

TABLE WITH RECEIVED COMMENTS

**Within the public consultations on the Application package of Call 1 (concept notes) under the Territorial Strategy of the (Interreg VI-A) IPA Bulgaria
Türkiye Programme**

Name of person and organization	Received Comments/ Remarks:	Position of the Operational Unit	
		Answer	Justification:
Georgi Dimitrov, Mayor of Karnobat Municipality, Co-Chair of the Strategy Board to the Programme	<p>It is not clear enough to what extent does the choice of indicators influence the identification process of the concept notes.</p> <p>Please, provide more information on that in the Guidelines for Application</p>	Accepted for consideration	<p>In conformation for the need to consider Territorial Strategy indicators as components of the identification process of the concept notes, we propose the following text to be included in the Guidelines for Applicants:</p> <p><i>‘For ranking purposes, when two or more concept notes are scored equally at or above the threshold of 60 points, the project idea who includes the two pairs of ERDF indicators will be ranked first. That approach will be also considered when there is a large number of equally scored concept notes at or above the threshold (e.g. when they exceed two times the Call’s budget). If, however, the project ideas who have included the two pairs of ERDF indicators are not enough to support the ranking of the remaining equally scored concept notes, the latter will be ranked according to the obtained score on the criteria ‘Maturity of the project idea’, i.e. project ideas with higher score on the Maturity criteria will be ranked first.’</i></p>
Maria Kostadinova, NGO activist	<p>1. As a NGO our biggest concern lies within the QUALITY CRITERIA FOR STRATEGIC ASSESSMENT OF CONCEPT NOTES. Specifically point 1.4. – Capitalization potential of the project idea.</p> <p>As an example – the highest graded criteria – “- the applicant has justified the capitalization potential of the project idea and upgrades existing practices and knowledge in the addressed intervention field/s in all administrative and policy areas targeted by the project;”</p> <p>The term “administrative and policy areas” suggests that a given project idea should have to change/upgrade an existing policy instrument (eg. Implements a new practice in a local/regional legislation). If that is the case, it would be very hard for an NGO</p>	Not accepted for consideration	<p>The definition of the ‘Capitalization potential of the project idea’ criterion goes in full compliance with the objectives of the Integrated Territorial Development and the European Territorial Cooperation (Interreg) programmes that consider every targeted area as a whole and interconnected territory where territorial cohesion needs to be fully promoted. Applicants are advised to take advantage of reached results and thus facilitate future project activities and solutions. Furthermore, please, note that the Capitalization criterion is a common selection criterion under all Interreg programmes.</p>

	<p>or any beneficiary for that matter, to influence municipal or regional policies and legislations. If the upgrade of existing practices and knowledge is viewed in terms of what has been done before in a given territory (in relation to a policy/legislation that is currently in force), it would be clearer and less subjective to remove “and policy areas” from the criteria. In other words if the criteria reads “upgrades existing practices and knowledge in the addressed intervention field/s in all administrative areas targeted by the project;” – it is understood that there has to be an improvement of an existing practice or knowledge in each participating partner’s administrative area (rather than an improvement to each partner’s administrative area policies that are in force).</p>		
<p>Maria Kostadinova, NGO activist</p>	<p>2. Another concern we have is that throughout the quality criteria there are points, which could be interpreted very subjectively and/or are limiting and could be dismissing relevant project proposals. An example we could give would be in point 2. “Partnership relevance”. One of the conditions states that the project partnership should be balanced. How could one measure balance? If it’s balance in terms of scope and social and territorial diversity – the words “diverse” or “comprehensive” might be more suitable. Also, condition 3 states that the partners should “compliment” each other. In terms of NGOs for example – all working in the same field – let’s say ecology – it would be easy to see how they would compliment each other. They are all in the same field. But if a municipality has to partner up with a different sized municipality and an NGO for example – it would be harder to measure and prove how much one project’s partnership compliments each other more than another one. Maybe a better condition would be to require partnerships to be “beneficial”. As an example – it would be beneficiary for a given municipality to co-operate with a bigger municipality – the smaller municipality could gain knowledge and experience from the bigger scale of operation of the bigger municipality.</p>	<p>Not accepted for consideration</p>	<p>The rationale behind the selection process of any funding programme is to build the link between programme objectives and project results. The definition of the “Partnership relevance” contains important aspects of the Programme and Territorial Strategy objectives. Applicants need to demonstrate and justify how they meet these objectives having considered the set-up of the partnership as a key precondition for that purpose. By ‘balance partnership’ it is meant the balanced distribution of functions and tasks according to partner’s competence and experience or exactly what condition 2 says: each partner should be competent to handle its assumed functions from the view point of target groups, sectors, territory.</p> <p>Last but not least, we would like to emphasize once again that all selection criteria conforming the quality assessment matrix of Call 1 are common Interreg selection criteria who applicants of all Interreg programmes need to meet. This a programme horizontal principle aimed at ensuring equal programme access to all interested organizations.</p>
<p>Bulent Bacioglu, Edirne</p>	<p>Partners’ capacity and project experiences related to the proposed project focus might also be considered as the second evaluation criteria just in case the equal score is not broken after</p>	<p>Not accepted for consideration</p>	<p>We appreciate your consideration to think of an alternative approach to resolve the issue of equally scored projects and confirm its importance. Please, see our response to the</p>

Tourism Association	the "Maturity of the project idea" criteria.		comment (№ 1) of Georgi Dimitrov, Mayor of Karnobat Municipality, Co-Chair of the Strategy Board to the Programme.
Bulgarian Association of European Program Consultants	1. In regards to the condition „All project partners need to be registered and to operate in the programme area for at least 3 years prior to the application“ we propose to extend the requirement also for branches of the eligible applicants registered in the eligible program territory, whereas the registration period to be reduced for both partners and their branches from 3 to 1 year. The reasons for this proposal are that newly registered organizations will be also given the opportunity to participate in the program in order to gain experience and expand the opportunities for partnership and cooperation. In order to ensure good project management, organizations that have been registered less than 3 years ago can participate in the project not as a lead partner.	Partially accepted for consideration	The rationale behind the 3-year experience as condition for project participation steps upon the need for the Strategy Board to identify project ideas that contribute the most to the Territorial Strategy (TS) and its indicators. Supporting newly registered organizations to accumulate experience of their interest is not a component of the Integrated Territorial Development approach (central to Call 1), nor is it an objective/indicator of the TS. The need to assist the institutional growth of new organizations goes beyond the scope and objectives of Interreg where territorial cohesion plays central role. However, taking into account this proposal, the requirement for 3-year experience for project partners has been reduced to 2-year experience. Thus, only the Lead partner needs to conform to the 3-year experience requirement.
	2. We propose to reduce the minimum grant to 300 000 Euro in order to allow the chance to fund more project proposals. Roughly speaking, with a budget of nearly 13.5 million euros, a maximum of 15-18 project proposals will be financed at these thresholds. If the minimum grant is reduced to EUR 300,000, more than 25 projects could actually be funded.	Not accepted for consideration	Funding more project proposals is not a purpose of any Interreg programme. What matters is the degree of contribution of each proposal to the objectives of the Territorial Strategy (TS) and the Programme. The project budget range is set in a way to guarantee the achievement of TS and Programme indicators. Any shift from this budget range would jeopardise that.
	3. We propose that the de minimis regime be applied only in the event that economic activities are carried out. Otherwise, the possibility of forming a partnership is severely limited, especially given the fact that a €500,00 project will require a minimum of 3 partners, and a €1 million project will require 5 partners if this regime remains. Most of the potential beneficiaries already have de minimis accruals from previous BFP provision schemes, which is also an additional obstacle to participate in a partnership under the programme. Moreover, the requirement on page 9 of the draft guidelines "Although, applicants under the present Call for concept notes will not be checked for de minimis eligibility, they must be aware that activities of economic character could be financed only under the de minimis rule." contradicts the condition for all partners to apply the de minimis regime, regardless of whether or not they perform economic activity.	Not accepted for consideration	The application of the de minimis regime under the present call does not differ from its application under any other EU funded programme, because its implementation provisions are defined in the EU regulation framework 2021-2027.

	<p>4. We propose the percentage for the investment component of the projects be reduced from 70% to 60% in order to allocate more funding to the development of human resources in the sectors of business, digitalization and climate neutrality, labor market, tourism ecosystem practices and management of natural resources that are key to achieving the program's goals.</p>	<p>Not accepted for consideration</p>	<p>Practically speaking, the reduction of the investment rate would not redirect free funds to specific policy areas. The amount of funds are firmly linked with the targets of the TS and the Programme indicators. Therefore, please refer to comment 2 and its answer. It is equally applicable here, as well. However, there is a room for minor reduction of the investment rate, but it needs different justification to do that.</p>
	<p>5. In regards to the condition on page 16 of the draft Guidelines „Only the owner of the respective property rights, or the legal body that has acquired the management rights of that particular property, is entitled to contract the implementation of those activities, i.e. it should be a project partner“ we suggest that the same does not apply when the state has provided a given site to a municipality for management. In this case, a municipality should be allowed to apply for investments under it with an established right of construction or otherwise according to the regulations of TSA.</p>	<p>Not accepted for consideration</p>	<p>The proposal cannot be accepted, because it contradicts with art. 65 (1) (b) of the REGULATION (EU) 2021/1060 of 24 June 2021 and jeopardizes the implementation of the durability principle set out under the same article. Therefore, only the owner of the respective property rights, or the legal body that has already acquired the management rights of that particular property, is entitled to contract the implementation of the project-related construction works.</p>
	<p>6. In regards to the condition on page 17 of the draft Guidelines „At the stage of application with full project proposal the partners should present all legally required documents for implementation of the envisaged investment activity“ it is not clear what project readiness is expected at the next stage - conceptual design, working design with a construction permit, etc., given the fact that the implementation should be assigned by the beneficiaries. Below in the guidelines, it is explicitly stated that the environmental procedures will be requested, but we believe that the readiness /objective maturity/ according to the TSA should also be clearly defined in the guidelines.</p>	<p>Not accepted for consideration</p>	<p>When it comes to project readiness, the Guidelines for Applicants with concept notes do not predetermine eligibility conditions for the submission of full project proposals. There will be no such conditions, because otherwise they would lead to unequal treatment of invited applicants when submitting full project proposals. For consistency purposes, we apply identical evaluation approach under the two application processes (concepts note and full project proposals) when applicants will have the opportunity to apply regardless of the degree of maturity of their concept notes and the achieved project readiness of the full project proposals.</p>
	<p>7. We believe that the qualitative criteria for strategic evaluation of project concepts are too subjective and there are no quantitative and clear evaluation indicators (covered final beneficiaries and target groups, etc.) and if the same are laid down in a public procurement procedure, then it will be sanctioned with a financial correction, for example:</p> <p>a. the project idea leads to a positive change (in terms of target groups and territorial developments) in the addressed</p>	<p>Not accepted for consideration</p>	<p>Please, do not mix selection criteria of Interreg project proposals with selection criteria of tendering procedures under Public Procurement Law. Both types of criteria pursue different objectives and follow different assessment methodologies and considerations.</p> <p>Please, refer to the comments (2 and 3) of Maria Kostadinova and the corresponding answer.</p>

	<p>type of intervention, e.g. expected solutions are adequate, feasible and sustainable, the scope of idea is broader than the usual local benefit only to the respective organisation or locality concerned – there are no definitions/examples for adequate, applicable and sustainable solutions;</p> <p>b. The proposed partnership is sufficiently relevant, e.g. all partner organisations have proven experience and competence (incl. legal rights to act in the proposed way) in the addressed intervention field/s (condition 1). The proposed partnership is balanced and reflects the addressed issue in terms of target groups, sectors, territory (condition 2). Partner organizations complement each other (condition 3) – it is not clear how competence and experience are verified.</p> <p>In this regard, we propose to include quantitative criteria, such as for the experience of the beneficiaries, or for the upgrade of already implemented previous projects under this and other programs, or for the implementation of good practices within this or other programs, etc.</p>		
Bulgarian Association of European Program Consultants	8. We believe that the period for providing explanations to the potential participants in the procedure of 10 working days is too long, given the indicative period for presenting project concepts, and we propose that it is shorten to 5 working days.	Not accepted for consideration	The proposal cannot be accepted because the Strategy Board and the Operational Unit will need more time to initiate joint working procedure to review each case.
Shenay CEKIC – <i>the comment is sent after the end of the public consultations</i>	<p>I would like to express my comments and view regarding the prepared Concept Note document:</p> <p>Till now, during all program planning stages I followed all issued documents and expressed my vision and comments on the draft versions of the Territorial strategy and other documents.</p> <p>Till now the program clearly stated that there will be Three programme priorities:</p>	Partially accepted for consideration	It is very important for all applicants to clearly distinguish between a strategic document (the Territorial Strategy) and Guidelines for applicants (GfA). Both documents pursue different objectives and therefore provide relevant information in a manner that serves readers’ diverse interests and needs. The strategic document is a broad, policy document, while the GfA sets a framework for its implementation, it does not replicate the strategic document itself. Usually, the GfA narrows down the policy scope of the strategic document, conforming to a given approach. In our case, the approach we follow and apply is the integrated territorial development (ITD). Please,

<p>- Priority 1 - Environmentally-friendly cross-border region</p> <p>- Priority 2 Integrated development of the cross-border region</p> <p>- Priority: 3 - More secure cross-border region</p> <p>Till now in all published documents including in the Territorial Strategy there was presented a clear approach and logic for the achievement of the outputs and results.</p> <p>Now, with the issued Concept note all information is presented in a very mixed way, hard to be understood and for sure outside of the logic of the Territorial strategy.</p> <p>For examples for Priority 2 in the territorial strategy you have clearly presented priorities, specific objectives and outputs and results to achieve.</p> <p>Priority: 2 - Integrated development of the cross-border region</p> <p>Specific objective: RSO5.2. Fostering the integrated and inclusive social, economic and environmental local development, culture, natural heritage, sustainable tourism and security, in areas other than urban areas</p> <p>Strategic objectives:</p> <ol style="list-style-type: none"> 1. Achieving sustainable and inclusive economic growth based on increased competitiveness of the local economy, digital and green transformation (addressing economic cohesion obstacles and missing links) 2. Development of better access to services of general interest (addressing social cohesion obstacles and missing links) <p>Now, in the Concept Note guidelines its mentioned that the Strategic objective 1 is separated to the 5 specific objectives with</p>	<p>make sure you get familiar with it (you may want to consult the Territorial Agenda https://territorialagenda.eu/ta2030/ or the following Interact's manual https://www.interact-eu.net/download/file/fid/18981) before you start developing your project idea. The logic and the approach of the presented GfA is thoroughly based on the concept of the ITD where multi-sectoral and integrated solutions to territorial challenges are expected to further contribute to the territorial cohesion of the cross-border area. Please, also consider the text under section 2 'Objectives and Focus of the Call' which links the objectives of the Territorial Strategy with the objectives of the Call 1.</p> <p>In regards to the participation of MSMEs in project proposals of circular economy importance under Priority 2, there will be added a text in the GfA specifying that MSMEs are not eligible to receive funding, as lead or project partners, under Call 1 to implement actions of circular economy relevance in order to demarcate this support from the one under Programme Priority 1. Legal entities other than MSMEs can apply or participate as partners in integrated projects of circular economy significance.</p> <p>Indeed, the MSMEs are not listed as eligible project partners under Priority 2 in the Timetable of planned calls for proposals in 2023, which is a technical oversight. However, please, note that MSME are listed as such in the Programme document.</p> <p>Once again, the purpose of the GfA for concept notes is to guide project partners in the development of their project ideas according to a framework of rules and conditions they need to meet. The type and scope of the information provided in the GfA corresponds to the quantity of information that the project partners need to present and justify their project ideas. Some texts in the GfA (in sections 1, 2 and 4.2) have been additionally extended to make sure that the provided guiding information is sufficient.</p>
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following type of interventions:

- **Competitiveness and business environment;**
- **Digitalisation and climate neutrality of the local economy;**
- **Employability and labour market adaptability;**
- **Tourism;**
- **Ecosystem practices and services in the management of natural assets with tourism potential**

Here it is not understandable about these types of interventions under which specific objectives are.

In the Timetable document you separated the two priorities and clearly provided information for the type of the target groups and potential beneficiaries, where is mentioned that MSMEs under priority 1 will have a chance to apply with open call, and for Priority 2: there was no mentioned that the MSMEs could apply?!

Now with this guide document for the concept notes we understand that actually MSMEs also could participate not only in the open call under priority 1, but also under Priority 2 in this targeted call. Additionally in the Strategy documents is written that: It will be clearly communicated to potential applicants that under this priority the MSMEs will not receive direct support for implementing circular economy models in order to demarcate this support from the one under priority 1. Legal entities other than MSMEs can apply or participate as partners in integrated projects of circular economy significance. - but this is not mentioned at all in the concept note call.

This new information actually is very confusing. Now we understand that the MSMEs also could be beneficiaries under Priority 2 and actually issued Timetable and explanation in these documents is totally invalid document, due to that the provided

	<p>information inside is totally different from the written in the Guide for the concept note, incl. type of the beneficiaries, amount of grants, etc.</p> <p>In short: the issued guidelines are with the insufficient information and there is need to be presented more information for the specific objectives of the call, to be specified if some activities are not allowed to some beneficiaries groups and to be more clear and detailed, not only to navigate the potential beneficiaries to the Strategy document - please, combine the information in the strategy document with the guidelines and be sure that the information is in line with it.</p> <p>Please, have in mind the territorial capacity of the potential beneficiaries and write as much as possible in detail your priority, specific objectives and not only the short names of the interventions, give examples for the possible activities, and be more detailed.</p>		
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