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| **No.** | **Institution** | **Proposals as received** | **IP structures opinion** | **Updated** |
| 1. | The National Administration Romanian Waters | Eu as propune următoarele modificări  1. mărirea numărului maxim de parteneri la 6  2. mărirea valorii maxime a proiectului la 3.000.000 EURO sau măcar 2.500.000 Euro  3. eliminarea limitării bugetare pentru proiecte soft sau hard  3. durata de implementare de 24 luni pentru orice tip de proiect  4. permiterea pentru cazuri fundamentate a instalării de echipamente si înafara zonei de proiect (pe principiu de la proiecte strategice)  Translation in EN  Proposals:  1. increase the maximum number of partners to 6  2. increasing the maximum value of the project to 3.000.000 EURO or at least 2.500.000 Euro  3. removing the budget limitation for soft or hard projects  3. 24 months implementation period for any type of project  4. in dully justified cases, allowing equipment installation outside the project (Programme) area (as for strategic projects) | Not accepted | Unfortunately, the threshold set for types of operations financed under the call and the project duration cannot be increased/removed, as this could have negative consequences on the reach of indicators. The thresholds for indicators have been calculated taking into consideration all these aspects. In case of an increase, the available amount allocated to this Specific Objective will not be sufficient for reaching the indicators.  Also, the current financial allocation does not allow increasing the budgetary limitations.  As concerns the size of the partnership the limit was set considering the previous experiences, while increasing the partnership, the Programme takes a risk, the partnership may or may not work.  Please note that Interreg VI-A Romania-Bulgaria Programme supports project activities implemented in the Programme area, which have cross-border impact on the Programme area and contribute to the objectives of the Programme. |
|  | MA | The possibility to increase the budget of the call in the limits of the available funds. |  | For flexibility and in order to diminish the risk of losing funds, MA proposes to include the possibility of increasing the financial allocation of this call, with the approval of the Monitoring Committee, if there will be available funds. |
|  | MA | Modifying the approach of launching two different calls in Jems depending on the type of project |  | In order not to create confusion among potential applicants, MA proposes to have the same Jems submission approach as when submitting the projects under the competitive call for project proposals dedicated to Priority 2: A Green Region, Specific Objectives 2.4 and 2.7 (call 2), respectively a single section in Jems for both soft and hard projects. |
|  | The Forest of Tomorrow Foundation, Romania | Regarding 2.2 Eligibility of applicants and applications, "In order to be eligible these applicants must fulfill the following criteria (...) have their headquarters in the Program area",  We believe that this restriction significantly limits the access to funding of some NGOs that, although they do not meet this geographic criterion, have extensive experience and relevant knowledge in the field of climate change and disaster risk management. In many cases, such organizations have carried out successful projects at national and international level, even in the regions targeted by this call, which could contribute to the achievement of the programme's objectives.  This approach can create discrepancies in terms of equal access to resources, ignoring the valuable input that these NGOs could bring.  In this context, we respectfully propose to expand the eligibility criteria to also allow the participation of NGOs that, although not based in the counties included in the Program, carry out significant activities in these regions or in the targeted fields. We believe that this could encourage a greater diversity of expertise and increase efficiency in achieving set goals.  We would also consider it useful to explore flexible options, such as the possibility for NGOs to open branches in eligible counties, which would allow their access to funding, without compromising the current territorial criteria. | Not accepted | Considering the cross-border dimension and relative reduce budget of the Interreg VI-A ROBG Programme compared to the previous periods, our main goal is to focus on an efficient use of the Programme budget in order to achieve the desired development objectives and to address the region’s diverse and substantial development challenges. In this respect the Programme focuses mainly, on projects that jointly solve challenges specific to the area, have a real cross-border impact and will benefit the population, businesses and institutions in the cross-border region.  Thus, according to the provisions of the Applicant’s Guide, the applicants must fulfill a set of criteria in order to be eligible. Among the potential eligible applicants of the Programme, the Applicant’s Guide mentions also applicants outside the Programme area, from Romania and Bulgaria, but only in exceptional cases, namely if they:   * *Are competent in their scope of action for certain parts of the Programme area (e.g. ministries, national agencies, research institutes etc.);* * *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, an applicant outside the Programme area is among the potential eligible applicants, provided it respects all the provisions of the Applicant’s Guide regarding eligibility.  Also, the applicants outside the Programme area may participate in Interreg VI-A ROBG projects as associated partner, in this respect please consult the relevant sections of the Applicant’s Guide and Application form. |
|  | Romanian Ministry of Internal Affairs | Având în vedere publicarea în consultare a Ghidului Aplicantului aferent Priorității 2 – O regiune mai verde, Obiectivul Specific 2.4. privind promovarea adaptării la schimbările climatice, prevenirea riscurilor de dezastre și creșterea rezilienței, în cadrul Programului Interreg VI-A România-Bulgaria 2021-2027, propunem următoarea modificare: introducerea opțiunii de a selecta categoria de cheltuieli „Travel and accommodation costs” ca și costuri reale.  În prezent, aceste costuri sunt limitate la un flat rate de până la 15% din costurile pentru salarizarea personalului, o restricție care nu reflectă realitatea activităților derulate de anumite instituții, în special cele din cadrul Ministerului Afacerilor Interne (MAI). În cadrul acestor instituții, există o discrepanță semnificativă între nivelul costurilor reale pentru salarizarea personalului și cel al costurilor pentru deplasări și cazare. Proiectele care implică activități transfrontaliere sau colaborări internaționale generează cheltuieli ridicate pentru transport și cazare, mult peste ceea ce permite limita impusă de 15%. Astfel, plafonul actual nu reflectă realitatea activităților derulate și poate conduce la o subfinanțare a acestor activități esențiale pentru implementarea proiectelor.  Legislația națională aplicabilă acestor instituții prevede un nivel scăzut al costurilor pentru salarizarea personalului, în timp ce activitățile care implică deplasări și cazare generează cheltuieli considerabil mai mari. În contextul proiectelor care necesită participarea personalului la activități transfrontaliere sau întâlniri cu partenerii, limitarea actuală de 15% poate duce la subfinanțarea acestor activități esențiale.  Astfel, propunem includerea cheltuielilor pentru deplasări și cazare („Travel and accommodation costs”), ca și costuri reale. Această modificare ar permite o mai bună utilizare a resurselor, asigurând o implementare eficientă a proiectelor și facilitând participarea instituțiilor publice la inițiative transfrontaliere, fără a compromite activitățile din cauza constrângerilor bugetare.  Translation in EN  Considering the public consultation of the Applicant Guide dedicated to Priority 2 – A greener region, Specific Objective 2.4. Promoting climate change adaptation and disaster risk prevention, resilience taking into account eco-system based approaches, in the context of the Interreg VI-A Romania-Bulgaria 2021-2027 Programme, we propose the following amendment: introducing the option to reimburse the cost category „Travel and accommodation costs” as real costs.  Currently, these costs are limited to a flat rate of up to 15% of eligible direct staff costs of the operation, a restriction that does not reflect the reality of the activities carried out by certain institutions, especially those within the Romanian Ministry of Internal Affairs (MAI). Within these institutions, there is a significant discrepancy between the level of actual costs for staff and the cost for travel and accommodation. Projects involving cross-border activities or international collaborations generate high transport and accommodation costs, well above what allows the imposed limit of 15%. Thus, the current ceiling does not reflect the reality of the activities carried out and may lead to underfunding of these activities essential for the implementation of projects. The national legislation applicable to these institutions foreseen a low level of costs for staff, while activities involving travel and accommodation generate considerably higher expenditure. In the context of projects requiring staff participation in cross-border activities or meetings with partners, the current 15% limitation may lead to underfunding of these essential activities. Thus, we propose to reimburse travel and accommodation costs as real costs. This change would allow a better use of resources, ensuring efficient project implementation and facilitating the participation of public institutions in cross-border initiatives without compromising activities due to budgetary constraints. | Not accepted | We understand national budgetary constraints, but the advantages of using simplified costs options (SCOs) are more significant than the disadvantages.  Based on the European Court of Auditors recommendations (that the Commission should extend the use of lump sum and flat rate payments instead of reimbursing real costs in order to reduce the likelihood of error and the administrative burden), the Programmes are encouraged to use as many simplified costs as possible.  Using SCOs is one of the key methods of simplifying the implementation of projects, programmes, control and audit procedures within a programme.  Where simplified costs are used:   * the tracing of every euro of co-financed expenditure to individual supporting documents is no longer required: this is the key point of simplified cost options as it significantly alleviates the administrative burden; * human resources and administrative effort involved in management of the ESI Funds can be focused more on the achievement of policy objectives instead of being concentrated on collecting and verifying financial documents; * a more correct use of the programme funds (performed programmes audits continuously show lower error rate).   Thus, using simplified costs option allows both Interreg Programmes and project partners involved to significantly reduce the administrative burden, focus on results, rather than tracing every euro. |