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| **No.** | **Institution** | **Proposals as received** | **IP structures opinion** | **Updated** |
| 1. **Eligibility of expenditure** | | | | |
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| 1. **Eligibility of actions** | | | | |
| II.1 | Primaria comunei Lumina, judetul Constanta | La sectiunea 3 "Tipuri de actiuni indicative eligibile" OS2.7, actiunea indicativa "Developing green areas (...) urban parks, green sort facilities, forests, riverbank greens".  In considerentul faptului ca operatiunile de dezvoltare integrala si management al unor arii verzi presupun mai multe tipuri de investitii, va rugam sa clarificati daca operatiuni/investitii precum achizitia si instalarea de mobilier urban, a sistemului de iluminat public aferent zonei amenajate, a sistemului de irigatii aferent zonei amenajate, cat si a grupurilor sanitare ecologice, reprezinta cheltuieli eligibile.  Analizand "Lista de cheltuieli eligibile" sectiunea Echipamente, putem considera ca produsele/echipamentele mai sus mentionate sunt eligibile, dar luand in calcul posibilitatea ca ele sa fie neeligibile si cheltuiala in cauza (care este necesara) sa fie pusa in sarcina Beneficiarului, consideram ca ar fi oportuna mentionarea clara a acestor activitati ca fiind eligibile sau nu.  **Translation**  In section 3 "Types of eligible indicative actions" SO2.7, the indicative action "Development of green areas (...) urban parks, green sorting facilities, forests, green banks".  Considering the fact that the operations of integrated development and management of some green areas involve several types of investments, please clarify whether operations/investments such as the purchase and installation of urban furniture, the public lighting system related to the landscaped area, the irrigation system related to the landscaped area, as well as the ecological sanitary groups, are eligible expenses.  Analyzing the "List of eligible expenses" in the Equipment section, we can consider that the products/equipment mentioned above are eligible, but taking into account the possibility that they may be ineligible and the expense in question (which is necessary) be charged to the Beneficiary, we consider that it would be appropriate to clearly mention these activities as being eligible or not. | In order to be eligible, the expenditures must be in line with the legal provisions inforce (see Regulation 1059/2021 and 1060/2021). All the equipment purchased must essential to the project implementation and must contribute to the project objectives and Programme specific objectives.  Please note that, after public consultation, more details/ inspirational examples have been included in the Applicant’s guide. | NA |
| 1. **Eligibility of applications and applicants** | | | | |
|  | НОРМА ПРОЕКТ | I have a matter under discussion regarding the requirement for eligible applications and candidates set out in the Guidelines, namely:  **"*The applicants that are in any of the situations mentioned under Art. 136 of REGULATION (EU, Euratom) 2018/1046 shall be excluded from participation in call for proposals."***  In Art. 136, paragraph 1, letter E of REGULATION (EU, Euratom) 2018/1046, reads: *"1. The authorizing officer responsible shall exclude a person or entity referred to in Article 135(2) from participation in procurement, award or award procedures governed by this Regulation, or from selection for the implementation of Union funds, where that person or entity is located in a or more of the following circumstances requiring his removal:..... f) by a final judicial decision or a final administrative act, it is established that the person or entity has committed an irregularity within the meaning of Article 1, paragraph 2 of Council Regulation (EC, Euratom) No. 2988/95"*  Article 1, paragraph 2 of Council Regulation (EC, Euratom) No. 2988/95: *"2. "Irregularity" means any breach of a provision of Community law, as a result of an act or omission by an economic operator, which has or would have the effect of disrupting the general budget of the Communities or of the budgets managed by them, or through the reduction or loss of revenues arising from own resources, which are collected directly on behalf of the Communities or through the execution of unjustified expenditure.“*  We should specify that an irregularity is not established by an administrative act or a court decision, the irregularity is administered on the initiative of the governing body of the relevant program or on a signal. The imposition of a financial correction for an irregularity is established by an administrative act or a court decision.  **T**his requirement for applicants limits them and does not give them the right to even defend themselves, and at the same time makes it impossible for many entities from both sides of the border (municipalities, ministries, various public institutions) to participate, as they all have irregularities and, accordingly, imposed financial correction of some of them.  **Please, take note of the requirement so stated and spell it out in more detail clarifying the conditions under which a candidate will not be able to participate or adjust the said requirement so that applicants can be given an equal chance to participate!** | Please consider the cases mentioned by the Article 136 of Regulation 2018/2046. |  |
|  | INCDCP ICECHIM Filiala Calarasi | Am o intrebare referitoare la Ghidul Aplicantului lansat in consultare.  INCDCP ICECHIM Filiala Calarasi este o entitate cu personalitate juridica proprie, cu sediul social in localitatea Calarasi, ce functioneaza in cadrul INCDCP ICECHIM Bucuresti.  Ghidul specifica faptul ca in cadrul unui proiect nu se pot incheia contracte intre parteneri.  Intrebarea mea este, in situatia in care Filiala Calarasi ar fi partenera intr-un proiect, ar putea incheia contracte de prestari servicii cu ICECHIM Bucuresti in cadrul proiectului respectiv? (Fiind totusi entitati cu personalitate juridica distincta).  **Translation**  I have a question regarding the Applicant's Guide released for consultation.  INCDCP ICECHIM Calarasi Branch is an entity with its own legal personality, with headquarters in Calarasi, which operates within INCDCP ICECHIM Bucharest.  The guide specifies that contracts between partners cannot be concluded within a project.  My question is, in the situation where the Calarasi Branch would be a partner in a project, could it conclude service contracts with ICECHIM Bucharest within the respective project? (However, being entities with distinct legal personality). | No, the subcontracting between partners is not allowed.  All project partners implementing projects in the framework of the Romania-Bulgaria VI-A Programme must comply with the relevant national procurement legislation or, if the case, with the provisions stipulated in the corresponding Annex of the subsidy contract – *Competitive procedure for Romanian private applicants/partners regarding the assignment of supplies, services and works contracts financed within Interreg VI-A Romania-Bulgaria Programme.*  The national and European legislation as well as the other Programme rules on procurement must be observed.  Projects which cannot prove the award of contracts in compliance with the procurement rules risk having expenditure ruled ineligible. |  |
|  | Politia de Frontiera  SERVICIUL GRANTURI SI FONDURI STRUCTURALE  DIRECTIA FONDURIEXTERNE NERAMBURSABILE | Referitor la sectiunea   *indicative type of actions* din cadrul obiectivului specific ***2.7 Enhancing protection and preservation of nature, biodiversity and green infrastructure, including in urban areas, and reducing all forms of pollution***   cuprinsă la nivelul Ghidului pentru …. OPEN CALL FOR THE OPERATIONS UNDER PO 2, propunem introducerea urmatoarei actiuni eligibile ***Investments in protection of landscapes and implementation of measures to conserve and restore ecosystems, biodiversity, forestry and to protect wildlife;***  Mentionam ca investitiile realizate prin introducerea acestei actiuni eligibile vor conduce la  contracararea activităților ilegale care afectează calitatea mediului, cum ar fi exploatările ilegale și braconajul, provocare identificată de asemenea la nivelul Programului de cooperare Interreg Vi A România - Bulgaria.  Regarding the section *indicative type of actions* within specificobjective ***2.7 Enhancing protection and preservation of nature, biodiversity and green infrastructure, including in urban areas, and reducing all forms of pollution*** in the Guide for OPEN CALL FOR THE OPERATIONS UNDER PO 2, we propose the introduction of the following eligible action ***Investments in protection of landscapes and implementation of measures to conserve and restore ecosystems, biodiversity, forestry and to protect wildlife***  We mention that the investments made through the introduction of this eligible action will lead to countering illegal activities that affect the quality of the environment, such as illegal mining and poaching, a challenge also identified at the level of the Interreg VI A Romania - Bulgaria Cooperation Program. | The types of actions included in the Programme (and subsequently in the Applicant’s guide) cannot be modified.  The applications should be in line with the types of actions included in the Programme or the scope of the actions proposed.  Please bear in mind that the objective of this specific objective is the protection and preservation of nature, biodiversity and green infrastructure, including in urban areas, and reducing all forms of pollution.  All the projects should be in the scope of this objective. |  |
| 1. **Indicators** | | | | |
| III.1 | Primaria comunei Lumina, judetul Constanta | La sectiunea 7 "Indicatori de program si proiect", indicatorul de resultat RCR35 "Populatie care beneficiaza de masurile de protectie impotriva **inundatiilor".**  Va rugam sa clarificati daca in cadrul OS2.4, apel competitiv, **exclusiv acest risc natural** (inundatii) **este contorizat** ca indicator de rezultat.  Este relevant pentru potentialii Beneficiari clarificarea/raspunsul dvoastra, in considerentul faptului ca teritoriul eligibil in Program este supus unei multitudini de riscuri generatoare de situatii de urgenta. Am vazut ca proiectele strategice aferente OS 2.4 acopera si celelalte tipuri de riscuri, de aceea consideram necesar sa fie clarificat acest aspect pentru apelul competitiv, astfel incat proiectele transmise de Beneficiari sa nu abordeze teme aferente unor riscuri care nu sunt vizate de apelul competitiv.  **Translation**  In section 7 "Program and project indicators", the result indicator RCR35 "Population benefiting from flood protection measures".  Please clarify whether in OS2.4, competitive call, exclusively this natural risk (floods) is counted as a result indicator.  Your clarification/answer is relevant for the potential Beneficiaries, considering the fact that the eligible territory in the Program is subject to a multitude of risks generating emergency situations. We have seen that the strategic projects related to OS 2.4 also cover the other types of risks, therefore we consider it necessary to clarify this aspect for the competitive call, so that the projects submitted by the Beneficiaries do not address topics related to risks that are not covered by the competitive call. | The pair of indicators approached by the competitive call is:  Output indicator RCO26 - *Green infrastructure built or upgraded for adaptation to climate change*  Result indicator RCR35 - *Population benefitting from flood protection measure.*  This pairing should be observed by the applicants (in line with the operation specific). RCR35 reflects the results of the RCO26, namely the population benefiting **from the flood** protection measure generated by the infrastructure built or upgraded for adaptation to climate change. For more details, please consider the *Priority 2 ‘A greener region’*  *ANNEX 2: Methodological descriptions of Interreg VI-A RO-BG indicators - SO 2.4.*  Also, please bear in mind that the competitive call does not approach the risks**, but actions regarding the adaptation to climate change.** |  |
| III.2 | Primaria comunei Lumina, judetul Constanta | La sectiunea 7 "Indicatori de program si proiect", indicatorul de output RCO26 are valoare tinta 67 hectare, si indicatorul de resultat RCR35 are valoarea tinta de 1.000.000 locuitori.  Va rugam sa clarificati daca aceste doua tinte (67 ha respectiv 1.000.000 locuitori) **insumeaza sau nu**, atat proiectele din apelul competitiv cat si proiectele din apelul strategic pentru OS2.4.  **Translation**  In section 7 "Program and project indicators", the RCO26 output indicator has a target value of 67 hectares, and the RCR35 result indicator has a target value of 1,000,000 inhabitants.  Please clarify whether these two targets (67 ha respectively 1,000,000 inhabitants) sum up or not, both the projects from the competitive call and the projects from the strategic call for OS2.4. | The targets of the indicators are set at Specific Objective level, thus, the information presented **reflects the values set at the level of the Programme for this specific objective, that need to achieved by the funded projects (strategic and regular operations).** |  |
|  | Association Center for Development Montanesium. | Through the current letter, we would like to provide our proposal concerning the Applicant`s Guide under Priority 2: A Green Region, SO 2.7.  Within the Guidance on monitoring Programme indicators /Annex 3\_SO 2.7/ for RCR 95 as a “Definition and concepts” is indicated the following: *“EC instructions: Estimated population living within a 2 km radius from the public green infrastructure built or significantly upgraded in urban areas and supported by the projects (see EC 2012 study in references). Programme indications: Resident population refers to the total number of persons living in a given area.”*  In accordance to the above-mentioned our proposal is the estimated 2 km radius to be expanded to 10 km from the public green infrastructure built or significantly upgraded in urban areas and supported by the projects.  We apply the following arguments, as a support of our proposal,:  1. In today's constantly developing world, the distances to the natural and cultural attractions where people spend their free time are increasingly accessible, even if they are at a greater distance, especially if they offer interesting and diverse opportunities for development and attracting more people.  2. On the other hand, this makes it possible to practice sports with bikes, segways, electric scooters on the way to them or longer walks, which are very necessary for people's health, considering the life they lead /more in front of computers, work from home, etc./.  3. The people will be able to touch places with rich biodiversity, which can in no way be observed in and near big cities, and thus cultivate in themselves a positive attitude for its study and preservation.   We hope our proposal to be taken into account so that projects can be developed in support of  protection and preservation of nature, biodiversity and green infrastructure. | The Guidance on monitoring Programme indicators is based on the EC guidelines regarding the *2021-2027 performance monitoring and evaluation*  *under the ERDF/CF and JTF*, applicable to all the common output and results indicators set by regulation 1058/2021. As such the definition and the method of measurement cannot be changed. |  |
| 1. **Type of operations financed under the call** | | | | |
| V.1 | Consiliul Judeţean Dolj | In urma consultarii prevederilor Ghidului Solicitantului dedicat apelului competitiv de operatiuni in cadrul Prioritatii 2 a Programului Interreg VI-A Romania-Bulgaria si in urma intocmirii unui buget minim pentru finantarea unor propuneri de proiect pe care le avem in vedere pentru aceasta perioada de programare, am constatat ca pentru realizarea acestora limita maxima stabilita prin ghidul solicitantului pentru proiectele hard, de 2.000.000 euro, ar fi insuficienta pentru finantarea activitatilor. In acest sens, dorim sa va propunem cresterea limitei maxime a fondurilor alocate prin program per proiect, de la 2.000.000 euro la 3.000.000 euro.  **Translation**  After consulting the provisions of the Applicant's Guide dedicated to the competitive call for operations within Priority 2 of the Interreg VI-A Romania-Bulgaria Program and following the preparation of a minimum budget for the financing of some project proposals that we have in mind for this programming period, we found that for their realization the maximum limit established by the applicant's guide for hard projects, of 2,000,000 euros, would be insufficient for financing the activities. In this sense, we would like to propose the increase of the maximum limit of the funds allocated by the program per project, from 2,000,000 euros to 3,000,000 euros. | Please note that, after public consultation, the threshold for hard operations was increased for the SO 2.7 to up to 3,500,000 euro (total eligible budget). |  |
|  | PRIMARIA COMUNEI ȘIMIAN  JUDETUL MEHEDINTI | Șimian is a commune by the Danube, inhabited by approximately 10.000 citizens. We are proud to be one of the few towns where the population is constantly growing, especially because of the migration from the neighbouring city, DrobetaTurnu Severin.  Amongst our 2023 development objectives is building a boardwalk along the Danube, and for this we have identified potential support through the Interreg VI-A Romania-Bulgaria Programme. By submitting an application and hopefully being granted financial support, we would contribute to its aim of *A Greener Europe*, that's why we come up with the following proposal to APPLICANT’S GUIDE-OPEN CALL FOR THE OPERATIONS UNDER PO 2 (version 1)  ”Priority 2 A greener region”, ***Section 6-Types of operations financed under the call:***  ***APPLICANT-GUIDE***   * **Type of operation: Hard operation** * **Project duration:**  not exceed 36 months from the starting date of the project * **Total financial support from the programme (including ERDF, and the national co-financing from the state budget and corresponding own contribution):**  between 500,000 Euro and 2,000,000 Euro.   ***PROPOSAL***   * **Type of operation: Hard operation** * **Project duration:**  not exceed 36 months from the starting date of the project * **Total financial support from the programme (including ERDF, and the national co-financing from the state budget and corresponding own contribution):**  between 500,000 Euro and 3,5,000,000 Euro. | Please note that, after public consultation, the threshold for hard operations was increased for the SO 2.7 to up to 3,500,000 euro (total eligible budget). |  |
| 1. **Annexes** | | | | |
| VI.1 | Primaria comunei Lumina, judetul Constanta | Anexa AG\_B Lista cheltuieli eligibile  La pct. 8 Costuri pregatire proiect, litera a), spre deosebire de litera b), nu apare mentiunea "supported by documents". De aici putem deduce faptul ca pentru costurile aferente pregatirii proiectului asa cum sunt explicate la litera a), Beneficiarul nu va furniza Finantatorului, documente justificative, ci doar va include aceasta suma in bugetul proiectului.  Va rugam sa clarificati acest aspect, in speta daca Beneficiarul are obligatia transmiterii documentelor suport atat pentru litera a) cat si pentru litera b).  **Translation**  Appendix AG\_B List of eligible expenses  In point 8 Project preparation costs, letter a), unlike letter b), the mention "supported by documents" does not appear. From here we can deduce the fact that for the costs related to the preparation of the project as explained in letter a), the Beneficiary will not provide the Financier with supporting documents, but will only include this amount in the project budget.  Please clarify this aspect, regarding whether the Beneficiary has the obligation to submit the supporting documents for both letter a) and letter b). | As presented within the List of eligible expenditure, the preparation costs shall be reimbursed based:   1. on basis of a lump sum **granted equally to all financed operations** within the Programme, **after the subsidy contract is signed**. The lump sum for project preparation is granted in block, per project, to the Lead Partner, no other supporting documents are needed. Thus, when submitting the application form, the division between partners of the lump sum must be mentioned and further on the Lead Partner will transfer the due amounts to its partners. The lump sum for project preparation covers elaboration of applications for financing, including the annex mandatory for all applications as listed in *A. Documents mandatory for all applications*. 2. on real cost principle - **for** expenditures for preparing the documents required at Programme level when submitting the application form   These annexes refer to the following documents listed on *B. Documents to be submitted depending on the specificity of the application* (non-exhaustive list): feasibility study or equivalent technical document, Cost Benefit Analysis, studies and costs for documentation necessary to obtain the necessary endorsements and authorizations, documentation concerning the urban planning plan, impact assessments, location studies/appraisals, technical verification etc.  Please note that the expenditures for project preparation based on real costs must be requested in the first reporting period, otherwise they would be considered ineligible.  All preparation costs on real bases shall be supported by documents. |  |
| VI.2 | South Muntenia Regional Development Agency  Programe (ADR Sud Muntenia | Analysing the APPLICANT’S GUIDE for INTERREG VI-A ROMANIA-BULGARIA PROGRAMME, South Muntenia RDA has the following observations:   1. **For this call, it is not foreseen the *External expertise and services costs* category as it is shown at page 21 of the document:**   Under this call, the following types of costs shall be applied:   * + Project preparation (based on lump sum and real costs, if the case)   + Staff costs flat rate   + Travel & Accommodation flat rate   + Office & administrative costs flat rate   + Project closure lump sum   + Real costs  1. For soft & hard projects, we made a budget simulation. For soft projects, where we have a budget of 1 million euros for 5 partners and maximum duration (18 months) using the type of calculation (flat rates for staff, Office and Travel categories) foreseen in the Applicant Guide, it results an insufficient budget for implementing activities.     In addition, as you may see in the table above, if we apply the proposed percentages for flat rate costs, we cannot calculate a correct budget since we cannot have an equal sum for external and for the rest of the flat rates, as indicated in the Applicant guide. After calculating the percentages for each category, for soft projects, it remains an uncovered budget of 37% (74.000 euro). For a better understanding of how the calculation can be made, we suggest to provide a template for calculating the budget (excel file with formulas inserted).  For the reasons mentioned above, we would like to propose the Interreg Europe type of calculating the budget so that it can be in the benefit of the beneficiaries in soft projects as well. As foreseen in Interreg Europe Programme Manual, staff costs can be estimated as follows:  *Staff costs cover costs for staff members employed by the partner organisation and who work on the project directly. Staff costs refers to the partner organisation’s gross employment costs, which usually comprise:*  *• Salary payments (specified in an employment/ work contract)*  *• Other costs directly linked to salary payments paid and not recoverable by the employer:*  *- Employment taxes*  *- Social security (including health coverage and pension contributions).*  *Staff costs must be calculated individually for each employee. Staff costs relate to the costs of activities that the relevant partner would not carry out in the absence of the project.*  *For employees working full time on the project, the total monthly gross employment cost (incl. employer’s social contributions) can be claimed. An employee’s 100% involvement in the project should be documented either in the employment contract and/ or in another official document issued by the employer. For Interreg Europe, the staff costs of employees working part-time on the project must be calculated using a fixed percentage of the gross employment cost1 (incl. employer’s contributions) in accordance with article 55 (5) of Regulation (EU) No 2021/1060.*  As shown above, for simplifying the reporting, the staff costs can be calculated as a fixed percentage of the person working in the project, based on a document with description of the activities of the person, role in the project and percentage dedicated to the project. | 1. Please consult the Annex AG\_B List of eligible expenditure, External expertise and services costs are also included.   The Programme decided to use simplified costs options and real costs.  Under simplified cost options are reimbursed: Staff costs, Travel and Accommodation, Office and administrative costs, Project preparation and Project closure.  Under real costs are reimbursed: External expertise and services costs; Equipment costs and Costs for infrastructure and works.   1. The application is submitted via JEMS, which automatically calculates the budget, based on the data provided by each partner.   Please note that the Programme decided to reimbursed staff cost as a flat rate of 20% or up to 20% of direct eligible costs of the operation, and not as real costs. As such, each partner can set, based on its staff needs, the percentage to be used, up to 20% of the direct costs.  Using simplified costs options means that no justification, no support documents will be requested by any Programme bodies for staff costs. |  |
| VI.2 | Primaria comunei Lumina, judetul Constanta | Referitor la:  Anexa B7 "Assessment of expected impacts of climate change":  a)"Documentation of climate proofing" max. 30 pg,  b) "Statement on climate proofing",  c) "Independent verification providing assurance that the climate proofing adheres to the applicable guidance and other requirements"   - Va rugam sa confirmati (sau infirmati) dupa caz, faptul ca este vorba de o singura anexa intitulata "Assessment of expected impacts of climate change" **compusa din documentele a)+b)+c),**   - Va rugam sa clarificati ce expert este admisibil de catre Program, sau la ce tip de expert se refera Ghidul, pentru efectuarea verificarii - consideram necesara clarificarea in Ghid a acestui aspect pentru a evita orice zona de interpretare subiectiva a fiecarui Beneficiar in parte,   - In eventualitatea prevazuta chiar si de textul Comunicarii (Anexa B), "Informatii privind verificarea **(daca este cazul)**", ca nu este cazul, va rugam sa clarificati daca proiectul este respins automat (in contextul in care Ghidul prevede obligativitatea tuturor celor 3 documente),   - Va rugam sa clarificati daca aceste documente sunt obligatorii pentru toate proiectele care includ investitii, indiferent de valoare (facem aceasta mentiune in considerentul faptului ca in textul Comunicarii este prevazut un prag de 10 milioane de euro).  **Translation**  Referring to:  Appendix B7 Assessment of expected impacts of climate change":  a)"Documentation of climate proofing" max. 30 pg,  b) "Statement on climate proofing",  c) "Independent verification providing assurance that the climate proofing adheres to the applicable guidance and other requirements"  - Please confirm (or deny) as the case may be, the fact that it is a single annex entitled "Assessment of expected impacts of climate change" **composed of documents a)+b)+c),**  Please clarify which expert is admissible by the Program, or which type of expert the Guide refers to, for carrying out the verification - we consider it necessary to clarify this aspect in the Guide in order to avoid any area of ​​subjective interpretation of each individual Beneficiary,  - In the eventuality provided even by the text of the Communication (Annex B), "Information regarding the verification (if applicable)", that it is not the case, please clarify if the project is automatically rejected (in the context where the Guide stipulates the obligation of all 3 documents),  Please clarify if these documents are mandatory for all projects that include investments, regardless of value (we make this mention considering the fact that in the text of the Communication a threshold of 10 million euros is provided). | The threshold mentioned by you is referring to the InvestEU funded projects:  *InvestEU specifies a threshold of EUR 10 million exclusive of VAT below which projects*  *are required to undertake sustainability proofing in accordance with Article 8(5).*  Interreg VI-A Romania-Bulgaria is funded by the European Regional Development Fund, as such this provisions is not applicable.  According to the legislation applicable to ERDF, namely EU Regulation 1030/2021, the climate proofing of investments in infrastructure which have an expected lifespan of at least 5 years is needed.  For Interreg funded projects, the EU regulation 1029/2021 establishes that **for investments in infrastructure with an expected lifespan of at least five years, an assessment of expected impacts of climate change is carried out.**  **Therefore, in the context of the projects funded by the Interreg VI-A Romania-Bulgaria, the climate proofing (namely Pillar 2 – Climate Resilience, Adaptation to Climate change) must be carried out for all investments in infrastructure with an expected lifespan of at least five years.**  In this respect, the applicant must observe the provisions of the COMMISSION NOTICE  Technical guidance on the climate proofing of infrastructure in the period 2021-2027  (2021/C 373/01) in relation to the Pillar 2.  Section 3.3. Adaptation to climate change (climate resilience) provides information on the steps that need to be followed.  Annex B *Climate-proofing documentation and verification* sets the type of information that need to be included in the documentation.  The Programme did not set a standard format for the Annex B7 *Assessment of expected impacts of climate change*, the applicant being responsible on the way the information is provided, in line with the requirements set by the Commission Notice (documentation and statement). The limit of 30 pages is applicable to the documentation.  Following the consultation process, a flexibility was included in the applicant guide, thus the approved version of the document should be checked and observed.  In case a project includes investments in infrastructure with an expected lifespan of at least five years, and the required documents on climate proofing are not provided, the project will be rejected from the eligibility stage. | Please bear in mind, that an independent verification providing assurance that the climate proofing adheres to the applicable guidance and other requirements may be required during the assessment process in case the documentation of climate proofing/statement on climate proofing is unclear or not in line with the Commission Notice, Technical guidance on the climate proofing of infrastructure in the period 2021-2027 (2021/C373/01). |
| VI.3 | Primaria comunei Lumina, judetul Constanta | Dupa consultarea documentelor publicate pe pagina programului <https://interregviarobg.eu/ro/lansare-in-consultare-publica-a-ghidului-aplicantului-dedicat-apelului-competitiv-de-operatiuni-in-cadrul-op2-in-contextul-programului-interreg-vi-a-romania-bulgaria>, cu referire la studiul **"Assessment of expected impacts of climate change"** va rugam sa luati in considerarea oportunitatea obligativitatii integrarii acestui document ca sectiune/capitol distinct in documentatia tehnica aferenta obiectivului de investitie- Studiul de fezabilitate/Documentatia de avizare a lucrarilor de interventie/Proiect Tehnic (dupa caz), si nu ca Anexa separata,  Motivarea unei astfel de propuneri rezida in faptul ca toate informatiile/detaliile ce trebuie prezentate de potentialul Beneficiar in acest document (ex. analiza de senzitivitate, evaluarea expunerii la riscuri, analiza de vulnerabilitate, analiza detaliata de risc), deriva strict din propunerea/solutia tehnica oferita de proiectant.  **Translation**  After consulting the documents published on the program page <https://interregviarobg.eu/ro/lansare-in-consultare-publica-a-ghidului-aplicantului-dedicat-apelului-competitiv-de-operatiuni-in-cadrul-op2-in-contextul-programului-interreg-vi-a-romania-bulgaria> with reference to the study "**Assessment of expected impacts of climate change**",  please consider the opportunity of mandatory integration of this document as a separate section/chapter in the technical documentation related to the investment objective - Feasibility Study/Documentation for approval of intervention works/Technical Project (as the case may be), and not as a separate Annex,  The motivation for such a proposal lies in the fact that all the information/details to be presented by the potential Beneficiary in this document (e.g. sensitivity analysis, risk exposure assessment, vulnerability analysis, detailed risk analysis) derive strictly from the proposal/solution the technique provided by the designer. | Considering the legal provisions set by the UE Regulations 1030/2021 and 1029/2021, the assessment of expected impacts of climate change should be available at the submission date.  The Programme does not require all the technical documentation at the submission stage.  Moreover, the provision and the steps set by the COMMISSION NOTICE  Technical guidance on the climate proofing of infrastructure in the period 2021-2027  (2021/C 373/01) should be observed. |  |
| 1. **Others** | | | | |
| **VII.1** | Primaria comunei Lumina, judetul Constanta | Referitor la Lista de Plafoane utilizata in cadrul INTERREG V-A ROBG  Consideram utilizarea Listei (in toate formele sale actualizate) ca fiind extrem de oportuna, transparenta si echilibrata (echilibrata nu numai in sensul ca erau limite de bun simt ci si pentru ca asigura un echilibru al cheltuielilor intre toti beneficiarii), fiind un mare plus pentru implementarea Programului trecut.  Consideram foarte indicata aplicarea unei astfel de Liste si in INTERREG VI-A.  **Translation**  Regarding the List of Ceilings used within INTERREG V-A ROBG  We consider the use of the List (in all its updated forms) to be extremely timely, transparent and balanced (balanced not only in the sense that there were common sense limits but also because it ensures a balance of expenses between all beneficiaries), being a great plus for the implementation of the past Program.  We consider it highly advisable to apply such a List in INTERREG VI-A as well. | Considering the actual socio-economic context (inflation rate, price instability, etc.) the Programme will not set a ceiling list. The partners are requested to make a market research corresponding to the actual costs. |  |
| 1. **Selection criteria** | | | | |
| **VIII.1** | EC | I had a look on 5 elements (as indicated in the “briefing note on project selection” from Interact): (1) Cross-border impact as eligibility criteria; (2) Economic and social durability; (3) Horizontal principles (gender equality, accessibility, human rights); (4) Eco-conditionality to ensure environmental sustainability (linked with the Don-No-Significant-Harm (DNSH) principle and the role of the Strategic Environmental Assessment (SEA)); and (5) Scoring and ranking.  On (1), there is a cross-border dimension criteria in the eligibility, but it does not cover the impact. I would be nice if it does.  On (2): OK, although the maximum score is low  On (3): OK, although the maximum score is low  On (4): OK  On (5): OK. There is clearly a scoring and I guess that this will lead to a ranking. | Cross-border impact was included in the evaluation grids. |  |