| **No.** | **Question received** | **Answer provided** |
| --- | --- | --- |
| **I. Application Form** | | |
| **I.1** | The deadline for the application? | **The competitive call deadline for submitting the applications in Jems is 11th of September 2023, 12.00 (PM)** |
| **I.2** | A definition of what the Programme will consider as a “tool” is provided on page 21 of Specific Objective 2.7’s Methodological descriptions of Interreg VI-A Romania-Bulgaria indicators, under Indicator PSR3 “Tools implemented for mitigating pollution” – “Tools may refer to investments such as networks of sensors, applications, platforms, etc. (list not exhaustive) ...” Will the Programme classify a “network of experts” among the project partners as a “tool”? | Please be informed that a “network of experts” cannot be considered as a “tool”, having in mind that the Applicant’s Guide describes the use of the “tools” for examples of the indicative action “Improving pollution control by supporting investments in monitoring and data collection on air, soil and water pollution, particularly in urban areas, including through setting up tools for measuring the air, soil and water quality and providing real-time data”. As a “network of experts” is not a supporting investments objective, it is not defined in order to observe the set conditions for a “tool” as mentioned by the Applicant Guide for this indicative action.  Of course, please consider that associating and relevance of your project ideas to any of the related Specific objectives of Interreg VI-A Ro-Bg Programme is depending on the entire conception of the related project ideas and not only to the eligibility of certain activity under the respective specific objectives |
| **I.3** | In the Applicants guide, Annex AF\_A5 “Documents certifying the ownership status of the land and/or building” is stated as mandatory for all applications. This could be found in 3.3. Required documents to be submitted with the Application form (p.71), while in section Annexes to the Application Form (p.85), A. Documents mandatory for all applications, is required Annex A5 Documents or Declaration on own responsibility certifying the ownership status of the land and /or building (where applicable, open format, partners decision) and it is explicated in the brackets “where applicable”.  When a project consists of soft operation measures only, and the activities do not include infrastructure and works, is it mandatory to present a document certifying ownership status of the land and/or building for the Applicants or not? | For projects which consist of soft operation measures only, and the activities do not include infrastructure and works, there is no need to provide any documents/declarations certifying the ownership status of a land and /or building. |
| **I.4** | We intend to submit a hard operation measures project which has an infrastructure/works component and since the Applicant has its own workers who could implement the works within the project frame and period, we need your confirmation if the costs for own workers implementing works could be included in the Project Budget under “Infrastructure and works” line. | According to the provisions of the List of eligible expenditure, annex to the Applicant’s Guide, costs related to the labour for infrastructure and works component are mentioned as eligible under Infrastructure and works expenditure category (article 14 Infrastructure and works). |
| **I.5** | 1. Preliminary Design: Should a Preliminary Design, which includes the estimation of bill o quantities and values, for the foreseen works be submitted? If so, we would appreciate further details on the level of detail and scope expected in this Preliminary Design. 2. Technical Design: Alternatively, is a Technical Design considered an acceptable optio for the foreseen works submission? We seek guidance of this approach and any specific requirements or guidelines to be adhered to in such a case. 3. Feasibility Study: In the event that a Feasibility Study is deemed suitable, could you please explain its applicability for the foreseen works? Additionally, we would be grateful for any specific instructions or assessment criteria associated with choosing this option...   Moreover, we kindly request information if applicable, on whether there are any differin assessment or considerations for each of the three options stated above (Prelimina Design, Technical Design, and Feasibility Study). Understanding any variations in evaluati criteria will enable us to align our submission appropriately and ensure compliance wi the project guidelines. | 1. In accordance with the Applicant’s Guide, “for Bulgarian beneficiaries it should be annexed: preliminary design (including estimation of bill of quantities and values) or technical design”. “Its elaboration and approval must observe the national provisions in this matter”.  2. The minimum requirement for Bulgarian beneficiaries is the preliminary design, including the estimation of bill of quantities and values, as mentioned in point 1, but you also have the option to submit a Technical Design. There are no others requirements from the Programme regarding the elaboration of the Technical Design, other than those foreseen by the national legislation (Ordinance No. 4 of 2001 on the scope and content of investment projects) in force, as mentioned in point 1.  3. As it is stated in the Applicant Guide, feasibility study for new investments/DALI plus energy audit plus technical expertise for upgrading/reconstruction is mandatory for Romanian beneficiaries. The feasibility study for Romanian beneficiaries shall also observe the national legislation in force. For the Bulgarian beneficiaries, you should submit the documents mentioned in point 1.  Related to your last question, if there are any differing assessment or considerations for each type of the three options (Preliminary study / Technical Design / Feasibility study), please observe that these documents shall be submitted as presented above, but the assessment grid does not include different score which my depend on the type of submitted technical documents. |
| **I.6** | 1. The project envisages preparation activities and expenditures based on real costs, for example: preparation of the technical design, Carrying out climate resilience studies, etc.  Is it necessary to add such an activity in the application form, and if so, in which work package should it be added?  2. We have the same question regarding external project management services as well as translation services - in which work package should they be added as an activity? | In relation with the request related to what activities should be included in the work package, we would like to inform that, within the Applicant’s Guide, section 3 “How to develop a high quality project and how to apply”, subsection 3.2 “How to plan a project”, point 3.2.2. “Developing the application” you can find provisions related to work packages. Thus, according to the abovementioned section of the Applicant’s Guide: “The Work Package (WP) is defined as group of related project activities required to produce project main outputs. This means that the project will have as many work packages as it will have project specific objectives defined… Work packages have to be broken down into activities, deliverables and outputs. A work package may include investments.”. Moreover, please note that each work package should have a distinct project specific objective (i.e. project specific objectives should not be repeated in other work packages).  Therefore, in response to your questions, please be informed that:  1. Even if it is not mandatory to include an activity related to project preparation in the application form, we recommend you to include details regarding the preparatory activity of an investment under the related WP of that investment, correlated with the first reporting period. Also, when drafting the project budget, you should include the related costs for project preparation that are reimbursed based on real costs and specify what they represent, and correlated with an investment. Please note that you should include these costs only under the first reporting period (Period 1). In case the projects is selected and contracted you must request the preparation costs based on real cost in the first partner report.  2. Please be aware that in JEMS, within section C. Project description you can find subsection C.7. Project management where you can include information related to the project management services. In relation to the translation services, please have in mind that you should correlate the deliverable (translation services) with its related activity within the work package. More precisely, if an activity has as deliverable for translation services, these should be included in the work package and related to the realization on that activity.  Also, we are kindly asking you to check the indications included in Annex K.1 Application form\_2.4+.2.7 (off-line format) - <https://interregviarobg.eu/en/calls-for-proposals> .  Last, but not least, we encourage you to consult the JEMS tutorial for development of the application, available at the following link: <https://www.youtube.com/watch?v=sipyi-qVt5A> |
| **I.7** | We would like to submit a soft project, under S.O. 2.7 with an investment element, but in addition we will establish pilot centers. Is it mandatory to submit during the application stage a signed contract for renting premises for the resource center in Ruse, if it is not our own property? If yes, is it mandatory for the premises to be public property in case we will only provide services there, there are no envisaged infrastructure works. | In relation with your question, please be informed that according with the Q&A list available [here](https://interregviarobg.eu/bg/kandidatstvayte-za-finansirane), “…for projects which consist of soft operation measures only, and the activities do not include infrastructure and works or installation of equipment, there is no need to provide any documents/declarations certifying the ownership status of a land and /or building. |
| **I.8** | Do you have the intention to extend the deadline for submitting the applications? | Please be informed that the Programme bodies do not take into account any extension of the deadline for submitting the applications. |
| **II. Eligibility of expenditures** | | |
| **II.1** | Regarding the associate partners, as their participation in the project, work meetings and events that will be organized within the project is very important, please specify if their participation as guest lecturers can be supported by the main partners of the projects through costs allocated in their own budget (Travel costs with transport, accommodation and daily allowance)? | According to the provisions of the Applicant’s Guide and the annex B. List of eligible expenditures, the costs for travel and accommodation shall cover the participation of project partners in events organized within the project (such as partners meetings etc.) or by other entities, relevant for the project implementation (such as the meetings organized by the Programme’s structures, other projects etc.). Travel and accommodation costs of external experts (including invited speakers, experts and chairpersons of meetings) and service providers fall under external expertise and services costs and shall be reimbursed on basis of real costs. The same applies to travel and accommodation costs of staff of institutions which are acting as associated partners.  Please be informed that no subcontracting between project partners or associated partners is allowed, thus, if case such cases are identified, the partnership will be considered ineligible, and the project rejected without further evaluation. |
| **II.2** | Page 74 of the Applicant's Guide states, “B. Documents to be submitted depending on the specificity of the application (the costs related to these documents are reimbursed by the Interreg VI-A Romania-Bulgaria Programme based on real cost principle).” Moreover, page 25 states, “All real costs must be justified based on 2 offers or an independent evaluation of the prices.” Does this indicate that during the project’s preparation phase, applicants must collect two offers to justify the cost for each Category “B” document? | Please be aware that the applicant must submit 2 offers or an independent evaluation of the prices in order to justify the envisaged real costs (External expertise and services; Equipment Costs; Infrastructure and works). If the applicant will not submit the 2 offers or the independent evaluation of the prices, the respective amount which is not justified will be reduced/deducted from the budget. In addition, the Applicant’s Guide states that in case of costs estimation which is made on the data provided by a Feasibility Study / equivalent documents, the applicant will not submit the 2 offers or the independent evaluation of the prices.  Therefore, in order to justify the proposed real costs within the budget and in order to ensure the sound financial management of the Programme, the applicants shall collect and submit either 2 (two) price offers from operators well-known on the market – print screens from websites of such operators are accepted, prints from national system on public procurements are also accepted – or an independent evaluation of the cost of that particular item (and English translation is required, if issued in other language than English) |
| **II.3** | If the external project management is an eligible expenditure in case the applicant is a Municipality which does not have the capacity to execute the project management. In that case, could the cost for the external project management be calculated as a percentage of the staff cost? For example, if the direct cost for the project is 500 000 euro, and the staff cost is 100 000 euro, could the staff cost be reduced in half – 50 000 euro in favour of the external management cost? | Please consider that in case the Partner does not have the necessary internal expertise or competency to ensure the proper development of activities with the own staff, the project management may be externalized.  Considering the flat rate for Staff cost category, please be aware that only external expertise and services for very technical/specific documents/contribution for the project implementation is allowed. In justifying the need for such expertise from the phase of drafting the Application Form and planning the budget, the partner shall have to prove that the expertise and services to be contracted under External expertise and services is not available at the level of the project management team and that the Staff costs are not already financing the type of external expertise and services (to be) contracted.  Regarding the second question, please consider that the eligible costs must be based on real costs, except for the lump sums and flat rates, which are automatically calculated. The direct costs shall include External expertise and services costs; Equipment costs and the Costs for infrastructure and works. Please have in mind that all real costs must be justified based on 2 offers or an independent evaluation of the prices!  In the context of the all the mentioned above, please consider that the costs for project management which are envisaged as direct costs could not be calculated as percentage from the staff costs, which are envisaged as flat rate costs.  Also, please take into consideration that the staff costs will be calculated based on a flat rate up to 20% of the direct eligible costs of the operation. This means that you may choose to use from 1% up to 20% flat rate for staff. |
| **II.4** | According to the application guide, in item 2.9. Eligibility of costs, It is indicated that costs for infrastructure and construction works are eligible for financing. In this regard, the costs of construction/repair of underground infrastructure are eligible for grant financing? | The eligibility of certain repair costs and related to the eligibility of the construction works for financing, please consider that according to the Applicant's Guide, the costs for infrastructure and works could be eligible and will be reimbursed by the Programme on a real costs basis.  There are no provisions to indicate that activities related to underground works are not eligible, as long as these works are related to the main investment which contributes to the related specific objective.  Last, but not least, please consider also the Applicant's Guide provisions regarding the rest of the aspects that shall be taken into consideration in case of investment activities proposed, “(...). There are also no separate investment work packages. Thus, you need to provide detailed information about investments that will be included in the work packages (details are included in the Application form). Please note that for investments in infrastructure with an expected lifespan of at least five years, the expected impacts of climate change need to be described and how climate proofing will be ensured. For each investment, a clear and concise description needs to be provided, including of the cross border relevance. This shall include a justification of the investment, its physical location, information on its environmental sustainability and risks, technical and legal requirements and ownership(...)For Bulgarian partners, in case of infrastructure and works, the investment activities should be carried out on public property (...)”" |
| **II.5** | If the total cost of the project is above EUR 5,000,000.00 (including VAT) only non- recoverable VAT under national VAT legislation is eligible, otherwise the VAT is considered as not eligible.  Please clarify, if the Beneficiary of the project is a Bulgarian municipality that does not recover VAT, then is the VAT an eligible expenditure on the project? | In the following provision of the Annex AG\_B\_LIST OF ELIGIBLE EXPENDITURES for INTERREG VI-A ROMANIA-BULGARIA PROGRAMME it is underlined that:  “(…) Article 5. The following costs are not eligible: (…)  f) value added tax (‘VAT’), except:  (i) for operations the total cost of which is below EUR 5 000 000(including VAT);  (ii) for operations the total cost of which is at least EUR 5 000 000(including VAT) where it is non-recoverable under national VAT legislation (…)”.  In this reference, please consider that if the potential beneficiary you are asking about, could prove that the VAT is not recoverable from other sources/is not recoverable under the national VAT legislation, then it could be considered as eligible project expenditure. In order to prove the fact that the beneficiary organization could not recover VAT from other sources, the beneficiary shall submit “(…) proof that the VAT is non-recoverable from other sources (…)”, as the Applicant’s Guide foresees.  However, please be informed that the eligibility of the proposed project expenditures is to be analyzed during the evaluation process, based on the justification documents submitted, in accordance with the eligibility criteria of the applicants listed in the Applicants Guide. |
| **II.6** | As part of the procedure for preparing the necessary documents, the requested technical documentation (technical project proposal and DALI) will be acquired. For the settlement of the flat-rate amount, an invoice issued BEFORE the project submission date limit is required, or it is possible that this invoice will be issued after that date ? | The invoice you are making reference to, should be issued before the submission date having in mind the provisions of the List of eligible expenditures for Interreg VI-A Romania-Bulgaria Programme, “Article 1, paragraph 1) (…) e) … Preparation costs are eligible if they were incurred between 01.01.2021 and the submission of the Application Form (…)”.  In addition, please consider also that the Programme is giving to the beneficiaries, the opportunity to reimburse the costs for Project Preparation only on basis of a lump sum and/or on real cost principle (supported by documents), as detailed in the Applicant’s Guide. Details about the differences between the both method of reimbursement are provided within the List of eligible expenditures for Interreg VI-A Romania-Bulgaria Programme, Article 8. Project preparation costs. |
| **II.7** | An applicant envisages to include activities related to provision of equipment and furniture for an urban park, including ecological playgrounds and educational sites, ecological lighting, etc. without construction and works activities. Is it possible to include only equipment and furniture costs, without works and construction, for an existing urban part, taking into account the condition in the Applicant Guide “ The cost of the (urban) furniture should be limited to maximum 20% of the total cost of investments related to urban parks/garden per partner”. Please clarify if this restriction applies only when there is construction and works envisaged for the urban park. | Regarding the second question, we envisage the fact that installation of furniture for an urban park, ecological playgrounds, educational sites, ecological lighting is still an investment activity which includes construction works, therefore the limitation to “maximum 20% of the total cost of investments related to urban parks/garden per partner” still applies. Additionally, we highlight the fact that the project and the related activities should be in the scope of the Specific Objective 2.7, namely the enhancing protection and preservation of nature, biodiversity and green infrastructure, including in urban areas, and reducing all forms of pollution. |
| **III. Eligibility of applicants and activities** | | |
| **III.1** | In Chapter 2.3 Eligible indicative types of actions, Specific Objective 2.7 the following “Inspirational example", is introduced:  "Investments in developing natural systems to manage rainfall runoff and effective natural solutions to handle flooding and storm-water pollution of urban and peri-urban green areas (green roofs, permeable surfaces/pavings, infiltration trenches/basins, storm water green streets/rain gardens, bioswales, detention basins, naturalized storm water ponds, bio-retention measures etc.".  This specific inspirational example, in our view, overlaps the aim of the SO 2.4 "supporting water and land management through green solutions (for example: swales, creek restauration and nature scaping, green solutions for drainage systems, naturalized storm water ponds etc.)”.  There are even the same expressions used to define possible activities under the two different objectives.  Please clarify, if a beneficiary, allegedly, is to submit a project proposal for the development of a “naturalized storm water pond”, under what Specific Objective will do it: 2.4 or 2.7 given that the eligible activity is presented in both SOs. | Please consider that association and the relevance of your project ideas to any of the related Specific objectives of Interreg VI-A Ro-Bg Programme is depending on the entire conception of the related project ideas and not only to the eligibility of certain activity under the respective specific objectives.  Speaking about the specific example of action you have mentioned – handling the flooding by development of a naturalized storm water pond and its’ relation to the climate change adoption and indicator RCR35 - Population benefitting from flood protection measure, without having details for the rest of the concept idea, according to the provisions of the Applicant’s Guide, definitely, the proposed actions is relevant to the specific objective 2.4 Promoting climate change adaptation and disaster risk prevention, resilience, taking into account eco-system based approaches.  According to the provisions of the Applicant’s Guide, the indicative types of actions envisaged within the Specific objective 2.4. are related to climate change adaptation. This means that nature-based solutions will be preferred, wherever possible, above hard or grey infrastructure. This includes flood plains, ecosystem restoration, afforestation, natural water retention measures and other green (or blue) infrastructure measures that have a direct benefit for climate change adaptation and risk prevention.  At the same time, according to the provisions of the Applicant’s Guide, the objective of the Specific objective: 2.7 is the protection and preservation of nature, biodiversity and green infrastructure, including in urban areas, and reducing all forms of pollution.  There are used similar expressions in the defining of the possible activities under the both specific objectives due to the fact that the both specific objectives actually are representing the same Priority 2 A greener region in a different way, depending on the context. More than this, the mentioned examples are representing inspirational examples and not an exhaustive list. |
| **III.2** | In Chapter 2.3 Eligible indicative types of actions, Specific Objective 2.7the following “Inspirational example", is mentioned:  “green sport facilities”  **Please clarify to what the term “green” refers to: to sport (green sport) or to facilities (green facilities for sports).**  The clarification is important because it determines the project objective to be attained:  a)   if SO 2.7 supports **green sports** (these being the eco-friendly sports such as football, running, cycling, outdoor swimming etc), than the submitted project will focus only on the above mentioned sports.  **b)**  if SO 2.7 supports green facilities (for sports), than the submitted project will focus on developing green facilities **but for all types of sports.** | Please consider that the expression "green sport facilities" is mentioned for the indicative action “Developing green areas, including connections between green spaces”. Therefore, all the actions within the brackets – “(urban parks, green sport facilities, forests, riverbank greens)” are linked with the indicative action for development of green areas.  In conclusion, the expression “green sport facilities” clearly refers to investments / facilities and not to the type of sports. |
| **III.3** | Is a National research and development institute eligible to lead projects if the headquarter is located in Bucharest and has a local offices in eligible area? | Such an institute could be considered eligible for financing under the present call for proposals. Also, please consider that, according to the provisions of the Applicant’s Guide, **the applicants from Romania and Bulgaria but outside the Programme area, cannot take the Lead Partner role.** |
| **III.4** | It is mentioned in the guide: "Applicants, outside the Programme area, but from Romania and Bulgaria, can also participate in projects, but only in exceptional cases”, what documents must be provided in order to respect this requirement? | There is no established list of the documents in this aspect but you have to keep in mind that the supporting documents which you will provide, have to prove the followings aspects:  ”Applicants, outside the Programme area, but from Romania and Bulgaria, can also participate in projects, but only in exceptional cases, namely if they:   * **Are competent in their scope of action for certain parts of the eligible area (e.g. ministries, national agencies, research institutes);** * Carry out activities that are beneficial for the Programme area; * Their participation must bring clear added value and expertise to the implementation of a project and has to be beneficial for the Programme area. * They cannot take the Lead Partner role. ”   Still, please be informed that the eligibility of the partners is to be analysed during the evaluation process, based on the justification documents submitted and in accordance with the eligibility criteria of the applicants listed in the Applicants Guide.  The Managing Authority or the Joint Secretariat may request, at any time, additional documentary evidence and argumentations regarding the eligibility of applicants. |
| **III.5** | Please clarify, if a beneficiary is to submit a project proposal for the development of a “naturalized storm water pond”, under what Specific Objective will do it: 2.4 or 2.7 given that the eligible activity is presented in the Applicant Guide, in both SOs. | Please consult the already-answered question III.1 |
| **III.6** | Please clarify the requirement for all applicants, namely: Not to be in a situation under Article 136 of Regulation (EU, Euratom) 2018/1046 or more precisely paragraph 1 letter E "...with a final judicial decision or final administrative answer. 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" | Please consider the cases mentioned by the Article 136 of Regulation 2018/2046. |
| **III.7** | Is a participant from Bucharest eligible? The participant can prove competences. | According to the provisions of the Applicant’s Guide, Applicants, outside the Programme area, but from Romania and Bulgaria, can also participate in projects, but only in exceptional cases, namely if they:   * Are competent in their scope of action for certain parts of the eligible area (e.g. ministries, national agencies, research institutes); * Carry out activities that are beneficial for the Programme area; * Their participation must bring clear added value and expertise to the implementation of a project and has to be beneficial for the Programme area. * They cannot take the Lead Partner role.   Still, please be informed that the eligibility of the partners is to be analysed during the evaluation process, based on the justification documents submitted and in accordance with the eligibility criteria of the applicants listed in the Applicants Guide. |
| **III.8** | A Bulgarian NGO located in the non-eligible area (headquarter in Sofia) can be partner in a project? The Bulgarian NGO has an important activity at the Bulgarian National level, its members being involved in the development of the national hydrogen strategy, both at the Bulgarian and EU level and being also active members in EU bodies dedicated to the hydrogen strategy. | Regarding the eligibility of a Bulgarian NGO from Sofia as your potential project partner, you have to keep in mind that the beneficiary has to fulfil and prove the following requirements in order to be possible its’ eligibility: ”Applicants, outside the Programme area, but from Romania and Bulgaria, can also participate in projects, but only in exceptional cases, namely if they:  • Are competent in their scope of action for certain parts of the eligible area (e.g. ministries, national agencies, research institutes);  • Carry out activities that are beneficial for the Programme area;  • Their participation must bring clear added value and expertise to the implementation of a project and has to be beneficial for the Programme area.  • They cannot take the Lead Partner role. ”  Therefore, according to the provisions of the Applicant’s Guide, the institution could be considered eligible under the present call for proposals if providing the fulfilment of the above conditions, as well as their competence in the field and the activities envisaged under the project.  Please, also consider that for all operations, it is compulsory that the applicant has among its attributions, according with its statute or according to the national legislation, the implementation of the proposed activities or that the applicant has an agreement with the relevant institutions to implement such activities, according with its statute or according to the national legislation. |
| **III.9** | Please clarify if a national research institute of public interest, outside the Program area, coordinated by the Romanian Ministry of Research, Innovation and Digitization, can be the coordinator of the partner’s consortium, and respectively the lead partner of the project. The national institute is an authority with specific activity extended at national level, including in the program area, who participated and coordinated bilateral projects in the Romania-Bulgaria cross-border cooperation program, in the period 2011-2015. | Please consult the already-answered question III.3 |
| **III.10** | Please clarify if a national research and development institute with legal personality and headquarter in Bucharest and a work point without legal personality in Corbu is eligible to participate under this call as coordinator? | Please consult the already-answered question III.3  In addition, it was emphasized that, according to the provisions of the Applicant’s Guide, **the applicants from Romania and Bulgaria but outside the Programme area, cannot take the Lead Partner role.**  Last, but not least, according to the provisions of the Applicant’s Guide, "Offices/ branches of public national/regional authorities and other public bodies active on the themes of the priority in the programme area (registered and functioning in the programme area), if those offices/ branches are functioning in the programme area are not legal bodies, the Application should be submitted by their Headquarters indicating the office/ branch responsible for implementing the activities".  In the context of all the above mentioned aspects and in view of the fact that you specified that you have a work point without legal personality in Corbu (located in the eligible area), please consider that you shall apply with the headquarter of the national research and development institute Bucharest and in this case your institution **cannot take the Lead Partner role.** |
| **III.11** | In Chapter 2.2. Eligible applications and applicants is mentioned “In order to assess the financial capacity of the partners, Annex AF\_A10 Financial Capacity Self-Assessment must be provided. In case the results reveal that the subvention, liquidity and debt rate are higher than the set threshold (red risk), the corresponding partner must provide a plan for ensuring the financial resources and the mechanism to cover the financial cash-flow of the project and the operation and maintenance costs of the project.”  Could you clarify the possibility of submitting a financial plan (for ensuring the financial resources and the mechanism to cover the financial cash-flow of the project and the operation and maintenance costs of the project) in cases where, after an assessment has been made in accordance with Annex AF\_A10 Financial Capacity Self-Assessment, the applicant's financial capacity is below the required one. What information should this plan contain for it to be considered sufficient? Please provide a specific example.  How would the hypothesis considered above affect the candidate's evaluation, provided that in the evaluation table attached, there is no separate line and/or detailed explanation of how points will be awarded for this parameter? | The financial capacity of the applicant is verified during Phase 1 of evaluation - Administrative compliance and eligibility check, under point 18 - The partners have the capacity to ensure their own contribution and the financing for non-eligible expenditures of the project; they must also have the capacity to ensure the temporary availability of funds until they are reimbursed by the programme. If, following the verification of all the submitted documents (requested by the Applicant Guide), it is considered that the respective applicant does not have the financial capacity to implement the activities, the project will be rejected.  Related to the Annex AF\_A10 Financial Capacity Self-Assessment: The calculated financial indicators should guide the lead partner and project partners in assessing the financial viability of the application. If the calculated financial indicators do not meet the targets, the financial position of the lead partner or project partner might be insufficient for the project implementation.  An example for completing the annex AF\_A10 Financial Capacity Self-Assessment is provided within the excel file, second sheet named 2 Sample Financial Statement, available at https://interregviarobg.eu/en/calls-for-proposals.  Speaking about the submission of a financial plan, please consider that it is required for attesting the beneficiary capacity to ensure the financial resources and the mechanism to cover the financial cash-flow of the project and the operation and maintenance costs of the project, so the content and the concept of the respective plan is depending on the overall project conception and on the beneficiary profile. |
| **III.12** | In Chapter 2.2. Eligible applications and applicants, eligible are Offices/ branches of public national/regional authorities and other public bodies active on the themes of the priority in the programme area (registered and functioning in the programme area). If those offices/ branches which are functioning in the programme area are not legal bodies, the Application should be submitted by their Headquarters indicating the office/ branch responsible for implementing the activities.  According to the Bulgarian legislation, offices/ branches are not legal bodies, but they are however listed in the Trade register. On the other side, Romanian National public institutions with headquarters outside the programme area, consisting of regional structures in the programme area, are not registered as legal bodies. In this case, will those regional structures be eligible Applicants irrespective of not being registered as legal bodies? | According to the provisions of the Applicant guide, offices/ branches of public national/regional authorities and other public bodies can participate in projects if they are registered and functioning in the programme area. If those offices/ branches which are functioning in the programme area are not legal bodies, the Application should be submitted by their Headquarters indicating the office/ branch responsible for implementing the activities.  Therefore, no office/branch/structure, without having the statute of legal body, is eligible to apply within this Programme. |
| **III.13** | Our association was established in 2006 with headquarter in Bucharest. We have been working on sustainable development and climate change for over 17 years, with a focus on education, being one of the most active and well-known NGOs in our country on these topics. Among our areas of intervention are the Danube cities and the Danube Delta, where we have developed numerous initiatives to promote sustainable development and climate resilience in cities and schools.  Under these conditions, we would like to know to what extent our association is eligible for partners located outside the Program area but who are, according to the Applicant's Guide on page 11, "competent in their scope of action for certain parts of the eligible area (e.g. ministries, national agencies, research institutes)"  We specify that we will fulfill the rest of the criteria for partners outside the area, respectively:  -> Carry out activities that are beneficial for the Programme area;  -> Their participation must bring clear added value and expertise to the implementation of a project and has to be beneficial for the Programme area.  -> They cannot take the Lead Partner role. | Regarding the eligibility of partners outside the Programme area, respectively the quality of your association as partner within the Programme but with headquarter in Bucharest and taking into account the provisions of the Applicant's Guide to which you refer, namely "competent in their scope of action for certain parties of the eligible area (e.g. ministries, national agencies, research institutes)", please be informed that:  According with the provisions of the Applicant’s Guide, the participation of applicants outside the Programme area is an exception and can be realized only if the applicants:  - Are competent in their scope of action for certain parts of the eligible area (e.g. ministries, national agencies, research institutes);  - Carry out activities that are beneficial for the Programme area;  - Their participation brings clear added value and expertise to the implementation of a project and has to be beneficial for the Programme area.  - They take the role of a partner, cannot take the Lead Partner role.  Analysing the information you provided, in accordance with Section 2, point 2.2. “Eligible applications and applicants” from the Applicant Guide, please note that having experience in projects implemented within the eligible area of the Programme is not an argument for proving the competence in the scope of action for specific part of the eligible area.  Please, also consider that for all operations, it is compulsory that the applicant has among its attributions, according with its statute or according to the national legislation, the implementation of the proposed activities or that the applicant has an agreement with the relevant institutions to implement such activities, according with its statute or according to the national legislation.  Therefore, in order to be eligible, applicants have to fulfil all the eligibility conditions mentioned in the Applicant’s Guide. Further, in the absence of a document that clearly states/establishes a specific competence in the respective field of action, at national or local level (but within the eligible area), your organization cannot be considered as eligible. Anyway, the eligibility of the partners is to be analysed during the evaluation process, based on the justification documents submitted and in accordance with the eligibility criteria of the applicants listed in the Applicants Guide. |
| **III.14** | Are project pilot actions, related to funding for SMEs, eligible under this call? | Please be informed that under the competitive call for projects proposals dedicated to Priority 2: A Green Region, Specific Objectives 2.4 and 2.7, no state aid is granted, any activities fulfilling state aid criteria cannot be financed. Thus, actions related to funding for SME`s are not considered as eligible under this call for proposals. Furthermore, please be aware that, the eligibility of actions/applicants will be analysed and assessed during the evaluation phase of the project proposal.  We assure you of our support and wish you success in applying under Priority 2: A Green Region, Specific Objectives 2.4 and 2.7, financed by Interreg VI-A Romania-Bulgaria Programme. |
| **III.15** | In the Applicant Guide it is mentioned that "the use of natural materials (wood, stone etc.) (...) is mandatory; **any other materials are not accepted"**,  The interdiction of using any other materials except wood and stone and any other environmental friendly materials, raises an issue/problem, given the fact that in particular cases, where the aim is to develop an infrastructure to protect the biodiversity and ecosystem of a **rocky area,** in accordance with various technical solutions, none of them excludes the use of **metal,**  Specifically, a metal structure is needed in order to overcome the irregularities of the terrain, this metallic structure being covered with materials such as wood and stone, but the underneath structure, for reasons of safety and also access for people with disabilities, must only be of metal,  It is not an issue of wanting or not to use only natural materials, because they will be used entirely, it is an issue of public safety an security, this being the only reason for which metal is needed to be used,  Your assistance in clarifying the above mentioned situation/case, is very much appreciated | Please observe that the full text of the Applicants Guide that was mentioned by you writes as follows:  “*The objective of the urban parks/gardens should envisage the promotion of biodiversity, nature, harmonious improvement of nature in public space. The use of natural materials (wood, stone etc.)”**and environmental friendly is mandatory; any other materials are not accepted. The cost of the (urban) furniture should be limited to maximum 20% of the total cost of investments related to urban parks/garden per partner*”.  Therefore, indeed, the use of other materials than natural materials (wood, stone, etc) is forbidden, but only in case of the objective “urban parks/gardens”.  Please observe that the Methodological descriptions of Interreg VI-A Romania-Bulgaria indicators for the Specific objective 2.7. *Enhancing protection and preservation of nature, biodiversity and green infrastructure, including in urban areas, and reducing all forms of pollution,* mention that “Given the fact that the ecosystem-based approach is essential to carrying out interventions under this specific objective, it is expected that some projects would carry out such investments. **This means that nature-based solutions will be preferred, wherever possible, above hard or grey infrastructure.**”  Hence, the use of other materials such as metal is not excluded, but it is preferred the use of natural based solutions.  Last but not least, we would like to draw your attention that when preparing your application, you should duly asses the type of action which is included in your project, also by using the methodology for Carrying out a DNSH background assessment for the environmental objective, provided by **Annex I DNSH Interreg VI-A Romania-Bulgaria level** (part of the Applicant’s Guide), which will help you to assess the environmental impact of the types of actions included in your project. |
| **III.16** | Are the measures for energy efficiency works over a building eligible under Priority 2: A Green Region, Specific Objectives 2.4 and 2.7.? | Please consider that **the indicative types of actions envisaged within the Specific objective: 2.4. Promoting climate change adaptation and disaster risk prevention, resilience, taking into account ecosystem-based approaches are related to climate change adaptation.** The ecosystem-based approach is central to implementing actions under this specific objective. This means that nature-based solutions will be preferred, wherever possible, above hard or grey infrastructure. This includes flood plains, ecosystem restoration, afforestation, natural water retention measures and other green (or blue) infrastructure measures that have a direct benefit for climate change adaptation and risk prevention.  At the same time, according to the provisions of the Applicant’s Guide, the objective of the **Specific objective: 2.7 Enhancing protection and preservation of nature, biodiversity and green infrastructure, including in urban areas, and reducing all forms of pollution** is the protection and preservation of nature, biodiversity and green infrastructure, including in urban areas, and reducing all forms of pollution.  In the context of all the mentioned above and considering the envisaged indicators for the specific objectives 2.4 and 2.7, please consider that even if the Energy efficiency measures are highly important in the fight vs climate change, the Interreg VI-A Ro-Bg Programme is focusing on the ecosystem-based approach and on the green instead of grey solution, like investments in building greens - green balconies, ground based green walls, façade-bound green walls, extensive green roofs, intensive green roofs, atrium spaces, green pavements and green parking pavements, green fences, noise barriers, gardening. In this regard, please consider that the Priority 2: A Green Region is aiming strictly to a greener region and in this regard the overall energy efficiency works over a building would not be eligible for financing within the framework of Interreg VI-A Ro-Bg Programme. |
| **III.17** | In the "Guidelines for Application" in "Section 2 - Conditions, Requirements, and feature," under "2.3. Eligible indicative types of actions," it is stated: „In order to be eligible these applicants must fulfil the following criteria: For Bulgarian partners, in case of infrastructure, the investment activities should be carried out on public property. “(On page 10 of the Guidelines).  Furthermore, in the "Guidelines for Application" in "Section 3 - How to develop a high quality project and how to apply ", under "3.3. Required documents submitted with the application form, "in item 5. Documents certifying the ownership status of the land and/or building (Annex AF\_A5)”, on page 72 of the Guidelines, it is stated:  „FOR PUBLIC AUTHORITIES and other PUBLIC BODIES:  • the legal act (e.g. government decision, law, government ordinance, decision of local counties, etc.) stating the fact that the land and/or building/ item of infrastructure is in concession/on long term contract/ in administration/ bailment contract/rent contract/ publicly owned by the applicant/ they hold a right under the real property law over the land and/ or building/ item of infrastructure.  FOR NGOs and other non-profit bodies  • property/ ownership document for the land and/or building/ item of infrastructure; OR  • the applicant holds the land and/or building/ item of infrastructure / place of investment installation (in case of equipment) under a concession/on long term contract/ bailment contract/ rent contract/ any other right under the real property law;“  Here, for NGOs and other non-profit organizations, there is no requirement that ownership be public.  Q: When an NGO participates, based on the requirements mentioned above, can it use its own land or building for interventions to achieve the goals of its project proposal? | Considering that in accordance with the Applicant’s Guide for the opened call for the operations under PO2, "(…) In case of infrastructure envisaged, the applicants should be the owners of the given territory/building subject of that investment activities. For Bulgarian partners, in case of infrastructure, the investment activities should be carried out on public property (…) For Bulgarian partners, in case of infrastructure and works, the investment activities should be carried out on public property (…) In case of infrastructure and works, the investment activities should be carried out on public property (concerning BG beneficiaries) (…)", and considering that there are not envisaged any exceptions in this regard, this means that the respective requirements are related to all the potential beneficiaries, regardless of whether they are NGOs or public institutions/bodies.  In addition, please consider that within the text from the Applicant’s Guide, page 72, the accent is placed on the type of the documents needed to be submitted together with the Application Form, in order to be attested the property/right of use of the land without making any reference to the character of the land – if it is private or public property. In this regards, please consider that the both texts from the Applicants’ Guide are complementary and are not contradictory. |
| **III.18** | For Priority 2 - A greener region, an University intends to submit a project for monitoring the quality of the environment in the Danube region. Please let me know if, the equipment for monitoring the quality of water and air + the boat on which they will be mounted exceed half of the eligible value of the project, this project can be considered HARD.  In the GUIDE it is specified that a Hard type project is one for which <infrastructure/works component equal or more than 50% of the total project eligible budget>.  The phrase <infrastructure/works component> is not clearly defined; at the University, the expression <research infrastructure> is frequently used, which also includes the necessary equipment.  In the <infrastructure/works component> category, the expenditures for setting up a botanical garden in the urban environment can be included? | Considering the fact that in The Applicant's Guide for the competitive call for projects dedicated to Priority 2: A Green Region, Specific Objectives 2.4 and 2.7, the hard project is defined as “a project that has an infrastructure/works component equal or more than 50% of the total project eligible budget”, please be informed that in order for project to be considered a hard project, it is necessary to have an infrastructure / works component.  For more details on what infrastructure / works component may include, please consult the Annex AG\_B List of Eligible Expenditures for Interreg Vi-A Ro-Bg Programme, art. 14 - Infrastructure and works, but also the definition provided for infrastructure within the Applicant’s Guide (section Glossary of terms).  Concerning your second question, in principle, the expenditures for setting up a botanical garden in the urban environment can be included under the infrastructure/works costs, if observing all the conditions for eligibility from the Applicant’s Guide. |
| **III.19** | In Article 136, Paragraph 1, Letter E of Regulation (EU, Euratom) 2018/1046, it states: „1. The authorizing officer responsible for budgetary credits shall exclude a person or entity referred to in Article 135(2) from participation in procedures for the award, granting or procurement governed by this Regulation, or from the selection for the implementation of Union funds when that person or entity is in one or more of the following situations, which require their exclusion:  ... e) it has been established by a final judicial decision or final administrative act that the person or entity has committed an irregularity within the meaning of Article 1(2) of Council Regulation (EC, Euratom) No 2988/95.“  Article 1, Paragraph 2 of Council Regulation (EC, Euratom) No 2988/95 states: „2. "Irregularity" means any infringement of a provision of Community law resulting from an act or omission by an economic operator which has, or would have, the effect of prejudicing the general budget of the Communities or budgets managed by them, or of breaching the obligations of economic operators regarding the implementation of the Community's own resources, which are collected directly in the name of the Communities or by carrying out an unjustified expense.“  Does this mean that the project proposal of any applicant who has an administratively determined irregularity and a corresponding financial correction imposed through an administrative act or a judicial decision will not be considered? | The question addresses a wide category of situations, subject to a complex set of rules. Each case should be addressed separately, depending on specific circumstances. We would like to draw your attention on the need to interpret together articles 135-139 of the Regulation (EU, Euratom) 2018/1046 on the financial rules applicable to the general budget of the Union (the Financial Regulation). The applicants must state correctly and in full honesty their situation when filling-in the declaration referred to in article 136(1) of the same Regulation.  There may have been an error in your exact quotation of the legal text as the article 136(1), point (e) of Regulation (EU, Euratom) 2018/1046 states the following:  "1. The authorising officer responsible shall exclude a person or entity referred to in Article 135(2) from participating in award procedures governed by this Regulation or from being selected for implementing Union funds where that person or entity is in one or more of the following exclusion situations:  (e) the person or entity has shown significant deficiencies in complying with main obligations in the implementation of a legal commitment financed by the budget which has:  (i) led to the early termination of a legal commitment;  (ii) led to the application of liquidated damages or other contractual penalties; or  (iii) been discovered by an authorising officer, OLAF or the Court of Auditors following checks, audits or investigations;"  The situation you may have wished to address is mentioned under article 136(1), point (f) of Regulation (EU, Euratom) 2018/1046:  "(f) it has been established by a final judgment or final administrative decision that the person or entity has committed an irregularity within the meaning of Article 1(2) of Council Regulation (EC, Euratom) No 2988/95 ( 3 )"  Last, but not least, Article 1, Paragraph 2 of Council Regulation (EC, Euratom) No 2988/95 states that:  "2. Irregularity" means any infringement of a provision of Community law resulting from an act or omission by an economic operator which has, or would have, the effect of prejudicing the general budget of the Communities or budgets managed by them, or of breaching the obligations of economic operators regarding the implementation of the Community's own resources, which are collected directly in the name of the Communities or by carrying out an unjustified expense."  When reading together both regulations mentioned above [article 136, Paragraph 1, point (f) of Regulation (EU, Euratom) 2018/1046 and Article 1(2) of Council Regulation (EC, Euratom) No 2988/95], the applicant will be excluded from participation in a call for proposals if it has an administratively determined irregularity and a corresponding financial correction imposed through a final administrative act or a final judicial decision. This rule is stated within the provisions of the Applicant’s Guide for the competitive call for projects dedicated to Priority 2: A Green Region, Specific Objectives 2.4 and 2.7, financed by Interreg VI-A Romania-Bulgaria Programme, section 2.2 – Eligible applications and applicants as following:  "(…) In order to be eligible these applicants must fulfil the following criteria:  (…)Not be in any of the situations mentioned under Art. 136 of REGULATION (EU, Euratom) 2018/1046  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.”  Still, the exclusion from the participation in the call is not automatic in all cases and it is subject to further consideration by the evaluators, depending on the specific circumstances of the case and considering, for example, the provisions of article 136(6), point (a) of Regulation (EU, Euratom) 2018/1046, respectively:  “The authorising officer responsible, having regard, where applicable, to the recommendation of the panel referred to in Article 143, shall not exclude a person or entity referred to in Article 135(2) from participating in an award procedure or from being selected for implementing Union funds where:  (a)the person or entity has taken remedial measures as specified in paragraph 7 of this Article, to an extent that is sufficient to demonstrate its reliability. This point shall not apply in the case referred to in point (d) of paragraph 1 of this Article;” (…).  “7. The remedial measures referred to in point (a) of the first subparagraph of paragraph 6 shall include, in particular:  (…) c) proof that the person or entity referred to in Article 135(2) has paid or secured the payment of any fine imposed by the competent authority or of any taxes or social security contributions referred to in point (b) of paragraph 1 of this Article.” (…)  We would also like to draw your attention on some of the provisions of article 139 of Regulation (EU, Euratom) 2018/1046 which sets a limitation period for the exclusion, which states, among others that:  “For the purpose of point (f) of Article 136(1) of this Regulation, the limitation period to exclude a person or entity referred to in Article 135(2) of this Regulation and/or impose financial penalties on a recipient provided for in Article 3 of Regulation (EC, Euratom) No 2988/95 shall apply”.  Please bear in mind that an applicant shall declare whether it is in one of the situations referred to in article 136(1) and, where applicable, whether it has taken any remedial measures referred to in point (a) of the first subparagraph of article 136(6).  Where applicable and in accordance with the Programme rules, the Programme may accept as appropriate evidence that an entity is not in the exclusion situation referred to in points (f) of Article 136(1): proof of payments, a recent extract from the judicial record or, failing that, an equivalent document recently issued by a judicial or administrative authority in its country of establishment showing that those requirements are satisfied etc. When the above mentioned requirements are observed, the applicant may be considered as eligible.  Not least, please consider that the evaluators may request, at any time during the evaluation process, additional documentary evidence and argumentations regarding the eligibility of applicants and that they will assess the eligibility on a case-by-case basis, relying on all the provisions of the Financial Regulation and other applicable legislation. |
| **III.20** | Is it eligible for the project proposal to include the construction of a green and cycling accessible environment and the rehabilitation of the Danube Park? | The eligibility of the actions proposed is to be analysed during the evaluation process, based on the justification documents submitted, in accordance with the eligibility criteria of the applicants listed in the Applicants Guide. In addition, please consider that the relevance of your project ideas to any of the related Specific objectives of Interreg VI-A Ro-Bg Programme is depending on the entire concept of the related project ideas and not only to the eligibility of certain activity under the respective specific objectives.  One of the examples for indicative actions which would be eligible under specific objective 2.7 is very close to your idea for construction of green and cycling accessible environment and rehabilitation of Danube Park, namely: Developing green areas, including connections between green spaces (urban parks, green/sustainable sport facilities, forests, riverbank greens), which is leading to the answer of the question that the proposed actions to be included in project proposal could be eligible, of course, depending on the entire project concept and based also on the supporting documents presented in this regard. |
| **III.21** | It is a permissible investment to install photovoltaic systems on the roof of the center in order to reduce the pollutions. Here we mean the instruction (page 16 of AG) “ that the objective of this specific objective is the protection and preservation of nature, biodiversity and green? | The Methodological descriptions of Interreg VI-A Romania-Bulgaria indicators for the Specific objective 2.7. Enhancing protection and preservation of nature, biodiversity and green infrastructure, including in urban areas, and reducing all forms of pollution, mention that “nature-based solutions will be preferred, wherever possible, above hard or grey infrastructure.”  Regarding the system of photovoltaic solar panels, we would like to indicate the section “GO GREEN WITH YOUR PROJECT!” from the Applicant’s Guide (page 33), which clearly states that “Projects aimed at renovation/modernization of existing buildings and/or construction of new buildings must consider the implementation of solutions to improve energy efficiency, as well as the use of renewable sources of electrical/thermal energy”. At the same section are also provided tips, about the green measures projects can apply to contribute to sustainable development, namely to “Consider resource efficiency and the use of renewable energy at all levels”. Having in mind that Photovoltaic solar energy is a clean, renewable source of energy that uses solar radiation to produce electricity, such an investment could be considered eligible/permissible under the Programme.  Please be informed that the eligibility of the actions proposed is to be analysed during the evaluation process, based on the justification documents submitted, in accordance with the eligibility criteria of the applicants listed in the Applicants Guide. Each proposed action should be logically linked with the project ideas and beneficiaries should clearly demonstrate its contribution to fulfilling the project objectives. |
| **III.21** | In the case of a project that would involve three partners (a university and an NGO from Romania and a university from Bulgaria), are there rules for the distribution of the budget between partners that could lead to ineligibility or de-pointing?  Clarification: It is a hard project (3.5 million EUR) in which a good part of the budget would be used by the Romanian partners for infrastructure and works, and the Bulgarian university would use the funds for equipment, salaries, services, etc. (would not use the budget allocated for infrastructure and works). | There are no specific rules regarding the distribution of the budget between partners and is not mandatory for the project partners to implement similar activities on each side of the border (one partner may implement investment activities, while other partners may implement different type of activities).  Still, overall, please be informed that the distribution of the financial resources shall duly reflect the distributed tasks / activities to be implemented and the project proposal shall observe all eligibility conditions set in the Applicant’s Guide.  One remark that we would like to make, considering the details within your question, that one of the project partners will use the funds for “wages”, is that you should pay attention to the fact that staff costs are eligible only under a flat rate basis and not as a direct cost for implementation. |
| **III.22** | Is it eligible in a project for overhaul of an urban park to provide park lighting, given your answer to question III.15 and the fact that the pillars of park luminaires cannot be made of timber (they are not available on the market)? Is it eligible to use metal pillars for park lighting? | All the type of expenditures you have mentioned (expenditures for park lighting, including pillars, park irrigation system, play facilities for various activities – climbing, rocking, balancing) can be framed as eligible expenditures within project budget. Still, please pay attention to the fact all the expenditures shall be proven necessary for the achievement of the project’s goals and objectives and shall demonstrate their contribution to the Programme’s objectives corresponding to each of the selected Investment Priority (2.4 Promoting climate change adaptation and disaster risk prevention, resilience taking into account eco-system based approaches or 2.7 Enhancing protection and preservation of nature, biodiversity and green infrastructure, including in urban areas, and reducing all forms of pollution). |
| **III.23** | The project envisages a park irrigation system. Is it eligible for a water tank for irrigation needs dug into the ground or placed on the ground (in this case a wooden lining/coating can be made) to be made of PVC material, as none are produced from environmentally friendly material? The question applies to all types of projects under the PO 2.7. | In relation of the type of materials to be used for water tank for irrigation, please see the already provided answer for the question III.1, available at https://interregviarobg.eu/assets/2023/06/list-of-qa-interreg-vi-a-robg-updated-10072023.docx. As explained within the above mentioned answer, “the nature-based solutions will be preferred, wherever possible, above hard or grey infrastructure”. Hence, the use of other materials such as plastic or metal is not excluded, but it is preferred the use of natural based solutions. You shall duly explain within your project proposals the chosen solutions and their contribution / coherence with the project and Programme’s objectives. In this regard, we recommend you to promote measures and initiatives that are environmental friendly and in line with the concept of sustainability and Do No Significant Harm principle. |
| **III.24** | Please confirm that green play facilities (for a various activities – e.g. climbing, rocking, balancing) are not covered and are not considered urban furniture to be limited to a maximum of 20% of the total value of investments related to city parks / gardens of a partner. | Regarding the green play facilities are not urban furniture, please be informed that the nature and eligibility of expenditures shall be decided during the assessment process, by the assessor, in accordance with the Programme rules. In this regard, in order to clarify the nature of each expenditures (framed or not into the category of urban furniture), we also recommend you to duly explain the scope of these play facilities and detail their direct contribution to the project activities and Programme objectives. |
| **III.25** | Can a Bulgarian stock company (EAD) established with stat property, apply as an eligible entity under the Interreg Romania- Bulgaria: Call 2?  Can a Bulgarian Ministry as sole owner of an EAD company comply with the eligibility criteria of the call? | In relation with the question, please be informed that in accordance with the eligibility criteria listed in the Applicants Guide, the following type of applicants are eligible for funding under Interreg VI-A Romania-Bulgaria:  • National, regional and local public bodies, institutions, administrations, agencies, including the bodies governed by public law (which fall under the definition of Article 2(1) of Directive 2014/24/EU on public procurement), county/district councils, local councils/ municipalities, educational and research institutions etc.  • Chambers of Commerce and Regional Development Agencies functioning in the eligible area and registered in accordance to national law  • Non-governmental organizations (associations or foundations) in the sense of art. 192, of Regulation (EU, Euratom) 2018/1046)  • Offices/ branches of public national/regional authorities and other public bodies active on the themes of the priority in the programme area (registered and functioning in the programme area). If those offices/ branches which are functioning in the programme area are not legal bodies, the Application should be submitted by their Headquarters indicating the office/ branch responsible for implementing the activities.  Therefore, considering your questions, we would like to inform you that:  1. If your organization falls within definition of Article 2(1) of Directive 2014/24/EU on public procurement, it is eligible.  In this regard, by art. 2(4) of the same Directive 2014/24/EU, “bodies governed by public law”, mentioned in article 2(1), are defined as bodies that have all of the following characteristics:  (a) “they are established for the specific purpose of meeting needs in the general interest, not having an industrial or commercial character;  (b) they have legal personality; and  (c) they are financed, for the most part, by the State, regional or local authorities, or by other bodies governed by public law; or are subject to management supervision by those authorities or bodies; or have an administrative, managerial or supervisory board, more than half of whose members are appointed by the State, regional or local authorities, or by other bodies governed by public law;”  You may consult the full text of the Directive 2014/24/EU here: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32014L0024 );  2. National public bodies, such as Ministry of Economy and Industry and their offices / branches within the eligible area of the Programme are listed within the type of applicants eligible for funding, as presented above.  Please be informed that under this call, no state aid is granted, any activities fulfilling all state aid criteria cannot be financed and the project is proposed for rejection. |
| **III.26** | In the situation where a branch with legal personality in Călărași, following the financial self-evaluation, the budget that the branch can request is too small to participate as a partner in the project, is possible for an Institute based in Bucharest to be eligible as a partner in the project. | Related to the Financial Capacity Self-Assessment, please be informed that this does not necessarily limit the budget of a partner. Please take into consideration the provisions of the Applicant’s Guide: “In case the results reveal that the subvention, liquidity and debt rate are higher than the set threshold (red risk), the corresponding partner must provide a plan for ensuring the financial resources and the mechanism to cover the financial cash-flow of the project and the operation and maintenance costs of the project. In case this plan is not provided or is not realistic, the project may be rejected from financing”. Therefore you also have the option of preparing and providing a plan for ensuring the financial resources.  In relation with your inquiry, if the Institute based in Bucharest may be eligible, please be informed that similar question and answer were already formulated and are available on the Q&A list on www.interregviarobg.eu website, position III.7 ([list-of-qa-interreg-vi-a-robg-updated-27072023-1.docx (live.com)](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Finterregviarobg.eu%2Fassets%2F2023%2F07%2Flist-of-qa-interreg-vi-a-robg-updated-27072023-1.docx&wdOrigin=BROWSELINK).  The provided answer is:  “According to the provisions of the Applicant’s Guide, Applicants, outside the Programme area, but from Romania and Bulgaria, can also participate in projects, but only in exceptional cases, namely if they:   * Are competent in their scope of action for certain parts of the eligible area (e.g. ministries, national agencies, research institutes); * Carry out activities that are beneficial for the Programme area; * Their participation must bring clear added value and expertise to the implementation of a project and has to be beneficial for the Programme area. * They cannot take the Lead Partner role.   Still, please be informed that the eligibility of the partners is to be analysed during the evaluation process, based on the justification documents submitted and in accordance with the eligibility criteria of the applicants listed in the Applicants Guide.” |
| **III.27** | Can I have some information regarding some properties you have published on the website https://interregviarobg.eu/ro/interreg-projects.  Is it possible to know the dates when more information will be released? is it possible to know what you will be financing? | The list of projects found at the link provided by you <https://interregviarobg.eu/ro/interreg-projects> is a consultative one and contains, for the moment, examples of projects financed within Interreg V-A Romania-Bulgaria Programme in the period 2014 -2020. The list will be updated as soon as the projects financed within Intereg VI-A Romania-Bulgaria Programme will start their implementation.  Regarding what shall be financed, we invite you to find more information on the Programme’s website [Interreg VI A RO-BG - Program - date generale (interregviarobg.eu)](https://interregviarobg.eu/program-date-generale). As a general information, please be informed that Interreg VI-A Romania-Bulgaria Programe is financed by the European Regional Development Fund (ERDF) and it is structured on 4 priorities, as follows:  Priority 1: A well connected region  Priority 2: A green region  Priority 3: An educated region  Priority 4: An integrated region.  Until now, two calls for projects have been launched so far and are still opened for application.  The first call is dedicated to operations of strategic importance and it is restricted only for the already selected applicants, while the second call is a Competitive call for project proposals dedicated to Priority 2: A Green Region, Specific Objectives 2.4 and 2.7.  The deadline for submission of applications within this competitive call is 11th of September 2023. For more information on this subject, you can consult the Applicant's Guide for the competitive call for projects dedicated to Priority 2: A Green Region, available on the Programme website, section *Funding*, subsection *Calls for proposals* or at the link <https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Finterregviarobg.eu%2Fassets%2F2023%2F04%2Fapplicant-guide-po2-24-27-approved.docx&wdOrigin=BROWSELINK>.  Furthermore, if you are interested in finding out specific information regarding the Interreg VI-A Ro-Bg Programme, please be informed that you can request answer to questions related with the opened call for proposal, by sending your questions to the e-mail address: [helpdesk\_robg@calarasicbc.ro](mailto:helpdesk_robg@calarasicbc.ro).  Also, online sessions for interactive assistance for potential applicants regarding the Competitive call for project proposals dedicated to Priority 2: A Green Region, Specific Objectives 2.4 and 2.7 will take place every Thursday, between July 27 – August 17.  If you would like to meet with us to discuss various matters regarding the competitive call for Priority 2, please follow the registration link here and select one of the available dates and times:  • 27th of July,  • 3rd of August,  • 10th of August,  • 17th of August.  For each of the 4 dates, you have 6 options for sessions for interactive assistance, with a maximum duration of 30 minutes, starting with: 10:00; 11:00; 12:00; 13:30; 14:30; 15:30.  The sessions for interactive assistance for potential applicants will be held in accordance with the "first came, first served" rule while taking the participation rules into account.  Please take into consideration that each beneficiary will only receive one session and each project idea will only have one organized session.  There is also an onsite event dedicated for this call scheduled to take place in Craiova on the 22nd of August 2023, for which more details will be available soon on the website https://interregviarobg.eu/. |
| **III.28** | Please clarify whether within Call 2 - the competitive call for projects dedicated to Priority 2: A green region, Specific Objectives (OS) 2.4 and 2.7. the development of urban parks in the rural environment is eligible. | Please take into consideration that developing urban parks (Developing green areas, including connections between green spaces; Developing and improving ecosystems to enhance their potential services for societal wellbeing to support biodiversity and reduce pollution) is one of the examples for indicative actions which would be eligible under specific objective 2.7 - Enhancing protection and preservation of nature, biodiversity and green infrastructure, including in urban areas, and reducing all forms of pollution.  Also according with the Applicant's Guide, the objective of the urban parks should envisage the promotion of biodiversity, nature, harmonious improvement of nature in public space.  Moreover it is also provided in the Applicant's Guide that in what concerns the indicative action related to Developing and improving ecosystems (such as forests, woodlands, rivers, lakes, coasts, wetlands, moorlands, urban parks, croplands, etc.) to enhance their potential services (benefits) for societal wellbeing (from an ecological, aesthetic, spiritual, health perspective) to support biodiversity and reduce pollution, “the action includes also support for the development and enhancement of croplands, both in urban and rural areas, covering niche crops on small areas, such as fruit trees, lavender, berries, sea buckthorn, anise, chamomile, lemon balm, etc. The action will focus on the development of environmentally friendly cultures, either in urban or rural grey areas or in spaces that were previously used for agriculture”.  Therefore, there is no limitation regarding the area in which the project may be implemented (urban or rural).  Still, please be informed that the eligibility of activities is to be analyzed during the evaluation process, based on the entire project concept. |
| **III.29** | A lead partner can be from another region than those indicated in the open call document at page 4? If we are located in Plovdiv District, can we apply for the programme, if the activities are conducted in the core programme districts? Can we engage a partner from the Suceava District for the project, provided again that the activities take place in the core programme districts? | Regarding your questions, please be aware that according to Applicant’s Guide, “Applicants, outside the Programme area, but from Romania and Bulgaria, can also participate in projects, but only in exceptional cases, namely if they:  • Are competent in their scope of action for certain parts of the eligible area (e.g. ministries, national agencies, research institutes);  • Carry out activities that are beneficial for the Programme area;  • Their participation must bring clear added value and expertise to the implementation of a project and has to be beneficial for the Programme area.  • They cannot take the Lead Partner role.”  Considering the above-mentioned provisions, you and your possible partner from Suceava County may be eligible as applicants for the Interreg VI-A Romania-Bulgaria Programme, if observing the above mentioned criteria and if the partnership will include also a partner form the eligible area to take on the role of Lead Partner.  Still, please be informed that the eligibility of the partners is to be analyzed during the evaluation process, based on the justification documents submitted and in accordance with the eligibility criteria of the applicants listed in the Applicants Guide. ” |
| **III. 30** | In chapter 2.2 eligible applications and applicants is been mentioned that legal institutions with their headquarters in the eligible cross border area can apply. If a Romanian NGO with the headquarter in Bucharest, will open a branch legal registered in the eligible cross border region, would be considered eligible for the programme? If yes would be eligible also as leading partner? | Please be informed that similar question and answer were already formulated and are available on the Q&A list on [www.interregviarobg.eu](http://www.interregviarobg.eu)  website, position III.7 ([list-of-qa-interreg-vi-a-robg-updated-27072023-1.docx (live.com)](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Finterregviarobg.eu%2Fassets%2F2023%2F07%2Flist-of-qa-interreg-vi-a-robg-updated-27072023-1.docx&wdOrigin=BROWSELINK).  According with the abovementioned Q&A list, an NGO “…could be considered eligible for financing under the present call for proposals. Also, please consider that, according to the provisions of the Applicant’s Guide, the applicants from Romania and Bulgaria, but outside the Programme area, cannot take the Lead Partner role.” In this regard, if you open a branch in the eligible area, the branch may apply within this Programme and also take the Lead Partner role. |
| **III. 31** | Please clarify the following aspects regarding the rules of State aid: We can mention that apart of grants, we apply for tenders to elaborate management plans for protected areas and also we have a store with different items like nest boxes, feeders, pin badges, t-shirts. Can you advise in which conditions our NGO can be considered undertaking? | Please bear in mind that under the competitive call for projects proposals dedicated to Priority 2: A Green Region, Specific Objectives 2.4 and 2.7 no state aid is granted, any activities fulfilling state aid criteria cannot be financed.  Moreover, regarding your question related to the conditions in which your NGO can be considered undertaking, within the Applicant’s Guide it is specified that: “For state aid to take place the recipient of project funding must be an undertaking, and the Court of Justice has consistently defined undertakings as entities engaged in an economic activity, regardless of their legal status and the way in which they are financed. The term "undertaking" is in this context used in a wide sense as any entity which has an activity of an economic nature and which offers goods and services on the market, regardless the legal form and the way of financing of this entity. Also if an entity is not profit-oriented, state aid rules will apply as long as it competes with companies that are profit-oriented. Therefore, not only private companies are subject to state aid rules but also public authorities, if they carry out an economic activity on the market.”  As mentioned within the Applicant’s Guide, the classification of an entity as an undertaking is always relative to a specific activity, not the status of that entity such as public or private. An entity that carries out both economic and non-economic activities is to be regarded as an undertaking only with regard to the former. Furthermore, the application of the State aid rules as such does not depend on whether the entity is set up to generate profits, as also non-profit entities can offer goods and services on a market too. The only **relevant criterion** **is to decide is whether or not the entity carries out an economic activity in the context of the ETC project**.  In this regard, you have to make an initial assessment if whether State aid is involved in your project and your options for dealing with this. As such, Annex AF\_A3 State Aid Self-Assessment must be filled in by each partner and submitted with the application.  Furthermore, please be aware that, the eligibility of actions/applicants will be analysed and assessed during the evaluation phase of the project proposal. |
| **III. 32** | We would like to develop a project under PO2, SO 2.7 with a Bulgarian partner. The headquarter is located in Varna, but the working station is in Ruse. Please, clarify if this partner is considered eligible? | Regarding the eligibility of your future Bulgarian partner who is located outside the Programme area (Varna), but has a working station in Ruse, please be informed that according to the eligible applicants are detailed within the provisions of the Applicant’s Guide, Section 2.2. Eligible applications and applicants.  In this regard, among other types of eligible applicants, may be eligible:  “Offices/ branches of public national/regional authorities and other public bodies active on the themes of the priority in the programme area (registered and functioning in the programme area). If those offices/ branches which are functioning in the programme area are not legal bodies, the Application should be submitted by their Headquarters indicating the office/ branch responsible for implementing the activities”.  Also, “Applicants, outside the Programme area, but from Romania and Bulgaria, can also participate in projects, but only in exceptional cases, namely if they:  • Are competent in their scope of action for certain parts of the eligible area (e.g. ministries, national agencies, research institutes);  • Carry out activities that are beneficial for the Programme area;  • Their participation must bring clear added value and expertise to the implementation of a project and has to be beneficial for the Programme area.  • They cannot take the Lead Partner role.  Applicants from third country partners (outside and inside EU) can participate as associated partners, but cannot receive ERDF funding from the Interreg VI–A Romania-Bulgaria Programme”.  Similar question and answer were already formulated and are available on the Q&A list on [www.interregviarobg.eu](http://www.interregviarobg.eu)  website, position III.8.  Please be informed that the eligibility of the partners is to be analysed during the evaluation process, based on the justification documents submitted and in accordance with the eligibility criteria of the applicants listed in the Applicants Guide. |
| **III.33** | In the Application Guide it is mentioned under the Section 2.4 "Location of activities" that  "By exception, activities outside the Programme area can be implemented in duly justified cases. In such cases, the following requirements must be observed by the concerned activities:  They are for the benefit of the Programme area  They are essential for the implementation of the project  They are explicitly foreseen in the application form."  In the same time, in the "Evaluation Criteria Phase 1-Administrative Compliance and Eligibility Check", criteria no. 20 it states "if part of the operation is to be implemented outside the programme area, it is within the territory of the countries participating to the Programme"  Can a project activity be developed outside the territory of the programme countries or not  Also, please inform us what Inforeuro exchange rate should we use (what month)? | There is no restriction regarding the area where the activities are implemented outside Programme area. However, this is accepted only in duly justified cases, and only in the benefit of the Programme, provided the Applicant’s provisions are observed (please see the rules regarding the eligibility of the expenditures).  Regarding your second question in relation to the Infoeuro exchange rate, we would like to inform you that there is no provision within the Applicants Guide in this regard. So, you may use the Infoeuro exchange rate from the month in which you intend to submit the Application form in JEMS. However, in case of investment projects, the calculation of budget for Infrastructure and works expenditures may be based on Infoeuro exchange rate from the month, in which the General Estimate was elaborated. |
| **III.34** | Both partners planned the cleaning of a river bed, the installation of cameras to detect areas where waste can be stored uncontrolled and the purchase of mobile stations for air quality monitoring. The Romanian partner, on the other hand, has approved a financial project from PNRR that includes the installation of surveillance cameras on the entire territory of the municipality, but the riverbeds do not belong to us as they belong to the Romanian Waters. Therefore, our Administrative Territorial Unit wants to carry out the ecological cleaning of a green area located in a forest owned by the municipality. The works that want to be undertaken consist of the demolition of concrete or bituminous alleys, the removal of various remains of concrete constructions and concrete urban furniture. We also want to clean the area of uncontrolled overgrown vegetation and sanitize the picnic area.  1. Considering the above, please specify which technical documentation must be attached to the financing request for the Romanian partner. Is it necessary to carry out the feasibility study? What other supporting documents must be attached to the funding application in this context?  2. In case of both, the ecological cleaning and the setting of this area (paths made of environmentally friendly materials, benches, playgrounds for children, lighting, waste collection points, etc.), please specify what technical documentation is required to be attached to the financing request for the Romanian partner. Is it necessary to carry out the feasibility study? What other supporting documents must be attached to the funding application in this context? | The main principle of the Programme, the Interreg VI-A Romania-Bulgaria Programme does not require any additional documents compared to the national legislation.  The investment documents must comply with national legislation (i.e. Decision 907/2016 regarding the elaboration stages and the framework content of the technical-economic documentation related to the investment objectives/projects financed from public funds, the law on local public finances 273/2006 etc). In addition, according to the Applicant's Guide, you must also consider Annexes B, depending on the type of activities to be carried out. Therefore, after analyzing the mentioned legislation and considering the entire concept of the related project idea and interventions foreseen, if it is required to elaborate a Feasibility Study according to the national legislation, than you will have to submit it along with the project. |
| **III.35** | In view of the above, within section 2.2. "Eligible applications and applicants" of the provided Applicant's guide for the competitive call for projects dedicated to Priority 2, it is said that among the types of applicants, eligible for funding under the Programme are:  "... Offices/ branches of public national/regional authorities and other public bodies active on the themes of the priority in the programme area (registered and functioning in the programme area).  If those offices/ branches which are functioning in the programme area are not legal bodies, the Application should be submitted by their Headquarters indicating the office/branch responsible for implementing the activities.".  It is also said that in order to be eligible, these applicants "must have their headquarters in the eligible cross border region".  Furthermore, if the applicants are outside the Programme area, but from Romania and Bulgaria, they can also participate in projects, but only in exceptional cases, and they cannot take the Lead Partner role.  The Agency is a specialized administrative structure to the Ministry of Transport and Communications of the Republic of Bulgaria. The headquarters is located in Sofia, and it has regional offices (directorates) in Burgas, Varna, Lom and Ruse. Among its main tasks and responsibilities, through its regional directorates the Agency organizes and coordinates activities, related to the safety and security of shipping and ports and exercises state environmental control of shipping to prevent environmental pollution from ships in the sea spaces and inland waterways of the Republic of Bulgaria (including the Danube river).  Having in mind the functions and responsibilities of the Agency's offices in Ruse and Lom, which are directly related to the field of intervention of the potential project proposal under the Second Call, and considering that the main project activities and results will be implemented and delivered within the eligible area of the Programme, we kindly ask for your clarification of the following questions:  1. Is the Agency considered an eligible applicant for funding under the Second Call for project proposals, taking in consideration that the headquarters of the Agency is located in Sofia, but the project main activities would be implemented in Agency's offices in Ruse and Lom, which functions and responsibilities are directly related to the objectives of the Call and respectively of the Programme?  2. Considering the above described, could the Agency be a Lead Partner?  3. Although the project activities will be implemented within eligible CBC region, is it possible part of the project implementation team, dealing with the management of the project, to be located in the headquarters of Agency in Sofia? | In relation with your first two questions, please be informed that according with the Applicant’s Guide, Executive Agency "Maritime Administration" (EAMA) can be considered as eligible applicant for funding under Call 2 - Competitve call for project proposals dedicated to PRIORITY 2: A GREEN REGION, SPECIFIC OBJECTIVES 2.4 AND 2.7.  Executive Agency "Maritime Administration" - main headquarter in Sofia cannot fulfil the role of Lead Partner.  However, the Executive Agency "Maritime Administration"  may take the role of lead partner only through   EAMA’s offices Lom or Ruse (with the mention that the offices should be legal bodies and have the legal responsibilities to act and implement the project) if it develops and submits the application in this respect.  Regarding the third question, please be informed that activities outside the Programme area can be implemented in duly justified cases, provided the Applicant’s provisions are observed (please see the rules regarding the eligibility of the expenditures). In addition, related to your question if it is possible part of the project management and implementation team to be located in Sofia, please consider that this aspect is a matter of internal organization, entirely covered by the applicants’ attribution.  Still, please be informed that the eligibility of the partners is to be analysed during the evaluation process, based on the justification documents submitted and in accordance with the eligibility criteria of the applicants listed in the Applicants Guide. |
| **III.36** | In the annex is written that in case one of the indicators is higher than the target value, indicating red risk, the applicant must provide a plan for ensuring the financial resources and the mechanism to cover the financial cash-flow of the project and the operation and maintenance costs of the project.  First, we wanted to know what are the consequences regarding the evaluation and/or scoring of the project if the indicator is higher than the target,how the document should be structured and what must be taken into account in order to fulfill this criteria.  Also, please clarify if an applicant wants to submit multiple projects, they must provide a financial assessment that shows the capacity for the cumulated value of all projects (if one entity is part of 3 projects, requesting 200.000 euro on each, they must prove capacity for 600.000 euro). | Please consider that the aspects you are referring to had already been raised as questions and included within the Q&A list ( question III.11), available on the Programme website: <https://interregviarobg.eu/en/apply-for-funding.>  Please consider that the financial capacity of the applicant is verified during Phase 1 of evaluation - Administrative compliance and eligibility check, under point 18 - The partners have the capacity to ensure their own contribution and the financing for non-eligible expenditures of the project; they must also have the capacity to ensure the temporary availability of funds until they are reimbursed by the programme. If, following the verification of all the submitted documents (requested by the Applicant Guide), it is considered that the respective applicant does not have the financial capacity to implement the activities, the project will be rejected.  Related to the Annex AF\_A10 Financial Capacity Self-Assessment: The calculated financial indicators should guide the lead partner and project partners in assessing the financial viability of the application. If the calculated financial indicators do not meet the targets, the financial position of the lead partner or project partner might be insufficient for the project implementation.  An example for filling in the annex AF\_A10 Financial Capacity Self-Assessment is provided within the excel file, second sheet named 2 Sample Financial Statement, available at https://interregviarobg.eu/en/calls-for-proposals.  Speaking about the submission of a financial plan, please consider that it is required for attesting the beneficiary capacity to ensure the financial resources and the mechanism to cover the financial cash-flow of the project and the operation and maintenance costs of the project, so the content and the concept of the respective plan is depending on the overall project conception and on the beneficiary profile.  Last, but not least, please consider that the respective AF\_A10 Financial Capacity Self-Assessment and the related financial plan are requested at every project and partner level, meaning that each beneficiary shall draft such for every project proposal he is included in. However, please consider that beside the A10 Financial Capacity Self-Assessment, the beneficiaries shall fill in also Annex A2 Project partner declaration, which is including their commitment for ensuring the financial capacity for the project implementation. |
| **III.37** | One of the objectives of a planned project is related to protection and restoration of nature and biodiversity in settlements and developing and improving ecosystems in urban parks for societal well being. The targeted park is rather large in size and needs significant investments for elaboration of a full technical design in accordance with the national legislation.In this relation, please clarify whether a project can include activities related to elaboration of a full technical design for park reconstruction and restoration, environmental assessment and other preparation activities related to the future development and improvement of the park. The reconstruction of the park will not be included as a project activity in this project. | The project may include activities related to elaboration of a full technical design for park reconstruction and restoration, either as preparation costs (based on lump sum and real costs, if the case), or during the implementation period, as external service cost. However, you should take into consideration that you should provide clear details regarding the sustainability and durability of the project results (in this case how the designed technical documents will be used by the partner, after the completion of the project).  In case the elaboration of the full tehncial design is an implementation period activity, please don’t forget that when submitting the application form, you shal still submit the preliminary design (including estimation of bill of quantities and values) for the investment of the Bulgarian partners |
| **III.38** | An association, in partnership with the municipality, is preparing a project under SO 2.7 for the development of green infrastructure, including the rehabilitation of a city park.  Is it admissible in a project under SO 2.7 to include an afforestation activity on a municipal property that falls within a Natura 2000 protected area that is outside the urban area? | Regarding your question related to “an afforestation activity on a municipal property that falls within a Natura 2000 protected area that is outside the urban area”, we inform you that this type of action could be considered eligible under SO 2.7. Of course, the eligibility of actions depends on the entire project concept and the supporting documents presented in this regard. However, considering that the activity will be performed within a Natura 2000 site, please take into consideration to have all the necessary agreements and approvals.  Last but not least, please be informed that the eligibility of activities is to be analyzed during the evaluation process, based on the entire project concept. |
| **IV. Applicant’s Guide and Annexes** | | |
| **IV.1** | Please explain in detail the difference between the definition of Result indicator RCR 95 /Population having access to new or improved green infrastructure / on page 19 from the Guidance on monitoring programme indicators/ Annex3 to SO2.7/, where 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.  Does this mean that this indicator /which at the program level is 3750 people/ should only be reported through visitors from the population living within a radius of 2 km from the public green infrastructure built or significantly upgraded, taking into account that other visitors will also benefit from the project results and they must to be included in its reporting too? /for example: it will be upgraded a green infrastructure around a dam, which is situated on 2 km /in a straight line/, from a village. On this place every year is organised young camps related to the exploring of biodiversity and nature. This place has many visitors, nature’s lovers too, but not all of these visitors lives on the territory of the above-mentioned village. Does this mean that these visitors cannot be included in the reporting of this indicator? | Program indicators for Interreg VI-A RO-BG are set, monitored and reported according to rules applicable across the EU. Regulations include details in respect to how the indicators at program level are set, the data which needs to be collected and reported, instructions on how this should be done, as well as information on how the information will be used by the Programme authorities and the EC. Progress is assessed against the milestones and targets established when the programme was designed.  Please bear in mind that the result indicators were set in direct correlation with the specific objectives of the programme and the changes that are planned to happen at the level of the programme area through the programme interventions. The result indicators measure short term effects of the interventions with reference to direct addressees, i.e., target groups.  As regards your question, please consider the Programme indications when defining and quantifying the targets of the indicators. Also, please set a reasonable, relevant and realistic target value, in direct connection with the Specific Objective of the Programme. Evidence should be collected and considered when setting the targets. Later on, during the implementation phase, relevant evidence (documents, statistics, analysis etc.) shall be used in supporting the reported contribution to the indicators targets.  Please consider that, according to the provisions of the Applicant’s Guide, there are some requirements for the result indicator RCR95. |
| **IV.2** | In the Applicants guide, Annex AF\_A5 “Documents certifying the ownership status of the land and/or building” is stated as mandatory for all applications. This could be found in 3.3. Required documents to be submitted with the Application form (p.71), while in section Annexes to the Application Form (p.85), A. Documents mandatory for all applications, is required Annex A5 Documents or Declaration on own responsibility certifying the ownership status of the land and /or building (where applicable, open format, partners decision) and it is explicated in the brackets “where applicable”.  When a project consists of soft operation measures only, and the activities do not include infrastructure and works, is it mandatory to present a document certifying ownership status of the land and/or building for the Applicants or not? | Please refer to the Applicant’s Guide for the definition of soft operation and infrastructure. According to the provisions of the Applicant’s Guide, soft operations **has also works/infrastructure component.** Considering that the project proposal you mentioned does not have an infrastructure component or does not involve a work component, therefore, it is not mandatory to attach the documents certifying the ownership status of the land and/or building as described within the Applicant guide, section 3.3. *Required documents to be submitted with the Application form*. |
| **IV.3** | In the Applicants guide there is no restriction on how many projects one organization could be involved in. However, in the pre-contractual phase the Managing Authority has the right to decide not to sign a financing contract in case a Partner already has in implementation 4 projects.  - Could you clarify this text and how these projects should be counted?  - What do you consider as “project” – project under Interreg VI-A Romania-Bulgaria Programme or together with other programmes (i.e. Interreg V-A Romania-Bulgaria Programme)?  - What do you consider as “Partner” – each Applicant no matter if it is Lead Partner or Project partner, or Project partner only?  - How many projects in implementation could have one Partner who is a national authority, submitting several projects on behalf of several local offices/ branches and how these projects would be counted? I.e. In case there are X number of branches applying via their headquarters, does the quantitative limitation apply to each of them separately (4 projects per office/branch) or to the headquarters (4 projects to that specific headquarter), irrespective of how many regional offices/branches which behalf it applies on? | Yes, there is no restriction as regards the number of projects, an applicant may submit, either in the quality of partner or Lead partner.  Nevertheless, according to the provisions of the Applicant’s Guide, the Managing Authority has the right to decide not to sign a financing contract in case a partner (regardless the role within the project, partner or Lead partner) already has in implementation under Interreg VI-A Romania-Bulgaria Programme, simultaneously, 4 projects.  After the finalization of one project the decision may be reconsidered, provided the financial allocation is available.  The condition mentioned in the Applicant’s Guide relates to the applicant as a legal entity. So, in your case, considering that the local offices/branches have no legal personality and the applicant within the Programme is the national authority, the project will be counted as submitted by the national authority. |
| **IV.4** | Should the proposed activities lead to the achievement of both objectives? | No, the project must be in-line with the specific objective of the Priority under which is submitted and to contribute to the related Programme output and results indicators. |
| **IV.5** | The pair of indicators RCO87 and RCR84 is selected only once for both objectives? | Please pay attention to the specific objectives and indicative actions as your project will have to correspond to the specific objective under which you wish to be financed and to contribute to the Programme output and results indicators set for the specific objective under which the project is submitted. |
| **IV.6** | The consortium must be limited to a maximum of 5 partners including the non-financeable associated partners or can we bring a supplementary number of associated partners without financing but with significant contribution to the project’s objective | The maximum number of partners that could be included within the partnerships is 5 and the size of the partnership should reflect the scope of the project and the role of each partner should be clear justified. **However, the associated partners are not part of the partnership they are key stakeholders of the project, whose involvement can improve the planning and development of project outputs and results** |
| **IV.7** | A project proposal may be funded under the 2.7 SO or under the 2.4 SO in relation to establishing a electric mobility bus line between RO and BG adjacent regions in order to reduce carbon emissions caused by private cars and fossil-fuel public transport vehicles (P1 is focused on rail and maritime transport and it looks like electric mobility is not explicitly prioritized in any of the RO BG Program priority policies). If the latter is not acceptable, please kindly advise under this SO and what kind of applicants may submit a proposal with such a scope in other on-going or forthcoming calls. | The projects submitted under this open call for proposals must be included in one of the two objectives of Priority 2 and must address the indicators (output and result) which are different for each specific objective. Please check the Guidance on monitoring Programme indicators for SO 2.4 and SO 2.7, available at the following link: <https://interregviarobg.eu/en/calls-for-proposals>. The types of actions included in the Programme and in the Applicant’s guide are only indicative, any action could be eligible under this call, as long as it addresses the objectives and indicators.  Moving on to your question related “to establishing a electric mobility bus line between RO and BG adjacent regions in order to reduce carbon emissions caused by private cars and fossil-fuel public transport vehicles”, you have to correlate it to the entire project concept, keeping in mind that transport related objectives are not eligible (as they are financed only through operations of strategic importance). Since you didn’t provide more details, the project idea leans more towards SO 2.7, if the objective is reducing one or more forms of pollution. However, you have to clear identify the exact indicator that it could contribute to. According to the Guidance on monitoring Programme indicators for SO 2.7, Output indicator PSO3 Tools implemented for mitigating pollution is referring to:  • reducing all types of pollution, by supporting investments in monitoring and data collection on air, soil and water pollution.  • supporting the development of green infrastructures, including by developing and protecting green areas in human settlements and raising awareness of the benefits of green spaces.  • enhancing biodiversity conservation, recovery and sustainable use and protection of natural heritage, including Natura 2000 and RAMSAR sites. |
| **IV.8** | Regarding open call for the operations under PO 2 Specific objective 2.4. page 13 “The actions related to disaster risk prevention and resilience (Specific Objective 2.4) are not financed under this call.” Is there a possibility for a municipality to apply for this invitation and if not, why was the invitation published in the first place. If there is such a possibility, please explain how. | As you have already quoted the Applicant’s Guide, point 2, Specific objective 2.4. page 13 “The actions related to disaster risk prevention and resilience (Specific Objective 2.4) are not financed under this call.”  Municipalities are eligible for specific objective 2.4, but please observe that the open call is only financing actions related with “climate change adaptation”. You may find an indicative list of eligible actions within the Applicant’s Guide, page 12- 13.  For the actions related to disaster risk prevention and resilience (Specific Objective 2.4), which are not financed under this call, there is no possibility for you to apply, as these type of actions are to be implemented through operations of strategic importance (already designed within the approved Interreg VI-A Romania – Bulgaria Programme |
| **IV.9** | In the Applicant Guide p.49 is mentioned that a Partner can work on 4 project simultaneously. "Please bear in mind that the Managing Authority has the right to decide not to sign a financing contract in case a Partner already has in implementation 4 projects. After the finalization of one project the decision may be reconsidered, provided the financial allocation is available." Are there any restrictions on how many projects a Partner can be a Lead Partner? | Please be informed that the rule regarding the maximum number of projects that a partner may have simultaneous in implementation is related to the quality of partners, in general, regardless of its role within the project, partner or Lead partner.  Therefore, according to the provisions of the Applicant’s Guide already quoted by you a partner may have maximum 4 projects simultaneous in implementation under Interreg VI-A Romania-Bulgaria Programme, with no relevance if the partner fulfills the role of Lead partner or partner in these projects.  After the finalization of one project implementation the decision may be reconsidered, provided the financial allocation is available.  We are waiting for your project proposals and are staying at your disposal for any further information you may need. |
| **IV.10** | Is it possible for the project manager to be appointed a person within the partnership, which is not employed by the lead partner, but employed by one of the other partners?  Is the following request from the guide "*The lead beneficiary is generally the employer of core project staff*" mandatory?  We want to mention that we intend to respect the joint financing criteria. | Please be informed that for position of project manager, may be appointed a person within the partnership, which is not necessarily employed by the Lead Partner. |
| **IV.11** | AS per GfA, Chapter 2.2 "In order to assess the financial capacity of the partners, Annex AF\_A10 Financial Capacity Self-Assessment must be provided. In case the results reveal that the subvention, liquidity and debt rate are higher than the set threshold (red risk), the corresponding partner must provide a plan for ensuring the financial resources and the mechanism to cover the financial cash-flow of the project and the operation and maintenance costs of the project. In case this plan is not provided or is not realistic, the project may be rejected from financing. This will be verified during the assessment process of the project."  This text is clearly referring to the possibility and the obligation to present a Financial plan in order to prove the necessary financial capacity during the eligibility check.  Regarding the answer you provided on the assessment of the financial capacity of an Applicant, I would like to ask for your concrete official statement if in addition to Annex AF\_A10 Financial Capacity Self-Assessment a Financial plan for ensuring the financial resources and the mechanism to cover the financial cash-flow of the project and the operation and maintenance costs of the project would be accepted during the Phase 1 of evaluation - Administrative compliance and eligibility check, under point 18 , for proving the financial capacity of the partners, as it is envisaged in Chapter 2.2. Eligible applications and applicants.  What information should this plan contain for it to be considered sufficient? | The result of the Annex AF\_A10 Financial Capacity Self-Assessment and the calculated financial indicators should guide the lead partner and project partners in assessing the financial viability of the application. If the calculated financial indicators do not met the targets, the financial position of the lead partner or project partner might be insufficient for the project implementation.  An example for completing the annex AF\_A10 Financial Capacity Self-Assessment is provided within the excel file, second sheet named 2 Sample Financial Statement, available at <https://interregviarobg.eu/en/calls-for-proposals>.  Speaking about the submission of a financial plan and the information that shall be included in it, it is required for attesting the beneficiary capacity to ensure the financial resources and the mechanism to cover the financial cash-flow of the project and the operation and maintenance costs of the project, so the content and the concept of the respective plan is depending on the overall project conception and on the beneficiary profile. Please consider that the provided guidelines within the Helpdesk correspondence is based on the Programme requirements which are strictly and detailed reflected in the Applicant’s Guide, so there is no room for different interpretation or for different "concrete official statement" in this regard.  The submission of the mandatory annexes together with the application form is settled within the first three questions from the Annex A. Evaluation Grids. More than this, it is clearly stated at the beginning, that "The administrative compliance and eligibility assessment is a ‘yes or no’ process. This means that the assessment does not allow for any flexibility in the way the criteria are applied. The non-fulfilment of one criterion leads to the ineligibility of the whole application. Only the applications which received ”yes” to all the following eligibility questions will pass the eligibility check and reach the second step of the selection procedure." More than this, please consider that the eligibility of the partners is to be analysed during the evaluation process, based on the justification documents submitted and that the evaluators may request, at any time, additional documentary evidence and argumentations regarding the eligibility of applicants. |
| **IV.12** | A little help with more accurate definitions for what it means:  - Green streets  - Green parking lots  - Green sidewalks  - Green playgrounds | Please consider that the Applicant’s Guide, as well as the Go Green Manual provides definitions for the concepts specified by you below, giving the potential applicants the possibility to adapt it to the entire project concept. Thus, the goal of each project proposed for financing shall be to contribute to general objectives of the PA 2 – A greener region, by investments that are promoting climate change adaptation and Enhancing protection and preservation of nature, biodiversity and green infrastructure, including in urban areas, and reducing all forms of pollution  However, in the context of the aspects embedded in the European Green Deal, which main goal is to make Europe the first climate neutral continent by 2050, which on their turn are laid down in the main principles of the Interreg VI-A Romania-Bulgaria Programme, as well, please find below interpretation examples on the concepts in discussion, with the remark that the given examples below are just indicative ones and are not representing the official, and exhaustive definition, in this regard:  Green street; Green parking lots, Green Sidewalks and the Green playgrounds could be a stormwater management approach that incorporates vegetation (perennials, shrubs, trees), soil, and engineered systems (e.g., permeable pavements) to slow, filter, and cleanse stormwater runoff from impervious surfaces (e.g., streets, sidewalks). Streets/sidewalks/parking/playgrounds comprise a significant percentage of publicly owned land in most communities, thereby offering a unique opportunity to incorporate green street elements that will not only protect the environment, but can improve community health and prosperity. Green streets are designed to capture rainwater at its source, where rain falls. Whereas, a traditional street is designed to direct stormwater runoff from impervious surfaces into storm sewer systems (gutters, drains, pipes) that discharge directly into surface waters, rivers, and streams. The Green parking lots; Green sidewalks and the Green playgrounds are designed to be environmentally more sustainable.  The Green streets; Green parking lots, Green Sidewalks and the Green playgrounds could incorporate a wide variety of design elements including street trees, permeable pavements, bioretention, and swales. Successful application of green techniques will encourage soil and vegetation contact and infiltration and retention of stormwater. Although their design and appearance will vary, the main functional goals are the same:  • provide source control of stormwater to limit the transport of pollutants to stormwater conveyance and collection systems,  • restore predevelopment hydrology to the extent possible, and  • create roadways that help protect the environment and local water and air quality." |
| **IV.13** | 1. Agreed Applicant’s guide ( Open call for the operations under PO 2 ) ; Priority 2 A greener region  Ecosystem services are:  Ecosystems serve a number of basic functions that are essential for using the Earth’s resources sustainably. The Economics of Ecosystem Services and Biodiversity (TEEB) study defines ecosystem services as: ‘the benefits people receive from ecosystems’. TEEB also sets out the basis of human dependence on the natural environment. The European-led study builds on the United Nations Millennium Ecosystem Assessment, which defined four categories of ecosystem services that contribute to human well-being:  provisioning services e.g. wild foods, crops, fresh water and plant-derived medicines;  regulating services e.g. filtration of pollutants by wetlands, climate regulation through carbon  storage and water cycling, pollination and protection from disasters;  cultural services e.g. recreation, spiritual and aesthetic values, education;  supporting services e.g. soil formation, photosynthesis and nutrient cycling. (TEEB, 2010  The issue is related to ecosystem services and biodiversity !!  For Bulgaria, the term medicinal plants and herbs is understood as a general term that includes more than 75% of the flora (plants, shrubs, trees)  In Bulgaria, the national strategy includes sections on herbs and medicinal plants. The Regional Ecological Structures (RDS) have responsibilities for herbs and medicinal plants. Municipalities have planning documents that oblige authorities to create regulations for the collection of herbs in nature, and to promote policies for actions that do not disturb ecosystems and biodiversity.  That is, in Bulgaria, the general concept of herbs and medicinal plants accepts them as extremely important ecosystems that affect animals, people, etc.  Is there a discrepancy between the Bulgarian and Romanian views on medicinal plants and herbs?  Should we consider that Romania accepts medicinal plants and herbs as part of the important ecosystems? | Please keep in mind that the help desk function for the Call 2 - Competitive call for project proposals dedicated to Priority 2: A Green Region, Specific Objectives 2.4 and 2.7 is dedicated to support in relation with the respective rules of the Call and Programme, in order to facilitate the understanding and application of those rules by the potential applicants.  Therefore, in relation with your first question, if you should “consider that Romania accepts medicinal plants and herbs as part of the important ecosystems”, we advise you to contact the relevant national authorities in Romania, for example the Ministry of Agriculture and Rural Development (https://www.madr.ro/sitemap.html) and / or the Ministry of Environment, Waters and Forests (http://www.mmediu.ro/messages/send).  In the same time, please bear in mind that according to the Applicant s Guide, all projects must demonstrate their relevance for the cross-border area, and contribute to national and EU strategic documents, especially the EU Biodiversity Strategy for 2030, EU Pollinators Initiative, the EU Nature Restoration Plan and the Bulgarian National Framework for Natura 2000 Priority Actions 2021-2027. The projects should be in the benefit of the Programme area and should focus also on the Green Deal objectives in respect to supporting the preservation of biodiversity, safeguarding protected areas and promoting green urban spaces.  In response to your second question, please be informed that within the Go Green Manual there are described a few examples for the purpose of sourcing goods and services that are produced and provided in a sustainable way, including electricity from renewable energy sources, section “Green procurement”.  In the same time, in accordance with the Applicant’s Guide, the actions made in order to reduce the pollution in the eligible area are considered eligible, but the eligibility of an action does not confer eligibility on the expenditure made for the implementation of that activity. Also, you should demonstrate how your idea to purchase/install an autonomous RES system with batteries for the park space are necessary and contributes to the project and programme. Also, we recommend you to promote measures and initiatives that are environmental friendly and in line with the concept of sustainability and Do No Significant Harm principle.  We would like to emphasize that the eligibility of expenditures shall be decided during the assessment process, by the assessor, in accordance with the Programme rules. |
| **IV.14** | Could you clarify if there is a limitation in the number of proposals where a project partner and/or lead partner participates? | In relation with your question, please be informed that similar question and answer were already formulated and are available on the Q&A list on <http://www.interregviarobg.eu> website, position IV.3 ([[list-of-qa-interreg-vi-a-robg-updated-27072023-1.docx (live.com)](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Finterregviarobg.eu%2Fassets%2F2023%2F07%2Flist-of-qa-interreg-vi-a-robg-updated-27072023-1.docx&wdOrigin=BROWSELINK))](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Finterregviarobg.eu%2Fassets%2F2023%2F06%2Flist-of-qa-interreg-vi-a-robg-updated-17072023.docx&wdOrigin=BROWSELINK). According with the above mentioned Q&A list, “…, there is no restriction as regards the number of projects an applicant may submit, either in the quality of partner or Lead partner. Nevertheless, according to the provisions of the Applicant’s Guide, the Managing Authority has the right to decide not to sign a financing contract in case a partner (regardless the role within the project, partner or Lead partner) already has in implementation under Interreg VI-A Romania-Bulgaria Programme, simultaneously, 4 projects. After the finalization of one project the decision may be reconsidered, provided the financial allocation is available.” |
| **IV.15** | It is accepted to combine within the same project proposals activities which are included in both specific objectives: 2.4 Promoting climate change adaptation and disaster risk prevention, resilience taking into account eco-system based approaches and 2.7 Enhancing protection and preservation of nature, biodiversity and green infrastructure, including urban areas, and reducing all forms of pollution? | Regarding your question, it is not possible to combine the Specific objectives in the same project.  Please be aware that the present call for proposals is dedicated to Priority 2: A Green Region, with Specific objectives: 2.4 and 2.7 and, according to the provisions of the Applicant’s guide: “The Programme results are measured by indicators. For each specific objective, output and results indicators were set. To each output indicator, a result indicator was identified. Each project must contribute to at least one output and one result indicator, corresponding to the Specific Objective under which the project is submitted.” In this sense, you may choose only one Specific Objective but, it is up to you which pairs of indicators you will choose. |
| **IV.16** | Each partner from the project can be part in other projects as well? | In relation with your question, please be informed that similar question and answer were already formulated and are available on the Q&A list on [www.interregviarobg.eu](http://www.interregviarobg.eu) website, position IV.3 ([list-of-qa-interreg-vi-a-robg-updated-27072023-1.docx (live.com)](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Finterregviarobg.eu%2Fassets%2F2023%2F07%2Flist-of-qa-interreg-vi-a-robg-updated-27072023-1.docx&wdOrigin=BROWSELINK).  Thus, according with the abovementioned list of Q&A,  it is specified that: “…, there is no restriction as regards the number of projects an applicant may submit, either in the quality of partner or Lead partner. Nevertheless, according to the provisions of the Applicant’s Guide, the Managing Authority has the right to decide not to sign a financing contract in case a partner (regardless the role within the project, partner or Lead partner) already has in implementation under Interreg VI-A Romania-Bulgaria Programme, simultaneously, 4 projects. After the finalization of one project the decision may be reconsidered, provided the financial allocation is available.” |
| **IV.17** | In Annex A10 Financial Capacity Self-Assessment\*\*-  \*Annex A10 Financial Capacity Self-Assessment (Update 26.06.2023), cell C5 in worksheet 3 Input financial statement is limited to a maximum value of 1500000.00.  For applications with a value greater than 1.5 million Euros, this version of the annex cannot be used, especially since it is also correlated with cell B7 in the 4 Results worksheet. | Regarding the relevant documents to be considered when developing the application for projects under Interreg VI-a Romania-Bulgaria are published on our website. In relation to Call 1 - operations of strategic importance (OSI) and the Call 2 - Competitive call for project proposals dedicated to Priority 2: A Green Region, Specific Objectives 2.4 and 2.7., the Programme bodies published, among others, the Annex A10 - Financial Capacity Self-Assessment.  Please, be informed that we published an updated version of Annex A10, in order to remove a clerical limitation in cell C5 of the third sheet of that annex, i.e. the “Input Financial Statement” sheet. The issue was about limiting to EUR 1.5 M the value which could have been inputted to that cell for the Interreg requested funds. The updated version of Annex A10 allows you to input a higher value than initially allowed.  If you wish to apply under Call 1 or Call 2 of our Programme, please use the updated version of Annex A10 - Financial Capacity Self-Assessment.  If not, you may still use the old annex but, in case you need to input a higher value to that cell, you may do so by modifying the maximum value validation criteria allowed, from the “Data” tab of the menu - “Data validation” function, in Microsoft Excel or similar application. |
| **IV.18** | 1) Considering that in order to obtain the final document issued by the Environmental Protection Agency for the types of investments for green spaces, it is necessary to go through several stages, and implicitly a long time, please specify if we can attach the initial evaluation Decision when submitting the application, following that the final document will be submitted in the pre-contracting phase.  2) With regard to the annex - Assessment of expected impacts of climate change, please specify the relevant legislation that the drafter of the document must take into account and at the same time provide us with the methodology based on which the evaluator (financier) will verify this Annexes. | 1. According with the Applicant’s Guide for the Open Call for the Operations under PO 2, within the framework of Interreg VI-A Ro-Bg, “for Romanian beneficiaries it should be annexed: feasibility study for new investments/DALI plus energy audit plus technical expertise for upgrading/reconstruction”. Also, in relation with elaboration of the respective documentation, it is mentioned that “its elaboration and approval must observe the national provisions in this matter”.  Therefore, for Romanian beneficiaries, the framework of the technical documentation is regulated by the provisions of Government Decision 907/2016, depending on the classification category of the investment works (see annex 4 or 5 of the respective Government Decision).  In Annex 4, for Feasibility studies, section 6: “Town planning, agreements and consents “, there are mentioned the followings:  6.1. The urban planning certificate issued in order to obtain the building permit  6.2. Extract from the land register, except for special cases, expressly provided by law  6.3. The administrative act of the competent authority for environmental protection, measures to reduce the impact, compensation measures, the way to integrate the provisions of the environmental agreement into the technical-economic documentation  6.4. Compliant notices regarding the provision of utilities  6.5. Topographic survey, targeted by the Office of Cadaster and Real Estate Advertising  6.6. Specific approvals, agreements and studies, as the case may be, depending on the specifics of the investment objective and which may condition the technical solutions  In the Annex 5, for DALI, section 7 “Town planning, agreements and consents”, there are mentioned:  7.1. The urban planning certificate issued in order to obtain the building permit  7.2. Topographic survey, targeted by the Cadaster and Real Estate Advertising Office  7.3. Extract from the land register, except for special cases, expressly provided by law7.4. Opinions regarding the provision of utilities, in case of supplementing the existing capacity  7.5. The administrative act of the competent authority for environmental protection, measures to reduce the impact, compensation measures, the way of integrating the provisions of the environmental agreement, in principle, into the technical-economic documentation  7.6. Specific notices, agreements and studies, as the case may be, which may condition the technical solutions, such as:  a) study on the possibility of using alternative high-efficiency systems to increase energy performance;  b) traffic study and circulation study, as the case may be;  c) archaeological diagnostic report, in the case of interventions in archaeological sites.  Also, based on the specificity of your project and the applicable legal provisions, you should submit the following:  - Annex B4 to the Application Form - *Environmental agreement* (mandatory for applications including infrastructure related activities)  The applicants must present an official statement/act from the competent environment authority stating that the investment project either:  • observes the legal provisions of environment protection (For Bulgarian beneficiaries – a letter from the competent body that a procedure under chapter VI of Environmental Protection Act is not required) or  • completed the first phase of the EIA procedure – screening (For Bulgarian beneficiaries – the decision of the competent body for the necessity of carrying out of Environmental Impact Assessment).  - And the Annex B5 to the Application Form - *Environmental Impact Report*, if required by the legislation and English translation (if issued in other language than English)  In case the relevant authorities conclude that a full EIA is requested, you should provide the Environmental Impact Report, namely Annex B5.  2. In what concerns your second question, please be aware that, within the Applicant’s Guide it is specified that: “ The Programme requires an assessment of expected impacts of climate change related to Climate resilience (adaptation to climate change) Pillar. You must provide the Documentation of climate proofing (maximum 30 pages) and the related statement, according to the Commission Notice (including the related requirements set by Annex B.2)“. Also, within the abovementioned Applicant’s Guide you can find on section “Annexes”, more precisely, point “B. Documents mandatory to be submitted depending on the specificity of the application”, pages 85-86, the “ Annex B7 Assessment of expected impacts of climate change”, the partner declaration and the independent verification report if additionally required (open format, partners decision)”. As it is specified, the abovementioned annex is a type of document mandatory to be submitted, but only depending on the specificity of your project. Moreover, the Annex B7 has an open format that can be scheduled based on partners decision.  Related to the legal base you request in order to draft the abovementioned annex, please have in mind that on the following link https://interregviarobg.eu/en/calls-for-proposals you can find the Annex J Relevant national and EU legislation. Here are all the legislative frameworks needed for the development of the project proposal. Returning to your question, in drafting the Annex B7 Assessment of expected impacts of climate change”, please consult the COMMISSION NOTICE Technical guidance on the climate proofing of infrastructure in the period 2021-2027 (2021/C 373/01) - <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52021XC0916(03)&from=EN>.  Other relevant documents regarding the environmental issues are:  **a) For the European Legislation:**    a.1 The Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment,  a.2. The Directive 2001/42/EC - Strategic Environmental Assessment Directive (SEA).  **b) For the Romanian Legislation:**    b.1. The Order no.117/2006 approving the “Manual on the application of the procedures for environmental assessment for plans and programs”,  b.2. The Order no.262/2020 for the modification of the Methodological Guideline on the appropriate assessment of potential affects from plans/ programmes and projects on the natural protected areas of Community interest – approved by the Ministerial Order no. 19/2010;  **c) For the Bulgarian Legislation:**  c.1. Climate Change Limitation Act.    Also, we are kindly inviting you to check the recorder workshop dedicated to applicants (22nd of May, <https://www.youtube.com/watch?v=EwKIzA7nUEQ&t=2s>) and the related presentation regarding the climate proofing:  <https://interregviarobg.eu/assets/2023/04/4-climate-proofing-25th-may.pdf>.  The assessment of the application, including environment related issues, shall be performed in accordance with the annex “ag-a-evaluation-grids-so-2427” - EVALUATION CRITERIA - Phase 2 – QUALITY ASSESSMENT (TECHNICAL AND FINANCIAL EVALUATION AND STATE AID INCIDENCE ASSESSMENT). |
| **IV.19** | Will the equipment be considered as an infrastructure component or not. For example, building a training center and equipment for it such as demonstration devices, laboratory equipment and the like.  The translation of the entire feasibility study/conceptual design would not be required, but only the detailed bill of quantities. Please clarify. | 1.Related to your first question, please be informed that, according to the Applicant’s Guide definition, in terms of financial spending, a hard project should have more than 50% from its eligible budget within budget chapter “Infrastructure and works”.  The definition provided for “Investment project” is not related to determining whether a project is soft or hard, but is rather aggregating the different type of services, equipment and works, necessary for completion of an investment operation.  Please pay attention that according to the Applicants Guide, Annex B List of eligible expenditures, Article 14. Infrastructure and works, the equipment expenditures are not considered as eligible for financing under budget chapter Infrastructure and works. Moreover, within Article 13. Equipment costs is provided the definition for Equipment costs “….to carry out the project activities and to infrastructures which are essential for the implementation of the project.” Even though, costs for equipment and works are connected when building and equipping a training center, as per the example of your project, those costs are budgeted in separate budget chapters.  Therefore, all costs refer to equipment purchased, which is used exclusively to carry out the project activities which are essential for the implementation of the project should be included in equipment costs category, unless they are part of an infrastructure/work contract.  2.Moving on to your second question, in the Applicant’s Guide it is specified that: “ Feasibility Study should be submitted in English, as an annex to the application form and should be accompanied by the legal agreements and approvals according to national legislation in force.” Moreover, just in case that: “The investments (works, infrastructure and equipment), for which the national legislation does not provide for the elaboration of a Feasibility Study/DALI or preliminary/technical design, the applicants should submit a detailed Bill of Quantities and Costs accompanied by the detailed explanations/plans/ measurements of the object/s of intervention, used for estimating the necessary works and costs.” |
| **IV.20** | In accordance to development of project proposal under open call for Priority 2 within Interreg VI-A RO-BG Programme,must to be submitted Annex ag\_h Partnership Agreement together with the application form and all other Annexes until the deadline /11.09.2023/,taking into account that on page 49 of the publicated Applicant's Guide it is indicated the following: "All partners participating in a project must sign a partnership agreement before the signing the subsidy contract with the MA......” | Please be informed that the Partnership Agreement is not necessary to be submitted till 11th of September 2023, but during the contracting stage of the project, if it will be selected for financing.  The entire package of documents mandatory to be submitted for all applications is mentioned on pages 71- 76 of the published Applicant’s Guide on the Programme website [www.interregviarobg.eu](http://www.interregviarobg.eu). |
| **IV.21** | If the applicant envisages to include construction and works activity, whose nature and scope does not require a feasibility study, preliminary or technical design under the Bulgarian legislation, including for movable objects as per art 56 (2) of Bulgarian territorial regulative act, will it be enough to submit only a detailed Bill of Quantities accompanied by the detailed explanations/plans/ measurements of the object/s of intervention, used for estimating the necessary works and costs? Should this documentation (a detailed Bill of Quantities accompanied by the detailed explanations/plans/ measurements of the object/s of intervention, used for estimating the necessary works and cost) be signed by a licenced designer? | Regarding the third question raised by you, please consider the Applicant’s Guide provision, “Section B. Documents to be submitted depending on the specificity of the application” state that the application form shall be accompanied by “Annex B2 to the Application Form - Feasibility studies/ equivalent technical documents or any other design document elaborated by the licensed designer that contains description of construction works and Bill of Quantities. Please consider that you should take into account the provisions of the specific legislation and also the provisions of the REGULATION No. 4 OF MAY 21, 2001 ON THE SCOPE AND CONTENT OF INVESTMENT PROJECTS chapter 1, article 8, where it is envisaged that:  (1)Each project part must be agreed by the designers of the other interrelated project parts;  (2) All project parts shall be signed by the contracting party (owner). |
| **IV.22** | As mentioned by the Applicant Guide, pag. 74-75, published for the Operations under PO 2, Interreg VI A Romania-Bulgaria, among the documents to be submitted together with the Application form via JeMS, at point B are indicated Feasibility studies/ equivalent technical documents or any other design document elaborated by the licenced designer that contains description of construction works and Bill of Quantities.  In case of an Applicant who will submit the up-dated Technical Project together with the Application Form in order to detail the green investment he intends to do, please clarify if the previous technical documentation which was drafted in this respect needs to be also made available for the evaluators, in English.  In this regard, it should be mentioned that the previous technical documentation was DALI, and this one includes an estimation of the investment costs, the final General Estimate being part of the Technical Project that will be uploaded within JeMS. | Regarding your question, please be informed that in case you will submit the technical project of the investment, you need to provide the updated document, in line with the rules set by the Guide (there is no need to submit the previous developed documentation (DALI)).  Please bear in mind that the technical project of the investment must be submitted in English. |
| **IV.23** | In the Applicant`s Guide, section 3.3 "Required documents to be submitted with the application form" point 9 "Methodology for measuring result/output indicators Annex AF-A9, it is specified "only for result indicators RCR35, RCR 95, PSR3, where applicable".  In the same Applicant`s Guide, section "Annexes" letter A, "Documents mandatory for all applications" Annex A9 "Methodology for measuring result/output indicators (only for result indicators RCR35, RCR37 and RCR96 and output indicator RCO53) (where applicable)"  Please clarify for what indicators the Methodology is needed, given that the indicators mentioned above, some of them, are different from others, when we read both sections.  Also, please clarify if the Methodology is to be transmitted by each project partner for its own indicators, or it will be one single Methodology at project level submitted by LP | In what concerns the first question, considering that the Guide clearly mentions that you should submit the Annex AF\_A9 Methodology for measuring result/output indicators only “where applicable”, you shall submit the respective Annex only in case your project contributes to any of the specific indicators targeted by this call and that require a methodology (namely RCR35, RCR95, PSR3). Thus, you should submit this methodology, depending on the specificity of your applications and on the indicators to which the project contributes.  Also, please consider that the outputs and results are set at project level (and reflect the joint outputs and results, at project level). As such, the methodology should reflect the project contribution to the Programme indicators and reflect the minimum requirements set by the Guide (the methodology shall be designed at project level for each indicator that requires a methodology. Under this annex, more methodologies can be submitted, depending on the number of result indicators selected by the project). |
| **IV.24** | Regarding the "State-aid self-assessment (Annex AF\_A3) filled in and electronic signed by each project partners".  Given that in the annex attached to the Guide, is to be signed, as written in the annex, by both Lead Partner and Partner(s), please clarify if the project must have one single Annex A3 signed by all project partners, or each project partner will complete and sign its own Annex A3. | According to Applicant’s Guide Open Call For The Operations Under Po 2 (SO 2.4 and 2.7), Section 2 – Conditions, requirements and feature, sub-section 2.12 State Aid, page 43: “As such, Annex AF\_A3 State Aid Self-Assessment must be filled in by each partner and submitted with the application”. Therefore, each project partner will complete and sign its own Annex AF\_A3 State Aid Self-Assessment. |
| **IV.25** | In the Applicant`s Guide, there are different mentions, in different sections, regarding the mandatory electronic signature of the documents:  - section 3.3 "Required documents to be submitted with the application form", letter A, point 1/2/3/8/10 - must be "electronic signed"  - section 3.3 "Required documents to be submitted with the application form", page 77 "all the documents shall be electronically signed"  Please clarify if the electronic signature is mandatory- only for the Annexes where it is specified that electronic signature is needed, or, for all attachments to be uploaded | According to Applicant’s Guide Open Call For The Operations Under Po 2 (SO 2.4 and 2.7), Section 3 - How to develop a high quality project and how to apply, sub-section 3.3. Required documents to be submitted with the Application form, page 77: “*All the documents shall be electronically signed (in duly justified cases and only for the documents not issued by the project partners, handwritten signature may be accepted)*”. Therefore, the electronic signature is mandatory for all the attachments which will be uploaded. |
| **IV.26** | As it states by the Applicant’s Guide published for PO 2, SO 2.7, Interreg VIA Programme, pag. 25-26 and taking into consideration the answer provided by JS at point II.2 from the list of Q&A, we hereby request additional clarification in regard to the following issues:  -in case the General Estimate provided by the Designer when drafting DALI includes estimations of costs for the information and publicity services, equipment and endowments to be installed after the investment will be finished, please confirm us that no offer or an independent evaluation must be submitted together with the Application Form. | Please be informed that in case technical-economic documentation related to the investment objective (Feasibility Study / DALI documentation / Technical project) is submitted together with the project proposal, the applicant does not need to provide additional documentation for the justification of the costs for the items for which costs are included in the respective technical –economic documentation (including costs for information and publicity for the investment objective, which are mandatory to be included in the general estimate, in accordance with the GD no. 907/2016). |
| **IV.27** | As we have prepared the balance sheet and the translation of the original once we need to know if we had used the correct numbers as the balance of the Municipality consists of  I. REPORTING GROUP "BUDGET"  II.REPORTING GROUP "ACCOUNTS FOR EUROPEAN UNION FUNDS"  III. REPORTING GROUP "OTHER ACCOUNTS AND ACTIVITIES" and TOTAL of the three groups.  In the ANNEX 10 - financial Capacity Self-assessment for lead partner and project european and other financial assets finance partners we have used the numbers of I. REPORTING GROUP “BUDGET” as the rest of the groups. Is the correct or we have to use the total amount of the balance? | Given the fact that the main purpose of the Annex 10 is to identify the potential financial risk related to the implementation of a project, you should use the values from the TOTAL column of the provided balance. Although the balance of Byala Municipality envisage three categories of financing sources (Budget; Accounts for European Union Funds; Other accounts and activities), the identification of the partner's financial capacity and related financial risk could be recognized correctly only by using of all financing sources, as well as of all commitments undertaken.  Please also bear in mind that annexes AF\_A10 Financial Capacity Self-Assessment and the related financial plan (if the case) are requested for each project at partner level, individualized, meaning that each applicant shall draft such annex for every project proposal for which is taking part from the partnership. However, please consider that beside the A10 Financial Capacity Self-Assessment, the applicants shall fill in also Annex A2 Project partner declaration (the version revised on 26.07.2023), which is including their commitment for ensuring the financial capacity for the project implementation.  As general remark, we have observed that the value of the "Exchange rate at the closing date of the last financial period" from the third sheet entitled  "3 Input Financial Statement" is 1.00 EURO but the calculations are being performed based on exchange rate 1 EURO = 1,9558 LEVA.  Also, please, be informed that we published an updated version of Annex A10, in order to remove a clerical limitation in cell C5 of the third sheet of that annex, i.e. the “Input Financial Statement” sheet. The issue was about limiting to EUR 1.5 M the value which could have been inputted to that cell for the Interreg requested funds. The updated version of Annex A10 allows you to input a higher value than initially allowed. So, if you wish to apply under Call 2 of our Programme, please use the updated version of Annex A10 - Financial Capacity Self-Assessment (revised 04.08.2023), available here https://interregviarobg.eu/en/calls-for-proposals. |
| **IV.28** | 1.In Chapter 2.2. Eligible applications and applicants is mentioned "In order to assess the financial capacity of the partners, Annex AF\_A10 Financial Capacity Self-Assessment must be provided. In case the results reveal that the subvention, liquidity and debt rate are higher than the set threshold (red risk), the corresponding partner must provide a plan for ensuring the financial resources and the mechanism to cover the financial cash-flow of the project and the operation and maintenance costs of the project.”  When filling in an item in table 2 Interreg funds requested (EUR) sheet 3 Input Financial Statement in Annex AF\_A10 should the lump sums that the partner will receive for project preparation and closure, fixed staff costs, fixed travel fee and accommodation and a fixed rate for office and administrative expenses?  When drawing up a plan for ensuring the financial resources, can the applicant include in the amount of funds available at the start of the project the one-time amount that he should receive upon approval of the project.  In the expenditure part of the plan for ensuring the financial resources, should the fixed sums for personnel and administrative costs and the one-time sum for closing the project be included, or only "real costs", which the partner should make and prove with expenditure documents?    2. In the declaration af-a3-state-aid-self-assessment there is a remark the State Aid Self-Assessment must be filled in and signed by every partner (lead partner and partners) and items for signature of LP and PP. Does it follow that on af-a3 signed by PP there should also be a signature of LP? | 1.As regards of your first question including request for certain instructions for completing the Annex AF\_A10 Financial Capacity Self-Assessment, please consider that:  Within the rubric Interreg funds requested you shall complete the entire amount of the Interreg funds to be requested by the project partner, meaning that you shall completed all the costs that will be framed within the different budget chapters: Project preparation; Staff costs; Office and administrative costs; Travel and accommodation costs; External expertise and services costs; Equipment costs; Costs for infrastructure and works);  The answer to your second and third sub questions is that as far as there is not a template of a financial plan to be provided by the applicants, it is up to the beneficiary decision what will be included in the plan.  Please consider that the only obligatory requirement is to demonstrate that you can ensure the necessary funds for project implementation, which plan shall be realistic. Please be aware that in case this plan is not provided or is not realistic, the project may be rejected from financing;  2.Please consider that according to the Applicant’s Guide provisions, "Annex AF\_A3 State Aid Self-Assessment must be filled in by each partner and submitted with the application" and no need for the LP signature on the others partners annexes. |
| **IV.29** | An association, in partnership with a municipality, is preparing a project under SO 2.7 for the development of green infrastructure, including the rehabilitation of a city park.  Regarding the Annexes for application for Call 2 - Competitive call for project proposals dedicated to Priority 2: A Green Region, Specific Objectives 2.4 and 2.7.:  1. Annex A2 – VAT Statement – the applicant is Bulgarian Municipality – which option we should check as it is a bit confusing:  - declares that recoverable VAT is not included in the partner budget and is aware that recoverable VAT will not be eligible for reimbursement;  - declares that VAT can be partially recovered in our organisation and that the recoverable part is not included in the partner budget as it is not eligible for reimbursement.  2. Annex 3 – could it be signed electronically and presented by each partner separately OR it should be signed by hand by both partners and then scanned?  3. Annex A7 -B. “When developing the application and the technical documents, at least the adaptation measures identified in the Annex ??????? DNSH Interreg VI-A Romania-Bulgaria level, to the Applicant’s Guide, corresponding to the Specific Objective under which the project was submitted were considered.” Which Annex name should be filled in?  4. Annex B7 Assessment of expected impacts of climate change - Should each partner submit such an Annex or should the annex be common to the entire project? | 1. In what concerns the first question, please be aware that the respective part from Annex A2 should be completed taking into account the situation that applies to you:  a. By checking the first box, you declare that the VAT is not included within partner budget and is not recoverable from the INTERREG VI-A Ro-Bg Programme;  b. By checking the second box, you declare that the VAT is included within partner budget, can be partially recoverable from the INTERREG VI-A Ro-Bg Programme and the part which is not recovered from the program is not included within partner budget and therefore, considered as not eligible for reimbursement.  If the VAT is not recoverable from other sources and will fully be eligible within the Interreg VI-A Ro-Bg Programme , please do not check any option from Annex A2. In addition, please be informed that you also have to check one of these 3 options, in JEMs system (Yes / Partial / No).  2. Regarding your second question, please be informed that all the documents shall be electronically signed (in duly justified cases and only for the documents not issued by the project partners, handwritten signature may be accepted). The State Aid Self-Assessment must be filled in and signed by each partner (a separate declaration for each partner).  3. Regarding your third question, please be informed that no annex should be filled in. That point refers to the fact that in the stage of developing the application and the technical documents, the DNSH provisions, identified in “Annex AG\_I DNSH Interreg VI-A Romania-Bulgaria level”, must be taken into account.  4. Regarding your last question, please be informed that Annex B7 shall be submitted by each partner, but only in case the project is including investments in infrastructure with an expected lifespan of at least five year (please consider the Commission Notice, Technical guidance on the climate proofing of infrastructure in the period 2021-2027 (2021/C373/01)). |
| **IV.30** | Considering the provisions of the Applicant’s Guide, pag. 58 regarding the need of an assessment of expected impacts of climate change related to Climate resilience, more details are needed for us in order to observe the eligibility rules established for the S.O. 2.7.  Thus, a municipality intends to submit a project within the above mentioned objective, project which will contribute to the development of green infrastructure (green urban parks).  In this respect, please note that a technical documentation will be submitted together with the Application form via JeMS, this one having attached the needed authorizations and opinions, including them issued by the Environmental Protection Agency.  Considering all these, please clarify if the documentation of climate proofing is needed in accordance with the provisions of the Commission Notice since the project itself hasn’t a negative impact, on the contrary.  In such a case, it will be enough to have only a statement included within the technical documentation according to which the project has a neutral impact? | In relation with your question please be informed that the Programme requires an assessment of expected impacts of climate change related to Climate resilience (adaptation to climate change) Pillar for infrastructure investments with an expected lifespan of at least 5 years. You must provide the Documentation of climate proofing (maximum 30 pages) and the related statement, according to the Commission Notice (including the related requirements set by Annex B.2)“.  Also, within the Applicant’s Guide you can find on section “Annexes”, more precisely, point “B. Documents mandatory to be submitted depending on the specificity of the application”, pages 85-86, the “ Annex B7 Assessment of expected impacts of climate change”, the partner declaration and the independent verification report if additionally required (open format, partners decision)”.  Therefore, the “statement included within the technical documentation according to which the project has a neutral impact”, as you have mentioned, is not enough, as it is related to a different process (namely the impact of your project on the environment). Thus, you should submit the Annex B7 Assessment of expected impacts of climate change (namely, the impact of the climate change on the investments of your project), if required by the type of infrastructure developed within the project. The Annex B7 has an open format that can be drafted based on partners own assessment and decision.  The Commission Notice, Technical guidance on the climate proofing of infrastructure in the period 2021-2027 (2021/C373/01) can be consulted here: <https://op.europa.eu/en/publication-detail/-/publication/23a24b21-16d0-11ec-b4fe-01aa75ed71a1/language-en> |
| **IV.31** | Please specify, if for the projects within the specific objectives 2.4 and 2.7, in which only equipment is purchased, without having the infrastructure, an environmental agreement is needed, as well as the assessment of the expected impact of climate change? | Please be informed that in case your project includes only purchasing of equipment (without installation), there is no need to submit the mentioned annexes.  The Environmental Agreement (Annex B4) is mandatory for applications including infrastructure activities, while the Documentation of climate proofing (Annex B7 Assessment of expected impacts of climate change) is needed for investments in infrastructure with an expected lifespan of at least five year (please consider the Commission Notice, Technical guidance on the climate proofing of infrastructure in the period 2021-2027 (2021/C373/01)).  Therefore, in case your project does not include infrastructure related activities, and if is not required by the national legislation, then Annex B4 should not be submitted. The same applies in case of Annex B7, respectively if the equipment is not assimilated to the infrastructure, as defined in the Commission Notice, then there is no need for Documentation of climate proofing either. |
| **V. JEMS** | | |
| **V.1** | Are there any training sessions for Jems implementation platform foreseen for the potential beneficiaries? | Yes, please check our website and facebook page. At the beginning of the June we will publish a tutorial on how to use JEMS and on 12th of June, an online Q and A session on Jems. |
| **V.2** | In the process of preparing a project proposal, we had to change the name of the project. Unfortunately, the system does not allow us to change the name in the Project overview. How should we act? | The project name can be changed from the section "Project identification - Project title". After you modify there, the system will automatically make the modification in the Project Overview. |
| **VI. Budget** | | |
| **VI.1** | We intend to submit a hard operation measures project which has an infrastructure/works component and since the Applicant has its own workers who could implement the works within the project frame and period, we need your confirmation if the costs for own workers implementing works could be included in the Project Budget under “Infrastructure and works” line. | According to the provisions of the List of eligible expenditure, annex to the Applicant’s Guide, costs related to the labour for infrastructure and works component are mentioned as eligible under Infrastructure and works expenditure category (article 14 Infrastructure and works). |
| **VI.2** | As we want to support some of the stakeholders (also target group) in creating a good ideas in the field, the question is - is it eligible if we foreseen in our budget some amounts as lump sums (without detailed breakdown), which later on to be used for some delivery of equipment and services in favor of the stakeholders' ideas? | As described within the Applicant Guide and the List of eligible expenditure, the Programme decided to use lump sums financing for project preparation and project closure, there are no other categories of eligible costs to be covered by the lump sums.  According to the provisions of the Applicant’s Guide, 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, in the Applicant’s guide). The lump sum for project preparation is granted in block, per project, to the Lead Partner.  Also, the closure costs shall be reimbursed on basis of a lump sum as decided at Programme level for all projects financed via the Interreg VI-A Romania-Bulgaria Programme  Reimbursement of the granted lump sum for project closure is linked to the delivery of predefined output, respectively final project report approved.  This simplified cost option exempts partners from presenting any evidence of the existence or payment of expenditure related to the project preparation and project closure.  As regards the eligibility please be advised that Annex AG\_B of the Applicant’s Guide lists the eligible expenditures under the Programme. |
| **VI.3** | Page 20 of the Applicant's Guide states that a hard project “Has an infrastructure/ works component equal or more than 50% of the total project eligible budget.” Is the “infrastructure/ works component” intended to include service activities like the author’s and construction supervision obligatory under Bulgarian and Romanian spatial planning law? If not, should they be included in the budget line for “Infrastructure and works” or “External expertise and services costs?” | Please be aware that within the article 14, paragraph 2 of the List of eligible expenditures is stated that " (2) Costs of feasibility studies, environmental impact assessments, architectural or engineering activities and any other expertise needed for the realization of the infrastructure, shall be allocated under the cost category “External expertise and services costs”, listed in Article 12 (if drafted with the support of external suppliers)", which means that the costs for the author’s and construction supervision obligatory under Bulgarian and Romanian spatial planning law shall be envisaged within the budget chapter External expertise and services. |
| **VI.4** | Is it permissible for an infrastructure project/hard/ in the presence of two partners, one to implement only soft measures and the other mainly hard measures. In this situation, the budget ratio will be 1:3? | There are no specific provisions within the Applicant's Guide regarding the issue raised. As regards the budget ratio, the project budget should be divided between partners according to the activities carried out and funding should come from both sides of the border and should illustrate the commitment by each partner to the joint project.  Still, when you design your project, please have in mind to demonstrate a cross-border character and impact of your project proposal, as well as a clear contribution to the Programme indicators. As well, the following mandatory cooperation criteria must be met by your project proposal: Joint development, meaning that the project must be designed in common by partners from both sides of the border and Joint implementation, meaning that activities must be carried out and coordinated among partners on both sides of the border.  In addition, the project should address also at least one of the following criteria (the projects can chose one or both of these criteria): Joint financing (meaning that there will be only one contract per project and there must therefore be one joint project budget) and / or Joint staffing (meaning that the project should not duplicate functions on either side of the border).  In situation in which the project proposal does not have cross-border character and impact and does not contribute to the Programme indicators, it will be rejected, so if the mandatory cooperation criteria are not met by the partners, as set in the Guide, the project will be rejected and the assessment process will stop without further analysis.  Please be informed that the eligibility of the partners and actions proposed is to be analyzed during the evaluation process, based on the justification documents submitted, in accordance with the eligibility criteria of the applicants listed in the Applicants Guide. |
| **VII. Horizontal issues and other aspects** | | |
| **VII.1** | I am asking for some clarification regarding the requirement to submit Documentation of climate proofing. | Please check the PPT dedicated to the climate proofing and the Commission Notice  Technical guidance on the climate proofing of infrastructure in the period 2021-2027  (2021/C 373/01) <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52021XC0916(03)> |
| **VII.2** | Will you make your website more transparent and intuitive this year? | Please check our new website, <https://interregviarobg.eu/en/home>. We are open to receive your proposals on how to improve the programme website. |
| **VII.3** | Is there any option in your web site where one could find a partner for the Interreg VI A project? Or any alternative way? | The web site www.interregviarobg.eu doesn’t have a specially designed section for matching partners for the Interreg VI-A Programme.  Instead, the Programme have organized a number of events giving the opportunity to the participants to actively discuss the rules and conditions for applying under the competitive call, but also to find a matching partner for their project ideas, generating new partnerships. Please keep a track of the upcoming events on the Programme website and Facebook page, where you will be able to meet others looking for a partner, if the case. Thus, please be informed that on 22nd of August 2023 in Craiova, Romania, there will be organized onsite event for competitive call dedicated to Priority 2: A green region, Specific Objective 2.4 and 2.7, in which you could participate and find a potential partner for your project idea.  Also we are informing you that an useful tool for finding partners is [www.keep.eu](http://www.keep.eu) (Partners - Keep.eu). It serves all professional audiences in need of aggregated data regarding projects and beneficiaries of European Union cross-border, transnational and interregional cooperation programmes among the member States, and between member States and neighbouring countries. Within section “Partners”, there is a Search option, where you can detail your search of potential partner by country, experience, Programmes, Public/Private, etc. |
| **VII.4** | Could you please clarify if under the Second Call for project proposals a partnership can submit at the same time one hard and one soft project proposal under SO 2.7? And, if yes, can one beneficiary be a Lead Partner in the two projects at the same time? | There is no restriction as regards the number of projects an applicant may submit, either in the quality of partner or Lead partner. Nevertheless, according to the provisions of the Applicant’s Guide, the Managing Authority has the right to decide not to sign a financing contract in case a partner (regardless the role within the project, partner or Lead partner) already has in implementation under Interreg VI-A Romania-Bulgaria Programme, simultaneously, 4 projects. After the finalization of one project the decision may be reconsidered, provided the financial allocation is available.”  In the same time, based on the same classification, it is not important if the project is part of the soft or hard category. |