent contracted personnel (which are covered by Article |



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| | | <p>4/B) and all other public officials. The academic personnel assigned at the universities and personnel covered by the 4/C clause of the Law No. 657 are not subject to these restrictions and can get all types of payments from the projects. As there may be future changes, all institutions implementing projects are responsible to follow national legislation regarding employment of staff and abide by these changes. The only exception for civil servants to be able to get payments under projects is assignment of personnel with instructing and training duties at institutions covered by Law No. 657 to be employed in return for tuition fees with a written consent of their formal offices. In addition, civil servants that are subject to special provisions in their regulatory legislations can give lectures on the condition of being limited to their own expertise. These salary payments and fees should be included under the Budget Line 4 - External Expertise. Also an "Educational Service Contract" must be prepared for the personnel to be employed in this context. This Service Contract should include the training subject, dates and times of this training, amount of the tuition fees per hour, bank account number to be used for disbursement of the fees, the amount of per diem in case such payment, and information about all other expenses to be made. In addition, the institution's written permission must be included with the contract. This approach can be used in exceptional cases. Detailed justification for the reasons to appoint the respective expert will be required, which shall be attached to the signed contract.</p> |
| 115 | <p>The project we would like to submit includes the renewal of an accommodation and recreational facility and landscaping. Since the location of this facility is a natural protected area in Turkey, prefabricated houses will be used for accommodation and their interior furniture will be designed in order to meet the needs of the tourist. In addition, it is planned to organize a sand festival on the beach near this facility. The ownership of this place is not with our institution, but the municipality has allocated it to our institution for 99 years with a protocol and still our organization has the right to use and run the facility for 50 years. Taking</p> | <p>All works activities should be implemented on a municipal or state-owned property. In this regard, public domain allocated for long periods is eligible for project planning. However all the legal documents regarding this allocation should be presented with the project application. In addition the property to be used in the project should be free of any encumbrances. It should not be object to a pending litigation, or the object of a claim according to the relevant national legislation. The project can be submitted only if all these conditions are met. However, the technical content of the project will be reviewed and evaluated during the evaluation process. It should be taken into consideration that profit-earning activities are not eligible under the Call for Proposals.</p> |



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| | <p>this into consideration, can our institution submit this project for the new period?</p> | |
| 116 | <p>Is it possible for an institution which is not residing in the program area to be a participant? Will it be eligible if we participate to the program as an associated partner?</p> | <p>There is no associated partner status in the program. Lead partner and partners have to meet all criteria listed in section 2.5.1.1 of the Guidelines for applicants. All criteria must be fulfilled together. In the particular case, special attention should be paid to the requirements the applicants to be legal institutions, which are legally established according to the national legislation of the respective country, to be registered in the Program area between Bulgaria and Turkey and their headquarters should be in the Program area between Bulgaria and Turkey.</p> |
| 117 | <p>Is it eligible to buy a container in the context of collecting and storing the biological wastes under Priority Axis 2?</p> | <p>Small scale investments for recycling of wastes, collection of wastes, separation of wastes and improving the illegal waste disposal areas are eligible. However, other criteria required in projects should also be taken into account.</p> |
| 118 | <p>If a vehicle is purchased in Turkey, will it be exempt from Special Consumption Tax in addition to exemption from VAT.</p> | <p>The purchases under EU projects are exempt from Special Consumption Tax according to the EU legislation. In that regard, the communications of Ministry of Finance of the Republic of Turkey should be taken as a basis.</p> |
| 119 | <p>We want to submit a project as an NGO under the program. Do projects of NGO's stand a chance against projects of high level organizations such as municipalities?</p> | <p>The list of potential beneficiaries under each specific objective is indicative. The eligibility and selection criteria are applied equally to all applicants. All applicants' projects, which are considered eligible under the program, are evaluated equally and impartially in the evaluation phase of project proposals.</p> |
| 120 | <p>We are an institution outside of the program area. Can we be a sponsor for an institution which is submitting a project?</p> | <p>Co-financing contribution can only be made by partners who meet all eligibility criteria listed in section 2.5.1.1 of the Guidelines for applicants. Sponsorship activities and related expenditures are not eligible expenditures under the project budget.</p> |
| 121 | <p>How do we certify our expenditures related to Project Preparation Process (travel, accommodation etc.)?</p> | <p>Project preparation costs should be supported by documents such as invoices, acceptance protocols, lists etc. For example, for travelling expenses, flight tickets, boarding passes, bus tickets should be documented and accommodation should be billed.</p> |

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| 122 | <p>We want to submit a project related to Sustainable Tourism. Do we need to be an institution operating in the field of tourism for this?</p> | <p>There is no explicit requirement the applicant to be an institution operating in the field of tourism in order to submit a project related to sustainable tourism. The list of potential beneficiaries under each specific objective is indicative. It should be taken into consideration that the relevance of the partnership to the proposed project in view of the partners' profiles and experience of the partners in the field addressed by the project are among the project selection criteria.</p> |
| 123 | <p>We have some issues in filling the budget page in the application form. The excel file which constitutes the form gives the warning that it is password protected. Would you mind providing information about how to remove the protection or password?</p> | <p>You only need to fill the lines, which are white, in the application form's budget part. The grey part of the form consists of formula and therefore it will automatically be filled when you fill the white parts. Trying to remove the protection of the form might cause serious problems in the form, therefore should not be attempted.</p> |
| 124 | <p>The column width cannot be adjusted when filling the beneficiaries and the final beneficiaries' part of the application form. Therefore, bottom portion of the content could not be viewed if the size of the original cell in the application form is exceeded. The bottom portion could not be viewed in the print preview as well. Additionally, as line and column sizes cannot be changed in logical framework, the content stretches towards the sides. The project partner responsible for carrying out the activity is normally a single line part.</p> | <p>The issues you are mentioning, probably originate from the Microsoft Excel version that you are using. It is suggested for you to use an Excel 2010 or a later version. For the logical framework, you can first select the entire column you want to enlarge then you can stretch that column to the side you want to enlarge.</p> |
| 125 | <p>Is a municipal company, registered under the Commercial Law, eligible applicant under the First Call of INTERREG IPA CBC Bulgaria-Turkey Programme? If the answer is positive, can the municipal company act as the Lead Partner in a project proposal or it can be only a project partner?</p> | <p>The criteria for eligibility of applicants under the Programme are described in point 2.5.1 of the Guidelines for applicants. Please, note that these criteria are cumulative and must be fulfilled all together. Particular attention should be paid to the requirement that in order to be eligible, the applicants must be non-profit making organizations. The decision whether one organization shall be a Lead partner of Project partner in a given project proposals is taken by the partners themselves.</p> |

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| 126 | <p>Our Municipality is preparing a project proposal under Specific Objective 2.1. Increasing the touristic attractiveness of the cross-border area through better utilisation of natural, cultural and historical heritage and related infrastructure. In addition to the investment activities, we are planning a few “soft” activities for the better approach towards the target groups and popularization of the result objectives and results. According to the guidelines, “ A project proposal may be submitted for financing under only one Specific objective which must be clearly indicated in the application form. This is obligatory condition”. Is it acceptable that we apply under Specific objective 2.1 and include soft activities such as organization and participation in seminars, fairs, etc? Or it might be considered as mixing of 2 specific objectives and will lead to rejection of the project proposal.</p> | <p>“Investment” projects including “soft” measures are also eligible for financing. In this case expenditures for investment activities should form at least 70 % of total eligible project costs. A project proposal may be submitted for financing under only one Specific objective which must be clearly indicated in the application form. This is obligatory condition. Project partners should beware that all proposed activities, soft and investment contribute to achievement of the concrete Specific objective, chosen by them.</p> |
| 127 | <p>According to the administrative and territorial structure in the Republic of Turkey and to the rules of Interreg – IPA CBC Bulgaria – Turkey Programme is “Birlik” an eligible applicant under the First Call for proposals - No. 2014TC16I5CB005 – 2015 –1?</p> | <p>The criteria for eligibility of applicants under the Programme are described in point 2.5.1 of the Guidelines for applicants. Please, note that these criteria are cumulative and must be fulfilled all together. Particular attention in the case should be paid to the requirement that all partners have to be legally established organizations (legal persons) according to the national legislation of the state on whose territory they are located and to be directly responsible for the preparation and management of the action, not acting as an intermediary.</p> |
| 128 | <p>Our school intends to apply as project partner under the 1st Call for proposal of the current Programme. LP will be school from Turkey. We sent to PP1 annex 2 and annex 4. Annexes 1, 3 and 5 in our opinion should be filled-in by the LP. What</p> | <p>In point 2.6.2 “How to fill in the Application Form and its Annexes” and in section 3 Annexes of the Guidelines detailed information is provided about all annexes and supporting documents relevant under the current Call for proposal. When preparing them please note that Annexes A2 Project Partnership agreement, A4 Sworn Statement and A5 Declaration of Commitment should be filled in and signed by each Project partner. Annex A3 Declaration of Eligibility should be prepared and signed</p> |

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| | <p>exactly should we stated in annex 6, which applies to the Bulgarian site. We are not fully aware of documents B1, B2, B3 and B4. We are a school; we are not a newly established organization. We will be grateful if you clarify which exactly documents should we filled-in and what exactly should be their content, especially of documents B1, B2, B3 and B4.</p> | <p>only by the Lead partner and Annex A6 De Minimis State Aid Declaration is relevant only for the Bulgarian project partners.</p> |
| 129 | <p>1. Is there a METHODOLOGY OF PROGRAMME OUTPUT AND RESULT INDICATORS ASSESSMENT available for the new programming period 2014-2020 and in particular, for the 1st Call for proposals?</p> <p>2. What are the requirements under the current Call for proposals concerning origin of vehicles and the related documentation, besides technical specifications?</p> | <p>1. There is no separate METHODOLOGY OF PROGRAMME OUTPUT AND RESULT INDICATORS ASSESSMENT envisaged for the new programming period 2014-2020.</p> <p>2. According to section 2.3.1. "The rules on nationality and origin" of the Procurement And Grants for European Union external actions – A Practical Guide (PRAG), applicable as of 15 January 2016, in principle, products supplied under a procurement contract, or in accordance with a grant contract, financed under the EU budget or the EDF (including OCTs) must originate from an eligible country as designated by the relevant Instrument(s). However, these products can originate from any origin (full untying) if their value is below the threshold of the competitive negotiated procedure for supply - EUR 100 000.</p> |
| 130 | <p>Our organization is a branch of a National Organization. It is an independent legal body, registered in Burgas. It has own sign, bank account and BULSTAT. Is there any legal problems? Do we fit in the eligible partners? Can we participate as a Project Partner or Lead Partner?</p> | <p>According to the Guidelines for Applicants, part 2.5.1.1 "General Criteria for Eligibility of Applicants" Lead Partner and its partners must comply cumulatively with all general eligibility criteria. Particular attention should be paid to the requirements to "be legally established organizations (legal persons) according to the national legislation of the state on whose territory they are located and to "have their headquarters established within the eligible cross-border region between Bulgaria and Turkey. Exception is made for national/ regional public authorities whose area of competence, established by legal acts, extends to the eligible area of the programme, or structures of central public authorities located in the eligible cross border region which cannot be registered as legal entities – in this case the central authority is a project partner".</p> |
| 131 | <p>We have encountered a problem during filling the Application Form in Excel. Some fields do not show the text that is being entered. Another problem has been encountered with adding activities and</p> | <p>Regarding the first problem, namely "Some fields do not show the text that is being entered", please pay attention that a revised version of the Application form has been published on 18.02.2016 on the Programme web-site, where this problem has been overcome for older versions of Excel.</p> <p>Regarding the second problem noted - impossibility to add activities and partners, the</p> |

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| | partners. We have tried different versions of Excel, but we could not succeed. | potential applicant should check the settings of the computer used, since it is not necessarily related with the file of the Application form and this functionality has been proven to be working properly, despite the version of Excel used. |
| 132 | Our organization is a Government Institution with local structures in Haskovo, Yambol and Burgas, but they cannot act as a legal entity. We are planning the implementation of the project to be in the eligible area but the project management should be in Sofia, outside the co-operation area but at the administrative address of the Institution, which act as the legal entity. According to the Guidelines the expenditures outside the border area should be budgeted only in BL3 and BL4, is that mean that the expenditures for Staff cost are not eligible? | Staff costs shall be reimbursed by the Managing authority to the beneficiaries as a flat rate In the verification process the beneficiaries do not need to present the supporting documents that the expenditure has been incurred and paid. The proper appointment of the project team is on the responsibility of the beneficiaries themselves. The restrictions in Guidelines for Applicants concerning the activities outside the eligible area are referred to the actual project activities |
| 133 | All our activities with the partner are common and they will be implemented in both countries but in the Application form only one location should be chosen. Is this a problem and do we need to choose only the location of the Lead Partner? Thank you in advance. | The AF requires listing of one location as a main location of implementation of the respective activity. If the activity requires involvement of more project partners and is targeting more areas, it should be described in the sub-section with responsibilities of partners. It is also possible to select the primary location and describe that the activity will be realised on both sides of the border. In such cases it's not obligatory to choose only lead partners location. |
| 134 | I have a question related to soft measure project – mark-up of a hiking route and installation of informational signboards. Is it necessary to provide a document from the Municipality – the owner of the forest? | Non-investment (“soft”) projects, containing mainly “soft” activities can envisage investment measures (supply of equipment), if necessary. Investment expenditures in this case must not exceed 50 % of total eligible project costs, and their need for the purpose of specific activity/activities has to be sufficiently justified. Specific supporting documents relevant to “investment” activities may need to be provided in these cases. If consent of the owner is needed according to the national legislation this consent has to be presented. |

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| 135 | <p>According to the Guidelines the community centres are eligible beneficiaries and it is explicitly emphasized that eligible beneficiaries among others should be non-profit making organizations. The community centres are non-profit organizations by their nature, but have proceeds from economic activity (rental) and therefore they pay tax on profits. As these organizations have been already partners on projects funded during the previous programming period 2007-2013 is this valid for the new programming period 2014-2020?</p> | <p>The criteria for eligibility of applicants under the Programme are described in point 2.5.1 of the Guidelines for applicants. Please, note that these criteria are cumulative and must be fulfilled all together. Particular attention should be paid to the requirement that in order to be eligible, the applicants must be non-profit making organizations.</p> |
| 136 | <p>In cases when community centres are not municipal property and they are managed by Community centres Boards of Trustees is it possible within soft projects supply of equipment and execution of repairs of community centres' premises to be applied in buildings that are not municipal or state property?</p> | <p>All works activities should be implemented on a municipal or state-owned property. Non-investment ("soft") projects, containing mainly "soft" activities can envisage investment measures - only supply of equipment not repair works - if necessary.</p> |