



PUBLIC CONSULTATIONS

(INTERREG VI-A) IPA Bulgaria – Türkiye Programme 2021-2027, CCI Number: 2021TC16IPCB005

TABLE
OF THE COMMENTS RECEIVED DURING THE PUBLIC CONSULTATIONS ON THE
GUIDELINES FOR APPLICANTS UNDER THE CALL FOR PROPOSALS
RSO2.1. PROMOTING ENERGY EFFICIENCY AND REDUCING GREENHOUSE GAS EMISSIONS
RSO2.6 PROMOTING THE TRANSITION TO A CIRCULAR AND RESOURCE EFFICIENT ECONOMY
PRIORITY 1: ENVIRONMENTALLY FRIENDLY CROSS-BORDER REGION
03.08.2023 – 20.09.2023.

No	Date and way of receipt	Sender	Country	Contents	Contact details	Position of the Managing Authority	
						Accept/Not accept/Accept for information	Justification
1	04.09.2023 e-mail	“Diyan Boyadzhiev” Ltd.	Bulgaria	<p>Dear Interreg VI-A IPA Bulgaria – Türkiye Programme 2021-2027 team,</p> <p>I would like to propose to add economic activity "Creation and broadcasting of radio programs", 60.10 to the list of eligible applicants specified in the Guidelines.</p> <p>The activity can be classified as productive considering organization of the production of radio programs that unite the efforts of professionals from journalism, music, education and theater, etc.</p>	didoboyadjiev@abv.bg	1). Accepted.	<p>The provisions of the Guidelines for applicants (GfA) will be revised accordingly to include in Section 2.1 Eligibility of applicants, criteria 4) of the GfA within the eligible economic activities the following:</p> <p>Division J – Information and Communication:</p> <p>J.58 Publishing activities</p> <p>J.59 Motion picture, video and television programme production, sound recording and music publishing activities</p> <p>J.60 Programming and broadcasting activities</p>



				<p>In this matter, I would you to consider the opportunity to add other branches of the economy in Section 2. Eligibility Criteria, 2.1. Eligibility of Applicants, point 4. This will contribute to the development of the cross-border Bulgaria – Türkiye region.</p> <p>This requirement for applicants limits them and does not give them the right apply for funding and at the same time makes it impossible for many entities from both sides of the border to participate.</p>			<p>J.61 Telecommunications</p> <p>J.62 Computer programming, consultancy and related activities</p> <p>J.63 Information service activities.</p>
2	15.09.2023 e-mail	Uğur BİTİRGEÇ Team Leader / Productive SMEs of Trakya Region	Türkiye	<p>Date of submission: 15.09.2023.</p> <p>My opinions on the guide prepared for SMEs within the scope of the Environmentally Friendly Cross-Border Cooperation Zone (Specific objective 2.1 “Promoting energy efficiency and reducing greenhouse gas emission”) are as follows:</p> <p>1. Energy Monitoring System Installation and consultancy</p>	u.bitirgec@gmail.com	1) Accepted for information.	<p>1). In Section 2.2.3 Eligible Activities in the Guidelines for applicants it is specified that all investments in the approved for funding projects have to be carried out with the aim of achieving a higher level of energy efficiency of SMEs. In order to do that the project must be supported either by an energy audit or a specific proposal assessment prepared by a certified energy auditor or a warranted engineer who would clearly describe and identify the proposed project and its expected benefits. This means that all</p>



			<p>It has been stated that support will be given to the "Energy Monitoring System" digital solutions for the installation and certification of the ISO50001 Energy Management system and to instantly view the energy consumption required for this. According to my opinion, it would be better to clarify that the “purchase of equipment for the installation of the energy monitoring system” (energy analyzer, gateways, software, meters, sensors, tablets, cabling, computers, etc.) is included in the guidebook.</p> <p>2. ISO14064 Carbon Footprint calculation training and consultancy It is recommended that ISO14064 Carbon Footprint calculation training and consultancy be included in the guide. Thus, the business will be able to calculate the current greenhouse gas value and the realized value after efficiency studies.</p> <p>3. Lean Manufacturing – Process Efficiency Consultancy The project encourages the business to replace machinery and equipment that emit greenhouse gases. However, if the capacity of the environmentally friendly machines to be purchased instead of the existing machine is different, the production capacity of the enterprise may be affected. Therefore, before purchasing new equipment, it is necessary to review the production flow if machinery and equipment are purchased. If the current flow is already inefficient, the new machine we purchase will only help reduce greenhouse gases but will not</p>		<p>investment activities that applicants propose in their project proposals need to be in implementation of the energy efficiency measures included in the energy audit or in the case of the Turkish SMEs energy efficiency assessment.</p> <p>In this respect, the Energy Management System with all its necessary parts for installation should be specifically included and described in the energy audit/energy efficiency assessment as part of the energy efficiency measures proposed in the project. Please bear in mind that specific requirement of the current Call under SO 2.1. is that all investment activities planned in the project should be with confirmed effect of energy savings from at least 5% for the measure concerned, according to the energy efficiency assessment. Furthermore, in the GfA, p. 27, Section 2.2.3 in the non-exhaustive list of eligible activities it is indicated the <u>installation of energy management system.</u></p> <p>And finally, ISO 50001 explicitly specifies the specific requirements applicable to the use and consumption of energy, including measurement, documentation and reporting, planning and purchasing of equipment, human resources, etc. that contribute to energy performance. In light of this, there is no need to specify in the Guidelines for applicants the equipment needed for the installation of the standard since this is included in the principles and requirements for the implementation of the standard itself.</p>
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<p>as stated in the guide. In my opinion, by examining the data and analysis of the energy monitoring system in the study, the engineer can recommend technology-appropriate machine replacement, equipment replacement such as motors and pumps, and work models instead of equipment and machines that produce carbon emissions.</p> <p>The engineer can make wrong suggestions without the energy monitoring system and mes/mom data (suggesting to change the motor of a machine that is running poorly, or recommending revisions to the compressed air lines according to the wrong machine park, or not being able to see the use of cables that are too thick or the excessive current draw of the machines, not being able to observe whether the system is available or not, determining the adequacy of the compensation system, monitoring reactive power etc.).</p> <p>5. The energy engineer will also recommend renewable energy systems (solar energy system on roofs, wind energy, solar wall to provide heating in buildings, etc.) in his check up-audit study to ensure resource efficiency in the operation.</p> <p>6. At the same time, it would be appropriate for the SME to prepare a "Sustainability Report in accordance with ESRS" in order to register the activities that reduce greenhouse gases and provide energy efficiency.</p> <p>As a result, It is recommended that the following</p>		<p>4) Accepted for information.</p> <p>5) Accepted. Not</p>	<p>information pertaining to each project and will hold the ultimate authority to decide on the eligibility activities.</p> <p>4). In line with the requirements of the current Call all activities proposed for funding under SPO 2.1. “Promoting energy efficiency and reducing greenhouse gas emissions“ should be in implementation of energy efficiency measures specified in the energy audit/energy efficiency assessment and should be with confirmed effect of energy savings from at least 5% for the measure concerned, according to the energy efficiency assessment.</p> <p>In light of this, if the purchase and installation of Manufacturing Operations Management (MOM) software, including MES and or ERP programmes is recommended in the energy audit/energy efficiency assessment as an energy efficiency measure that has a confirmed effect of energy saving, it would be considered eligible activity according to the specified in p. 27, Section 2.2.3. Eligible Activities of the Guidelines for Applicants.</p> <p>5). The current Call for proposals explicitly specifies that aid shall not be granted to investments related to the generation of electricity such as PV (photovoltaic) installations. This limitation stems from the fact that the eligible projects and activities are under Specific objective (i) “Promoting energy efficiency and reducing greenhouse gas” (article 3 of REGULATION (EU) 2021/1058 OF THE</p>
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			<p>items be considered in the guide (Specific objective 2.1 “Promoting energy efficiency and reducing greenhouse gas emission”).</p> <ol style="list-style-type: none"> 1. Training on ISO 9001, 14001, 45001 additional to 50001 management systems and certification if desired 2. ISO 14064 Carbon Footprint Calculation Training and consultancy for calculation 3. Receiving lean production training and consultancy. 4. MES/MOM ERP installation in the business (Software purchase and consultancy service 5. Energy Monitoring system (available in the guide but for me, Even if the business just wants to install an energy monitoring system, it should be supported.) <p>I believe that it should be supported to see the energy saving opportunities and greenhouse gas reduction potential. With the realization of these 5 items, the business will only be able to see the problems and collect and analyze the necessary data. Therefore, it would not be right to expect savings from the business just by purchasing these services, but for me, these are systems that all businesses should have.</p> <p>6. Machinery and Equipment Purchase: (Available in the guide) I believe that with the realization of the energy audit in the guide, the engineer will use the Energy Monitoring System and MES/MOM data and analysis to state more clearly the projects that</p>		<p>6) Not Accepted.</p>	<p>EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 June 2021 on the European Regional Development Fund and on the Cohesion Fund). The activities related with renewable energy are listed under Specific objective (ii) “promoting renewable energy are specified in accordance with Directive (EU) 2018/2001, including the sustainability criteria set out therein” of same regulation.</p> <p>6). European Sustainability Reporting Standard is carried out in line with DIRECTIVE (EU) 2022/2464 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU. The EU rules on disclosing non-financial information as per DIRECTIVE (EU) 2022/2464 apply to all large companies and all companies listed on regulated markets. The rules also apply to listed SMEs, taking into account their specific characteristics. For non-European companies, the requirement to provide a sustainability report applies to all companies generating a net turnover of €150 million in the EU and which have at least one subsidiary or branch in the EU. These companies must provide a report on their ESG impacts, namely on environmental, social and governance impacts, as defined in this directive.</p> <p>Since in the provisions of the current Call we don't have a requirement for SMEs to be listed on regulated</p>
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				<p>will increase energy efficiency in his report, and in this case, the enterprise will realize the projects specified in the survey (purchase and sale of machinery and equipment) with a deviation of 5%.</p> <p>7. Renewable Energy Renewable energy installation will ensure resource efficiency. Projects such as solar energy system installation on roofs and solar wall applications in buildings can be supported and included in the guide.</p> <p>8. Providing consultancy for the preparation of a Sustainability Report in accordance with ESRS.</p>			<p>financial markets, it is not justified to include among the eligible activities such that is not aimed at our target group in its entirety. In addition, we have to bear in mind one of the main principles of EU funding which is that aid should not be granted where investments bring undertakings into compliance with Union standards already adopted or not yet in force. On the contrary, support is provided so that as a result the undertakings can improve their behaviour to adapt early to future Union standards before such standards enter into force and as long as such standards do not apply retroactively.</p> <p>1) Not Accepted</p> <p>1). Training on ISO 9001 and ISO 45001 (Occupational Health and Safety Management System) do not fall within the scope of the current Call for proposals – increase the energy efficiency of SMEs and circular economy. All activities proposed for funding under SPO 2.1. “Promoting energy efficiency and reducing greenhouse gas emissions“ should be in implementation of energy efficiency measures specified in the energy audit/energy efficiency assessment and should be with confirmed effect of energy savings from at least 5% for the measure concerned, according to the energy efficiency assessment.</p>
3	18.09.2023 via e-mail	Şenay Çekiç	Türkiye	<p>Dear Experts,</p> <p>I would like to share with you my comments about the published draft version of the Guidelines for Applicants under the forthcoming call under</p>	sheni.cekic@gmail.com	1). Accepted for information.	The current GfA does not provide limitations for own contribution. The decision for the amount of the own contribution, if any, should be taken by the applicant depending on the nature and scope of the investment



			<p>Priority 1 “Environmentally friendly cross-border region”, as underling that all of them are based on the dedicated meetings and discussions with the local companies from the Turkish side of the border.</p> <p>The companies underlied the following important points:</p> <p>1. In line with the Eligibility criteria for the applicants and especially point 5) to have generated Annual turnover cumulative for the last three years, obviously the SMEs that apply for the grant will have a serious net sales revenues and it is expected that these companies will be with a bigger production base and processes. These criteria are automatically leading to the need for serious investments in these companies for the ensuring of the required 5% energy savings. And this by itself is leading to the question regarding the grant amount and the possibility to provide any own resources. In the draft guidelines, there is written that: '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> <p>The uncertain moment here is that the current draft version of the guidelines do not present any clear information about are there any limits / rates for the own-contribution and could the companies participate in the project with the investments that exceed two or three times the EU grant value. It is good for the companies to know if they could</p>	<p>2.1.). Accepted for information.</p> <p>2.2.). Accepted for information.</p>	<p>they want to undertake.</p> <p>This additional funding should be included in the project budget, indicating the applicant's commitment to investing their own resources into the project and will be subject of verification.</p> <p>2.1) The document specified as B1 in Section 3.2. Supporting documents of the GfA refers to Turkish partners and is required in order to be able to establish their legal status and compliance with the eligibility criteria. For Bulgarian partners the legal status can be established by check in official public registers and this check will be carried out ex-officio.</p> <p>2.2). The submission of the supporting document required in Section 3.2. of the GfA as B8.5 depends on the technological characteristics of the manufacture process of the specific undertaking. This requirement stems from the necessity to prevent, reduce and as far as possible eliminate pollution arising from industrial activities in compliance with the principle of prevention of pollution and the principle “polluter pays”. In this respect you can refer to DIRECTIVE 2000/60/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23 October 2000 establishing a framework for Community action in the field of water policy as well as DIRECTIVE 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 November 2010 on industrial emissions (integrated pollution prevention and control).</p>
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				<p>participate in the project for example with 500.000-600.000 euro investments, from which the 200.000 Euro is grant and the other one is their own co-financing.</p> <p>Actually, in the current guidelines is missing information about the min. and max values of the project - there are written the minimum and max possible grant amounts, but it is obvious that the companies would like to make serious investments and would prefer to participate with some own financing too. Therefore there is need for some additional clarification about the possible max values of the total project costs.</p> <p>2. Please, clarify all requested annexes to respond to the existing documents and certificates that the both countries' relevant institutions are issuing. In B1 - In the title it is mentioned that the document is for the Turkish partners, but inside of the explanations is requested the most recent legal status of all partners. About B8.5. - There is a need for more clear information about what kind of companies should provide this explanatory note and how they could evaluate whether they should give it or not.</p> <p>Thank you in advance for taking into consideration our comments.</p>			
4	19.09.2023 via e-mail	Şenay Çekiç	Türkiye	<p>Dear experts,</p> <p>Regarding the ongoing public consultations on the forthcoming call under Priority 1, I</p>	sheni.cekic@g mail.com	1) Accepted for information.	1) Since the focus of the current call is to achieve a higher level of energy efficiency in enterprises we need to be able to define the amount of saved energy as a result from the supported investments



			<p>would like to ask you for additional clarification about the text in the section 2.2.4: 'All projects that envisage building of new or rehabilitation of existing infrastructure, must comply with the environmental legislation of the respective country before the implementation stage. This is verified by the MA and the NA at the application stage. The land or buildings where works will be carried out must be in the ownership of the beneficiary. Aid shall not be granted to investment in new buildings or expansion of existing buildings and on investments related to the generation of electricity such as PV installations.'</p> <p>In the abovementioned text there is written that there is a possibility to be planned building of new infrastructure and at the same time it is mentioned that the aid will not be granted to investment in new buildings. Could you please clarify here the description of investment in new buildings, does it mean that there is not eligible any costs relating to the construction of new buildings? What do you mean by a new building - could it be an already existing new production base of the company that will be equipped with the new equipment for the project? (1)</p> <p>About the PV installations and generation of</p>		<p>2) Not accepted.</p>	<p>determined by measuring and/or estimating consumption before and after implementation of an energy-efficiency improvement measure/s in the respective enterprise. To be able to do these calculations certified energy auditors need to carry out baseline analysis based on accumulated data about the energy consumption, the energy costs and CO2 emissions of the building or the production premises/site, whichever the case may be, at least 3 years back. These data cannot be accumulated for new buildings and that is why investments in the construction of new buildings is not eligible under the current call.</p> <p>In addition, Regulation (EU) 2021/1058, article 5 specifies the scope of support from the European Regional Development Fund (ERDF) as follows: (a) investments in infrastructure; (b) activities for applied research and innovation, including industrial research, experimental development and feasibility studies; (c) investments in access to services; (d) productive investments in SMEs and investments aiming at safeguarding existing jobs and creating new jobs; (e) equipment, software and intangible assets; (f) networking, cooperation, exchange of experience and activities involving innovation clusters including between businesses, research organisations and public authorities; (g) information, communication and studies; and (h) technical assistance.</p> <p>2). Please refer to the answer already provided under comment number 2, point 5 from 15.09.2023.</p>
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				<p>electricity - actually on the base of the made several meetings with the companies, it is clearly seem that the companies have a huge need and are ready to make investments in electricity production by PV or similar installations aming decreasing the greenhouse gas emissions by using the green energies.</p> <p>Could it be possible to review this decision and rule written in the draft version of the guidelines that the aid could not be granted for the production of electricity such as the PV installations, and to be put there some clarification, for example: the PV installations or other electricity production installations could be used only for the needs of the company and the produced electricity could not be shared in the general electricity system of the country. (2)</p> <p>Thank you!</p>			
5	20.09.2023 via e-mail	Ibrahim Cekic	Türkiye	<p>Dear experts,</p> <p>Regarding the published draft guidelines of the forthcoming call under Priority 1 “Environmentally friendly cross-border region”, we would like to make the following comment:</p> <p>1. Regarding the point. 2.1. Eligibility of Applicants, 5) <i>to have generated Annual</i></p>		1) Accepted.	<p>1). Clarification shall be made accordingly and the average annual exchange rate for the respective years 2020, 2021 and 2022 for TR to EUR of the European Central Bank (EuroSystem - https://www.ecb.europa.eu/stats/policy_and_exchange_rates/euro_reference_exchange_rates/html/eurofxref-graph-try.en.html -</p> <p>The average annual exchange rate obtained from the ECB's data is utilized in order to convert financial figures from Turkish Lira (TR) to Euro (EUR) for the</p>



			<p>turnover (<i>Net Sales Revenue</i>) cumulative for financial years: 2020, 2021, 2022 according the category of applicant undertaking, as follows... As you know, the fluctuations of the exchange rates of the Turkish Lira against the Euro is making it hard to make a correct calculation of the required cumulative revenue of the Turkish companies. If the Turkish companies should take the monthly accounting rate of the European Union for the current year, then the calculations will be very different, than the exact made revenues for the last three years.</p> <p>That's why could you please add some clarification for the exchange rates that the Turkish companies should use during the calculation of their annual turnover for the last financial years: 2020, 2021, 2022.</p> <p>2. Regarding: B8. Supporting documents concerning INVESTMENT ACTIVITIES B8.1. All investment activities have to be performed on SME-owned property.</p> <p>Could it be possible to make some change in this rule for the investments concerning only supply of equipment under one of the two SOs, by providing a chance to the companies that are with for example at least 10 years rent contracts to make investments in their production places. Also, such companies could be very innovative production</p>		<p>2) accepted.</p> <p>Not</p>	<p>purpose of calculating the annual turnover of TR applicants during the specified financial years 2020, 2021, 2022, as follows:</p> <ul style="list-style-type: none"> -Average exchange rate for 2020 TRY to EUR – 0.124; -Average exchange rate for 2021 TRY to EUR – 0.095; -Average exchange rate for 2022 TRY to EUR - 0.057. <p>2). In order to ensure the effectiveness, fairness and sustainable impact of the European Funds, we are obliged to set provisions guaranteeing that investments in infrastructure or productive investment shall be long-lasting and shall prevent the Funds from being used to undue advantage. The requirement to perform all investment activities on SME-owned property is in compliance with article 65 of Regulation (EU) 2021/1060, which stipulates that EU contribution shall be repaid if investment in infrastructure or productive investment, within 3 years of the final payment to the beneficiary in the case of SMEs that operation is subject to any of the following:</p> <ul style="list-style-type: none"> (a) a cessation or transfer of a productive activity outside the NUTS level 2 region in which it received support; (b) a change in ownership of an item of infrastructure which gives to a firm or a public body an undue advantage; (c) a substantial change affecting its nature, objectives
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<p>companies located in the Teknoparks of the relevant regions.</p> <p>3. Regarding the part: 2.3.4. List and description of Eligible Expenditures per categories of costs, 4. External expertise and services costs - External expertise: <i>Preparation of main design and other technical designs for contraction/reconstruction of sites (all phases)</i> - is this actually the made costs at the stage of the preparation of the project proposal and does the programme will approve the costs for technical design, made during the implementation stage of the project and its realization of the work activities OR should the applicants actually plan these costs as the costs made during the project preparation stage and calculate them under the BL 7: Project preparation costs?</p> <p>Thank you in advance for your clarifications.</p>	<p>3) Accepted for information.</p>	<p>or implementation conditions which would result in undermining its original objectives.</p> <p>3). BC 4 - External expertise and services costs consider costs that are needed during the implementation period of project and are essential to its successful completion.</p> <p>Those expenditures should be incurred during the implementation period of the Project and paid before the end date of the project.</p> <p>BC 7 - Project preparation costs is for costs that have been made prior to the submission of the project proposal and which have been essential to the correct preparation and successful submission of the project. The GfA, p. 41 explicitly specifies the costs that shall comprise the Project Preparation Costs.</p>
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