**Q and A, Call for Concept Notes – Integrated Territorial Strategy for development of the Romania – Bulgaria region as of the date of 30.01.2025**

|  | **Main topic** | **Question** | **Answer** |
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| 1. | **ELIGIBILITY OF APPLICANTS & PARTNERSHIP** | Regarding SO2, **M2.3:**Supporting local businesses, entrepreneurship and job creation including the circularity of tourism services, having in mind that **SMEs are not eligible** under this call, this means that we can submit a project where we can budget a minimis scheme, in which we SMEs can apply for grants? | According to the Guidelines for Concept Notes (call 1), SMEs are not eligible to submit concept notes or to apply as partners under the current call.  Only eligible entities will be considered for funding under the current call (see 2.2. of the Guidelines).  A call dedicated for SMEs will be launched at a later stage under the Interreg VI-A Ro-Bg Programme. |
| 2. | Please clarify if a **partnership** can submit one project for SO1 and SO2, considering the fact that one partner wants to apply under SO1 and the other one idea is under SO2 or we should find a consensus for only one specific objective?  In how many project concepts an organization can participate as a project partner? | No limitations are established in the Guidelines for the number of Concept Notes that an applicant or a partnership can submit.  However, the application must also comply with the conditions of the envisaged financing source (Interreg VI Ro-Bg or other sources).  The Guidelines for Concept Notes does not prevent the applicants to plan investments from multiple SO. Still, any project idea should be jointly developed and both partners should contribute to the objectives of the project. |
| 3. | I am interested in the territorial scope of the program and whether we, as a primary school in Plovdiv, can apply for the project, respectively for Priority 2 A greener region (PO2)? | The current call for Concept Notes is open to applicants who are registered and/or functioning in the ITS geographical area.  In line with the Integrated Territorial Strategy (ITS) and with Annex 3 of the Guidelines for Concept Notes (List of Local Administrative Units within the Ro-Bg ITS area), Plovdiv is not part of the selected territory for the ITS. |
| 4. | **ELIGIBILITY OF ACTIVITIES / ROUTES** | Our municipality is applying to the MRDPW Bulgaria for a concept for ITI with 2 projects "Construction of a pedestrian bicycle route with infrastructure for tourist attractions Evrovelo6". It mainly envisages the placement of markings and information signs along a 20 km long route and the construction of infrastructure for tourist attractions. We plan to apply under your advertisement for the same route, but now with the construction of an additional bicycle lane with a length of 6 km. on the same road after additional installation of the guardrail and installation of photovoltaic lighting. This is a clear demarcation of the site for implementation.  Our question is whether this is admissible for funding from the program.  The second site is the construction of a site for the use of the site "Roman Tomb Mausoleum" village of Babovo, which is a UNESCO site and is located in close proximity to the official route of the "Evrovelo6". We plan to carry out the construction in two stages. The first stage includes the construction of infrastructure related to the protection and exhibition of archaeological immovable cultural values; • Ensuring an accessible environment - approach to the site, information boards, signposts, etc.; • Construction of new infrastructure - electricity supply, cabling, water supply, sewage, alley network, roads, etc.; This is the subject of national financing, and for the second stage, the very deconservation of the tomb and the construction of a visitor center, we plan to apply under your program. With this clear demarcation, our question is whether this is admissible for financing under your program. We kindly ask you to respond as soon as possible so that we are aware of the financing situation. | In order to be eligible for financing under ITS in line with the Guidelines for Concept Notes, you must fulfil the criteria detailed in section 2.1. and 2.2 of the Guidelines.  The Guidelines encourage projects with clear synergies and complementarities with other initiatives. Therefore, with the condition that your project idea meet all requirements set out in the Guidelines, as well as the budget limits, you are encouraged to apply. |
| 5. |  | Following the conversations we had during the meetings for to the current Interreg VI-A Romania-Bulgaria program (Priority 4: Integrated Region) and the already opened Call for project ideas for 5.2 (Promoting integrated and inclusive social, economic and environmental local development, culture, natural heritage, sustainable tourism and security in non-urban areas), we would like to ask for your opinion and advice about the possible applying a Concept Note regarding our project for the "Black Sea Route" tourist route.  As we are aware, the Strategy Board decided to accept and support the development of the following directions as adjacent routes to the EuroVelo6 infrastructure:  - Silistra - Dobrich - Durankulak;  - Silistra - Dobrich - Balchik.  During the meetings we had proposed the "Black Sea Route" tourist route (which is connecting Constanta, Varna, Burgas and Istanbul) as a meaningful continuation of the EuroVelo6 with the idea of connecting the city of Constanta in Romania with Balchik in Bulgaria. In this way, the directions to Constanta, Durankulak and Balchik would be connected, and bicycle tourists traveling to these points would have a logical continuation of their route, regardless of whether they were heading north or south.  We truly believe that the section of the "Black Sea Route" tourist route between Constanta and Balchik as a connection of these two parts of EuroVelo6 can provide a one-of-a-kind experience for tourists and would boost the bicycle tourism on both sides of the border and along the sea coast.  We have already made several meetings regarding the "Black Sea Route" with representatives of Balchik, Kavarna and Constanta municipalities and we have their support. The initiative has been also supported by the Bulgarian Ministry of Tourism, Ministry of Agriculture and Food, Ministry of Youth and Sports, Ministry of Transport, i.e. our government has interest in its development.  The European cycling federation and European Ramblers association also support the initiative as they proposed it to be a continuation of EuroVelo6 and the E-3 path as a beginning of its development.  In regard to the above I'm sending to you again the presentation and description of our initiative with a request to give us your advice about:  - is a similar connection between Constanta and Balchik, in particular using the "Black Sea Route" concept, eligible for application for funding under the current call?  - how relevant to the program such a concept note would be considered? | Please refer to the approved Integrated Territorial Strategy and its Annexes for details on the EuroVelo6 main and secondary routes, eligible for funding under the ITS and the Call for Concept Notes.  Part of the Black Sea Route is eligible under the ITS and the Guidelines for Concept Notes. The connection between Constanta and Balchik is also part of the ITS territory. However, please consider the budget limitations stated in the Guidelines, compared to the activities and investments that are envisaged. |
| 6. |  | We are working on a concept note for the development of an integrated infrastructure project which will include both the development of the cycling routes in the municipality and the creation of a tourist infrastructure for recreation and rest - parking for caravans with all amenities to guarantee a pleasant stay of the visitors in the municipality.  The parking infrastructure will be built on land, owned by the municipality. Still, the future management - maintenance, cleaning, security, etc. is outside the scope of the municipality's activities, so we intend to award it to a concessionaire under the Concession Act of the Republic of Bulgaria.  We would like to ask if such a use of the infrastructure meets the requirements of the procedure. We expect a substantial increase in the number of visitors to the municipality due to the new parking for caravans, thus the local businesses will observe a substantial rise in customers (one of the goals of the program). In the same time, the management of the infrastructure will be performed by a company specialising in such activities, thus ensuring high quality of service and optimal maintenance of the infrastructure.  Any income from the operation/concessional management of the infrastructure will be reinvested in the construction/rehabilitation of the remaining technical infrastructure (roads, parks, tourism trails) in the surrounding area to improve the life of the citizens of the municipality.  Thank you in advance for your time and consideration. | The construction of camping sites falls under Measure 2.1 of the ITS, ”Development of touristic infrastructure and cultural assets”. The parking for caravans, in the proximity of tourist attractions falls under the specified measure.  Considering the indicative types of actions financed under the current Call for Concept Notes under the Integrated Territorial Strategy, actions for which the partners do not act as economic operators and for which there are no considerations to assume that the competition will be distorted, the Concept Notes **shall not be subject to state aid rules**, where the state aid is defined as *any aid granted by a Member State or through State resources in any form whatsoever which distorts or threatens to distort competition by favouring certain undertakings or the production of certain goods […], in so far as it affects trade between Member States* (Article 107(1) of the Treaty).  Please pay attention to the project idea activities which could be most susceptible to be subject of state aid provisions, for example:   * aid to operators: operators who make use of the infrastructure to provide services to end-users receive an advantage if the use of the infrastructure provides them with an economic benefit that they would not have obtained under normal market conditions; or * aid to end-user: if the operator of an infrastructure has received State aid or if its resources constitute State resources it is in a position to grant an advantage to the users of the infrastructure (if they are undertakings) unless the infrastructure is made available to the users on market terms; etc.   Thus, in case of the examples above mentioned, an economic advantage to the operator/end-user can in particular be excluded if the concession to operate the infrastructure (or parts of it)/the fees for use of the infrastructure is assigned for a positive price/have been set through a tender that meets all the relevant conditions (the tender procedure has to be competitive, transparent, sufficiently well-publicized, non-discriminatory, unconditional (to allow all interested and qualified bidders to participate in the process), using and complying with the national laws on public procurement of the country on whose territory the partner which organizes the procedure is located. |
| 7. |  | Is it eligible under the call, the project partners to participate with an infrastructural project, which investment part do not include construction/modernization of cycle infrastructure? I mean is it eligible the investment part of the project to include only construction/modernization of cultural and touristic objects on the territory of the both partners? | The project concept must include a combination of investment actions (e.g., cycling network infrastructure and/or facilities) and soft-type actions (e.g., services).  If your project idea aligns with **SO2**, project partners are eligible to participate with an infrastructure project, even if the investment component does not involve the construction or modernization of cycling infrastructure but it does focus on the construction or modernization of cultural and tourist sites within the territories of both partners.  Still, in order to increase the chances of your project to obtain higher scoring during assessment, you may consider adding some support facilities and/or safety features for cycling tourists, within your site or along the roads leading to it. |
| 8. |  | Is it eligible under the call, an investment only in a part of the cycle infrastructure which is a part of local route - for example reconstruction of appr. 1 km. road, but not a whole length of the local route?  Also, is there some limits regarding the constructional works on the local cycle infrastructure? I mean, is it possible to plan construction of road and established of cycle route or the investment need to be only in cycle route and excludes reconstruction works on the road, which is a part of the cycle local route? | The length of the newly built / significantly upgraded cycling routes or lanes will be included in the Concept Note and will be taken in consideration for the overall assessment of the project idea, in accordance with the evaluation criteria.  This call is not dedicated to building roads. As a general rule, reconstruction works of the road infrastructure are not eligible under the present call for Concept Notes.  Still, the call allows punctual interventions such as “ensuring road safety for the sections overlapping the EuroVelo Route, in view of complying with standards related to traffic signaling systems and/or additional development of infrastructure dedicated to cyclists and pedestrians, such as tunnels, bypasses, bridges, overpasses and walkways and protected cycling paths.”  From another perspective, project activities which may not be eligible under this call or, in general, under the Interreg VI-A Romania-Bulgaria Programme, may be still included into the project, if financed from the partners’ own contribution or from other sources.  Finally, please also consider the budgetary limits for the submitted Concept Notes. |
| 9 | **MULTIPLE SPECIFIC OBJECTIVES** | It is possible to submit one project with contains investments activities from SO1 and SO2?  For example, 2 millions for cycle tourism infrastructure and 1 million for renovation of churches. | The Guidelines for Concept Notes does not prevent the applicants to plan investments from multiple SO. Moreover, applicants are encouraged to design project ideas with an integrated character, combining activities from multiple SOs.  Please keep in mind that the project idea must meet all conditions detailed in the Guidelines. |
| 10. | In Section 1/1.3, in the table detailing the indicative financial allocation available for the present call, there are 2 different total amounts corresponding, each, to a SO: 22.500.000 euro for SO1, and 33.750.000 euro for SO2.  Given this tiebreaker, of different total budgets corresponding to different SOs, please clarify if one concept note must respond to/address only one ITS specific Objective: SO1, or SO2?, or can respond to two SOs in one single concept note?  For example, our concept note will regard the **development of a modernized cycling lane** (being addressed by SO1) and also will **develop a camping site near a natural landmark** (being addressed by SO2). If the case might be that each of these two types of interventions can not be framed under 1 single concept note, we will submit two different concept note: one, addressing SO1, and one addressing SO2, but your clarification upon this issue is important in order for us to not wronglt interpret the Guidelines,  In conclusion, please clarify **if we can cover/include both above mentioned interventions** (addressed according to the Guidelines under two different SOs), in one single concept note, **or each intervention addressing a Specific Objective, must be framed under one single concept note?** | A Concept Note is expected to contribute or respond to one or several of the specific objectives within the available budget threshold.  The Guidelines for Concept Notes does not prevent the applicants to plan investments from multiple SOs. Moreover, applicants are encouraged to design project ideas with an integrated character, combining activities from multiple SOs.  Please keep in mind that the project idea must meet all conditions detailed in the Guidelines.  In the described situation is important to make sure that the proposed actions under the 2 objectives fall within the maximum budget limit of 6.000.000 euro. |
| 11. | **ASSESSMENT CRITERIA** | 1. Does the distance from a project location to EuroVelo 6 is calculated in a straight line from the specific location of the project to EuroVelo6?  2. If a project has included  multiple locations at different distances from EuroVelo, how are the points granted calculated upon evaluation? | 1. The distance between the main intervention of the project and the EuroVelo6 will be calculated based on maps, on the existing road infrastructure, and on the GPS coordinates that the applicant will provide in the Concept Note. 2. The distance that will be assessed under the ”Proximity to the EuroVelo6 route” criteria is the distance from the main intervention of the project to the EuroVelo6 route (see Table 3. ITS prioritization criteria). In accordance with the Guidelines, ”the main intervention of the project defines its most important output which may be an investment but also an activity. If compared to other interventions of the project, the main intervention will be defined by applying the following criteria, in this order: budget, number of people benefiting from that output, duration of the activity. If all activities cannot be not related to a certain location, then the place of the main intervention will be the headquarters of the lead partner”. |
| 12. |  | In the framework of the Call for concept notes under ITS, we respectfully request your assistance in order to clarify the following issue:  In accordance to the Criteria "Proximity to the EuroVelo6 route", **different points are granted, to different distances:** for eg. 20 points if the main intervention is located on the course of the EuroVelo6 route, and 10 points are granted if the main intervention is located within 10-20 km distance from the course of the EuroVelo6 route.  Based on this example, and having in mind that each project partner will develop interventions, **please clarify what would be the points granted in the following situation:**  -LP`s main intervention will be located on the course of the EuroVelo6 route  and  -PP1`s main intervention will located within 10-20 km distance from the course of the EuroVelo6 route  The same goes for the second criteria "Effective support for cycling tourism": **please clarify what would be the points granted in the following situation:**  -LP will target over 30 km of cycling routes to be endowed with support facilities and substantial safety features  and  -PP1 will target 12 km of cycling routes to be endowed with some support facilities  The chances of having the same geographical proximity to the EuroVelo6 route or the same necessities of endowment, for both project partners (or 3 partners), is low, and in this context, it is important for the beneficiaries to understand how the points will be granted, specifically for these 2 criteria (above mentioned) | The distance that will be assessed under the ”Proximity to the EuroVelo6 route” criteria is the distance from the main intervention of the project to the EuroVelo6 route (see Table 3. ITS prioritization criteria). In accordance with the Guidelines, ”the main intervention of the project defines its most important output which may be an investment but also an activity. If compared to other interventions of the project, the main intervention will be defined by applying the following criteria, in this order: budget, number of people benefiting from that output, duration of the activity. If all activities cannot be related to a certain location, then the place of the main intervention will be the headquarters of the lead partner”.  So, if the main intervention of the project is located on the course of the EuroVelo6 route, the project idea could get the maximum scoring for the criterion "Proximity to the EuroVelo6 route".  For the criterion ”Effective support to cycling tourism”, the distance of the cycling routes created/significantly upgraded within the project will be calculated as a cumulative result of all project partners. The same cumulative approach will be used to assess the endowments, on condition that partners ensure an equivalent level of endowment. Please, pay attention:   * on one side, to describing how your project satisfies the conditions to consider a cycling route or lane as being “significantly upgraded”, as explained in section 2.4, point 4 of the Guidelines and * on the other side, to describing how your project satisfies the cumulative or alternative conditions concerning the endowments and the length of cycling routes or lanes, as the case may be.   Based on the description of the project intervention, the highest possible scoring will be awarded, depending on the respect of conditions described within the criterion.  If the project will deliver over 30 km of **newly built or substantially upgraded** cycling routes or lanes, endowed with support facilities **and** substantial safety features, the project idea could obtain the maximum scoring for the criterion "Effective support for cycling tourism". |
| 13. | **LETTER OF COMMITMENT** | We have a couple of  questions:  The first one is  with respect to Annex 3 Letter of Commitment under call 1 for concept notes under the Integrated Territorial Strategy for the Romania-Bulgaria cross-border area:   The Letter of Commitment should be signed by each partner in the project or only by the lead partner? (the form within the guide solely indicates the lead partner)  The second question is related to the size of the partnership, we know it is recommended that the partnership is formed of max. four (4) organizations in compliance with the conditions of the envisaged financing source.  Does this number include associated partners as well? | According to the format, the Letter of Commitment should be signed by the lead partner.  The partnership recommended size refers to lead partner and partners, not to associated partners. |
| 14. | **OTHER** | Is it ok to create a bicycle lane along an existing road**by compacting the land** on the right and left sides of the respective road and be awarded points for the number of km of bicycle lane created? | In line with the Integrated Territorial Strategy, the present call for Concept Notes envisages the creation of high-quality bicycles lanes, in order to respond to the needs in the ITS region (*i.e.* poor bicycle infrastructure).  Moreover, the Guidelines include references to Cycling Design Best Practices (2023), available at <https://www.iurc.eu/wp-content/uploads/2024/04/Cycling-Design-Best-Practices-Report.pdf>.  The construction of bike lanes along an existing road should comply with the national regulations and authorization conditions. We advise you to address the competent authorities in advance, to check for conditions. |
| 15. | Letter on the strategic importance of restoring and developing the railway line Tulcea–Constanța–Medgidia–Kardam. | The letter reveals an important local need, but it falls outside of the scope of the present Guidelines for Concept Notes. |