| **No.** | **Question received** | **Answer provided** |
| --- | --- | --- |
| **I. Application Form** | | |
| **I.1** | Can you please confirm that it is not mandatory to apply the joint staffing principle according to which there is only one joint project manager, one joint financial manager etc. per project and that each project partner can include in the project staff costs for project coordinator and financial expert for managing its own part of the activities and the finances? | According to the provisions of the Applicant’s Guide, in order to be eligible, projects must contribute to at least three out of the following four cooperation criteria: joint development (mandatory), joint implementation (mandatory) and at least one of the following criteria (the projects can choose one or both of these criteria): joint financing and/or joint staffing. In case the mandatory cooperation criteria are not met by the partners, as set in the Guide, the project shall be rejected and the assessment process shall stop without further analysis. Still, each partner has the flexibility to appoint the project implementation team as they consider necessary, having in mind that the staff costs expenditures are reimbursed as flat rates from the direct eligible costs of the operation, as described above. |
| **II. Eligibility of expenditures** | | |
| **II.1** | Regarding the upcoming call 4 priority 2: Greener region, SO 2.4 - Promoting climate change adaptation and disaster risk prevention, resilience taking into account eco-system based approaches – climate change adaptation, could you please clarify whether the purchasing of a mobile center, vehicle, and personal protection equipment are an eligible cost? | Regarding the eligibility of certain expenditures such as: mobile center, vehicle, and personal protection equipment, please consider that according to the Applicant's Guide, the costs for equipment may be an eligible expenditure if procurement of the equipment is needed and justified for the implementation of the project’s activities and are in full compliance with the specific objective SO 2.4 of the Interreg VI-A Ro-Bg Programme. Therefore, in order to establish if the equipment is eligible or not, you shall first see if the proposed actions are framed within the specific objective of the current call for proposals. We underline that the actions related to disaster risk prevention and resilience (Specific Objective 2.4) mentioned in the Programme are not financed under this call. These type of actions are to be implemented through other calls. Please pay attention to the fact that the project’s activities shall contribute to the specific objective of the call for proposal, namely the current call addresses only the types of actions related to climate change adaptation measures, meant to identify, asses and reduce the effects of climate change. These actions aim at adapting to the effects of climate change and taking appropriate action to use the opportunities that may arise.  However, please bear in mind that the eligibility of the expenditures is to be analyzed during the assessment process, based on the justification documents submitted, and in accordance with the eligibility criteria of the applicants listed in the Applicants Guide. For detailed information of the eligible expenditures, please consult Annex AG\_B LIST OF ELIGIBLE EXPENDITURES for INTERREG VI-A ROMANIA-BULGARIA PROGRAMME APPROVED THROUGH MC Decision no 27/08.05.2024. |
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| **III. Eligibility of applicants and activities** | | |
| **III.1** | Dear Interreg VI-A Romania-Bulgaria Programme team,  Regarding the launching of a new 4th call for project proposals, please give me the clarification of the following questions:   1. We are an NGO from Bulgaria established in 2020 in region, which is outside of the Programme area. At the moment we are in a process of changing our place of registration (headquarter) in the city of Vratsa, which is in the eligible area. Are we eligible to participate as a Lead partner or a Project partner under the current call, if our registration in the eligible region will be established a month or two, before the deadline for the project’s submission? 2. Our NGO was registered as a non-profit organization operating its activity in a “private benefit”. Regarding to that, is it eligible to participate as an applicant/partner in the project or its registration need to be in a “public benefit”? | To clarify the question regarding the launching of the 4th call for project proposals, please see the response below:   1. There conditions set within the Applicant’s Guide regarding the location of the applicants (with their headquarters in the Programme’s area) should be met at the time when the application form is submitted, before the deadline for project submission.   However, in case the organization does not change its registration and is located outside the Programme area, please be informed that the organization may still participate in projects if the following conditions are met:  “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, organizations 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.”   1. Regarding the eligibility of a NGO that is registered as a non-profit organization operating its activity in a “private benefit”, please note that according to the Applicant guide Non-governmental organizations (associations or foundations) are eligible applicants, regardless of whether the organization is operating for “public benefit” or for “private benefit”, therefore both types of NGOs are eligible. Please keep in mind, that grants shall not have the purpose or effect of producing a profit within the framework of the action or the work programme of the beneficiary (‘no-profit principle’).   However, please bear in mind that the eligibility of the partners is to be analyzed during the assessment process, based on the justification documents submitted and in accordance with the eligibility criteria of the applicants listed in the Applicants Guide. The assessors may request, at any time, additional documentary evidence and argumentations regarding the eligibility of applicants. |
| **III. 2** | We would like to ask a clarification regarding eligible activities under Call 4 - Competitive call for project proposals dedicated to Priority 2: A Green Region, Specific Objectives 2.4, so we can best structure our proposal.  Partner organizations in the eligible territories have established a need for acquiring a specialized "vessel for collecting algae and floating garbage", which could be used for various interventions around the Danube river beds, including collecting floating tree branches and other debris, as well as cleaning oil spillages. The vessel could also be used for surveys of the river bank’s state, observation of erosion processes, visible only from the river surface and observation of natural habitats without disturbing the plans and wildlife, residing there.  Will such a vessel be eligible under the current call if both Romanian and Bulgarian partners have equal and free access for its use? | Regarding your question concerning the eligibility of  purchasing a vessel, please be informed that in accordance with the Applicant’s Guide, section 2.9 Eligibility of Expenditures, the project budget should be prepared on the basis of the activities needed to meet the projects’ objectives and the resources required to carry out these activities. Therefore, eligibility of a certain type of equipment (including a vessel) shall be established by the assessment committee when assessing the project, based on the described justification of the need of the specific equipment for implementation of the project’ activities.  Please pay attention to the fact that the project’s activities shall contribute to the specific objective of the call for proposal, namely the current call addresses **only** the types of actions related to **climate change adaptation measures,** meant to identify, asses and reduce the effects of climate change. These actions aim at adapting to the effects of climate change and taking appropriate action to use the opportunities that may arise.  **At the same time, please keep in mind that the actions related to disaster risk prevention and resilience are not financed under this call.**  Therefore, just describing the use of the vessel as needed for collecting algae and floating garbage / debris, observing the river banks / interventions will not ensure the eligibility of the procurement of such equipment as it is not duly justified in terms of clear contribution to the climate change adaptation measures. For a proper development of the project proposal, we are recommending you to first determine the need for the project’s activities, the desired goals of the project and their contribution to the Programme’s objectives and indicators and only after that to proceed with the identification of the resources needed (such as equipment) for the implementation of the respective activities. |
| **III. 3** | A partner municipality in Bulgaria is in the process of developing a project under Call 4 and would like receive a confirmation that the planned activities match the eligibility criteria and goals of the call.  According to existing analysis of the needs of the region and the characteristics of the ecosystem and habitats, the main risk for both the ecology and the population of the municipality is the erosion of river banks.  The main objective of their idea is to prevent erosion of river banks, while improving water supply during periods of drought thanks to the effect of green buffer zones to be developed around areas with particular erosion risks. These buffer zones will serve as natural filters that will reduce water pollution and improve the hydrological balance in the region.  Planned investment Activities:  - Construction of buffer zones. This includes planting shrubs and trees that will prevent soil erosion through their root system and help retain moisture. Green buffer zones will also provide habitat for native animals and support biodiversity.  - Planting specific plant species: Vegetation species that have the ability to retain soil moisture and reduce the rate of surface water runoff will be used. This includes species that are drought tolerant and have high water holding capacity, such as reeds, willows and other water loving plants.  - Erosion Prevention: In addition to planting vegetation, other methods of soil stabilization will be used, such as the placement of natural or geotextile barriers (e.g., wood and stone structures) that will stabilize banks and reduce the erosion process during times of heavy rainfall or rising water levels.  - Purchase of planting and maintenance equipment: Specialised machinery will be purchased, including a planting excavator, which will be able to carry out work in inaccessible areas along rivers and ponds, while ensuring the effectiveness and sustainability of reforestation projects. High-clearance vehicles will be needed to transport workers and equipment in these areas, which is particularly important in difficult terrain where conventional vehicles cannot pass.  The municipality also envisions “soft” measures  - info campaigns, wildfire prevention trainings (to raise awareness for the importance of the preservation the newly developed green zones), flood prevention training in order to raise awareness on the reasons for floods due to human activities and what nature preservation activities are needed to sustain the eco systems in a healthy and balanced state.  Setting up volunteer disaster response teams as a subsidy activity to keep up the know-how from the information campaigns and coordinate efforts by the population when needed.  Would such activities be permissible under the call’s conditions? | Please note that this call focuses on climate change adaptation. Actions related to disaster risk prevention and resilience (Specific Objective 2.4) as outlined in the Programme are not eligible for financing under this call.  Projects submitted under this call should align with objectives and activities that specifically address climate change adaptation.  We recommend focusing the project activities on climate change adaptation measures. Also, please clearly define the project objective, in relation to climate change adaptation, emphasizing how the project will cope or address the (adverse) impacts/effects of climate change or turn them into opportunities.  The ecosystems-based approaches (vegetation, buffer zones etc.) can be useful tools to reduce/to adapt to the effects of the climate change and incorporated into a climate change adaptation project.  Moreover, we are recommending you to reconsider the activities such as those focused on purchasing intervention equipment, on floods and wildfires or setting up of volunteers disaster response network which seems rather to tackle the disaster risk prevention and resilience than promoting climate adaptation measures.  Also, we would like to underline the fact that all proposed actions shall prove the cross border relevance, which shall be duly explained in the project proposal. 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.  Still, please be informed that the eligibility of activities is to be analysed during the evaluation process, based on the entire project concept. In addition, please be aware that, during the process of elaboration of the application proposal, it is recommendable to consult regularly the list with the Q&A available on the Programme website, which includes questions and given answers from other potential applicants under Call 4. |
| **IV. Applicant’s Guide and Annexes** | | |
| **IV.1** | Please, can you give more information regarding the need of preparation of Cost Benefit Analyses (Annex B1) for the project proposals:   1. For which kind of projects CBA is applicable? 2. Is it applicable for "soft" projects? 3. Is it applicable for "hard" projects, which includes only supply of equipment?   Because I can't find the template of the CBA in the published annexes, is there such a template? | Based on the provisions of the Applicant’s Guide, please find below the answers to your request:  *1. For which kind of projects CBA is applicable?*  CBA is applicable and is **mandatory only for projects for which partners that may have revenues** from the supported activities included in the applications.  *2. Is it applicable for "soft" projects?*  Yes, if the project is soft but **the supported activities included in the applications generate incomes**. In case a Feasibility Study is provided, the submission of the CBA is not required.  *3. Is it applicable for "hard" projects, which includes only supply of equipment?*  Yes, as also mentioned above, even if the project is hard and includes only supply of equipment with the condition **to have income from the supported activities included in the applications.**  Regarding the format of the Annex B1 - Cost-Benefit Analysis, please be informed that in Applicant’s Guide there is no mandatory template for the elaboration of the Cost Benefit analysis. The national rules, if any, should be followed. Therefore, you should decide the format of the CBA, provided that the applicable national rules are observed, if any. You can use, as general guidance for drafting the cost-benefit analysis also the document available here <https://ec.europa.eu/regional_policy/sources/studies/cba_guide.pdf> (main page <https://ec.europa.eu/regional_policy/policy/evaluations/guidance_en>). |
| **V. JEMS** | | |
| **V.1** |  |  |
| **VI. Budget** | | |
| **VI.1** | 1. Is the flat rate for staff costs (20% of the direct eligible costs), office and administration costs (15% of the direct eligible costs) and travel costs (15% of the direct eligible costs) applicable to the whole project budget cumulatively or the percentages apply to the individual partners’ budgets? 2. When defining if the project is soft or hard operation (section 2.6 of the Applicant's Guide), what exactly is meant by defining it as “cumulated value or stand-alone budget”? | 1. Having in mind the provisions of the Applicant’s Guide, Chapter 2.9 Eligibility of expenditures, pg. 19-22, please be aware that the percentages for flat rates are applying, as follows:   a) Staff costs is calculated by applying the rate (up to 20%) to the sum of direct cost under external expertise and services, equipment and infrastructure and works, as soon as the amounts are filled in within these budget lines of Partner’s budget;  b) Travel and accommodation costs is calculated by applying the rate (up to 15 %) to the eligible direct staff costs (as foreseen within Partner’s budget under the cost category Staff costs);  c) Office and administrative costs is calculated by applying the (up to 15 %) to the eligible direct staff costs (as foreseen within Partner’s budget under the cost category Staff costs).  Each partner within the project can set their own percentages for flat rates, between 0% - 20% for staff costs and 0% - 15% for travel and accommodation costs and office and administrative costs. This means that the flat rates are automatically filled in by Jems electronic system based on the percentages established at partner level, not at project level.   1. Regarding the definition of budget as "cumulative value or stand-alone budget", please note the following:   a)"cumulative value" within a project proposal refers to the amounts foreseen at project level in terms of the budget component for works/infrastructure/equipment;  b)"stand-alone budget" within a project proposal refers to the amounts foreseen at the level of each budget component for works/infrastructure/equipment.  Please be informed that the assessors will consider and assess your project during the evaluation process based on the information and data provided in the submitted project proposal. |
| **VI. 2** | My question is regarding the requested condition in the applicant guidliens about the budget: there is mention that the real costs must be justified based on 2 offers (eg. Print screen from sites, other contracts of the institution or other organizations, offers etc.). Please explain which price/amount for the concrete service/asset we need to put in the budget – the lower price by the 2 offers or the middle arithmetic price from the 2 offers?  For example, We have 2 offers for an asset - one for for 1000 euro, the second for 1200. So we need to put in the budget for that asset the lower - 1000 euro, ot middle - 1100? | Having in mind the situation presented by you, please be aware that, in order to ensure the sound financial management of the Programme, in case of 2 offers, the budgeted prices must not exceed the average value of the 2 offers.  In addition, in order to overcome the impact of future inflation and price instability, the expenditures included in the budget might be increased with the average of the national inflation of the last 3 years before the application submission, but not more than 10% from the price. Please be aware that the increase shall be reflected distinct in the document, as well as the applied percentage (the average of the inflation rate of the last 3 years, before the application submission. The average shall be calculated at the level of partners, in accordance with the national inflation rate).  In addition, in order to have a realistic budget of the project, the partners may make use of the statistical data on prices available at the level of each country, if available.  Considering the example you gave, the answer regarding the amount to be added to the budget is 1100 euro plus, if the case, the average of the national inflation of the last 3 years before the application submission, but not more than 10%. |
| **VII. Horizontal issues** | | |
| **VII.1** |  |  |
| **VIII. Other aspects** | | |
| VIII.1 | Dear Interreg VI-A Romania-Bulgaria Programme team,   1. Regarding forming of the partnership under the project, can you publish on your internet site some data base with information, contacts, profile of potential partners from the eligible area - NGO's, municipalities, etc.? 2. Also, do you plan to organize some much-making event for searching of the partners under the call?     Thank you for your kindly cooperation. | 1. Regarding your first question, please be informed that the platform <https://keep.eu/> 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 or pre-accession countries. The database covers the 2000-2006, 2007-2013 and 2014-2020 periods, and is currently incorporating data on the 2021-2027 period. Within section Partners, there is a Search option, where you can detail your search of potential partner by country, experience, Programmes, public/private, etc. 2. Regarding the organization of some events for searching partners under the present call, please be informed that in the next period will be published on the Programme website, the schedule of the events for promoting the 4th call for proposals dedicated to SO 2.4 – Promoting climate change adaptation and disaster risk prevention, resilience taking into account eco-system based approaches – climate change adaptation. For sure, you will find a fitting format of the event, for your needs. Just keep an eye on the Programme website <https://interregviarobg.eu/en> and social media (<https://www.facebook.com/RomaniaBulgariaCbcProgramme>, <https://www.instagram.com/interregviarobg/>) to be kept updated. |