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Record of questions


Information days / Information campaign

in the framework of the

INTERREG-IPA Bulgaria – Serbia CBC Programme, CCI Number: 2014TC16I5CB007-2015-1

No.	Question	Answer
1	Is a lead partner – NGO registered in public benefit, eligible, if its registration and management address is in Sofia, but the project activities are planned to be implemented on the territory of the eligible regions according to the Guidelines for applicants?	<p>According to p. 2.5.2. “Lead partner Principle” in the Guidelines for applicants under the Interreg – IPA Cross-border cooperation Bulgaria – Serbia Programme, in order the eligibility of the Lead partner to be ensured it should be registered on the territory of Bulgaria or Serbia at least 12 months prior to the deadline for submission of project proposals. Additionally, the Lead partner and the other project partners should fulfil the requirements concerning the eligibility of applicants, described in p. 2.5.1 of the Guidelines for applicants.</p> <p>A legally established entity (acting as Lead partner or Project partner), located outside the eligible cross-border area, but still on the territory of Bulgaria or Serbia, may participate under the Call for Proposals provided that the envisaged operations in the proposed project are for the benefit of the programme area.</p>
2	We are interested if a NGO registered in public benefit, established in 2013, but with headquarters and management address re-registered in the end of 2015 in the eligible cross-border area of Bulgaria – Serbia, is eligible under the current call for project proposals, in case all others requirements are fulfilled?	<p>According to p. 2.5.2. “Lead partner Principle” in the Guidelines for applicants, one of the requirements for eligibility of the Lead partner is to be registered within the territory of Bulgaria or Serbia at least 12 months to the deadline for submission of project proposals. There is no restriction related to date of registration of other partner/s in the project.</p> <p>Additionally, the Lead partner and the other project partners should fulfil the requirements concerning the eligibility of applicants, described in p. 2.5.1 of the Guidelines for applicants.</p>

3	Is it acceptable, if a project under Priority Axis 3. Environment covers “common natural resource”, envisages interventions / investments to be carried out in two different rivers (one in Bulgaria and other in Serbia), provided that the project contributes to the natural protection of the region as a whole?	An eligible project under the First Call for proposals is any project, which consists of eligible activities (activities compliant to the eligibility criteria, under the respective Priority axes/Specific objective, mentioned in the Guidelines for Applicants). There is no explicit requirement, specified in the Guidelines for Applicants, the object of intervention to be related to a “common natural resource”. In all cases, the project activities have to show clear cross-border impact.
4	Is it eligible if project under Priority Axis 2. Youth, where cultural activities are envisaged to be implemented by one project partner and sport activities by other project partner, or it has to envisage mirror-activities (only cultural activities, only sport activities)?	There is no requirement, specified in the Guidelines for Applicants that mirror-activities should be implemented in both sides of the border, but in all cases the project activities have to show clear cross-border impact.
5	Is it necessary to publish officially a service contract notice or other relevant document, if the project preparation is assigned with a single tender procedure, according to PRAG?	The project preparation expenditures have to be assigned according to the procurement rules mentioned in p. 2.3 of the Guidelines for Applicants, observing all requirements of the respective type of tender procedure. PRAG annexes and procedures should be followed in the process of preparation of tender dossier and implementation of tender procedure. According to the current PRAG rules, the single tender procedure does not require publication of service contract notice.
6	Is it envisaged, that the Guidelines for Applicants under the First Call for proposals to be published in Bulgarian?	The Guidelines for applicants are available only in English, because the official language of the Programme is English.
7	According to the Guidelines (page 49): “... all supporting documents must be presented either in original (when it is possible) or in the form of copies, certified “True copy” by the legal representative or an authorized person from the Lead partner and/or the respective project partner. No notary certifications are needed at the stage of application”. At the same time some of the documents required from the Bulgarian partners (as Ownership act, Positive Environmental Impact Assessment, detailed works design) must to be presented in notary certified copy. So, please give to the beneficiaries some final explanation about the form of the documents that must to be presented as a copy from the Bulgarian partners – in certified “True copy” form, or notary certified?	The full sentence in section “Important” on page 49 of the Guidelines for applicants says that: “Unless stated differently, all supporting documents must be presented either in original (when it is possible) or in the form of copies, certified “True copy” by the legal representative or an authorized person from the Lead partner and/or the respective project partner”. You should follow the instructions for submission of each supporting document as described in the Guidelines for applicants.

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8	<p>It the Guidelines for Applicants is not clearly stated whether the branches of organizations (agencies) registered in the indicated districts (eligible area) can apply under the Programme or it refers only to organization, which main offices are located in the eligible area?</p>	<p>As an exception to the requirement the applicants to be legally established organizations according to the national legislation (p. 2.5.1 "General Criteria for Eligibility of Applicants" of the Guidelines for applicants) subsidiary structures of local/regional/national authorities are eligible applicants.</p> <p>Regional structures/branches of central organizations, other than local/regional/national authorities, are ineligible applicants under this Call for proposals. For Bulgarian applicants this means that even though a regional structure/branch may have its own registration code (as an extension to the registration code of its central body), it is still not a separate legal entity and therefore only the central structure could be a project partner.</p>
9	<p>How to determine the eligibility of "Southwest state enterprise" DP which is registered under the Forest law of Republic of Bulgaria:</p> <p>Art. 163. (1) The management of forest areas - state property, which are not committed to the administrations or legal entities, is establishing state enterprises in compliance with Annex № 1.</p> <p>2) The enterprises under paragraph 1 are legal entities with statute of state enterprise under art. 62, paragraph 3 of the Commercial law.</p> <p>(3) The Minister of agriculture and foods defines with an ordinance the ranges of action of the state enterprises under paragraph 1.</p> <p>Art. 164. The state enterprises under art. 163 have subsidiary structure:</p> <ol style="list-style-type: none"> 1. Central structure; 2. Regional structures – state forestries and state reserves. <p>Article 165. (1) The main activity of the state enterprises under Art. is:</p> <ol style="list-style-type: none"> 1. implementation of forest management plans for forest areas - state property; 	<p>The criteria for eligibility of applicants under the Programme are described in point 2.5.1 of the Guidelines for applicants. Please, note that these criteria are cumulative and must be fulfilled all together.</p> <p>Particular attention should be paid to the following:</p> <ul style="list-style-type: none"> - Exception to the rule the applicants to be registered in the eligible cross-border region is made for national/regional public authorities whose area of competence, established by legal acts, extends to the eligible area of the programme. Further exception to this rule is the eligibility of applicants that are located outside the eligible cross-border regions, ensuring that the envisaged operations in the proposed project are for the benefit of the programme area. - In order to be eligible, the applicants must be non-profit making organizations.

- 2. implementation of the hunting plans in the state reserves and the state forestry;
- 3. implementation of maintenance and / or restoration activities in forest areas - state property included in protected areas management plans;
- 4. organizing and conducting of events for protection of forest areas - state property;
- 5. organizing and conducting of anti-erosion activities;
- 6. maintenance of the ecosystems diversity and biodiversity conservation;
- 7. organization and assignment of design and construction activities in forests and lands in forest areas - state property;
- 8. creating new forests on agricultural lands;
- 9. protection of forest areas - state property;
- 10. provision of public services.

Article 166.


(7) The state enterprises can apply for operational programs, as well as international, national and regional programs and can be equal participants in the procedures of the Public Procurement Act, except those for inventory, elaboration and implementation of forest management plans and programs.

According to the Commercial Law

ESTABLISHMENT


Article 62.(3) State enterprises that are not trade companies can be established by law.

According to the above laws can be considered that Southwest state enterprise Blagoevgrad is eligible under the program?

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10	<p>I have a foundation established 10 years ago, but up to the current period the foundation was not operational. I would like to apply under the current Programme and therefore I intend to declare start of the operation of the foundation. In the documents concerning the eligibility of candidates is written the following:</p> <p>"2) Potential applicants are not eligible to participate in calls for proposals if:</p> <p>(a) they are bankrupt or being wound up, are having their affairs administered by the courts, have entered into an arrangement with creditors, have suspended business activities, are the subject of proceedings concerning those matters, or are in any analogous situation, arising from a similar procedure provided for in the national legislation or EU regulations;"</p> <p>.....</p> <p>"In the cases referred to in points (a), (c), (d), (f), (h) and (i) above, the exclusion applies for a period of two years from the time when the infringement is established"</p> <p>Please provide me with explanation of "have suspended business activities", and its relation to "the exclusion applies for a period of two years from the time when the infringement is established".</p> <p>There is no any violation by myside for which the foundation to be inactive or suspended. I have declared that up to now and from the beginning the foundation is not operational. In my opinion now is the proper time to start its activity taking into consideration the project proposal I would like to apply for.</p>	<p>To be eligible under the First Call for proposal the Lead partner and the other project partners should fulfil the requirements, described in p. 2.5.1 of the Guidelines for applicants.</p> <p>For explanation of "have suspended business activities" please refer to relevant EU Regulations and national legislation.</p>
11	<p>There is no clear information stated in the Guidelines for Applicants if the "Non-government organizations", as a term, includes foundations. My question is prompted by the fact that in some text of the Guidelines is stated that the non-government organizations are eligible applicants, and in other texts the foundations are specified separately from the Non-government organizations. Is it the above discrepancy accidentally or the foundations are eligible applicants under some of the Programme specific objectives (please see specific</p>	<p>As specified in p. 2.5.1. of the Guidelines for applicants, the candidates should be non-profit making organizations, registered in the eligible cross-border region between Bulgaria and Serbia and directly responsible for the preparation and management of the action, not acting as an intermediary. Additionally the candidates should be legally established organizations (legal persons) according to the national legislation of the state on whose territory they are located. Exceptions are also indicated there.</p>

	objectives 1.1, 1.2, 1.3 and 2.1 from the Guidelines for Applicants)?	The list of potential beneficiaries under each specific objective is indicative.
12	How many projects one applicant can submit? Can one municipality submit project as lead partner under priority 1 and under priority 2?	<p>Under the current Call for proposals an institution/organization may submit maximum one project proposals as a Lead Partner. In case an institution/organization has submitted more than one project proposal as a Lead Partner, all these proposals (submitted as Lead partner) will be eliminated at the administrative assessment stage. In addition, an organization may participate in no more than 3 (three) project proposals as a partner (i.e. if an organization/institution has submitted a proposal as a Lead Partner, the same organization can be a project partner in no more than 2 (two) other projects; an organization that has not submitted a project as a Lead Partner, can participate as a project partner in no more than 3 (three) projects). In case an organization participates in more than 3 (three) project proposals, all submitted proposals will be eliminated at the opening stage of the evaluation.</p> <p>The above requirement, specified in point 2.5.3 of the Guidelines for Applicants, applies to all three Priority Axes as a whole, meaning that an organization may be a Lead partner in only one project proposal, regardless of whether it is under Priority Axis 1, 2 or 3,</p>
13	Will costs for project elaboration during months September and October 2015 be considered eligible? What is the acceptable max sum for project preparation which could be reimbursed? Projects need to be submitted in English – in this line will the translation cost be considered eligible also? External expertise for proper filling of the project application form could be considered eligible cost or no?	To be considered eligible expenditures, the project preparation costs should be carried out before or on the date of submission of the project proposals at the latest. It means that all supporting documents as invoices, acceptance protocols, lists, etc., should be issued before or on the date of submission of the project proposal to the Managing Authority at the latest. The maximum rate of the project preparation costs is 3% of the total project direct costs under the project and they cover the expenses for project preparation (meetings between partners, consultancy, elaboration of technical documentation (incl. feasibility studies, detailed design, technical drawings, etc.), elaboration of project proposal and application form, translation of documents, taxes and other charges). In case of sub-contracting project preparation activities, procurement rules, mentioned in point 2.3 of the Guidelines for applicants, should be observed in order for the costs to be eligible for reimbursement under the Programme.
14	Regarding the requirement for realistic market-based costs, which is a criterion in the evaluation table, could you clarify does it mean that you ask to submit offers from suppliers	The proposed unit rates should be actual and realistic, not overestimated and be in compliance with the actual market prices. There is no requirement for additional documents (offers, market researches, etc.)


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	of services – for instance translation, advertising, trainers for seminars, etc.? How many offers per service type we have to submit?	to be submitted with the project proposal.
15	What is the percentage of the advance payments under the project?	<p>According to the Guidelines of applicants, Annex C. Subsidy contract, the following rules are going to be applied concerning the advance payment of the projects:</p> <p>4.1. For soft projects:</p> <p>The LP may request advance payment at the rate of 20 % of the total amount of the Contract.</p> <p>4.2. For investment projects:</p> <p>The LP may request advance payment in two installments:</p> <ul style="list-style-type: none"> - The LP may request the first installment of the advance payment at the rate of 10 % of the total amount of the Contract after the Contract enters into force. - The LP may request the second installment of the advance payment at the rate of 10% of the total amount of the Contract after one of the project partners awarded a sub-contract for investment activity.
16	Is it possible the project manager to be a person external for the lead partner (municipality)? Also it is possible an independent expert to be involved for the PR, communication and dissemination activities under the project, i.e. person who is not employee of the municipality?	<p>The appointment of the staff by the beneficiary is its own responsibility and has to be made in accordance with European and national legislation. Taking into account that the members of the project staff perform periodically repetitive actions related to the organization, coordination, management and reporting of the activities and results related to the project during the project period, the proposed (exemplary) positions for the project staff members are project manager, coordinator, accountant and assistant.</p> <p>In BL 4. EXTERNAL EXPERTISE AND SERVICES COSTS of the project partner budget could be included an external services in case they are well justified and are needed for the purposes of the project. These external services could not overlap the responsibilities related to staff mentioned above.</p> <p>The eligibility of expenditures under the First call for proposal is specified in point 2.5.8 of the Guidelines for applicants.</p>


17	<p>Regarding so called “flat rates” is there any requirement related to local legislative provisions – for instance: the monthly salary and respectively the daily wages of the accountant of the municipality are fixed. How to pay for additional activities within the project under the programme: accountant will spend few hours each month for the activities under the project which could be supplementary paid. In order to use the flat rates is it required to stick to the hour wages per hour payable within the current monthly salary or it is allowed the wages to be different?</p>	<p>The appointment of the staff by the beneficiary is its own responsibility and must to be made in accordance with national labor legislation. There is no specific requirement in the Guidelines for Applicants, which stipulates that internal experts of the beneficiary should be appointed as a project staff.</p>
18	<p>Regarding the indicators for Skills and entrepreneurship – where is the list of applicable indicators or they need to be defined with the project preparation? Number of young people attending seminar is acceptable indicator or not?</p>	<p>The output indicators are different for each Priority Axis and Specific Objective. Once the applicant select the Priority Axis and the Specific Objective in the Cover sheet of the Application Form, the respective set of possible output indicators shall appear in Part II of the Application Form “Project Identification”, point 5.1 “Expected outputs”.</p>
19	<p>What is definition for young people which you accept for the purpose of priorities of the programme?</p>	<p>According to the Programme document, young people are people up to the age of 29. Additionally, eligible target groups under the programme are both young people (up to the age of 29) and pupils in primary and secondary schools.</p>
20	<p>Can soft project under priority 2 of the programme include research (as external consulting service) for level of unemployment in the cross – border area in the sector of agriculture and measures at regional level to reduce and overcome unemployment or this activity will be considered not relevant?</p>	<p>The eligibility of activities under the First call for proposals is specified in point 2.5.6 of the Guidelines for applicants. In addition, all project activities have to show clear cross-border impact.</p>
21	<p>In the example for investment project on page 33 the sum seems to be below 300 000 euro which is required threshold for investment projects or no?</p>	<p>The grant amounts and project duration are defined in section 2.4.5 of the Guidelines for applicants. Additionally, the example on page 33 of the GoA shows how to calculate the amount of BL1 and BL2 on the basis of the maximum flat rates for staff costs and office and administrative costs, and its total amount is an instance.</p>
22	<p>Is Sofia University “St. Kliment Ohridski” eligible beneficiary under Priority axis 3. Environment, Specific objective 3.1. Joint Risk Management?</p>	<p>To be eligible under the First Call for proposal the Lead partner and the other project partners should fulfil the requirements, described in p. 2.5.1 of the Guidelines for applicants.</p>

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		<p>Additionally, a legally established entity (acting as Lead partner or Project partner), located outside the eligible cross-border area, but still on the territory of Bulgaria or Serbia, may participate under this Call for Proposals. The total amount allocated under the Programme to such beneficiaries shall not exceed 20% of the support from the Union at Programme level.</p>
23	<p>According to the text on page 37 of the Guidelines for applicants under the first Call for proposals No. 2014TC1615CB007 – 2015 – 1 the project preparation expenditures should be carried out before or on the date of submission of the project proposals at the latest and all supporting documents as invoices, acceptance protocols, lists, etc., should be issued before or on the date of submission of the project proposal to the Managing Authority at the latest. Does the above mean that payments should be also made before or on the date of submission of project proposals at the latest against invoices issued by this date? If not, is it possible a pro-forma invoice to be issued instead of a final invoice?</p>	<p>To be considered eligible expenditures, the project preparation costs should be carried out before or on the date of submission of the project proposals at the latest. It means that all supporting documents as invoices, acceptance protocols, lists, etc., should be issued.</p> <p>The respective payment could be performed in accordance with the national legislation after the date of submission of the project proposal to the Managing Authority.</p> <p>Pro-forma invoice is not valid tax document and could not be taken into account.</p>
24	<p>Is the complaint procedure going to extend the assessment and contracting period with 4 months?</p>	<p>In case of initiated complaint procedure, the period for assessment and contracting will be extended only for the project/s included in the complaint.</p>
25	<p>What is the indicative deadline for contracting under the First Call for proposals?</p>	<p>The provisional time for awarding of the first subsidy contracts is the fall of 2016. Please have in mind that this period of time is indicative only - the exact time for awarding of subsidy contracts depends on the overall number of received project proposals.</p>
26	<p>Is Sofia-city District included in the cross-border region of the Programme?</p>	<p>Sofia-city Region is not included in the cross-border region of the Programme. For all potential applicants registered in Sofia-city Region are applicable the terms and conditions for applicants registered outside the Programme area. As an exception to the rule is the eligibility of beneficiaries that are located outside the eligible cross-border regions, ensuring that the envisaged operations in the proposed project are for the benefit of the programme area. The Programme shall finance operations involving beneficiaries located outside the eligible cross-border area, but still on the territory of Bulgaria or Serbia.</p>
27	<p>Please clarify if the partnership should obligatory include partners from neighboring regions</p>	<p>There are no additional eligibility criteria regarding regions within the eligible cross-border region. A</p>

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	in Bulgaria and Serbia (mirror-based partnership)?	partnership should be considered eligible, when all its partners comply with all eligibility criteria.
28	What is the source of funding for the 15 % national contribution?	For all Bulgarian partners the 15 % national contribution shall be ensured by the State budget. For all Serbian partners the 15 % national contribution shall be ensured as own contribution.
29	Is the project funding under the Programme to be considered state aid?	Due to the fact the funds granted by the Interreg IPA CBC Bulgaria – Serbia Programme are of a public nature, all projects financed under the Programme shall be subject to state aid assessment. Please be aware that the Managing Authority is preparing detailed description of the procedure and a new Annex A.6 De minimis state aid declaration which will be included in the Guidelines for applicants.
30	Is the delivery of software products to be considered supply or services?	When the project envisages delivery of already developed software products, existing on the market, the expenditure should be considered as supply. In case the project envisages elaboration (programming) of custom/new software, the expenditure should be considered as service.
31	What is the meaning of the term soft-measures / people to people measures?	The term includes the vast field of activities including interaction between people and groups of people. Examples of such projects are available on the Programme's website.
32	Is mobility eligible as a project activity?	In general, mobility of people is eligible, when duly justified.
33	Is the activity of renovation of the private premises of an NGO eligible under this Call?	Renovation of premises/buildings located on private territory is not eligible under the First Call. Only investment activities on municipal or state property (compliant to all other eligibility criteria) are to be considered eligible.
34	Please clarify where should we consider the official address of a foundation, registered 10 years ago, which recently changed its official address?	According to the Guidelines for applicants, the place of establishment (registration) of candidates should be stated in the Application form and supported by most recent legal status, containing information for its official address.
35	Is there any difference between NGOs and foundations in terms of eligibility of candidates under this Call?	There is no difference under the First Call between the eligibility criteria of NGO and foundation candidates.
36	Is the expenditure for supply of transport and mobile equipment eligible?	Expenditures for supply of equipment are eligible if compliant to the eligibility of expenditures criteria and well-justified.

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37	Should all Bulgarian and Serbian LPs submit their project proposals at the same address?	All project proposals should be submitted at the JS Main office in Sofia. Postal address is included in the Guidelines for applicants.
38	Is sustainability of projects' results necessary?	Sustainability of projects' results is obligatory for all funded projects. For investment projects the minimum period for sustainability is 5 years after the end of the implementation period. For soft measure projects the minimum period for sustainability is 2 years after the end of the implementation period.
39	What is risk management?	The term risk management is used in the context of Priority axis 3. Environment, Specific objective 3.1. Joint risk management. In general risk management includes activities as Establishing joint early warning and disaster management systems; Capacity building related to disaster resilience; Investments in equipment related to disaster resilience and Support of small-scale interventions/ investments.
40	Please clarify if any origin requirements are applicable?	The rule of origin of supplies according to PRAG is applicable to all projects under this Call. For more information, please refer to PRAG.
41	What should we do if we are experiencing technical issues with printing the AF and not all text is visible?	The Managing Authority will take into consideration all reported possible problems with the AF and if necessary – will publish a revised AF. The beneficiaries will be informed for all modifications on the internet page of the Programme.
42	Can one activity be relevant/targeting more than one area?	The AF requires listing of one area as a main area of implementation of the respective activity. If the activity requires involvement of more project partners and is targeting more areas, it should be described in the sub-section with responsibilities of partners.
43	Who determines cooperation criteria applicable for the project?	The cooperation criteria are chosen by the applicants/partners.
44	How can we be sure that project activities do not duplicate activities of local and regional authorities?	Since the projects and the programme are very specific in nature, in general we do not expect difficulties with applicants identifying possible areas of overlapping between the projects and their usual activities. Furthermore, please be reminded that projects are encouraged to complement the usual activities of the organizations.
45	How can we justify project activities?	The justification of project activities should include references to sources of public information - strategic


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		documents, analyses, etc.
46	If some declarations are not filled in properly, can they be provided additionally?	Depending on the type of the document, in some cases this is possible depending on the decision of the Assessment working group.
47	Is it possible to provide additionally missing “de minimis” declaration?	Depending on the type of the document, in some cases this is possible depending on the decision of the Assessment working group.
48	How should we plan the recoverable VAT?	The unrecoverable VAT from other sources is eligible under the Programme and should be included in the unit rate for all expenditures, under all budget lines. Instructions for Bulgarian partners on recoverable or unrecoverable VAT are given in letter № 91-00-316/31.07.2014 of the Ministry of Finance.
49	What is the expected time-frame for contracting?	The expected time-frame for contracting depends on the overall number of proposals received. The indicative time-frame is the fall of 2016.
50	Is it possible to include expenditures for remuneration of driver who is not part of the project team?	Expenditures for remunerations of employees who are not part of the project team are to be considered ineligible. Expenditures for transport can be envisaged under BL 3 and BL 4, and do not cover remuneration.
51	For reporting of daily allowances of business trips is it sufficient to present administrative order for the trip and report from the trip?	The requirements under the national legislation should be respected. In this case and for Bulgarian partners these documents are sufficient.
52	Should we submit the proposal with CVs of the project team?	There is no such requirement. CVs are not requested.
53	Is it possible to plan the same positions (project coordinator as an example) for several partners?	According to the needs of the project you could plan equal positions under two or more project partners.
54	Is it possible to plan the project accounting under BL 4. External expertise and to hire a company for this service?	In general, planning of project accounting could be done under BL 4. External expertise and the company which is going to provide the accounting services should be selected according to the procedures of PRAG.
55	Is it possible to transfer financial resources between budget lines?	In general, such transfers are possible, in accordance to the terms and conditions of the Subsidy contract


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		and the Project implementation manual.
56	Should we submit the supporting documents for project preparation together with the project proposal?	The supporting and payment documents for project preparation are to be presented to the FLC in the first reporting period of the project implementation.
57	What is the type of project with budget for supply of 60 % of the total eligible amount?	<p>According to the Guidelines for applicants, such a project is ineligible. Under the First Call are envisaged only 2 types of project:</p> <p>Investment projects – with investment costs (expenditures for small-scale construction and supply) equal to or higher than 70 % of the total eligible amount;</p> <p>Soft measure projects with expenditures for supply equal to or less than 50 % of the total eligible amount.</p>
58	What is the acceptable definition of young people taking into consideration priorities of the Programme?	Eligible target groups under the Programme are both young people (up to the age of 29) and pupils in primary and secondary schools.
59	What kind of property is eligible for financing under the Programme?	According to the Guidelines for applicants all works activities should be implemented on municipal or state-owned property. Additionally the property should be free of any encumbrances, not an object of a pending litigation, not an object of a claim according to the relevant national legislation.
60	Are the NGOs eligible for applying investment projects?	<p>According to the Guidelines for applicants each organization that fulfills the requirements can apply for all of the priority axes under the Programme. In particular the investment projects can be done only on municipal or state-owned property and the following documents should be submitted:</p> <ul style="list-style-type: none"> - ownership act or certificate or legal document for municipal or state ownership of the tangible assets, which will be subject of works activities together with recent outline/design of the property – original or officially certified copy (notary certified for Bulgarian partners and certified by the responsible administrative body - for Serbian partners), issued in the original language and translated into English. - consent of the owner (Decision of the Council, Board, etc.), issued in the original language and translated into English, clearly stating that the assets are given for free right of use for the purpose of the project at least for 5 years after the end of the project – original or officially certified copy (notary certified


		<p>for Bulgarian partners and certified by the responsible administrative body - for Serbian partners). The consent should be signed by the person/body with the decision-making authority (e.g. the Municipal Council, not the Mayor). Consent of the owner is necessary in all cases even when the partner is the owner of the assets.</p> <p>In case the assets are owned by a partner the consent can be given in the same act (document) as the one containing the Decision for project development and implementation.</p>
61	Are Centers for vocational training and Centers for vocational development and information eligible candidates under the current Call?	The criteria for eligibility of applicants under the Programme are described in point 2.5.1 of the Guidelines for applicants. Please note that these criteria are cumulative and must be fulfilled all together.
62	Are regional district administrations, executive agencies, schools, kinder gardens, etc. eligible candidates under the current Call?	The criteria for eligibility of applicants under the Programme are described in point 2.5.1 of the Guidelines for applicants. Please, note that these criteria are cumulative and must be fulfilled all together.
63	In case the project proposal has Lead partner from the cross-border area, is it obligatory and the project partner to be from the cross-border area?	Every project must include at least one partner from each side of the border region. Projects which do not comply with this requirement will not be eligible. All partners are directly responsible for the project implementation and cannot act as an intermediary. The maximum number of partners in a project shall not exceed 5 (five) including the Lead Partner.
64	What is the number of priority axes that should be selected per project proposal?	Only one priority axis under the Programme can be selected under the current call for proposals. The candidates should choose between 1. Sustainable tourism, 2. Youth, 3. Environment.
64	What kind of information should be provided concerning the management capacity of the project partners?	The provided information should concern the organization's background, number of implemented projects, available project staff of the organization, scope of competences and activities, etc.
66	Does information concerning the financial status of the project partners should be provided in the AF?	The financial data of each project partner should be inserted in section 2. Financial data of the AF and should refer to the last three years – 2012, 2013 and 2014.
67	What is the minimum age of youths according to the Programme document?	Eligible target groups under the Programme are both young people (up to the age of 29) and pupils in primary and secondary schools.
68	What kind of activities should be included in youth infrastructure activities?	The described investment and support activities provided in the Guidelines for applicants are only

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		indicative and the project partners should include the project activities that correspond to the target group/s of the project in order the cross-border impact to be ensured and the project objectives to be achieved.
69	What are the assessment stages of the project proposals?	<p>The assessment is performed by Assessment Working Group (AWG) and is divided into two parts:</p> <ol style="list-style-type: none"> 1. Administrative compliance and eligibility check; 2. Technical and quality assessment. <p>The assessment process is described in details in section 6. Assessment and selection of applications of the Guidelines for applicants and examples of the evaluation grid are provided.</p>
70	What is the estimated period for assessment of the project proposals and that is the amount of the financial resources available under the current call for project proposals?	The period for assessment of the project proposals depends on the decision of the Managing Authority and the number of the project proposals received. The subsidy contracts under the First Call for project proposals are estimated to be signed in the winter of 2016. The total amount in Euro allocated under the current Call for Proposals for the three priority axes is available in section 1.3. of the Guidelines for applicants.
71	Is there any additional requirement concerning the registration of NGO – in public or private benefit?	There is no specific requirement concerning the registration of NGO and can be registered in public or private benefit. Additionally the criteria for eligibility of applicants under the Programme as described in point 2.5.1 of the Guidelines for applicants should be fulfilled by all project partners.
72	The organization is registered in 2014 and there is no financial data for 2014. Is this circumstance is significant and influence the final score of the project partner?	The financial stability of the project partners is subject of assessment during the technical evaluation and reflects on the overall score of the project proposals. For further details please see section 6.2. Technical and quality assessment of the Guidelines for applicants.
73	Does the financial support of the Programme will be considered as De Minimis aid?	Due to the fact the funds granted by the Interreg IPA CBC Bulgaria – Serbia Programme are of a public nature, all projects financed under the Programme shall be subject to state aid assessment. Please be aware that the Managing Authority is preparing detailed description of the procedure and a new Annex A.6 De minimis state aid declaration which will be included in the Guidelines for applicants. The Bulgarian project partners should submit Annex A6. State Aid De Minimis Declaration duly filled in,

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		signed and stamped.
74	Does the “soft measures” project envisage only supply?	For “Soft measures” projects, the amount of eligible expenses under sub-line “Supply” should be less than 50 % of total eligible project costs and there should be no expenditures foreseen under sub-line “Small scale construction”. In case of “investment projects”, the amount of eligible expenses under sub-line “Small scale construction” and sub-line “Supply” should form at least 70 % of total eligible project costs. This threshold is obligatory for all “investment projects” involving works and/or supplies.
75	What bank charges are eligible under the Call for proposals?	Expenses for opening and administrating of the bank account where the implementation of the project requires a separate account to be opened (only for the Lead beneficiary) and charges for transnational financial transactions (for all beneficiaries) are eligible under the current Call for project proposals.
76	Is obligatory condition CVs to be submitted during the application phase?	According to the Guidelines for applicants no CVs should be submitted. The appointment of the staff by the beneficiaries has to be made in accordance with European and national legislation. In the beginning of the project implementation each beneficiary will be requested to present a declaration that in the project implementation period he will keep up the necessary and qualified project staff for successful implementation of the project activities and a nomination of the project team members – internal order, a letter, etc.
77	Is it possible the project team members to be external experts and is it obligatory labour contracts to be signed?	According to the Guidelines for applicants no CVs should be submitted. The appointment of the staff by the beneficiaries has to be made in accordance with European and national legislation. In the beginning of the project implementation each beneficiary will be requested to present a declaration that in the project implementation period he will keep up the necessary and qualified project staff for successful implementation of the project activities and a nomination of the project team members – internal order, a letter, etc.
78	Is it possible civil servants to be hired as members of the project team?	According to the Guidelines for applicants no CVs should be submitted. The appointment of the staff by the beneficiaries has to be made in accordance with European and national legislation. In the beginning of the project implementation each beneficiary will be requested to present a declaration that in the project implementation period he will keep up the necessary and qualified project staff for successful

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		implementation of the project activities and a nomination of the project team members – internal order, a letter, etc.
79	Is it possible daily allowances to be paid to participants (others than project team members) in the process of implementation of the project activities?	According to the application form costs for daily allowances can be planned and paid only to the project team members and catering costs under BL4 can be planned for the participants in project events. Additionally in case there are daily allowances planned for the project team members in BL3, the same people should not be planned in BL4, subline Catering in order double financing to be avoided.
80	In case NGO has rights to use state or municipal property for a period of 10 years is it eligible the NGO to submit an investment project that should be implemented on this property?	<p>In case the investment activities will be performed on municipal or state-owned property except the documents described in the Guidelines for applicants, the following should be also submitted:</p> <ul style="list-style-type: none"> - ownership act or certificate or legal document for municipal or state ownership of the tangible assets, which will be subject of works activities together with recent outline/design of the property – original or officially certified copy (notary certified for Bulgarian partners and certified by the responsible administrative body - for Serbian partners), issued in the original language and translated into English. - consent of the owner (Decision of the Council, Board, etc.), issued in the original language and translated into English, clearly stating that the assets are given for free right of use for the purpose of the project at least for 5 years after the end of the project – original or officially certified copy (notary certified for Bulgarian partners and certified by the responsible administrative body - for Serbian partners). The consent should be signed by the person/body with the decision-making authority (e.g. the Municipal Council, not the Mayor). Consent of the owner is necessary in all cases even when the partner is the owner of the assets. In case the assets are owned by a partner the consent can be given in the same act (document) as the one containing the Decision for project development and implementation.
81	Is it eligible NGO registered in Plovdiv to implement project activities in Pernik for example?	In case a legally established entity (acting as Lead partner or Project partner), located outside the eligible cross-border area, but still on the territory of Bulgaria or Serbia, may participate under this Call for Proposals. The total amount allocated under the Programme to such beneficiaries shall not exceed 20% of the support from the Union at Programme level.

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82	Is it eligible an organization that is newly established to participate as project partner under the current Call for proposals?	The requirement for registration of at least 12 months prior to the deadline for submission of project proposals under current Call for Proposals is valid only for the Lead partner and does not apply to the rest of the Project partners.
83	Is it eligible an investment project to include “soft measures” activities?	The investment projects can include and “soft measures” activities, but in order the project to be classified as “investment project”, the amount of the eligible expenses under sub-line “Small scale construction” and sub-line “Supply” should form at least 70 % of total eligible project costs.
84	If there are three project partners applying for a project proposal with investment activities, is the requirement of 70% of the total eligible project costs should be fulfilled by all project partners or each of the partners should have at least 70%?	The estimation of 70% of total eligible project costs for investment projects is valid for the whole project budget and for all project partners.
85	Is there any restriction concerning the locations of the partners and specifically if organizations from Pernik can be partners with organizations from any of the 7 eligible areas from Serbia?	Each project must include at least one partner from each side of the border region and projects which do not comply with this requirement will not be eligible.
86	Are the churches eligible under the current call for project proposals?	The criteria for eligibility of applicants under the Programme are described in point 2.5.1 of the Guidelines for applicants. Please note that these criteria are cumulative and must be fulfilled all together.
87	Are the churches can be considered ideological organizations under the current call for project proposals?	The churches are not considered ideological organizations under the current call for project proposals.
88	According to the described complaint procedure the Lead partner may officially lodge a complaint not later than 3 working days after official receipt of the assessment grids from the MA but is it possible to be extended since is considered too short?	The determined deadlines concerning the compliant procedure remain unchained since are considered realistic. Please be aware that during the compliant procedure no additional documents improving the project proposal can be submitted by the project partners.
89	Are students eligible for project activities under the current Call?	The students may participate in different project activities under the current Call for project proposals.
90	Is it possible mirror projects to be implemented under the current Call?	There are no envisaged mirror projects to be implemented under the current Call for project proposals and in case are proposed these projects should provide detailed description of the mirror actions and explanation of the cross-border impact.


91	How should be considered the implementation of activities by organization registered in Sofia-city?	The whole budget of organizations located outside the eligible area will be considered as 20% of the support from the Union at Programme level.
92	Which section of the application form refers to information and publicity and does information concerning the publications and visibility can be provided in other sections of the AF?	The information concerning the information and publicity activities under the project can be inserted in section 3.5.1. Communication and visibility of the Application form. In case additional instruments and activities are needed to be described concerning the publicity measures, the respective information can be provided in section 3.5. Project activities of the AF.
93	Are the translations of documents for the needs of the project proposal should be made by translator or can be done by the organization itself?	The translations of the documents for the needs of the project proposal should be done by official translator.
94	What is the eligible period of validity of the document on the most recent status of each project partner?	The documentary and other evidence on the most recent legal status of each project partner should be not older than 6 months prior to the date of submission of the application. In the cases when the applicable document does not show the legal representative of the organization, additional document should be provided (the act of appointment/nomination, decision of municipal election commission, etc.) showing clearly the name of the person with representative power.
95	How the co-financing percentage /15%/ for the Serbian partners can be indicated in the application form?	Table 5 of the AF indicates the project sources and partners contribution and the respective information concerning the co-financing by the Serbian project partners is automatically filled in the table after filling in the previous sections of the application form.
96	Are there any specific requirements concerning the description of activities outside the eligible cross-border area?	The beneficiaries that are located outside the eligible cross-border regions should ensure that the envisaged operations in the proposed project are for the benefit of the Programme area and the beneficiary should provide a detailed justification proving that those activities are necessary for achieving of the specific project objectives.
97	In which part of the application form should be filled in the information concerning the activities outside the eligible cross-border area?	The description of all project activities /inside and outside the eligible area/ should be provided in section 3.5. Project activities – description and methods of implementation of the AF. The expenditures planned to be made outside the eligible area should be filled in column “Expenditures outside the eligible area” of the budget of the respective partner.

98	What does include the unit rate of 1,50 euro for travel costs?	The expenditure for rent of vehicle for project staff travels (car, van, minibus, etc.) must be budgeted in kilometers at a maximum rate of 1,50 euro per kilometer. Please note that the VAT is included in the unit rate and personal vehicles or vehicles of the organization cannot be rented for the purposes of the project activities.
99	What is the requirement concerning the “soft measures” project in case of planned supply?	For “Soft measures” projects, the amount of eligible expenses under sub-line “Supply” should be less than 50 % of the total eligible project costs and there should be no expenditures foreseen under sub-line “Small scale construction”. The respective expenditures should be planned in BL5 of the budget of the project partner.
100	In case one of the project activities foresees research and the sub-contractor assigned to perform the research is situated outside the eligible cross-border area, where is the place of implementation of the activity?	The territorial location/registration of the sub-contractor does not influence the place of implementation of the activity and the incurring of the expenditure.
101	Does the participation of project partners in the Partners search forum organized under the Programme will be considered eligible expenditure in BL6. Project preparation of the respective partner of the AF?	In order the project costs to be reimbursed subsidy contract between the Managing Authority /Contracting Authority/ and the Beneficiary /Contractor/ should be signed and the expenditures should be planned in BL6 of the respective partner and to be made according to the Programme rules.
102	Is it possible NGO to provide office /property of the organization/ to itself for the needs of project implementation?	The provision of an office /property of the organization/ to the same organization for the projects needs will be threatened as contribution in kind and as described in section 2.5.9. of the Guidelines for applicants is ineligible expenditure.
103	In what currency should be transferred the advance payment from the Lead partner to the project partner/s?	The Lead partner should transfer the advance payment to the project partner/s in Euro.
104	In case one of the project activities envisage event in Serbia, does the number of the participants from Bulgaria that are accommodated should be the same with the number of the participants received catering because in practice some of the participants can return the same day?	Only the actual number of participants received catering and accommodation will be taken into account during the verification of the expenditures and reimbursement of funds.
105	Are non-governmental organizations eligible candidates under specific objective 3.1. since	The list of the eligible organizations provided in the Guidelines for applicants is only indicative and there


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	are not included in the description available in section 2.5.1. General criteria for eligibility of applicants of the Guidelines for applicants?	are no restrictions concerning the type of organizations that can apply for.
106	In case our project proposal is in the reserve list for contracting, is there any possibility for financing at later stage?	In case any project proposal is in the reserve list the only possibility the project to be financed is in case of additional financial resources available /as a result of the performed negotiations with the proposed projects for financing or after refusal for financing by Beneficiary/.
107	Are eligible for financing construction activities or only small-scale infrastructure is envisaged under the current Call for project proposals?	Activities including construction, reconstruction, rehabilitation, widening and modernization of the building(s)/site(s) and the related installations are eligible for financing under the current Call for project proposals.
108	Is there any requirement concerning the version of the MS Office to be used in order the application form to be filled in?	There are no specific requirements concerning the version of the applicable MS Office.
109	Is it obligatory to provide fax number in section 1.1. Contact information for each project partner?	The provision of an operational fax number is obligatory since will be used by the Managing Authority during the assessment process of the project proposals if needed. Please be aware that the communication via fax is an official instrument for communication with the candidates except the registered mail and the electronic signature.
110	Is it obligatory the description of the project management to be provided only in section 4. Management of the project and reporting or the project management can be described in section 3.5. as separate project activity?	The main responsibilities of each project partner in view of the overall project implementation and reporting, the structure of the project team, the responsibilities of each member of the project team should be described in details in section 4 of the application form. In case additional actions concerning the project management are needed and are specific for the project these can be described as separate project activity.
111	What is the tentative period that will be given for response by the candidates after the administrative and eligibility check?	The period for response will depend on the decision of the Assessment Working Group in terms of number of project proposals submitted, etc. The deadlines will be realistic and according to the set operational deadlines, i.e. 5 working days.
112	Is the furniture can be considered equipment?	The furniture is considered equipment and the expenditures should be included in BL5 of the AF of the respective partner.


113	If after the performed negotiations the total project costs are lower than the minimum required for the specific objective, does it mean that the project will be rejected?	The negotiation process does not envisage automatic reduction of the project costs but is performed by Negotiation committee and the reductions are in accordance with the given recommendations by the assessors during the technical and quality assessment. In case the total project costs are lower than the minimum required for the specific objective, the project will not be proposed for financing.
114	Does the given maximum rate of 1.50 euro per kilometer for rent of vehicles for project team and participants in events include fuel?	The unit rate of 1.50 euro per kilometer is the maximum expenditure that can be made and includes fuel, rent of vehicle, VAT, etc. Please note that personal vehicles or vehicles of the organization cannot be rented for the purposes of the project activities.
115	In which budget line should be filled in the information for rent of vehicle for the project team?	The travel costs, daily allowances and the accommodations costs necessary for the needs of the project team members during the project implementation period should be planned in BL3 of the budget of the respective partner.
116	Can you provide clarifications concerning the allowances for depreciation of equipment i.e. computer that will be used for the project implementation period, i.e. 1 year?	Depreciation costs for equipment that will not be used by the project partners or the project target group after the project completion and if the economic lifetime of the equipment (respectively – the period of depreciation) is longer than the project duration, are eligible only for the period of project duration. The depreciation rate has to be in line with national rules. Depreciation is charged proportionally for each relevant period for which a periodical report is required and prepared. The full value of depreciated costs on equipment in relation to the total project duration cannot be charged as total amount for one particular period. Only the proportionate sum of the depreciations costs according to the use of equipment for the project is eligible. The amount (percentage used and time duration) has to be properly clarified (auditable). The depreciation costs of equipment can never exceed the purchase price of the equipment.
117	In the description of BL3 of the application form in the Guidelines for applicants is written that the travel costs cover expenses for train tickets, bus tickets, airline tickets, parking fees, car/mini-bus travels (expenditure for fuel/kilometer, insurances for cars, green cards, motor way taxes, vignettes, etc.), rent of vehicle for the operation, medical insurances. In case that personal vehicle is used for the needs of the project implementation, do the following expenditures are eligible namely annual vignette, medical insurance, green card and other	In case such expenditures are made and requested for verification and reimbursement, strict control of the documentation will be exercised concerning the reported information and will be reimbursed only the expenditures that are really incurred and are in accordance with the Programme rules.

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	insurances?	
118	How will be considered the costs for elaboration of the tender procedures – as direct or indirect costs?	These expenditures should be included in BL4 of the budget of the respective partner. Budget lines 3, 4 and 5 are direct costs and budget lines 1 and 2 are indirect costs.
119	Should all project partners fulfil the requirement for registration of at least 12 months prior to the deadline for submission of project proposals?	The Lead partner must be registered on the territory of Bulgaria or Serbia at least 12 months prior to the deadline for submission of project proposals under current Call for Proposals and the condition for registration at least 12 months prior to the submission deadline does not apply to the rest of the project partners.
120	How many Lead partners can participate in one project proposal?	Under the current Call for project proposals only one organization can participate as Lead partner and may submit maximum one project proposals as a Lead Partner. In case an institution/organization has submitted more than one project proposal as a Lead Partner, all these proposals (submitted as Lead partner) will be eliminated at the administrative assessment stage. Under the current Call for proposals an organization may participate in no more than 3 (three) project proposals as a partner (i.e. if an organization/institution has submitted a proposal as a Lead Partner, the same organization can be a project partner in no more than 2 (two) other projects; an organization that has not submitted a project as a Lead Partner, can participate as a project partner in no more than 3 (three) projects). In case an organization participates in more than 3 (three) project proposals, all submitted proposals will be eliminated at the opening stage of the evaluation.
121	Is it possible to be submitted three identical project proposals by three different project partners?	Each project proposal should implement different project activities, the target groups should differ and the cross-border impact should be ensured. Under the current Call for proposals an organization may participate in no more than 3 (three) project proposals as a partner (i.e. if an organization/institution has submitted a proposal as a Lead Partner, the same organization can be a project partner in no more than 2 (two) other projects; an organization that has not submitted a project as a Lead Partner, can participate as a project partner in no more than 3 (three) projects). In case an organization participates in more than 3 (three) project proposals, all submitted proposals will be eliminated at the opening stage of the evaluation.

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122	Is there any exact definition of reconstruction activities?	There is no definition for reconstruction activities but these should be in compliance with the Programme rules. Please be informed that the list of activities provided in the Guidelines for applicants is only indicative.
123	Can you explain in details the criteria "Joint financing"?	Joint financing means that there will be only one contract per project and therefore there must be one joint project budget. The budget should be divided between partners according to the envisaged activities. A project with 0.00 Euro or very small financing from one side of the border cannot be considered as having joint financing. There is also only one project bank account for the EU and national contribution (held by the Lead Partner) and the Lead Partner is responsible for administration and distribution of these funds and for reporting on their use. Complementary funding should come from both sides of the border and guarantees the commitment by each partner to the joint project. The budgets of the project partners should be balanced and in according to the project activities.
124	How significant is the distribution of the project costs between the project partners In case of investment project and is it acceptable the Bulgarian partner to implement infrastructure activities and the Serbian partner to participate in the project with know-how for example?	Even distribution of the project costs should be ensured and the project costs should be in accordance with the project activities. Even distribution doesn't mean equal. The balanced distribution is quite significant since is part of the technical and quality assessment, for further details please see the Technical and quality assessment grid, point 21 of the Guidelines for applicants. Other significant requirement is the achievement of the cross-border impact as a result of the implementation of cross-border project.
125	Is it possible "soft measures" project to include investment activities?	For "Soft measures" projects, the amount of eligible expenses under sub-line "Supply" should be less than 50 % of total eligible project costs and there should be no expenditures foreseen under sub-line "Small scale construction".
126	Does the optimization of the budget as a result of the performed negotiations envisage only reduction or distribution of the project costs between the different budget lines?	The optimization of the budget is performed on the basis of the recommendations of the assessors, given during the technical and quality assessment, the negotiation process also envisages changes of the units, unit rates and distribution of project costs between the different budget lines if needed. Please take into consideration that during the negotiations is not allowed increasing of the project total costs.

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127	Who is responsible for the elaboration of the detailed works design in case of investment activities and are the expenditures for its elaboration eligible for reimbursement?	<p>The responsibility for the elaboration of the detailed works design is of the respective project partner planned implementation of investment activities. The detailed works design should be elaborated by an authorized person/expert according to the national legislation. The costs for the elaboration of the detailed works design can be reimbursed in case are respected the following:</p> <ul style="list-style-type: none"> - The subsidy contract between the Managing Authority and the Beneficiary is signed; - The expenditures are planned in BL6 of the budget of the respective partner; - The expenditures are requested for verification by the Beneficiary; - The expenditures are incurred according to the Programme rules and the national legislation.
128	Does it eligible the external expert/company developed the project proposal to be sub-contractor during the project implementation in case are respected the PRAG rules?	According to PRAG and the Programme rules there is no restriction concerning the participation of external experts/companies developed the project proposal to be sub-contractors during the project implementation phase in case all the envisaged requirements for assigning are respected.
129	Is it mandatory requirement the payments and transfers during the project implementation to be made through the official bank account of the Lead partner in foreign currency /euro/?	The Lead partner is obliged to maintain the official bank account in euro in order to receive funds from the Managing Authority and to transfer funds to the project partners. The payments concerning the project implementation /salaries, overheads, consumables, payments on service/supply contracts/ can be made through separate bank account/s in BGN maintained by the Lead partner. National transactions costs are ineligible under the current Call for project proposals.
130	In case a service contract is signed with company for elaboration of the project proposal is it eligible the payment to the company to be made after the signing of the subsidy contract between the Managing Authority and the Beneficiary?	The project preparation expenditures should be carried out before or on the date of submission of the project proposals at the latest. It means that all supporting documents as invoices, acceptance protocols, lists, etc., should be issued before or on the date of submission of the project proposal to the Managing Authority at the latest. The expenses for project preparation should be requested for reimbursement and verified only in the first reporting period of the respective project partner and in accordance with the guidelines from the Managing Authority. In case of sub-contracting project preparation activities, procurement rules should be observed in order the costs to be eligible for reimbursement under the Programme.

131	Do we have to merge the costs for rent of hall for three similar project events or should be written in separate rows?	The costs for rent of hall should be planned in BL4 of the budget of the respective partner and in case the unit prices of the halls are identical for all three events the costs can be planned in one subline otherwise should be planned in separate sub-lines of the budget line.
132	Is there minimum or maximum rate for information and publicity activities that should be taken into account during planning of the total project costs?	There are no specific rates for the information and publicity activities under the project. These expenditures should be realistic according to the market prices and to be planned in BL4 of the respective partner.
133	Is it necessary the items supplied under BL5 of the respective partner to be accompanied with declaration of origin?	The beneficiaries should be familiar with the most actual version of the PRAG document concerning the requirements for declaration of origin in case of supply.
134	Is it eligible the implementation of each project activity to be during the whole period of the project realization, i.e. each project activity to continue 12 months in case of "soft measures" project?	The planning of the project activities implementation and the development of the action plan is responsibility of the project partners and it should be strictly observed. The realistic and logically structured action plan on the other hand is one of the prerequisites for the successful project implementation.
135	Does the project management will be considered external expertise if is written as separate activity in 3.5. of the AF?	The main responsibilities of each project partner in view of the overall project implementation and reporting, the structure of the project team, the responsibilities of each member of the project team should be described in details in section 4 of the application form. In case additional actions concerning the project management are needed and are specific for the project these can be described as separate project activity.
136	Does the maximum number of characters /1500/ of section 3.5. of the application form refer to one activity or is valid for the description of all project activities?	The requirement for minimum 600 to maximum 1500 characters refers to the description of each project activity in section 3.5. of the AF.
137	What kind of document/s should be submitted under section B4.6 as described in the Guidelines for applicants?	Section B4.6 refers to description of envisaged supplies, including exact quantities, presented in English. For supplies, payments for which may be made against invoice without prior acceptance of a tender, submission of technical specifications is not required. For all other supplies, which shall be procured through tender procedures, applicants must provide technical specifications. Please note that brands/trademarks and models must not be indicated in the technical specifications.


138	Are the candidates obliged to submit offers, market researches, etc. during the submission of the project proposals in case maximum eligible unit rates are not specified in the Guidelines for applicants?	According to the Guidelines for applicants justification for calculation of the expenditures planned as a lump sum in BL4. External expertise and services costs, sub-line "Consultancy, studies, designs, website development, etc." should be presented in separate document/s signed by the respective partner.
139	Are the costs for elaboration of tender documentation under BL4 should be deducted from the staff costs?	The costs for elaboration of the tender documentation as part of BL4 are classified as direct costs and will not be deducted from the staff costs /indirect costs/. Direct costs are all expenditures that can be attributed directly to the project - expenditures for travel and accommodation, external expertise and services, equipment and works (Budget lines 3, 4 and 5). Indirect costs are the costs that cannot be assigned directly to the project activities but are necessary for their implementation – expenditures for staff, office and administrative expenditures (Budget lines 1 and 2).
140	Is it eligible the translation of project documentation to be planned in sub-line "Elaboration, design, translation of advertising materials" of BL4?	The subline "Elaboration, design, translation of advertising materials" includes expenses for elaboration, design, written translation, publishing or printing of: information materials (concerning project documents, project events, meetings, implementation provisions, etc.); brochures, leaflets (informing about the project's implementation and results); manuals and guidelines (related to the project); design of project's logo; design and printing of advertising items with the logo of the project or with the logo of the Programme (pens, key chains, CDs, USBs, hats, bags, note books, folders etc.). The maximum allowed rate for written translation is 10 euro per page.
141	Are eligible costs the scholarships and travel costs of trainees /unemployed/ selected through the Employment agencies?	According to the Guidelines for applicants no scholarships should be awarded to trainees or other participants in project events. The eligible expenditures related to trainees as part of project activities should be planned in BL4 of the respective partner and envisage costs for travel, accommodation, catering, materials, etc.
142	What is the percentage of the staff costs that will be reimbursed to the Lead partner after the verification of the expenditures?	Staff costs shall be reimbursed by the Managing Authority to the beneficiaries as a flat rate of maximum 20 % of direct costs for "Soft measures" projects. For "Investment" projects the flat rate shall not exceed 10% of direct costs. The flat rate percentage should be indicated in the budget by the project partner and will remain the same for the entire project implementation period! In the verification process the beneficiaries do not need to present the supporting documents that the expenditure has been incurred

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		and paid.
143	How is organized the process of project assessment?	In order to be proposed for financing, a project must fulfil all the administrative and eligibility criteria and receive at least 65 points at the technical and quality assessment. Taking into account the Good Administrative Practices, the Assessment Working Group can exclude an applicant at any stage of the evaluation process whenever it is obvious that the latter does not meet the eligibility criteria. Detailed description of the assessment process, the procedure for selection of applicants as well as the administrative compliance and eligibility check and the technical and quality assessment check are provided in part. 6 of the Guidelines for applicants.
144	In one of your answers concerning the preparation costs you state: "...all supporting documents as invoices, acceptance protocols, lists, etc., should be issued before or on the date of submission of the project proposal to the Managing Authority at the latest". Is it obligatory for a Contracting Authority (Applicant under the call) to pay its Contractor (Consultant) before the deadline for submission of projects or it's enough that the invoice is issued before the deadline?	Please see the answer above (Question 23)
145	According to the Guidelines for applicants under the first call for proposals 2014TC16I5CB007–2015–1 (p.51), in case of construction works, for which the relevant legislation does not require approval of a works design, the applicants have to present a statement by the relevant institutions for exception of the rule for design's approval, issued in the original language and present situation drawings, supported with the following documents, translated in English: Explanatory note and detailed Bill of Quantities. In relation to the above mentioned, is it possible in the application phase to be submitted preliminary design, in case it is eligible, the Construction permit to be issued on the basis of the preliminary design, as per the relevant legislation, and the works design to be elaborated during the project implementation phase, as well as the respective expenditure related to its	If the national legislation requires elaboration /and approval of detailed works design, its submission after the deadline for application or separately from the related project proposal is to be considered unacceptable. Additionally, to be considered eligible expenditures, the project preparation costs should be carried out before or on the date of submission of the project proposals at the latest. It means that all supporting documents as invoices, acceptance protocols, lists, etc., should be issued before or on the date of submission of the project proposal to the Managing Authority at the latest.

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	elaboration to be recovered under the project?	
146	<p>Regarding the eligibility criteria set in section 2.5.1. in the Guidelines for applicants, and the important note “Regional structures/branches of central organizations, other than local/regional/national authorities, are ineligible applicants under this Call for proposals. For Bulgarian applicants this means that even though a regional structure/branch may have its own registration code (as an extension to the registration code of its central body), it is still not a separate legal entity and therefore only the central structure could be a project partner.”, please clarify whether the branches of the NGOs are ineligible as Lead partners or as Project partners as well. The branches of organizations, registered in the cross-border area were eligible applicants during the last programming period – please clarify why they are not now, or at least they can be a partner to a leading organization from Serbia.</p>	<p>One of the general criteria for eligibility of the applicants is to be legally established organizations and can act as a legal entity according to the national legislation of the state on whose territory they are located.</p> <p>In case of branches of NGOs, they shall be considered as ineligible partners under the Call, regardless of the fact that they may have their own registration codes (as an extension to the registration code of their central bodies), since that does not constitute a separate legal entity. Therefore, in those cases only the central structure could be a project partner.</p> <p>All potential applicants must be reminded that the current INTERREG IPA CBC Bulgaria – Serbia Programme is a different programme that the one from the last programming period and thus many of the requirements, conditions and eligibility criteria have considerably changed as a result of EC regulations, public consultations and lessons learnt. Therefore, Applicants must study carefully the Guidelines for Applicants under the present Call for Proposals and comply with all their requirements without making references to previous periods, documents and practices.</p>
147	<p>Please clarify whether the Bulgarian non-profit making NGOs will be receiving the subsidy as a de minimis state aid, given that they had no economic activities.</p>	<p>Under the programme as an undertaking will be considered any entity engaged in an economic activity, regardless of its legal status and the way in which it is financed (an undertaking can be a public body, a charity, a NGO, an association, an university etc.). The application of the State aid rules as such does not depend on whether the entity is set up to generate profit, as also non-profit entities can offer goods and services on a market too. The only relevant criterion is to decide whether or not the entity carries out an economic activity in the context of the project. It is important whether the aid is giving an economic advantage (a benefit), which an undertaking would not have obtained under normal market conditions, including the potential possibility for development of economic activity as a result of the project and whether as a result of the project the market will be changed. Public support given by the Programme to undertakings for activities of economic character can be granted under the de minimis rule.</p>


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148	When filling in the sections of the application form in electronic, only part of the added text is visible, although the eligible number of symbols is not exceeded. The whole filled in information is visible only in paper copy.	The Managing Authority has taken into consideration all reported problems concerning the filling and printing of the Application form and will publish an up-dated version of the AF on the website of the programme.
149	There is a technical problem regarding the filling in the detailed project budget /T2-B/ of the Application form. When filling in the type of the expenditure in a new added row of the respective budget sub-line, only part of the added text is visible, if it contains many symbols.	Please, see the answer to question 148.
150	A technical problem regarding the part II. Project identification, point 5.1. Expected outputs of the Application form is observed. After selection of the first output and filling in its related information (quantity, sources of verification), the AF adds a new row where a random quantity is generating automatic.	Please, see the answer to question 148
151	The Bulgarian association for transfer of technologies and innovations is non-profit making organization (NGO), which is registered in Varna more than 12 months ago. At the present, a procedure for change of managing address of the organization (on the territory of Sofia city) is leading. In relation to the abovementioned, is it eligible to apply BATTI as a lead partner under the Programme, since its managing address will be changed in a period shorter than 12 months prior to the deadline for submission of project proposals, but it will correspond to the eligibility criteria, as per the initial registration of the organization.	Please see the answer of question No1, listed above.
152	<p>Regard to the filling in on the detailed project budget /T2-B/ for each of the project partners, observe the following problem:</p> <p>- By the filling in on new rows after the first row after the each budget sub-line the words in the newly introduced rows are not visible.</p> <p>-Expect this in Part II of the Application form /"Project identification"/, point 5.1 "Expected outputs", by the filling in on the expected output in the row, it introduce automatic a new row under the first.</p>	Please, see the answer to question 148


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	Please explain how to eliminate these problems.	
153	According to the Guidelines for Applicants the consultancy costs, which amount is to be 3%, should be carried out before the submission of the project proposal. Our question is what should we understand by "carried out" - to be actually paid or to be only invoiced before the submission of the project proposal?	Please see question No 23 and its answer, listed above.
154	Could the Leading partner be registered outside the eligible cross-border area of the program?	<p>There is no requirement, specified in the Guidelines for Applicants that the Lead partner should be registered in the eligible cross-border area.</p> <p>According to p. 2.5.2. Lead partner principle, the Lead partner must be registered on the territory of Bulgaria or Serbia at least 12 months prior to the deadline for submission of the project proposals under the First Call for Proposals. In addition, to be considered eligible the project proposal must include at least one partner from each side of the border region.</p> <p>Additionally, the Lead partner and the other project partners should fulfil the requirements concerning the eligibility of applicants, described in p. 2.5.1 of the Guidelines for applicants.</p>
155	If a NGO is registered 5 years ago in Sofia and re-registered in the eligible area 3 months prior to project submission, is it eligible to be the Lead Partner? Can it have more that 20% of the project budget?	<p>Please see the answer stated above.</p> <p>Additionally, the Programme shall finance project partners that are located outside the eligible cross-border regions and/or activities outside the eligible cross-border area, in case they are well justified and ensuring that the envisaged operations in the proposed project are for the benefit of the programme area. The total amount allocated under the Programme to beneficiaries and activities outside the eligible cross-border area shall not exceed 20 % of the support from the Union at Programme level. The Joint Monitoring Committee under the Programme will monitor the percentage of funds allocated to both project partners and activities outside the eligible cross-border area in order to ensure compliance with the 20% rule.</p> <p>Project partners are not obliged to respect the 20% rule at project level.</p>

156	<p>Is it possible in BL4, budget sub-line “Elaboration, design, translation of advertising materials”, to be included expenditures for translation of project’s documentation or these expenditures must to be included in budget sub-line “Other”?</p>	<p>In case the expenditures for translation of project documentation are going to be carried out during the project implementation period, they should be included in BL4. External expertise and service costs, sub-line “Interpreters, lecturers, trainers, moderators, etc.”.</p> <p>In case the above expenditures are related to the preparation of the project proposal, they are to be included in BL6. Project preparation. In addition, all expenditures under BL6 are to be carried out before or on the date of submission of the project proposals at the latest.</p>
157	<p>In point 2.5.8 “Eligibility of Expenditures” of the Guidelines for Applicants is indicated, that the maximum allowed rate for translation is 10 euro per page. For what kind of translation concern this limitation / English or Serbian/?</p>	<p>The maximum allowed rate for written translation (10 euro per page), specified in p. 2.5.8 “Eligibility of Expenditures” of the Guidelines for Applicants, applies to all types translation, including English, Serbian and Bulgarian.</p>
158	<p>In case the development of the project proposal is assigned to a company which of the partner has to assign the task to the company and conclude the contract with it? Does the partner has to apply tender procedures before assignment of the task for development of the project proposal to a company? In case the project partners are schools in the eligibility area do they have to approve the decision for assignment of a contract in a School council? Which partner is obliged to do that?</p>	<p>The project preparation expenditures have to be assigned according to the procurement rules mentioned in p. 2.3. Applicable law and public procurement of the Guidelines for Applicants, observing all requirements of the respective type of tender procedure. There is no requirement which partner will assign the project preparation to the contractor, but PRAG annexes and procedures should be followed in the process of preparation of tender dossier and implementation of tender procedure. In addition, the project preparation expenditures cannot exceed 3% of total project direct costs and should be envisaged in BL6 of the respective project partners’ budget.</p> <p>Decision of local council, or board of directors, or any similar body, or managing person should be provided (in original or in the form of copy, certified “True copy”) by each project partner regarding the project development and implementation. The decision has to be issued in the original language and has to be provided in all cases, no matter whether sole or collective managing authority takes the decisions in the organization.</p> <p>Additionally, in case of investment project, Consent of the owner (Decision of the Council, Board, etc.), issued in the original language and translated into English, clearly stating that the assets are given for free right of use for the purpose of the project at least for 5 years after the end of the project – original or officially certified copy (notary certified for Bulgarian partners and certified by the responsible</p>


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		<p>administrative body - for Serbian partners). Please be reminded that the investment activities under the First call for proposals must be performed on municipal or state-owned property.</p> <p>Both the decision for project development and implementation and the consent should be signed by the person/body with the decision-making authority (e.g. the Municipal Council, not the Mayor).</p> <p>The detailed list of the supporting documents required is mentioned in p. 3.2 of the Guidelines for Applicants.</p>
159	<p>According to the guides for applicants Serbian project partners has to co-financed the grant with 10%. Are these 10% from the total amount of the project proposal or from the amount which Serbian partner possesses according the activities he is supposed to complete?</p>	<p>The obligatory own co-financing for Serbian partners should be minimum 15 % of total amount of the respective project partners' budget.</p>
160	<p>On page 64 from the Guidelines for Applicants, in the table of "Technical and Quality Assessment Grid", p. 2 The partners are experienced in project management in EU funded projects, line 1 reads:</p> <p>- The same partnership has implemented at least 1 EU funded project.</p> <p>Would you be so kind to provide additional information how "same partnership" should be interpreted when referring to 4-5 partners - if one partner is replaced with a new (better for the present project one) and all the rest (main partners) are preserved, then do we still have "same partnership"?</p>	<p>The "same partnership" means if all of the project partners included in the respective project proposal have implemented all together previous project/s. In cases, one of them is replaced with another, the partnership cannot be considered "the same".</p>
161	<p>According to the Guidelines for Applicants (p.20-21), soft projects should not "grant more than half of their total eligible budget to purchase of equipment" and investment projects should "have works (construction, reconstruction, rehabilitation, renovation, etc.) and/or purchase of equipment components, forming at least 70% of the total eligible cost of the entire project". Are projects with equipment component between 50%-70% of total eligible budget (and no works component) eligible for financing under the Programme and, if yes, how are they classified – as soft or investment projects?</p>	<p>The projects that grant between 50% - 70% of their eligible budget to purchase of equipment are not eligible under the First call for proposals.</p>

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162	Our project envisages the development of a software application. Should we treat this as equipment?	<p>In case the project nature necessitates development of unique software application its development should be considered as service and the respective expenditure should be planned in BL4. External expertise and services costs of the respective project partners' budget</p> <p>In case the software application is going to be purchased, it should be treated as equipment and its related expenditures should be planned in BL5. Equipment and works.</p>
163	Is it possible project partner to be located outside NUTS III regions? For example, organization from Bor to participate with organization from Damyanovo or to form consortium, for example organizations from Bor and Knjazevac to participate with project partner in Damyanovo.	Every project must include at least one partner from each side of the border region. Projects which do not comply with this requirement will not be eligible.
164	Could you please tell me how to open sheets for more than two partners in the Application Form?	The sheet for a new partner will be created if you put "X" into the cell of the subsequent partner (partner 3, partner 4, etc.) in sheet "Checklist" of the Application form. Please be reminded that you should fill in all sections of the Application form consequently, starting from the Cover page.
165	According to p. 28 of the Guidelines for applicants concerning investment projects all works activities should be implemented on municipal or state-owned property. In that regard would it be permissible for us as NGO to include under the project the implementation of construction works on our own private property? What documents should be presented in this case?	Under the First call for proposals the investment activities is eligible to be performed on municipal or state-owned property. All supporting documents should be provided and submitted together with the Application form are described in point 3.2 of the Guidelines for Applicants.
166	According to p. 28 of the Guidelines for applicants concerning investment projects all works activities should be implemented on municipal or state-owned property. In that regard would it be permissible for us as NGO to include under the project the implementation of construction works on municipal or state-owned property with having the rights construction? What documents should be presented in this case?	Please see the list of the supporting documents should be provided and submitted together with the Application form are described in point 3.2 of the Guidelines for Applicants.
167	Is it permissible to equip an educational center in a rented private building? What documents should be presented in this case?	To be considered eligible the equipment envisaged in project proposal should be necessary for implementation of planned project activities and should ensure the achievement of project objectives.


		Description of envisaged supplies, including exact quantities (Annex B4.6.) should be provided in English and submitted together with the Application form.
168	According to the Guidelines for applicants all Bulgarian Applicants bear the responsibility to declare that the de minimis aid they apply for when accumulated with the one they have received before, will not exceed the de minimis aid ceiling. Does that mean that the maximum budget of a Bulgarian partner should not exceed 200 000 euro in case the partner has not received any other aid.	Public support given by the Programme to undertakings for activities of economic character will be granted under the de minimis rule (the amount of the state aid received should not exceed 200 000 euro for the last three fiscal years). This implies that undertakings will receive grants only if they have not received public aid under the de minimis rule (for activities of economic character) totaling more than 200,000 EUR within three fiscal years from the date of granting the aid. As a consequence, undertakings (i.e. not only private companies but also public authorities, NGOs etc.) carrying out state aid relevant activities in the project might receive limitations on the public contribution to their budgets in case they have received public aid in the mentioned period.
169	Our NGO is registered in the eligible area on 13th of February 2015. Can we apply as Lead Partner under current Call for proposals?	To be eligible under current Call for Proposals, the Lead partner must be registered on the territory of Bulgaria or Serbia at least 12 months prior to the deadline for submission of project proposal. Additionally, the project partners, including the lead partner, must fulfil all other requirements, specified in point 2.5.1 of the Guidelines for applicants.
170	Regard to the indicated in the Guidelines for Applicants maximum rates for the different kind of services/supplies, are these maximum rates with included VAT?	All indicated rates in the Guidelines for applicants as well as the whole project budget are VAT included.
171	Is it possible establishment of cross-border cultural product for popularization of songs and dances and for covering all the eligible area to buy a mini-bus for the traveling activities of musicians under priority axis 1? Is it possible this mini-bus to be considered as eligible expenditure under Budget line 5?	The eligibility of activities under the First call for proposals is specified in point 2.5.6 and the eligibility of expenditures is specified in point 2.5.8 of the Guidelines for applicants. In addition, all project activities have to show clear cross-border impact. The planning of the project costs is responsibility of the project partners and should be in accordance with the unit prices provided in the Guidelines for applicants. The realistic and logically structured project budget and the correspondence of the project costs with the project activities is one of the prerequisites for the successful project implementation.
172	Are decoration costs for concerts of folklore ensemble eligible under budget line 4 or budget line 5?	The planning of the project costs is responsibility of the project partners and should be in accordance with the unit prices provided in the Guidelines for applicants. The realistic and logically structured project budget and the correspondence of the project costs with the project activities is one of the prerequisites

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		for the successful project implementation.
173	Is it acceptable under this call to purchase also musical instruments and folklore ensemble costumes and under which budget line?	The eligibility of activities under the First call for proposals is specified in point 2.5.6 and the eligibility of expenditures is specified in point 2.5.8 of the Guidelines for applicants. In addition, all project activities have to show clear cross-border impact. In case the project envisages supply these expenditures should be filled in BL5 of the budget of the respective partner.
174	For purchasing of acoustic and recording equipment for the concerts could you clarify if the project is for 15 months what will be the eligible amount of these equipment if you will apply kind of accounting principles for amortization expenses?	Depreciation costs for equipment that will not be used by the project partners or the project target group after the project completion and if the economic lifetime of the equipment (respectively – the period of depreciation) is longer than the project duration, are eligible only for the period of project duration. The depreciation rate has to be in line with national rules. Depreciation is charged proportionally for each relevant period for which a periodical report is required and prepared. The full value of depreciated costs on equipment in relation to the total project duration cannot be charged as total amount for one particular period. Only the proportionate sum of the depreciations costs according to the use of equipment for the project is eligible. The amount (percentage used and time duration) has to be properly clarified (auditable). The depreciation costs of equipment can never exceed the purchase price of the equipment.
175	Regarding the indicators could you clarify for priority 1.3 People to people networking under priority axis 1 Sustainable tourism – is it applicable to carry out activities related to elaboration of strategies and action plans or these indicators are applicable only for priority 3.2 Cross border touristic product?	List of indicative activities under each of the priority axes is provided in part 2.5.6. Eligible activities of the Guidelines for applicants. Additionally, each project proposal, through its envisaged activities and expected results, must clearly contribute to the achievement of the Programme's output indicators for the respective Priority Axis and Specific Objective.
176	Which regions can apply under the Programme? Are partners registered in Vratsa District eligible or not?	The eligible Programme area includes 6 districts in Bulgaria, i.e. Vratsa District, Vidin District, Montana District, Sofia District, Pernik District and Kyustendil District, as stated in point 1.1.1 of the Guidelines for applicants.
	Our Serbian partner has concluded long-term contract (for 10 years) with local tourist association for usage of bungalows camp, situated near to City of Nis. The association is not a public body. In our Serbian colleagues' opinion, the bungalows are buildings which have	All investment activities under the Programme must be performed on municipal or state-owned property. Consent of the owner is necessary to be submitted together with the Application form in all cases even when the partner is the owner of the assets.

	<p>different statute from the other buildings according to the relevant Serbian legislation and the type of the land property is the key factor. The land owner is the state enterprise "Serbia shuma". In this connection, I have the following questions:</p> <p>1. In case there is consent of the land owner, is it possible reconstruction of the camp to be done under the Programme?</p> <p>2. In case the above described is not eligible, is it possible an investment project which envisages only supply of furniture/equipment (without construction activities) to be financed under the Programme?</p>	<p>The Programme shall finance investment activities if the assets are not owned by the respective partner. In this case, the consent of the owner should clearly state that the assets are given for free right of use for the purpose of the project at least for 5 years after the end of the project.</p> <p>Investment projects under the Programme must envisage works (construction, reconstruction, rehabilitation, renovation, etc) and/or purchase of equipment components, which form at least 70% of the total eligible cost of the entire project.</p>
177	<p>Our NGO is registered in the eligible area on 13th of February 2015. Can we apply as Lead Partner under current Call for proposals?</p>	<p>To be eligible under the First call for proposals, the Lead partner should be registered on the territory of Bulgaria or Serbia at least 12 months prior to the deadline for submission of project proposals. Additionally, the project partners, including the lead partner, must fulfil all other requirements, specified in point 2.5.1 of the Guidelines for applicants.</p>
178	<p>Is it possible to apply with a conceptual project on the priority " 2.1." for infrastructure and the rehabilitation and reconstruction of the building to be set out as engineering in the project?</p>	<p>All envisaged works activities have to be supported with approved/certified detailed works design, detailed Bill of Quantities and Explanatory Note (if applicable according to the relevant legislation of the respective country, where the works activities will be implemented). In case the construction works do not require approval of a works design, the applicants have to present a statement by the relevant institutions for exception of the rule for design's approval. Please see the list of supporting documents that are to be submitted together with the Application form, mentioned in point 3.2 of the Guidelines for applicants.</p>
179	<p>Is a NGO registered in Sofia eligible to be Lead partner under this open call of the programme?</p> <p>Does it necessary the 20% of the budget to be for the lead partner in Sofia and 80% of the budget for the project to be for the partner in Nis?</p>	<p>Since Sofia-city Region is not included in the cross-border region of the Programme, for all potential applicants registered in Sofia-city Region apply the terms and conditions for applicants registered outside the Programme area. The Programme shall finance operations involving beneficiaries located outside the eligible cross-border area, but still on the territory of Bulgaria or Serbia, and ensuring that the envisaged operations in the proposed project are for the benefit of the programme area. The total amount allocated under the Programme to beneficiaries and activities outside the eligible cross-border area shall not</p>

		<p>exceed 20 % of the support from the Union at Programme level. At the project level, it is not obligatory the 20% rule to be respected by the project partners. Additionally, please keep in mind that each partnership must include at least one project partner from the eligible border region of each country – i.e. besides the project partner registered in Sofia City District, the partnership must include at least one more Bulgarian project partner, registered in one of the 6 eligible border regions.</p>
180	<p>Can NGO registered in Plovdiv to apply with project under the program through its subsidiary office located in Vidin?</p>	<p>Regional structures/branches of central organizations, other than local/regional/national authorities, are ineligible applicants under this Call for proposals, as specified in point 2.5.1 of the Guidelines for Applicants.</p>
181	<p>The project will cover education for entrepreneurship for 12 months where participation in trainings is free of charge. Can we continue offering more advanced education (second stages) in the next years which to be paid by participants (not big taxes but training to be paid for generating incomes to cover hall rent and teacher costs)?</p> <p>Do you consider eligible the costs for Art planner that will be part of common touristic product between eligible region? Painters will produce drawings which we want to offer for sale to tourists. Is it allowed to develop income generating projects under the program? If there is no mechanism for this estimation is it acceptable if we realize drawings for sales to give this amount for charity?</p>	<p>In case the project generates revenue, in accordance with Article 65.8 from Regulation 1303 the total eligible expenditures of the operation shall be reduced by the net revenue of the operation directly generated during its implementation.</p> <p>During the project implementation phase, each beneficiary, generating revenue under a project, should keep detailed, timely, adequate and traceable information concerning the generated revenues.</p> <p>To be considered eligible, the expenditures should be necessary for the implementation of the proposed activities and should be envisaged in the project budget. In addition.</p>
182	<p>Can our NGO also prepare and apply with project under another priority axis for tourism product?</p>	<p>Under the current Call for proposals an institution/organization may submit maximum 3 (three) project proposals as a partner, i.e maximum one project proposals as a Lead Partner. Each project proposal may cover different priority axis under the Programme.</p>
183	<p>Our association was established in 2009 with headquarters in Sofia-city. We are currently in process of moving our headquarters in the cross-border area, therefore changing our official address. Can we apply as Lead Partner under the current call, having in mind that the period from changing the official registration address and the deadline for submission of the project</p>	<p>Please see the answers above (Questions 2, 154 and 155).</p>

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	will be shorter than 12 months?	
184	Our association was established in 2009 with headquarters in Sofia-city. We are currently in process of moving our headquarters in the cross-border area, therefore changing our official address. Can we apply as Lead Partner under the current call, having in mind that the period from changing the official registration address and the deadline for submission of the project will be shorter than 12 months?	Please see the answers above (Questions 2, 154 and 155).
185	Is it eligible under Priority axis 1. Sustainable tourism free advertisement of hotels, restaurants and other private sites to be done together with promotion of state cultural – historical sites and sights?	There is no restriction about the kind of property of the tourist sites which could be promoted within the Programme. It depends on the specific character of activities envisaged in the respective project proposal.
186	Is it eligible under Priority axis 1. Sustainable tourism business representatives to participate in a festival together with representatives of state cultural – historical sites and sights?	Every project partner defines the target groups, direct and final beneficiaries (point 3.4 of the Application form) depending on the specific character of the planned activities in the respective project proposal.
187	We are interested whether a Bulgarian District Administration which has reached the limit de minimis for the last 3 years is eligible to participate in a project as a Partner.	Public support given by the Programme to undertakings for activities of economic character will be granted under the de minimis rule. This implies that undertakings will receive grants only if they have not received public aid under the de minimis rule totaling more than 200,000 EUR within three fiscal years from the date of granting the aid. Considering the activities financed under the programme non-economic activities for which the beneficiaries do not act as economic operators and for which there are no considerations to assume that the competition will be distorted, will generally not be treated as subject to state aid rules.