



**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
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>



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.



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>

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.



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"> <li>- 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.</li> <li>- 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.</li> </ul>	<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>



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"> <li>1. Presence of Public resources.</li> <li>2. The measure granted confers an economic advantage (a benefit) to an undertaking, which it would not have otherwise received.</li> <li>3. The measure granted by the State is selectively favouring certain undertakings or the production of certain goods.</li> <li>4. The grant distorts or threatens to distort competition.</li> <li>5. The grant affects trade between Member States.</li> </ol> <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: <a href="http://www.ipacbc-bgtr.eu/partners?country=45&amp;term_node_tid_depth=45&amp;field_priority_tid=All">http://www.ipacbc-bgtr.eu/partners?country=45&amp;term_node_tid_depth=45&amp;field_priority_tid=All</a>.</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>



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, <b>though it is not exhaustive but indicative</b>. 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>



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.





32	How the Turkish design papers/drawings can be scanned regarding their length and volumes and the visibility of signatures?	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. 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.
33	Can the branches of organizations apply for the Programme?	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”.
34	How placement of temporary prefabricated buildings is considered by the Programme - as supply or construction?	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.



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 <b>national</b> 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.

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 <b>identical positions under BL1 of two or more project partners</b> 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”.



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.

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 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.
56	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?	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.
57	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?	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.
58	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?	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>- 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>





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.



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 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.