

QUESTIONS AND ANSWERS

under the Second Call for proposals

Interreg-IPA Cross-border Cooperation Bulgaria-Serbia Programme, CCI Number: 2014TC16I5CB007

No.	Question	Answer
1	Is Sofia-city District included in the cross-border region of the Programme?	<p>Sofia-city District is not included in the Cross-border region of the Programme.</p> <p>However, the Programme could finance operations involving beneficiaries located outside the eligible cross-border area, but still on the territory of Bulgaria or Serbia. Exceptions to the eligibility rules of the Programmes are allowed for the following organizations:</p> <ul style="list-style-type: none"> - Bulgarian or Serbian national/regional public authorities whose area of competence, established by legal acts, covers the eligible area of the Programme; - Regional structures/branches of central organizations of local/regional/national authorities only; - Applicants located outside the eligible cross-border regions, ensuring that the envisaged operations in the proposed project are for the benefit of the programme area. A legally established entity located outside the eligible cross-border area, but still on the territory of Bulgaria or Serbia, may participate under this Call for Proposals. In order to be eligible for financing, the project proposal involving partner/s located outside the eligible cross-border area must additionally include at least one partner from each side of the eligible cross-border region.
2	Is the Call open for Institutions of the system, i.e. Centre for Social Work?	<p>Criteria for applicants' eligibility are defined in Guidelines for Applicants (p. 2.5.1 "General Criteria for Eligibility of Applicants (Lead Partner and Partners)"). The whole document is available for download on the website of the Programme.</p> <p>https://www.ipacbc-bgrs.eu/second-call-application-stage-news/second-call-project-proposals</p> <p>As a general rule, the Lead Partner and its partners must comply with all of the following general eligibility criteria:</p> <ul style="list-style-type: none"> • be legally established organizations (legal persons) according to the national legislation of the state on whose territory they are located. Exception is made for subsidiary structures of local/regional/national authorities. In case a structure of local/regional/national authority is not and cannot act as a legal entity, its legally established central

		<p>organization, if such exists, shall be the project partner.</p> <ul style="list-style-type: none"> • be registered in the eligible cross-border region between Bulgaria and Serbia or fall under one of the exceptions: • be non-profit making organizations; • be directly responsible for the preparation and management of the action, not acting as an intermediary. <p>In addition, specific requirements and potential exclusions of specific applicant are determined by the specifics of the organization and the envisaged project. It should be also taken into consideration that authority of project partners and relevance of the partners to the proposed projects is subject to quality evaluation of project proposals.</p>
3	<p>How could teachers and high schools participate in the Programme under Priority Axis Foods?</p>	<p>The Guidelines for Applicants (available for download on the web site of the Programme), provide detailed information about the three Priority Axes, open for submission of proposals – “Sustainable tourism”, “Youth” and “Environment”. Priority Axis “Foods” does not exist under the Programme.</p> <p>All applicants under the Second call (including educational and training institutions) must comply with the eligibility criteria, listed under p. 2.5.1 General Criteria for Eligibility of Applicants (Lead Partner and Partners) of the Guidelines for Applicants:</p> <ul style="list-style-type: none"> • be legally established organizations (legal persons) according to the national legislation of the state on whose territory they are located. Exception is made for subsidiary structures of local/regional/national authorities. In case a structure of local/regional/national authority is not and cannot act as a legal entity, its legally established central organization, if such exists, shall be the project partner. • be registered in the eligible cross-border region between Bulgaria and Serbia or fall under one of the following exceptions: <ul style="list-style-type: none"> • be non-profit making organizations; • be directly responsible for the preparation and management of the action, not acting as an intermediary.
4	<p>How to find potential partners?</p>	<p>There are several possibilities to find potential partners. The Programme provides the following options:</p> <ul style="list-style-type: none"> • to check already funded projects and their beneficiaries. The information is available on the following links: https://www.ipacbc-bgrs.eu/projects-funded and http://07-13.ipacbc-bgrs.eu/page.php?c=65 • to check the online data-base with potential partners, available on the following link: https://www.ipacbc-bgrs.eu/partners?country=45&term_node_tid_depth=45&field_priority_tid=All • to check online via web search; • to take part in the Partner Search forum planned to be carried out in March 2018.

5	Where to find the application package?	<p>The information is available on the following links:</p> <ul style="list-style-type: none"> • Programme's website: www.ipacbc-bgrs.eu • MRDPW website: www.mrrb.government.bg • MEI website: www.mei.gov.rs • EU Structural funds portal: www.eufunds.bg • Information system for coordination of the development assistance to the Republic of Serbia: http://www.evropa.gov.rs/CBC/PublicSite/Default.aspx
6	What is the deadline for submission of project proposals for high schools?	<p>The deadline for submission of proposals is relevant to all potential applicants. Proposals must be submitted until 23.04.2018, 17:00 h local Bulgarian time.</p>
7	Is the combination of construction work and software development eligible activity under the Specific Objective 1.1 Touristic attractiveness?	<p>The following activities under Specific Objective 1.1, enlisted in p. 2.5.6 "Eligible Activities" of the Guidelines for Applicants, are considered eligible:</p> <ul style="list-style-type: none"> • Preservation of natural and cultural heritage such as restoration and maintenance of sites of historical and cultural importance; conservation and protection of both tangible and non-tangible natural, historical and cultural heritage, etc. • Development of small-scale support infrastructure to touristic attractions and additional small scale technical infrastructure, encouraging the visits to the tourist attractions including rehabilitation of access roads; upgrade of public utilities related to natural, cultural and historic tourism sites; small touristic border crossings and related facilities; ICT facilities development/upgrade, playgrounds; recreational and sports facilities; landscaping; signing and lighting; other support facilities serving tourist attraction and visitors, etc. • Development of joint transport access schemes and adventure routes (e.g. cross-border public transport to touristic sites; tourist paths and health paths, climbing, horse riding and biking routes, etc.). • Development of tourist attraction accessible to persons with disabilities (e.g. encouraging the modification of access points, washrooms, stairs, transportation vehicles, rough paths, etc.). • Development of information access facilities such as info-centres and/or kiosks to guide potential visitors; joint GIS platforms; joint platforms for online reservations, payment, etc. • Support for public awareness activities (information campaigns), promoting the region as a tourist destination. <p>Please note that the list of activities is indicative only, as applicants can envisage activities that are not listed in the Guidelines, but they should be relevant to the Priority axis, specific objective and proposed project.</p>

		As it is specified in p. 2.6.1. How to review the Application Package of the Guidelines for Applicants, observing the principle of transparency and equal treatment of all potential applicants, the Managing Authority cannot give prior opinion on eligibility of specific applicants and specific activities, since those shall be subject to the assessment of the project proposal. All requirements are explained in detail in p. 2.5 “Eligibility Criteria” of the Guidelines for Applicants and must be strictly observed by all potential applicants during the project preparation phase.
8	Are expenditures for elaboration of technical specifications for supply of specialized equipment and their translation, incl. conduct of research for potential suppliers, research of market prices or other similar activities, concerning supply of equipment only (without construction works), eligible under BL6, sub-line “Preparation of technical documentation”?	The eligible expenditures under BL6, sub-line “Preparation of technical documentation” are described in p. 2.5.8. Eligibility of Expenditures of the Guidelines for Applicants under the Second call for project proposals. The budget sub-lines cover expenses for elaboration of technical documentation (incl. feasibility studies, detailed designs, technical drawings, etc.) including consultancy, as well as all connected translation costs, taxes and other charges.
9	If the amount for preparation of project proposal/ preparation of technical documentation is more than EUR 2 500 VAT excluded and a single tender procedure under PRAG shall be conducted by the project partner, which tender documents shall be used – the templates for services in PRAG or the templates for services, elaborated by the JS of the Programme and annexed to the PIM for the first call for proposals?	When preparing the tender dossier for preparation of project proposal/preparation of technical documentation all applicants under the Second Call for Proposals must refer to and use the guidelines and templates of the Practical Guide for Procurement and Grants for European Union External Actions (PRAG), available at the web page: http://ec.europa.eu/europeaid/prag/ .
10	How shall the supporting documents in original language be scanned – in their original hard copy versions or they should first be copied, certified as “True copy”, signed and stamped by the partner and then scanned?	As per the Guidelines for Applicants all supporting documents should be submitted in the original language and when specifically required, translated in English as well. The translation may either be made by a certified translation agency or be certified “True copy” by the legal representative or an authorized person from the Lead partner and/or the respective project partner. In addition, a list of all documents that need to be submitted as part of the electronic application is provided in p. 4 “How to submit the Project proposal” of the Guidelines for Applicants. The documents must not be scanned and provided in one file – each document has to be scanned

		<p>separately, provided as a separate file and named accordingly.</p> <p>Accordingly, if the applicants are required to submit documents in original language, they should scan the original without making additional copies and without certifying them as “True copy”. However, if a translation is required, the document should be first translated, certified it as “True copy” and then scanned.</p>
<p>11</p>	<p>We ask for your assistance in clarifying whether Sofia University is an eligible candidate for the cross-border cooperation program with Serbia. As evidence of the national scope of activity, we attach the Regulations for Organization and Activities of the University, where the relevant texts are highlighted, as well as the Decree on the Establishment of the University. Additionally, we could provide data on the number of graduates from the cross-border area whom are hired in the local administrative structures. Data can also be provided about the projects implemented by our professors in the target area.</p>	<p>In general, as specified under p. 2.5.1 General Criteria for Eligibility of Applicants (Lead Partner and Partners) of the Guidelines for Applicants. the Lead Partner and its partners must comply with all of the following general eligibility criteria:</p> <ul style="list-style-type: none"> - be legally established organizations (legal persons) according to the national legislation of the state on whose territory they are located. - be registered in the eligible cross-border region between Bulgaria and Serbia or fall under one of the following exceptions: - be non-profit making organizations; - be directly responsible for the preparation and management of the action, not acting as an intermediary. <p>The Programme though could finance operations involving beneficiaries located outside the eligible cross-border area, but still on the territory of Bulgaria or Serbia. Exceptions to the eligibility rules of the Programmes are allowed for the following organizations:</p> <ul style="list-style-type: none"> - Bulgarian or Serbian national/regional public authorities whose area of competence, established by legal acts, covers the eligible area of the Programme; - Regional structures/branches of central organizations of local/regional/national authorities only; - Applicants located outside the eligible cross-border regions, ensuring that the envisaged operations in the proposed project are for the benefit of the programme area. A legally established entity located outside the eligible cross-border area, but still on the territory of Bulgaria or Serbia, may participate under this Call for Proposals. In order to be eligible for financing, the project proposal involving partner/s located outside the eligible cross-border area must additionally include at least one partner from each side of the eligible cross-border region. <p>As it is specified in p. 2.6.1. How to review the Application Package of the Guidelines for Applicants, observing the principle of transparency and equal treatment of all potential applicants, the Managing Authority cannot give prior opinion on eligibility of specific applicants and specific activities, since those shall be subject to the assessment of the project proposal. All requirements are explained in detail in p. 2.5 “Eligibility Criteria” of the Guidelines for</p>

		Applicants and must be strictly observed by all potential applicants during the project preparation phase.
12	Is it obligatory to have a partner registered in the target area?	According to Guidelines for Applicants, p. 2.5.2 “Lead partner principle”, in order to be eligible for financing, every project must include at least one partner from each side of the eligible cross-border region.
13	PRAG or the National Public Procurement Law should be applied to procurement of services regarding project preparation activities?	<p>The award of contracts is subject to the procurement rules set out in Chapter 3 of Title II of Part Two of Delegated Regulation (EU) No 1268/2012 on the rules of application of Regulation (EU, Euratom) No 966/2012 of the European Parliament and of the Council on the financial rules applicable to the general budget of the Union. In accordance with Art. 45(1) of Commission Implementing Regulation (EU) No 447/2014, those procurement rules apply in the whole Programme area, both on Bulgarian and Serbian territory.</p> <p>Beneficiaries under this Call for Proposals must refer to and use the guidelines and templates of the Practical Guide for Procurement and Grants for European Union External Actions (PRAG), available at the web page: http://ec.europa.eu/europeaid/prag/.</p>
14	The procurement procedures according to the Serbian Public Procurement Law ("Official Gazette of Republic of Serbia", No. 124/2012, 14/2015 and 68//2015)[1] obey the principles of transparency (Article 11), proportionality, equal treatment, non-discrimination (Article 12) and fair competition (Article 10). Is it possible to apply these procedures to project preparation activities?	See answer to question No 13.
15	Ineligible expenditures are contracting of employees of the partner organizations as external experts (for Serbian partners only). Is it eligible costs for the Bulgarian partners and in which cases?	Contracting of employees of the partner organizations as external experts is eligible costs for the Bulgarian partners only in case the procurement principles and rules stipulated in Chapter 3 of Title II of Part Two of Delegated Regulation (EU) No 1268/2012 on the rules of application of Regulation (EU, Euratom) No 966/2012 of the European Parliament and of the Council on the financial rules applicable to the general budget of the Union and PRAG are observed.
16	Regarding the requirement for realistic market-based costs, is it necessary to submit offers from suppliers with the project application?	<p>Submission of offers as proof for calculation of the envisaged costs, is not required at the project submission stage. The requirement that the Guidelines for Applicants stipulates concerns justification of the lump sum costs through detailed description and calculation of the costs (see p. 3.2 “Supporting documents”).</p> <p>However, in case the project is proposed for financing, during the budget optimization procedures additional</p>

		information, including 3 offers from different service providers/suppliers, could be requested by the managing bodies in order to ensure transparent and market-oriented financial allocations at the project budgets.
17	During the procedure of budget clarification, should partners present offers? In that case, how many offers we have to submit?	In case the project is proposed for financing, during the budget optimization procedures additional information for justification of proposed expenditures, including 3 offers from different service providers/suppliers, could be requested by the managing bodies.
18	The expenditure for fuel for personal vehicle or vehicle of the organization for project staff travels must be budgeted in kilometers at a maximum rate of 0.21 euro per kilometer. Is medical insurances entered into these costs or it must be separately identified in the budget?	The expenditures for medical insurances have to be separately identified in the budget under Budget Line 3 Travel and Accommodation Costs, Sub-line Travel costs.
19	Delivery of custom made software products – should we considered as supply or services?	The cost of delivery of custom made software products should be considered as costs for supply and should be planned under BL 5, as per the requirements of p. 2.5.8. “Eligibility of Expenditures”, Budget line 5 “Equipment and Works”, sub-line “Eligible expenditures”, sub-line “Supply” (page 39 of the Guidelines of the Applicants”).
20	Supplies, which need installation such as traffic sign or a small notice board, is it necessary to submit Ownership act?	Point 3.2 “Supporting documents (B)” of the Guidelines for Applicants, B5 – Supporting documents concerning INVESTMENT ACTIVITIES ONLY, B5.1.1 strictly stipulates that “In the case the project envisages purchase of supplies which need to be permanently installed, it is necessary to submit an ownership act for municipal or state-owned property as well – issued in the original language and translated into English”.
21	What are the legal provisions (exact article and title of European Regulation), for points 3 and 4 of Article 13 Subsidy contract under the Instrument for Pre-accession Assistance II.	The legal provisions are in art. 43 of Commission Implementing Regulation (EU) No 447/2014 of 2 May 2014 on the specific rules for implementing Regulation (EU) No 231/2014 of the European Parliament and of the Council establishing an Instrument for Pre-accession assistance (IPA II).
22	If a candidate has a project implemented under the previous call, how many projects can it apply for under the present call?	The limitations for the number of projects are valid only for the Second call. According to Guidelines for Applicants p. 2.5.3. under the current Call for proposals, an organization may participate in no more than 2 (two) project proposals as a partner.
23	Under PA 2 there is only one underachieved indicator – are we going to receive better score under assessment if we address this	According to the Technical and quality assessment grid, the awarded score under criterion 7 depends on the number of output indicators addressed and the provided justification. As indicated in p. 6.3 “Technical and Quality Assessment” of the Guidelines for Applicants, concerning criterion No. 7 of the Technical and Quality Assessment

	indicator?	<p>Grid – “Since the Programme has identified only one Output Indicator under Priority Axis 2 “Youths”, Specific Objective 2.2 “People to people networking”, project proposals applying under this Specific Objective can contribute to the achievement of only Output Indicator 2.2.1 “Total number of youth networking initiatives supported by the Programme”. In view of question No. 7 from the technical and quality assessment grid below, which gives priority and maximum points to proposals covering more than one Output Indicator, an exception will be made only for the projects applying under Specific Objective 2.2 – namely, they will still receive the maximum score of 8 points if clear evidence that the pointed quantities are reasonable is presented, regardless of the fact that they contribute to the achievement of only one Output Indicator”.</p> <p>The projects addressing underachieved indicators will have a priority in a selection process, since the ranking system envisages the available funds to be allocated with priority towards the achievement of the target values of those Programme Output Indicators in need of more contracted projects, whereas projects fulfilling only Output Indicators that have already been achieved shall only be contracted in case some funding still remains available.</p>
24	Is it obligatory that all partners must be registered at least 12 months before the deadline for submission of a project proposal?	According to Guidelines for Applicants, p. 2.5.2 Lead Partner Principle, only 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. The condition for registration at least 12 months prior to the submission deadline does not apply to the rest of the Project partners.
25	Is it true that an applicant could participate twice as a project partner - in 2 project proposals and once as a Lead partner, i.e. at maximum of 3 project proposals?	According to Guidelines for Applicants, p. 2.5.3. under the current Call for proposals, an organization may participate in no more than 2 (two) project proposals altogether, including no more than once as a Lead partner. This means that an organization may either submit proposals once as a Lead partner and once as a project partner, or twice as a project partner.
26	You mentioned that the project staff should not have duplicate functions on either side of the border. For example in an environment related project, if the team on the one side has a forest management specialist, does it mean that the team on the other side should not have the same type of specialist?	The management team includes persons who will be engaged on behalf of the project partner to carry out the administrative and project management activities, which are regular, repeatable activities (project manager, coordinator, accountant, assistant, etc.). In order the cooperation criterion for joint staffing to be met, the partners should not merely carry out activities in parallel without mutual coordination and exchange of information, but the project team will be responsible for project activities on both sides of the border..
27	Could an organization registered outside the cross-border area be a Lead partner? What are the budgets for such organizations - 20%	In general, the Lead Partner and its partners must comply with all of the general eligibility criteria. Regardless the fact where an organization is registered, if it fulfils all eligibility criteria for Lead partners it could be a Lead partner.

	at Programme level, could you clarify this?	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. Compliance with this rule will be monitored at Programme level, and not at project level.
28	What happens if one of the partners decides to leave the partnership during the evaluation process of the project proposal?	If such a change occurs during the evaluation stage, the partnership should inform the Managing Authority immediately, in order for the project proposal to be excluded from the assessment, since substitution of a project partner during the evaluation stage is not envisaged.
29	Is there any form or e-mail address where we can ask our questions in advance?	According to the Guidelines for Applicants, page 42, there is a possibility to ask questions at the following e-mail: SKanatov@mrrb.government.bg . The deadline for submitting questions is 21 days before the deadline for submitting of project proposals - 23.04.2018. All questions received by then will be posted on the Programme web site not later than 11 days before the deadline for submission of project proposals. It is our practice to send the replies also via e-mail for your convenience.
30	Are the kindergartens eligible candidates? Is there a problem that we have a delegated budget?	<p>As it is specified in p. 2.6.1. How to review the Application Package of the Guidelines for Applicants, observing the principle of transparency and equal treatment of all potential applicants, the Managing Authority cannot give prior opinion on eligibility of specific applicants and specific activities, since those shall be subject to the assessment of the project proposal.</p> <p>In general, the Lead Partner and its partners must comply with all of the general eligibility criteria, specified in p.2.5.1 of the Guidelines for Applicants.</p> <p>All Bulgarian partners which are second-level budget administrators/work under delegated budget should present a Letter of Support for implementation of the project issued by the respective first level administrator.</p>
31	Association is registered in Blagoevgrad, members of the organization are the municipalities of Sofia district, is the association an eligible partner?	<p>As it is specified in p. 2.6.1. How to review the Application Package of the Guidelines for Applicants, observing the principle of transparency and equal treatment of all potential applicants, the Managing Authority cannot give prior opinion on eligibility of specific applicants and specific activities, since those shall be subject to the assessment of the project proposal.</p> <p>In general, the Lead Partner and its partners are eligible if they comply with all of the general eligibility criteria, specified in p. 2.5.1 of the Guidelines for Applicants.</p>
32	Is there a different way to find project partners except the envisaged Partner search forum (PSF)?	<p>There are several possibilities to find project partner:</p> <ul style="list-style-type: none"> - You can check the list of funded projects on our webpage and see organizations already funded, both in this programming period and in the previous one;

		<ul style="list-style-type: none"> - You can check the partner search platform on our webpage; - You can participate in the Partner Search forum, planned for March 2018; - You can initiate a web-based search; - You can contact the Joint Secretariat for assistance, explaining what you are looking for - what type of organization, region, profile, interest, etc. We could exchange information and try to assist you, if possible.
33	When there is a combination of soft and investment projects, what is the requirement for their ratio/distribution?	The Guidelines for Applicants allow combination of investment and soft activities in two types of projects - investment projects, where more than 50% of the costs are investments (supply or/and works), or soft projects, where the maximum of investment costs (supply or/and works) can be up to 50%. Right from the beginning, when start planning the project proposal, you should choose what kind of project you want to develop. This in not restricting you in any way from including both types of activities/expenditures, which we encourage due to the fact that it will contribute to the achievement of more output indicators.
34	How to engage the project team?	<p>There is no specific Programme requirement for engaging the project team. This type of expenditure (staff costs) is to be envisaged as a flat rate, remaining the same for the entire implementation period of the project.</p> <p>The appointment of the staff by the beneficiaries is the sole responsibility of the beneficiaries themselves and has to be made in accordance with European and national legislation.</p>
35	Should the invoice (for project preparation) be issued before the submission date of the project proposal, and should there be actual payment under this invoice or not?	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 at the latest. It is possible the actual payment to be made after this date.
36	Could we apply with an investment project under Specific objective 1.2 Cross-Border Touristic Product or we could have investment project only under Specific objective 1.1. Tourist attractiveness? Can we submit projects under the already fulfilled output indicators?	<p>According to the Guidelines for Applicants investment projects under Priority Axis 1 can be supported only within SO 1.1 - Tourist attractiveness. The other two specific objectives under Priority Axis 1. Sustainable tourism provide support for soft measures projects only.</p> <p>You may submit projects addressing already fulfilled indicators, but it should be taken into consideration that projects fulfilling only output indicators that have already been achieved shall be contracted in case some funding still remains available after financing the projects necessary for reaching the set targets under the Programme.</p>
37	Is it admissible not to know our project partners?	It is admissible for you not to know your partner before starting preparing the project, allocating the functions and responsibilities. The period for preparation of project proposals is the time to make contact with your partners and

		to coordinate joint efforts.
38	In which cases is it admissible to make an exception to the rule for legal registration in the cross-border area?	<p>According to the Guidelines for Applicants, exceptions to the rule for legal registration in the cross-border area are allowed for the following organizations:</p> <ul style="list-style-type: none"> - Bulgarian or Serbian national/regional public authorities whose area of competence, established by legal acts, covers the eligible area of the Programme; - Regional structures/branches of central organizations of local/regional/national authorities only; - Applicants located outside the eligible cross-border regions, ensuring that the envisaged operations in the proposed project are for the benefit of the programme area. A legally established entity located outside the eligible cross-border area, but still on the territory of Bulgaria or Serbia, may participate under this Call for Proposals. In order to be eligible for financing, the project proposal involving partner/s located outside the eligible cross-border area must additionally include at least one partner from each side of the eligible cross-border region.
39	Would it be duplication of functions if both partners include an accountant in their team?	There will be no duplication of functions if both partners include an accountant in their team, if the scope of duties of both accountants are divided.
40	The Lead partner is responsible for collecting information, checking all expenditures, etc. – is it not fulfilling the FLC function?	Checking the expenditures of all project partners does not include their verification. FLC function is performed by bodies designated for this purpose in each partnering country.
41	Is it possible for an association with an agricultural activity to submit an application?	Any organization that meets the eligibility criteria can submit an application. The main character of the organization, its relevance to the proposed activities and its experience is taken into account during the assessment process.
42	Is there any specific requirement what should be the status of cultural monuments, applying for subsidy under the Programme?	<p>There is no specific requirement for the status of cultural monuments. As the Programme is related to CBC and the development of regions along the border, we could fund investments in cultural monuments with national or regional importance.</p> <p>In case of investment activities within territories/objects with special status, including cultural monuments, relevant documentation (permits, approvals, certificates, statements, etc.) required by the respective national applicable law should be presented.</p>
43	How will an investment project for tourism attractiveness be assessed according to the	The technical and quality assessment contains checks for contribution of the project to output indicators. There are different scores envisaged, depending on the number of output indicators contributed and the quality of their

	technical and quality assessment grid, in relation to output indicators?	justification.
44	Is the amount of eligible expenditure for elaboration of project proposal up to 2500 €, VAT excluded?	The minimum threshold for single tender procedure under the provisions of PRAG is > 2500 €, VAT excluded.
45	Is the assessment score of the project dependent on the fact whether expenditures for project preparation are included or not?	<p>The expenditures for project preparation depend on the needs and capacity of the project partners.</p> <p>During the assessment of project budget it is taken into account if the estimated expenditures are necessary for the implementation of the project and the prices are realistic and market based, if the specific rules for each budget line are respected and what budget breakdown between partners is.</p>
46	How to estimate the expenditures proposed as lump sum?	<p>All expenditures envisaged as lump sum should be estimated based on actual market prices. You could justify such estimation through market research based on pricelists (if applicable for your purchases) or received offers. To this purpose you should compare pricelists/offers and prepare justification for lump sums, containing description of the details of your purchase. This documents is to be prepared in English, signed, dated and stamped by the official representative of your organization.</p> <p>Further information on possible justifications of the lump sum costs is provided on page 55 of the Guidelines for Applicants.</p>
47	In the Guidelines for Applicants is stated, that project could have compliance with the Danube macro-region strategy, could you clarify?	<p>This means compliance of the project proposal with any of the pillars of the strategy, which is to be described and justified. The projects which demonstrate relevance with the EU Strategy for the Danube Region will receive extra points during the technical and quality evaluation stage (see question No. 9 from the Technical and quality assessment grid).</p> <p>For more information about the interaction of the Interreg-IPA CBC Bulgaria – Serbia Programme with the EUSDR, please refer to the Programme document: http://www.ipacbc-bgrs.eu/sites/ipacbc-bgrs-105.gateway.bg/files/uploads/op/interreg-ipa_bg-rs_ver4.pdf.</p>
48	Are there any requirements regarding the budget breakdown between project partners?	Budget breakdown between project partners is subject to technical assessment (see question 21 of the Technical and quality assessment grid in the Guidelines for Applicants). Balanced budget breakdown between partners should be awarded with better assessment.
49	Is it possible to have a project intervention on territory property of local community centre?	The territory on which the investment is envisaged to be implemented should be only state or municipal property.

50	If an account is generated and on the second day I can attach all the necessary documents, should I finish the process of submitting a project proposal by pressing the send button?	The documents uploaded in time remain in the system. You can upload additional documents, you can delete them and save your progress, but when you click the Submit button, you will not be able to edit the content of the application any more.
51	Should the project team members be hired under labour contracts?	There are no specific Programme requirements on how to engage the project team members. Project partners should follow the applicable national legislation.
52	The documents related to project preparation costs should be issued before or on the date of submission of the project proposal, at the latest. Does the above mean that payments should also be made before or on the date of submission of project proposals, at the latest against?	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 documents related to project preparation costs, as invoices, acceptance protocols, etc., should be issued prior the submission of the project proposal. It is possible the actual payment to be made after this date.
53	Could we (established as Bulgarian organization) hire as external experts staff of the Serbian partner?	Contracting of employees of the partner organizations as external experts is eligible costs for the Bulgarian partners only in case the procurement principles and rules stipulated in Chapter 3 of Title II of Part Two of Delegated Regulation (EU) No 1268/2012 on the rules of application of Regulation (EU, Euratom) No 966/2012 of the European Parliament and of the Council on the financial rules applicable to the general budget of the Union and PRAG are observed.
54	What are the applicable VAT rules in the Republic of Serbia?	VAT is not an eligible expenditure for Serbian partners under the current Call, i.e. all costs of Serbian partners should be planned in the budget without VAT.
55	Are all project proposals subject to de minimis rule check?	<p>All activities planned by Bulgarian applicants within the projects proposed for financing will be subject to check for compliance with the state aid and de minimis rules.</p> <p>Detailed information regarding State Aid and De Minimis provisions is given in the Attachment 2 of the Guidelines for Applicants.</p>
56	Is construction works of new investments objects ineligible for financing?	It is possible to envisage construction works of new investment objects, as long as it is necessary, well-justified and planned in accordance within the provisions of the national legislation.
57	Regarding the procedure for selecting a contractor under PRAG – should we strictly	Tender procedures should be carried out in accordance with the applicable thresholds. The procedure should be carried out according to the PRAG templates, deadlines and requirements for submitting of tenders.

	follow the forms for the respective procedure?	
58	Regarding the costs for lecturers – is it eligible plan costs for preparation of the training, i.e. for lecturers, training content, etc.?	There is no limitation for planning costs for preparation of lecturers, materials, content of trainings, etc., as long as it is justified and relevant to the specific of the training and project.
59	If we have our own lecturers for conducting the training, and experts to carry out some researches, could the costs for them be planned within the budget or it is necessarily to be contracted externally?	Contracting of employees of the partner organizations as external experts is eligible costs for the Bulgarian partners only in case the procurement principles and rules stipulated in Chapter 3 of Title II of Part Two of Delegated Regulation (EU) No 1268/2012 on the rules of application of Regulation (EU, Euratom) No 966/2012 of the European Parliament and of the Council on the financial rules applicable to the general budget of the Union and PRAG are observed.
60	Regarding the staff costs – could we chose the maximum flat rates?	As per the requirement described in p. 2.5.8. “Eligibility of Expenditures” of the Guidelines for Applicants, “Budget line 1: Staff costs”, in particular: “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!”
61	Where could be found information regarding the projects which are in progress as well as for already implemented projects?	Information summaries of all financed projects up to date is available on the official web page of the Programme – https://www.ipacbc-bgrs.eu/ .
62	Regarding the investment projects – is it possible to apply with approved Detailed Works design or with Technical design?	If the national legislation requires the respective approved Detailed works design, this document should be provided with the application form. In case Detailed Works Design is not mandatory for the planned construction works – applicants must submit a Statement by the competent institution that the envisaged construction/repair works do not require approval of works design.
63	Is it obligatory to include VAT in the budget or it could be reimbursed from the state?	VAT is included in the budget of the Bulgarian partner in case it is not recoverable from other sources.
64	What is the practice of co-financing for the Serbian partners? Is it possible for them to be co-financed by the Republic of Bulgaria?	The obligatory own co-financing for Serbian bodies is borne by the respective partner.
65	Does the obligatory own co-financing of Serbian partners mean that the project	There is no requirement for proving availability of funds, apart from the declarations and consent given by each

	partner should prove the availability of funds before the start of the implementation of the project, i.e. real funds in a bank account?	partner in the application process.
66	If one of the partners is newly registered and until now has not implemented project, which button under p. 1.3. „Experience in project management of public funded projects” from the respective sheet of the partner in the Application form should be pressed?	If the partner is newly registered and until now has not implemented project, the respective button “no” under p. 1.3. „Experience in project management of public funded projects” should be pressed.
67	Regarding investment projects – could we decide that only one of the project partners should have investment part, which will amount more than 50% of the whole budget?	The requirement for minimum rate of more than 50 % for works and/or supplies under investment project is observed on project level.
68	Is there any template for letter for support?	There is no specific template for letter for support. It could be prepared in free form.
69	Should the Excel file of the Application form be printed, signed, dated and stamped and after that converted in “.pdf”-format?	The Excel-file of the Application form should be printed, signed, dated, stamped by the official representative of the beneficiary as well as converted in .pdf-file.
70	Which documents should be translated into English?	Specific guidance for the requirements for translation and submission of each supporting document is given in p. 3.2. Supporting Documents (B) of the Guidelines for Applicants.
71	Do we have to plan costs for First Level Control in the budget?	The responsibilities for FLC verification under the Programme are carried out by designated FLC bodies, managed by the Programme authorities. The costs for First level controllers should not be planned in the project budget.
72	Do we have to plan contingency reserve related to investment costs?	There is no requirement for planning of contingency reserves. All costs under BL5 should be planned as direct costs, i.e. based on actual market prices. The contingency reserve costs are provisional costs and should not be included in the budget.
73	Non-governmental organization wants to buy a minibus 7+1 seats under Priority axis Youth, which will contribute to the implementation of the project activities. Our partners from Serbia also want to buy a	In order to be eligible, the cost should meet the criteria for eligibility of the expenditures, to be included in the respective budget line, to be necessary for the implementation of the project activities and comply with the principles of sound financial management, in particular value for money and cost-effectiveness. The correspondence of the planned expenditures to the proposed activities and their necessity for the implementation of the project are subject to quality assessment of the project. Therefore, it is in the applicants’ interest to provide a

	minibus – is such of vehicle eligible because in the Guidelines for Applicants is written “specialized equipment”?	<p>realistic and cost-effective budget.</p> <p>Beneficiaries should ensure the use of the investment for the project purposes throughout the sustainability period of the project (5 years after the implementation period).</p>
74	Should we meet the obligation to find a partner from Republic of Serbia of the so called “correspondence district of the Cross-border region” – for Vratsa, in Bulgaria such district is Toplica, in Serbia?	There is no such requirement in the Guidelines for Applicants, where no “correspondence districts of the cross-border region” are defined. Organizations from the cross-border region in Bulgaria may partner with organizations from the cross-border region in Serbia without any territorial restrictions.
75	How long after the end of the project implementation, a training center created with Programme funds may start generating profit?	<p>Profit-earning activities are not eligible for financing under the Call for Proposals (see p. 2.5.7. Ineligible Activities).</p> <p>As per the requirements of 2.6.2. “How to fill in the Application Form” of the Guidelines for Applicants, (page 48): “The Lead Partner and project partners should ensure the sustainability of the project results not less than 5 (five) years after completion of the implementation period for both investment support projects and “soft measures” projects. In the sustainability period the beneficiaries should ensure that all project results/deliverables shall be made available for free to all interested individual or legal persons, in a non-discriminatory way. Making the project results available only for certain individual or legal persons is strictly forbidden.”</p>
76	Is it possible to have a partnership between a kindergarten located in Vratsa with a universities located in Bulgaria and Serbia, on the one hand, and is it possible the kindergarten to act as Lead Partner and the branch of the University of Veliko Tarnovo to act as partner?	<p>The Lead Partner and its partners must comply with all of the general eligibility criteria, specified in p.2.5.1 of the Guidelines for Applicants. Additionally, every partnership/project must include at least one partner from each side of the eligible cross-border region. Projects which do not comply with this requirement will be eliminated at the eligibility assessment stage.</p> <p>The projects involving beneficiaries located outside the eligible cross-border area should ensure that the respective activities are for the benefit of the programme area.</p>
77	For Investment project - the costs for repair, equipment and furnishing exceed 50% of the total budget. Is it possible to plan the remaining amount of the budget for soft measures?	According to the Guidelines for Applicants, for investment projects, the costs for small scale construction and/or supply components (representing Budget Line 5 – Equipment and Works) must form more than 50% of the total eligible cost of the entire project. It is recommended those projects to also involve “soft” activities relevant to the proposed investment measures.
78	Is a public authority of the Republic of Serbia, with a branch without legal registration in the	In general, the Lead Partner and its partners must comply with all of the general eligibility criteria specified in p. 2.5.1 General Criteria for Eligibility of Applicants (Lead Partner and Partners) of the Guidelines for Applicants.

	<p>territory of the Cross-border region, an eligible applicant?</p>	<p>Organization not registered in the CBC could be considered eligible if the requirements for one of the possible exclusions are met:</p> <ul style="list-style-type: none"> - Bulgarian or Serbian national/regional public authorities whose area of competence, established by legal acts, covers the eligible area of the Programme; - Regional structures/branches of central organizations of local/regional/national authorities. In case a structure of local/regional/national authority is not and cannot act as a legal entity, its legally established central organization shall be the project partner. - Applicants located outside the eligible cross-border regions, ensuring that the envisaged operations in the proposed project are for the benefit of the programme area. A legally established entity located outside the eligible cross-border area, but still on the territory of Bulgaria or Serbia, may participate under this Call for Proposals. In order to be eligible for financing, the project proposal involving partner/s located outside the eligible cross-border area must additionally include at least one partner from each side of the eligible cross-border region. <p>As it is specified in p. 2.6.1. How to review the Application Package of the Guidelines for Applicants, observing the principle of transparency and equal treatment of all potential applicants, the Managing Authority cannot give prior opinion on eligibility of specific applicants and specific activities, since those shall be subject to the assessment of the project proposal.</p>
<p>79</p>	<p>Is it obligatory to envisage own co-financing of Bulgarian partners?</p>	<p>For Bulgarian bodies, it is not obligatory to envisage own co-financing. However, project partners (Bulgarian or Serbian) may choose to provide additional own co-financing for the needs of the project. There are no limits for the amount of the additional own co-financing.</p>
<p>80</p>	<p>Is it necessary to provide any form of guarantee for the advance payment?</p>	<p>There is no requirement for providing a guarantee for advance payment under Subsidy contracts, apart from the declarations and consent given by each partner in the application process.</p>
<p>81</p>	<p>Under the SO 3.2 Nature Protection you have as potential project idea the development and implementation of joint management plans, and from our experience, the process of preparation and approval of such plans takes more time than the maximum project duration. How can we report such activity as successfully implemented?</p>	<p>In such cases, you can set as a goal of the project the elaboration of joint management plans and starting of the relevant procedure for its approval within the implementation period of the project.</p>

82	How do we plan the expenditures/prices for works and construction materials?	In order to plan the expenditures for works and construction materials appropriately, you could consult investment experts and check periodical bulletins for prices of works and construction materials. In any case, you should plan the investment costs based on actual market prices.
83	We have an investment site for which we have a Detailed works design. If we apply for its reconstruction under two project proposals, with the aim to receive funding at least under one of them, should this lead to the disqualification of the project proposals?	The application of one and same work design under two project proposals with the aim to receive funding at least under one of them, could lead to an infringement of art. 65, point 11 of Regulation (EC) 1303/2013 which sets the general prohibition for double financing of operations, in case of approval of both project proposals. As laid down in p. 6.5 Pre-contracting procedures of the Guidelines for Applicants, signature of subsidy contract may be declined in event of double financing.
84	Are the expenditures for international transfers eligible under the Programme? Are the expenditures for internal transfers within the Republic of Bulgaria eligible?	According to the Guidelines for applicants, p. 2.5.8 Eligibility of Expenditures, eligible expenditures under BL2 are bank charges (expenses for opening and administrating 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). According to the Guidelines for applicants, p. 2.5.9. Ineligible Expenditures, the charges for national financial transactions are not eligible.
85	There is a limitation in how many project proposals an organization may participate. Is there such a limitation for the experts part of the project teams?	There is no such limitation. The engagement of project team members should be carried out in accordance with the applicable national legislation.
86	You mention that each partner has the task of performing its specific activities, and at the same time, the Lead partner is responsible for the implementation of the whole project. Please clarify!	<p>The Lead partner is the organization submitting the project proposal. The Lead partner provides a guarantee to the Managing Authority that the partners will be organized in such a way that the project results and activities will be fulfilled. At the same time, the partners are responsible for the implementation of their part of the activities according to their budget. The role of the Lead partner is to unite the efforts, to gather information for reporting and verification of funds and to conduct communication with the MA. The Lead partner is the only organization that is a party of the Subsidy contract.</p> <p>The provisions specifying rights and obligations of each partner in view of project implementation shall be included in the Project partnership agreement.</p>
87	We are NGO registered in the city of Sofia and conduct projects on the territory of Tran municipality, are we an eligible candidate?	<p>The Lead Partner and its partners must comply with all of the general eligibility criteria specified in p. 2.5.1 General Criteria for Eligibility of Applicants (Lead Partner and Partners) of the Guidelines for Applicants.</p> <p>Exceptions from the general rules are made only for:</p>

		<ul style="list-style-type: none"> - Bulgarian or Serbian national/regional public authorities whose area of competence, established by legal acts, covers the eligible area of the Programme; - Regional structures/branches of central organizations of local/regional/national authorities only; - Applicants 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 for financing, the project proposal involving partner/s located outside the eligible cross-border area must additionally include at least one partner from each side of the eligible cross-border region. <p>As it is specified in p. 2.6.1. How to review the Application Package of the Guidelines for Applicants, observing the principle of transparency and equal treatment of all potential applicants, the Managing Authority cannot give prior opinion on eligibility of specific applicants and specific activities, since those shall be subject to the assessment of the project proposal.</p>
88	Does the duration of the project include only implementation of activities or it also includes reporting of the expenditures?	The duration of the project is the duration of the implementation of project activities. The final reporting of expenditures could be done after the end of the project implementation period.
89	Is it obligatory for Project partner 2 to have a separate bank account for the project?	<p>Only the Lead partner is obliged to open and administer a separate bank account for the project.</p> <p>All partners shall ensure traceability of the performed operations analytical accounting for the purposes of the project.</p>
90	Is it required to scan originals of project documents, stamped as stamped “true copy”?	The originals of the documents should be scanned without any additional stamp “true copy” on them.
91	When will be the provisional time for signature of Subsidy contracts?	Indicative schedule for selection and contracting is available in p. 9 of the Guidelines for Applicants. The pointed terms are only indicative and may vary depending on the number of the received project proposals.
92	Regarding the investment projects – is it true that the respective phase of project proposal should be elaborated preliminary, i.e. prior the submission of the project proposal? Should this payment be co-financed by the organization prior the submission of the project proposal?	The budget can cover the expenses for project preparation (meetings between partners, consultancy, studies, translation of documents, taxes and other charges arising from preparation of project proposal, elaboration of investment technical documentation, etc.). The cost for project preparation will be reimbursed only to those applicants awarded subsidy contracts.

93	Is it required to prove the nationality/origin of experts?	With regard to tender procedures, detailed instructions regarding the rule of nationality is given in the Practical Guide to Contract Procedures for EU External Actions (PRAG) in section 2.3.1. The rules on nationality and origin.
94	Is the experience of the candidate going to be awarded with more points during the assessment process?	<p>The expertise to implement the project and previous experience of the partners, relevant to the project proposed for assessment, is subject to quality evaluation. The Applicant may indicate in the Application form information for already implemented projects/experience, related with the current project proposal.</p> <p>For further information about assessment of the proposals, please consult with the Technical and Quality Assessment Grid, available in the Guidelines for Applicants (page 71, point 6.3).</p>
95	Is it true that each non-profit making organization located on the territory of Republic of Bulgaria, but outside the eligible region, whose target group, effect and results will cover the eligible region, could be considered as eligible candidate?	<p>As it is specified in p. 2.6.1. How to review the Application Package of the Guidelines for Applicants, observing the principle of transparency and equal treatment of all potential applicants, the Managing Authority cannot give prior opinion on eligibility of specific applicants and specific activities, since those shall be subject to the assessment of the project proposal.</p> <p>In general, the Lead Partner and its partners must comply with all of the general eligibility criteria, specified in p.2.5.1 of the Guidelines for Applicants. Exception to the general rules, is the eligibility of applicants that are located outside the eligible cross-border regions, ensuring that the envisaged activities in the proposed project are for the benefit of the programme area. In order to be eligible for financing, the project proposal involving partner/s located outside the eligible cross-border area must additionally include at least one partner from each side of the eligible cross-border region.</p>
96	There are many cases that civil structures do not have its own juridical bodies acting as a branch offices of the respective non-profit making organization in the Cross-border region. Are these branches eligible candidates?	<p>The Lead Partner and its partners must comply with all of the general eligibility criteria specified in p. 2.5.1 General Criteria for Eligibility of Applicants (Lead Partner and Partners) of the Guidelines for Applicants:</p> <p>Organization not registered in the CBC area could be considered eligible if the requirements for one of the possible exclusions are met:</p> <ul style="list-style-type: none"> - Bulgarian or Serbian national/regional public authorities whose area of competence, established by legal acts, covers the eligible area of the Programme; - Regional structures/branches of central organizations of local/regional/national authorities only. In case a structure of local/regional/national authority is not and cannot act as a legal entity, its legally established central organization shall be the project partner. - Applicants 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 for financing, the project

		<p>proposal involving partner/s located outside the eligible cross-border area must additionally include at least one partner from each side of the eligible cross-border region.</p> <p>As it is specified in p. 2.6.1. How to review the Application Package of the Guidelines for Applicants, observing the principle of transparency and equal treatment of all potential applicants, the Managing Authority cannot give prior opinion on eligibility of specific applicants and specific activities, since those shall be subject to the assessment of the project proposal.</p>
97	Should the costs for the work of volunteer groups be supported with separate lump sum justification or the given explanation should be in one file?	The costs for external expertise and services could be planned as lump sum or with detailed breakdown. If the applicant chooses to plan them as lump sum, justification should be provided separately for each project partner.
98	Should we present the most recent legal status of NGOs, pre-registered according to the provisions of the national legislation in the Registry Agency of Republic of Bulgaria?	Documentary and other evidence on the most recent legal status should be provided by each applicants as required in the Guidelines for Applicants.
99	If we plan to submit a project proposal under Priority axis Environment, should we include also indicators under Priority axis Youth, i.e. as environmental trainings of youth?	Projects can only contribute to the respective output Indicators for the Specific Objective under which the project is applying.
100	Should all expenditures be pre-funded by the Beneficiary?	The principle is that all projects awarded with subsidy contracts could receive advance payment for up to 20% of the subsidy. The beneficiaries should pre-finance the project expenditures operatively and receive a regular reimbursement of funds, corresponding to the amount of paid and verified costs.
101	Should the offers, proving the actual market prices for lump sum expenditures, be provided also in English, as the justification of lump sum costs?	There is no specific requirement the offers to be provided and prepared in English at the application stage. Minimum requirements for justification of lump sum amounts are specified in p. 3.2. Supporting Documents (B) of the Guidelines for Applicants.
102	Is our project going to be eligible, if we replace the low carbon component with renewable energy, in relation to activities for air pollution protection, under Priority axis	<p>Each project which fits within the scope of the Priority axis and Specific objective, and has a proven cross-border effect should be considered as eligible. The list of eligible activities in the Guidelines for Applicants is indicative.</p> <p>As it is specified in p. 2.6.1. How to review the Application Package of the Guidelines for Applicants, observing the</p>

	Environment?	principle of transparency and equal treatment of all potential applicants, the Managing Authority cannot give prior opinion on eligibility of specific applicants and specific activities, since those shall be subject to the assessment of the project proposal.
103	When planning elaboration of a web page, should it be used for the whole project or for some of the project partners only?	The project web page should be for the purposes of the whole project, and not for the needs of some of the project partners only.
104	Could we plan expenditures outside the cross-border region in the sections of the budget, related to expenditures within the cross-border region?	Expenditures outside the cross-border region should be planned in the respective budget section. If the candidate is registered outside the eligible region all its expenditures should be considered as expenditures outside of the cross-border region.
105	Is there any restriction in the budget regarding costs outside the eligible area?	There is no such restriction on project level. However, 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. Compliance with this rule will be monitored at Programme level by the Programme Implementation Structures.
106	Is it necessary a signature and stamp for the electronically signed documents?	If the national legislation and the Guidelines for applicants allow electronic signature for the submitted documents, there are no objections the respective documents to be provided with electronic signature.
107	We would like to submit a project proposal aimed at the development of youth related small scale infrastructures and training information facilities. This thematic priority falls under the priority axis YOUTH - specific objective 2.1: Skills & Entrepreneurship. In the “guidelines of applicants” we noticed that for the aforementioned specific objective the target has been achieved. Therefore we were wondering if the Programme will still support projects submitted under that specific objective?	The Call is open across all priority axis and specific objectives and we welcome all quality project proposals that help achieve the Programme objectives. However, priority in financing shall be given to projects addressing Programme indicators for which targets have not yet been achieved. This does not mean that other projects do not have any chance to be approved – they just have a smaller chance, as compared to those that address unfulfilled targets. As the Guidelines for Applicants, Attachment 1 - Fulfilment of Programme indicators and ranking of project proposals, states – “available funds under the Call shall be allocated towards those Output Indicators in need of more contracted projects, whereas projects fulfilling only OIs that have already been achieved shall only be contracted in case some funding still remains available”.
108	Could the children be a target group under	According to the Interreg-IPA Cross-border Cooperation Programme Bulgaria-Serbia, Priority axis 2 “Youths”, p.

	Priority Axis Youth?	2.1.5. “Actions to be supported and their expected contribution to the programme implementation” and p.2.1.5.1. “A description of the type and examples of actions to be supported and their expected contribution to the specific objectives, including, where appropriate, identification of the main target groups, specific territories targeted and types of beneficiaries”, in particular, the youth (up to age of 29), and pupils of primary and secondary schools are envisaged as eligible target groups (page 49 of the Programme – available on the following link: https://www.ipacbc-bgrs.eu/sites/ipacbc-bgrs-105.gateway.bg/files/uploads/op/interreg-ipa_bg-rs_ver4.pdf).
109	Which person is to be described as “youth”?	According to the Interreg-IPA Cross-border Cooperation Programme Bulgaria-Serbia, Priority axis 2 “Youths”, p. 2.1.5. “Actions to be supported and their expected contribution to the programme implementation” and p.2.1.5.1. “A description of the type and examples of actions to be supported and their expected contribution to the specific objectives, including, where appropriate, identification of the main target groups, specific territories targeted and types of beneficiaries”, in particular, the youth (up to age of 29), and pupils of primary and secondary schools are envisaged as eligible target groups (page 49 of the Programme – available on the following link: https://www.ipacbc-bgrs.eu/sites/ipacbc-bgrs-105.gateway.bg/files/uploads/op/interreg-ipa_bg-rs_ver4.pdf).
110	Is there any restriction in the budget of Bulgarian partners, registered outside the eligible area?	There is no such restriction on project level. However, 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. Compliance with this rule will be monitored at Programme level by the Programme Implementation Structures.
111	How to envisage the remuneration of project team members, which are municipal servants, and which are the applicable rules?	There is no specific Programme requirement for engaging the project team. This type of expenditure (staff costs) is to be envisaged as a flat rate. The appointment of the staff by the beneficiaries is the sole responsibility of the beneficiaries themselves and has to be made in accordance with European and national legislation.
112	Should we consider (accumulate) the expenditures for tenders under national rules, when we plan the tenders under the PRAG rules?	There is no specific Programme requirement to accumulate expenditures for tenders under national procurement rules, when planning the tender under PRAG rules.
113	Our organization is a sport club registered in the City of Sofia. Could we apply with project proposal under PA 2 Youth? Where could we receive consultations?	As specified under p. 2.5.1 General Criteria for Eligibility of Applicants (Lead Partner and Partners) of the Guidelines for Applicants, the Lead Partner and its partners must comply with all of the general eligibility criteria. The Programme though could finance projects involving applicants located outside the eligible cross-border regions, but still on the territory of Bulgaria or Serbia, ensuring that the envisaged operations in the proposed project are for the benefit of the programme area. In order to be eligible for financing, the project proposal

		<p>involving partner/s located outside the eligible cross-border area must additionally include at least one partner from each side of the eligible cross-border region.</p> <p>As it is specified in p. 2.6.1. How to review the Application Package of the Guidelines for Applicants, observing the principle of transparency and equal treatment of all potential applicants, the Managing Authority cannot give prior opinion on eligibility of specific applicants and specific activities, since those shall be subject to the assessment of the project proposal. All requirements are explained in detail in p. 2.5 “Eligibility Criteria” of the Guidelines for Applicants and must be strictly observed by all potential applicants during the project preparation phase.</p> <p>The applicants can submit questions to the email address specified in p. 2.6.1. How to review the Application Package of the Guidelines for Applicants. The JS will reply no later than 11 calendar days before the deadline for the submission of proposals.</p>
<p>114</p>	<p>Could you clarify if the maximum rates of costs, included in the Guidelines for Applicants, are VAT included, (maximum rate for fuel - 0,21 euro per kilometer)?</p>	<p>For Bulgarian partners: The amount of eligible VAT (non-recoverable from other sources) should be included in the unit rates of each cost part of the budget. For Serbian partners: The unit rate of costs, stated in the budget, should not include VAT.</p>
<p>115</p>	<p>Is an executive agency, second-level budget administrator, an eligible candidate with its branch in the CBC region, which is not a separate legal entity?</p>	<p>As specified under p. 2.5.1 General Criteria for Eligibility of Applicants (Lead Partner and Partners) of the Guidelines for Applicants, the Lead Partner and its partners must comply with all of the general eligibility criteria.</p> <p>The Programme though could finance operations involving beneficiaries located outside the eligible cross-border area, but still on the territory of Bulgaria or Serbia. Exceptions to the eligibility rules of the Programmes are allowed for the following organizations:</p> <ul style="list-style-type: none"> - Bulgarian or Serbian national/regional public authorities whose area of competence, established by legal acts, covers the eligible area of the Programme; - Regional structures/branches of central organizations of local/regional/national authorities only. In case a structure of local/regional/national authority is not and cannot act as a legal entity, its legally established central organization shall be the project partner. - Applicants located outside the eligible cross-border regions, but still on the territory of Bulgaria or Serbia, ensuring that the envisaged operations in the proposed project are for the benefit of the programme area. In order to be eligible for financing, the project proposal involving partner/s located outside the eligible cross-border area must additionally include at least one partner from each side of the eligible cross-border region.

		As it is specified in p. 2.6.1. How to review the Application Package of the Guidelines for Applicants, observing the principle of transparency and equal treatment of all potential applicants, the Managing Authority cannot give prior opinion on eligibility of specific applicants and specific activities, since those shall be subject to the assessment of the project proposal. All requirements are explained in detail in p. 2.5 “Eligibility Criteria” of the Guidelines for Applicants and must be strictly observed by all potential applicants during the project preparation phase.
116	Please clarify the meaning of the "Environmental NGOs", which are identified within the Guidelines as an eligible Beneficiaries under Specific Objective 3.2. Must these NGOs have some special registration/statut or it is enough to be included within their legal documents as an area of its activity?	There are no specific programme requirements for the legal status of NGOs, envisaged as eligible applicants, apart from the general eligibility criteria, as specified under p. 2.5.1 General Criteria for Eligibility of Applicants (Lead Partner and Partners) of the Guidelines for Applicants.
117	Can Staff costs include salaries of project staff other than those performing periodically repetitive actions related to the organization, coordination, management and reporting of the activities and results related to the project during the project period? More specifically, can it include salaries of employees performing project activities such as various analyses, studies and other that are part of the project and defined in the proposal?	<p>The Budget line 1 “Staff costs” covers only expenditures for salary payments and social security payments of the members of the project management team of each partner. The members of the project staff are those experts who will be responsible for the project organization, administration and reporting – i.e. project manager, coordinator, accountant, technical assistant, etc. Staff costs must relate to activities which the partner organization would not carry out if the project was not undertaken.</p> <p>Costs for all other experts needed for implementation of the planned project activities (for example: experts for elaboration of feasibility studies, surveys, technical expertise, legal advice, elaboration of works design/specialized software/web-pages, etc.) should be planned in Budget line 4 “External expertise and services costs”.</p>
118	In which budget sub-line should we envisage the travel and accommodation costs for the external experts participating in the project events - 4.3 Travel for events + 4.5 Accommodations for participants in the events or such costs should be part of the “per contract” lump sum in sub-line 4.9 Consultancy, studies, designs, website	The travel and accommodation costs for external experts should be included in the lump-sum for external experts under sub-line 4.9 Consultancy, studies, designs, website development etc.

	development etc.	
119	<p>Is the Singidunum University Belgrade (private university with a training center in Nis) an eligible candidate?</p> <p>Does this candidate Singidunum University Belgrade fall into the exception of a partner registered outside the cross-border region?</p> <p>The training center in Nis has no legal registration.</p>	<p>In general, as specified under p. 2.5.1 General Criteria for Eligibility of Applicants (Lead Partner and Partners) of the Guidelines for Applicants. the Lead Partner and its partners must comply with all of the following general eligibility criteria:</p> <ul style="list-style-type: none"> - be legally established organizations (legal persons) according to the national legislation of the state on whose territory they are located. - be registered in the eligible cross-border region between Bulgaria and Serbia or fall under one of the following exceptions: <ul style="list-style-type: none"> - be non-profit making organizations; - be directly responsible for the preparation and management of the action, not acting as an intermediary. <p>The Programme though could finance operations involving beneficiaries located outside the eligible cross-border area, but still on the territory of Bulgaria or Serbia. Exceptions to the eligibility rules of the Programmes are allowed for the following organizations::</p> <ul style="list-style-type: none"> - Bulgarian or Serbian national/regional public authorities whose area of competence, established by legal acts, covers the eligible area of the Programme; - Regional structures/branches of central organizations of local/regional/national authorities only; - Applicants located outside the eligible cross-border regions, ensuring that the envisaged operations in the proposed project are for the benefit of the programme area. A legally established entity located outside the eligible cross-border area, but still on the territory of Bulgaria or Serbia, may participate under this Call for Proposals. In order to be eligible for financing, the project proposal involving partner/s located outside the eligible cross-border area must additionally include at least one partner from each side of the eligible cross-border region. <p>As it is specified in p. 2.6.1. How to review the Application Package of the Guidelines for Applicants, observing the principle of transparency and equal treatment of all potential applicants, the Managing Authority cannot give prior opinion on eligibility of specific applicants and specific activities, since those shall be subject to the assessment of the project proposal. All requirements are explained in detail in p. 2.5 “Eligibility Criteria” of the Guidelines for Applicants and must be strictly observed by all potential applicants during the project preparation phase.</p>
120	Could we apply with one project that	The project proposal can contribute to achievement of only one Programme’s specific objective. Within the chosen Specific objective, the project proposal can contribute to the achievement of more than one of the Programme

	contributes to two Specific objectives?	Output Indicators.
121	When we fill in the Application Form and section Financial date of respective partner, should we write in front of National registration code abbreviation RS?	National registration code – may contain only numbers. The number should be exactly the same number, as it is written in Business Registers Agency.
122	Do we have to fill in Application Form on-line?	The Application form is filled in offline by using the template published on the Programme website. Upon completion of the Application form it must be uploaded in the system. The detailed description can be found in Attachment 4 - Instruction for electronic submission of project proposals.
123	Should we provide financial data for year of 2017?	According to the Guidelines for Applicants, section 2.6.2. How to fill in the Application Form, 2.2. Financial status and human resources the required information concerning the annual turnover are for the past 3 years (2016, 2015 and 2014), as well as the number of full time and/ or number of part time staff.
124	In relation to the sustainability of the projects, can any income be generated, in order to secure the sustainability of project after the project's end?	In accordance with the Guidelines for Applicants, namely p. 2.5.7 Ineligible activities, the actions supporting establishment or activities of private or public enterprises, and profit-earning activities, are ineligible. Furthermore, if any revenues shall be generated by the operation, the total eligible value of the operation will be diminished accordingly with the value of the revenues generated within that period.
125	If we apply with an investment project, should the land be owned by local government?	<p>All works activities should be implemented on municipal or state-owned property. The property should be:</p> <ul style="list-style-type: none"> - free of any encumbrances; - not the object of an pending litigation; - not the object of a claim according to the relevant national legislation. <p>In case the investment activities will be performed on municipal or state-owned property the following documentation should be submitted:</p> <ul style="list-style-type: none"> • B5.1.1 – 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 – issued in the original language and translated into English. In the case the project envisages purchase of supplies which need to be permanently installed, it is necessary to submit an ownership act for municipal or state-owned property as well – issued in the original language and translated into English. • B5.1.2 – 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

		<p>project at least for 5 years after the end of the project.</p> <p>The consent should be signed by the person/body with the decision-making authority (e.g. the Municipal Council, not the Mayor).</p>
126	If the project proposal is awarded for financing, can the project partners get advance payment from MA?	<p>According to the Subsidy Contract, the part of the Application Package, the LP may request advance payment at the rate of 20 % of the total amount of the Contract.</p> <p>For soft projects, the MA transfers it in one instalment after receiving request for advance payment.</p> <p>For investment projects the LP may request advance payment in two installments. The LP may request the first installment of the advance payment at the rate of 10 % of the total amount of the Contract as per article 4, paragraph 1 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 as per article 4, paragraph 1 after one of the project partners awarded a sub-contract for investment activity.</p>
127	Is the expenditure for preparation of technical documentation expenditure, if carried out before the announcement of the Second Call for proposals?	<p>For the partners from Serbia the starting date for the eligibility of expenditure for project preparation is 23 September 2014 - the date following the submission of the Programme to the EC. The ending date for eligibility of expenditures for project preparation is the date of submission of the project proposal, and this condition applies to all applicants, both Bulgarian and Serbian.</p>
128	If the tender procedure for preparation of the technical documentation for construction activities is developed in accordance to the Public Procurement Law of Republic of Serbia, are this costs eligible?	<p>The cost for project preparation will be reimbursed only to those applicants awarded subsidy contracts. Otherwise this cost is not recoverable. According to the Guidelines for Applicants, section 2.3. Applicable law and public procurement, in the case that the project preparation activities are sub-contracted, procurement rules should be observed in order for the costs to be eligible for reimbursement under the Programme. Procurement rules are set out in Chapter 3 of Title II of Part Two of Delegated Regulation (EU) No 1268/2012 on the rules of application of Regulation (EU, Euratom) No 966/2012 of the European Parliament and of the Council on the financial rules applicable to the general budget of the Union. In accordance with Art. 45(1) of Commission Implementing Regulation (EU) No 447/2014, those procurement rules apply in the whole Programme area, both on Bulgarian and Serbian territory.</p> <p>Beneficiaries under this Call for Proposals must refer to and use the guidelines and templates of the Practical Guide for Procurement and Grants for European Union External Actions (PRAG), available at the web page: http://ec.europa.eu/europeaid/prag/</p>
129	If our project proposal includes construction activities on cultural heritage site, how can we	<p>As it is described in the Guidelines for Applicants, section 2.2. Description of the target groups and beneficiaries (estimated number) you have to fill in the estimated numbers (in total for all partners). Please, do not overestimate</p>

	determine the quantity of target groups and beneficiaries?	the numbers and try to be as realistic as possible.
130	Will the project proposal receive higher scores if more partners participate in it?	Detailed description about scoring of the project proposals are given in Guidelines for Applicants, section 6.3 Technical and quality assessment. The program bodies cannot give preliminary opinion on quality of project proposal.
131	In which format technical documentation related to the construction activities should be submitted?	All the technical documentation should be submitted in .pdf format. The detailed description of the format of all required annexes is described in Guidelines for Applicants, section 4. How to Submit the Project proposal.
132	Who can issue Positive Environmental Impact Assessment or statement by relevant authority that EIA is not necessary?	Positive Environmental Impact Assessment or statement by relevant authority that EIA is not necessary should be issued by the relevant institution, in according to the relevant legislation.
133	Is it necessary to submit Positive Environmental Impact Assessment or statement by relevant authority that EIA is not necessary with the project proposal, or it can be submitted in further stages?	Positive Environmental Impact Assessment or statement by relevant authority that EIA is not necessary should be submitted with the project proposal
134	Is it necessary to submit construction permit together with the Project proposal?	Serbian partners must present Project for Works Design (Projekat za gradjevinsku dozvolu), or, if works design is not mandatory for the planned construction works according to the Serbian legislation - Preliminary Design (Idejni projekat), valid on the date of deadline for submission of project proposals under the current call and valid decision on construction permit (Rešenje o građevinskoj dozvoli) issued according article 135 of the Law on Planning and Construction of Republic Serbia in force, or valid decision on approval of construction works (Rešenje o odobrenju izvođenja radova) issued according article 145 of the Law on Planning and Construction of Republic Serbia in force.
135	Where can the own contribution of the respective project partner be filled in?	In case the project partners envisage additional own contribution (co-financing), the amount of contribution must be inserted by the partner in its respective column (PP1/LP, PP2, PP3 etc.), row "Thereof others co-financing" of the table 5. of the Application form.
136	How the Municipalities should provide evidence that they are established at least 12 months before the deadline for submission of	The Municipalities should provide the act from which can be seen how they are established in accordance to national legalisation.

	a project proposal?	
137	Is it possible to submit copy of the document from which can be seen that the Municipality is established?	Please see section 4. How to Submit the Project proposal, of the Guidelines for Applicants.
138	If the project proposal includes construction activities on the school and the owner of the property is the Republic of Serbia, who should issue Consent of the owner?	The Consent of the Owners should be issued in accordance to the national Laws of the Republic of Serbia.
139	Is the expenditure for publication on social network eligible?	Publications in the social networks or at the organization's own website will be considered to be done for free by the applicants. Such publications could be specified in the description of the project activities, but no costs should be associated with them in the budget.
140	Is it eligible to foresee publication on on-line media?	There are no specific requirement on the type of media which beneficiaries could choose for publications. However, publications in the social networks or at the organization's own website will be considered to be done for free by the applicants. Such publications could be specified in the description of the project activities, but no costs should be associated with them in the budget.
141	Is it eligible to purchase supply of specialized equipment for floods prevention through the project? Can Municipality purchase the equipment through the project and then transfer it for further use to some other institution?	The project partners should be aware that in case the project is financed they cannot sell or otherwise transfer in any form the goods, purchased from the financing, throughout the period of 5 (five) years after the end date of the implementation period of the project or throughout their life period, as it is stipulated by the national legislation, if this period is shorter than the implementation period of the project. In case the project envisages direct use of supplied assets/goods by representatives of target groups, the respective project partner should ensure this use without transferring of the assets to third parties.
142	Is it necessary to fill in exactly names of the project team members in the section 3. Management of the project, of the Application form?	<p>In the section 3. Management of the project, it should be described the overall plan for management of the project. The number of the project team members, their specific positions in the project, duties and responsibilities should be clear enough to guarantee smooth project implementation and reporting.</p> <p>You have to provide the following information:</p> <ul style="list-style-type: none"> - The responsibilities of each project partner in view of the overall project implementation and reporting; - The structure of the project team (both Bulgarian and Serbian representatives).

		<p>- The responsibilities of each member of the project team.</p> <p>The submission of CVs and the names of the appointed project team members is not necessary.</p>
<p>143</p>	<p>If the Project proposal includes project partner outside the eligible area and the output of the project is strategic document that include regional development plan (including region outside of the eligible territory of the Programme) is that kind of output eligible?</p>	<p>According to the Guidelines for Applicants, section 2.5.5 Activities location, beneficiaries that are located outside the eligible cross-border region, have to ensure that the envisaged operations in the proposed project are for the benefit of the Programme area. To this end, the Programme shall finance operations involving beneficiaries located outside the eligible cross-border area, but still on the territory of Bulgaria or Serbia.</p> <p>Furthermore, the Programme shall finance activities outside the eligible cross-border area carried out by project partners located inside the eligible area, given that those activities are for the benefit of the eligible cross-border area and the beneficiary has provided a detailed justification proving that those activities are necessary for achieving of the specific project objectives.</p> <p>Additionally, applicants are reminded that a strong justification is needed for the inclusion of both project partners and activities outside the eligible area, and where the necessity for such inclusion is not visible, the project proposals shall not be recommended for funding.</p> <p>Please, note that a clear cross-border impact should be demonstrated by the project, e.g. wider effect that can be credibly attributed to the implemented project activities.</p>
<p>144</p>	<p>Is a State University outside the eligible cross-border area eligible for a partner in case there is another BG partner, which is from the eligible cross-border area? In case of a positive answer, can this University be a Leading Partner?</p>	<p>In general, as specified under p. 2.5.1 General Criteria for Eligibility of Applicants (Lead Partner and Partners) of the Guidelines for Applicants. the Lead Partner and its partners must comply with all of the following general eligibility criteria:</p> <ul style="list-style-type: none"> - be legally established organizations (legal persons) according to the national legislation of the state on whose territory they are located. - be registered in the eligible cross-border region between Bulgaria and Serbia or fall under one of the following exceptions: - be non-profit making organizations; - be directly responsible for the preparation and management of the action, not acting as an intermediary. <p>The Programme though could finance operations involving beneficiaries located outside the eligible cross-border area, but still on the territory of Bulgaria or Serbia. Exceptions to the eligibility rules of the Programmes are allowed for the following organizations::</p>

		<ul style="list-style-type: none"> - Bulgarian or Serbian national/regional public authorities whose area of competence, established by legal acts, covers the eligible area of the Programme; - Regional structures/branches of central organizations of local/regional/national authorities only; - Applicants located outside the eligible cross-border regions, ensuring that the envisaged operations in the proposed project are for the benefit of the programme area. A legally established entity located outside the eligible cross-border area, but still on the territory of Bulgaria or Serbia, may participate under this Call for Proposals. In order to be eligible for financing, the project proposal involving partner/s located outside the eligible cross-border area must additionally include at least one partner from each side of the eligible cross-border region. <p>The eligibility criteria for Lead partners, include also the requirement to be registered 1 year prior the deadline for submission of project proposals.</p> <p>As it is specified in p. 2.6.1. How to review the Application Package of the Guidelines for Applicants, observing the principle of transparency and equal treatment of all potential applicants, the Managing Authority cannot give prior opinion on eligibility of specific applicants and specific activities, since those shall be subject to the assessment of the project proposal. All requirements are explained in detail in p. 2.5 “Eligibility Criteria” of the Guidelines for Applicants and must be strictly observed by all potential applicants during the project preparation phase.</p>
<p>145</p>	<p>Are there any requirements regarding the origin of the equipment and machines we plan to buy under the project? For example, to be produced in the EU?</p>	<p>All goods to be delivered under a supply contract and all materials, goods and components part of a works contract, financed under the Programme, must originate from an eligible country as per the rules of the Practical Guide for Procurement and Grants for European Union external actions (PRAG), Annex A2a.</p> <p>The term 'origin' is defined in the Commission Regulation (EU) No 1063/2010 of 18 November 2010 amending Regulation (EEC) No 2454/93 laying down provisions for the implementation of Council Regulation (EEC) No 2913/92 establishing the Community Customs Code.</p> <p>The country of origin is not necessarily the country from which the goods were shipped and supplied. Two basic concepts are used to determine the origin of goods:</p> <ul style="list-style-type: none"> -the concept of “wholly obtained” products (when only one country is involved in the production); -the concept of products having undergone a "last substantial transformation" (when two or more countries are involved in the production). <p>However, these products can originate from any origin (e.g. full untying of the rules of origin) if their value is below the threshold of the competitive negotiated procedure - EUR 100 000. The amount of any ancillary works and</p>

		services is not taken into account.
146	Is the Bulgarian Tourist Union eligible as a leading partner at the Interreg-IPA Bulgaria-Serbia Programme?	<p>As it is specified in p. 2.6.1. How to review the Application Package of the Guidelines for Applicants, observing the principle of transparency and equal treatment of all potential applicants, the Managing Authority cannot give prior opinion on eligibility of specific applicants and specific activities, since those shall be subject to the assessment of the project proposal. All requirements are explained in detail in p. 2.5 “Eligibility Criteria” of the Guidelines for Applicants and must be strictly observed by all potential applicants during the project preparation phase.</p> <p>In general, as specified under p. 2.5.1 General Criteria for Eligibility of Applicants (Lead Partner and Partners) of the Guidelines for Applicants the Lead Partner and its partners must comply with all of the following general eligibility criteria:</p> <ul style="list-style-type: none"> - be legally established organizations (legal persons) according to the national legislation of the state on whose territory they are located or fall under the exception.; -be registered in the eligible cross-border region between Bulgaria and Serbia or fall under the exceptions; - be non-profit making organizations; - be directly responsible for the preparation and management of the action, not acting as an intermediary. <p>In addition to other eligibility criteria, 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.</p>
147	It is said that the expenditures for supervision which are construction and author’s (obligatory by Bulgarian law) shall be budgeted under Budget Line 5: Equipment And Works. Are there any budget thresholds for their costs? These are costs for services and not construction works, but it is said that they are eligible.	For the obligatory according to the Bulgarian law expenditures for supervision there are not any budget thresholds set in the Guidelines for Applicants. They should be in compliance with the relevant national legislation.
148	Do we need to provide also justification for calculation of the amount in a separate free-form document, signed by the respective partner as it is obligatory for Budget Line 4:	The requirement that the Guidelines for Applicants stipulates concerns justification of the lump sum under Budget Line 4, sub-line “Consultancy, studies, designs, website development, etc.” through detailed description and calculation of the costs (see p. 3.2 “Supporting documents (2)”). The applicants are not obliged to provide specific justification for other costs at the application stage.

	External Expertise And Services Costs that are budgeted under “Consultancy, studies, designs, website development etc.”	However, in case the project is proposed for financing, during the budget optimization procedures additional information, including 3 offers from different service providers/suppliers, could be requested by the managing bodies in order to ensure transparent and market-oriented financial allocations at the project budgets.
149	Are the costs for Investor’s control of the planned construction works eligible for financing, if they are necessary for the project partner?	The expenditures for Investor’s control are eligible if they are needed for the project implementation. They should be in compliance with the relevant national legislation.
150	<p>If the costs for Investor’s control of the planned construction works are eligible, where is the right place to put them in the budget:</p> <p><u>Option A.</u> Budget line 4: External expertise and services costs In “Consultancy, studies, designs, website development etc.”,</p> <p><u>Option B.</u> Budget line 5: Equipment and works - Small scale construction;</p> <p><u>Option C.</u> Budget Line 4: External Expertise And Services Costs – in “Other”?</p>	As stated in the Guidelines for Applicants, the expenditures for supervision should be part of Budget line 5: Equipment and works - Small scale construction.
151	Are the expenditures for procurement expertise eligible for 2 partners from different countries in one project – if no procurement expert is envisaged in the project team by those partners? Clarification: That means that we can put maximum of 3000 E in the budget of the partner in Bulgaria and another 3000 E in the budget of the partner in Serbia.	If no procurement expert is envisaged in the project team, the expenditures for procurement expertise can be planned at a maximum rate of 3000 Euro for each project partner.
152	Are the costs for contingency for construction works eligible for financing?	There is no requirement for planning of contingency reserves. All costs under BL5 should be planned as direct costs, i.e. based on actual market prices. The contingency reserve costs are provisional costs and should not be included in the budget.

153	If the contingency costs are eligible, what is the correct way to put them in the project budget – together with the sum for construction works or on another line? These are costs that usually are necessary and they are written in technical documentation.	Please see the answer to question 152.
154	Is there any threshold for contingency costs?	Please see the answer to question 152.
155	Do the applicants need additional justification for contingency costs?	Please see the answer to question 152.
156	Could the expenditures for financial management of the activities of one partner be included in BL4 since an accountant is not provisioned to be part of the project team?	As it is specified in p. 2.5.8. Eligibility of Expenditures of the Guidelines for Applicants, the costs for members of the project staff (project manager, coordinator, accountant, assistant, etc.) are included in Budget line 1 Staff costs. The members of the project team 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.
157	I am a representative of a non-governmental organization whose headquarters are located in Sofia city and with which we would like to participate with a project proposal under the Second Call of the Programme. As we have learned, we will not be able to participate as a leading organization in the Programme. The question is whether we can participate as a partner organization, since a leading organization will be a Serbian organization that is registered in the relevant cross-border areas. If the answer is no, then it is logical to	<p>In general, the Lead Partner and its partners must comply with all of the general eligibility criteria stipulated in p. 2.5.1 General Criteria for Eligibility of Applicants (Lead Partner and Partners) of the Guidelines for Applicants. Regardless the fact where an organization is registered, if it fulfils all eligibility criteria and the requirement for the Lead partners to be registered on the territory of Bulgaria or Serbia at least 12 months prior to the deadline for submission of project proposals, it could be a Lead partner.</p> <p>In order to be eligible for financing, the project proposal involving partner/s located outside the eligible cross-border area must additionally include at least one partner from each side of the eligible cross-border region. The projects involving beneficiaries located outside the eligible cross-border area should ensure that the respective activities are for the benefit of the programme area.</p>

	ask whether we can participate as a partner in a project where a leading country and a partner are organizations from the cross-border regions of Bulgaria and Serbia.	
158	Please explain what does the phrase “Partner’s authority” mean in the line 1.2.2 Partner’s authority (especially the word “authority” – how the AWG will understand it). Do you associate the word “authority” only as ownership of the land?	<p>As specified in the Guidelines for applicants under the Second call for project proposals, “In section 1.2.2 Partner’s authority, it is important to describe whether the project partners have the authority to implement the project activities envisaged for each of them. Note that the envisaged project activities should be of the respective partner competence”. The project partners have to demonstrate if they are entitled by relevant legal acts/regulations to carry out the envisaged activities. Proper planning of the project’s activities and the project partner’s responsibilities should be in relevance with the partner’s experience and specific competence of partner’s organization, according to the defined requirements of the Second Call for project proposals, as well as respective national legislation.</p> <p>The meanings of "authority" is not associated with "ownership of the land" in context of section 1.2.2 Partner’s authority of the Guidelines for Applicants.</p>
159	Does that mean that if someone wants to make an event on national or municipal land and is required a permission from the state/municipality does not have the authority to do so and the project will be rejected? For example, a NGO plans to make event on place A and is required to ask permission from the state/municipality to make a public event there, does that mean that the NGO does not have the authority to do the event. Those permissions are required before the events when the exact date and persons are known and cannot be provided when the project is submitted.	Submission of a respective permission for conduction of specific event on place, municipal or state-owned property is not required. The beneficiaries should ensure the necessary conditions for successful implementation of the planned project activities.
160	Is a municipality/NGO promotes national touristic/historical places (which the State	Please see the answer to question 158.

	owns) does that mean that the municipality/NGO does not have the authority to promote tourism?	
161	If in the act of incorporation which is accepted by the court is said that the organisation is aimed at promotion of tourism/culture/etc, is that enough to implement activities in these areas and is that considered as “authority”?	Please see the answer to question 158.
162	If we install movable equipment on land and not permanent does we need to provide Ownership act and Permit?	For not permanent/temporally installation of movable equipment for conduction of specific event, there is no requirement for providing ownership act and/or respective permit on the application stage. In any case, the activities proposed to be implemented should be in coherence with the national legislation.
163	The project provides an establishment, training and logistics of teams of volunteers on the territory of the program area for co-operation in natural disasters. Our organization (University Emergency Rescue Team - UASO) is an NGO, registered under the Public Benefit and Salvage Units (UASO), with a seat in Sofia. Is our organization eligible as far as it is located outside the eligible cross-border region but are the activities provided for in the project beneficial to the program area? Can our organization act as a Lead Partner? Is a project partner eligible to be a Regional Council of the Bulgarian Red Cross in the program area (participating as a partner via its central organization - in this case Bulgarian Red Cross)?	<p>As it is specified in p. 2.6.1. How to review the Application Package of the Guidelines for Applicants, observing the principle of transparency and equal treatment of all potential applicants, the Managing Authority cannot give prior opinion on eligibility of specific applicants and specific activities, since those shall be subject to the assessment of the project proposal.</p> <p>As a general rule, the Lead Partner and its partners must comply with all of the general eligibility criteria, specified in p.2.5.1 of the Guidelines for Applicants. Exceptions to the eligibility rules of the Programmes are allowed for the following organizations:</p> <ul style="list-style-type: none"> - Bulgarian or Serbian national/regional public authorities whose area of competence, established by legal acts, covers the eligible area of the Programme; - Regional structures/branches of central organizations of local/regional/national authorities only; - Applicants located outside the eligible cross-border regions, ensuring that the envisaged operations in the proposed project are for the benefit of the programme area. A legally established entity located outside the eligible cross-border area, but still on the territory of Bulgaria or Serbia, may participate under this Call for Proposals. In order to be eligible for financing, the project proposal involving partner/s located outside the eligible cross-border area must additionally include at least one partner from each side of the eligible cross-border region.“ <p>In addition, specific requirements and potential exclusions of specific applicant are determined by the specifics of the organization and the envisaged project. It should be also taken into consideration that authority of project partners and relevance of the partners to the proposed projects is subject to quality evaluation of project</p>

		<p>proposals.</p> <p>Regardless the fact where an organization is registered, if it fulfils all eligibility criteria and the requirement for the Lead partners to be registered on the territory of Bulgaria or Serbia at least 12 months prior to the deadline for submission of project proposals, it could be a Lead partner.</p>
164	<p>Our project envisages deliveries for which a permit issued by the municipality is required. Whether this permit should be submitted within the application stage or it should be included in budget line 5.1 "Small scale construction"?</p>	<p>Section 3.2 "Supporting documents (B)" of the Guidelines for Applicants, p. B5 – Supporting documents concerning INVESTMENT ACTIVITIES ONLY, p .B5.1, stipulates that in the case the project envisages purchase of supplies which need to be permanently installed, it is necessary to submit an ownership act for municipal or state-owned property and decision/consent of the owner as well, 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. In any case, the activities proposed to be implemented should be in coherence with the national legislation.</p>
165	<p>About the maximum rate of 1,5 euro per km within Budget line 4, sub-budget line Travel for events, please clarify if this maximum rate include expenditures for motor way taxes and vignettes.</p>	<p>The maximum rate of 1,5 euro per kilometer refers to renting of vehicle for participants in the events and includes all expenditures needed for the respective travel service.</p>
166	<p>When a joint event is organized, it is eligible for the project management team to be included expenditures for catering under Budget line 4 with the other participants, without daily allowances or it is not eligible and must to be included only daily allowances?</p>	<p>The expenses for participation in events of the project staff members are to be budgeted in BL3, whereas budget line 4 covers expenses related to the participants of the project target groups/final beneficiaries. In addition, as set on page 51 of the Guidelines for Applicants, project staff members are entitled daily allowances, but should not be included in catering costs; on the contrary, participants (other than the project staff members) are entitled catering, but cannot receive daily allowances.</p>
No.	Question	Answer
167	<p>In the application form it is indicated that "The maximum allowed rate for procurement expertise is 3000 Euro per contract". This amount is with or without VAT?</p>	<p>For Bulgarian partners, the amount of eligible VAT (non-recoverable from other sources) should be included in the unit rates of each cost part of the budget. For Serbian partners, the unit rate of costs, stated in the budget, should not include VAT.</p>

168	Can we apply the CVs of the experts, which will be engage in the implementation of the projects (lecturers, etc.)?	There is no requirement for submission of CVs of the experts who will be engaged in the implementation of the projects, neither for the project team members, nor for the external experts (lecturers, moderators, interpreters, etc.) listed in BL 4.
169	Please, clarify what exactly means “respective certificates” in “Examples of clarification”, OI 3.1.4 (Attachment 1 - Fulfilment of Programme Indicators and Ranking of Project Proposals)? Is there any requirements regarding them and which?	There are no specific requirements regarding the certificates which are to be issued as documentary proofs for participation in training. As established in practice, the name of the training course, the name of the participant, the venue and the days attended should be indicated in the certificates.
170	Please, clarify are the non-governmental organizations eligible candidates under Specific Objective 3.1 or not?	<p>The Guidelines for Applicants do not lay down specific requirements for eligibility of applicants under Specific objectives. Non-governmental organizations are eligible applicants provided that they meet all eligibility criteria specified under p. 2.5.1 General Criteria for Eligibility of Applicants (Lead Partner and Partners) of the Guidelines for Applicants.</p> <p>It should be taken into consideration that Project partners’ authority to implement the project activities, relevance of the partnership to the proposed project and level of involvement and participation of project partners in activities are subject to quality assessment of the project proposal (please refer to p. 6.3 Technical and quality assessment of the Guidelines for Applicants).</p>
171	Our project will be implemented within the districts of Montana, Vratsa and Vidin by the Archive State departments Vidin, Vratsa and Montana, which are subordinated to the Regional State Archives Directorate with its headquarters in Montana. The Directorate has no legal autonomy, we are subordinated to the Archives State Agency having it seats in Sofia, Republic of Bulgaria. Could the ASA based in Sofia be an eligible partner if the project envisages to be implemented in Vidin,	<p>According to the Guidelines for Applicants, exceptions to the rules that the applicants should be legally established organizations (legal persons) and legally registered in the cross-border area are allowed for the following organizations:</p> <ul style="list-style-type: none"> - Bulgarian or Serbian national/regional public authorities whose area of competence, established by legal acts, covers the eligible area of the Programme; - Regional structures/branches of central organizations of local/regional/national authorities only. In case a structure of local/regional/national authority is not and cannot act as a legal entity, its legally established central organization shall be the project partner; - Applicants located outside the eligible cross-border regions, ensuring that the envisaged operations in the

	Vratsa and Montana?	proposed project are for the benefit of the programme area. A legally established entity located outside the eligible cross-border area, but still on the territory of Bulgaria or Serbia, may participate under this Call for Proposals. In order to be eligible for financing, the project proposal involving partner/s located outside the eligible cross-border area must additionally include at least one partner from each side of the eligible cross-border region.
172	Please clarify if the construction of forestry protection station is an eligible activity under PA 3 Environment?	As it is specified in p. 2.6.1. How to review the Application Package of the Guidelines for Applicants, observing the principle of transparency and equal treatment of all potential applicants, the Managing Authority cannot give prior opinion on eligibility of specific applicants and specific activities, since those shall be subject to the assessment of the project proposal. The list of the eligible activities under each of the priority Axis given in p. 2.5.6 Eligible activities of the Guidelines for Applicants is indicative. The applicants can envisage activities that are not listed in the Guidelines, but they should be relevant to the Priority axis, specific objective and proposed project.
173	Is it possible to have a project intervention on a land with established right of use in favour of the municipality for 10 years period?	According to the Guidelines for Applicants, all works activities and supplies, which need permanent installation should be implemented on municipal or state-owned property. In case the investment activities will be performed on municipal or state-owned property you will need to provide ownership act or certificate or legal document for municipal or state ownership of the tangible assets, consent of the owner, 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, and all other supporting documents related to investment activities stated in the requirements of p. 3.2 Supporting documents the GfA.
174	Regarding choosing flat rate option for the budget category staff costs and office and administrative costs – is it compulsory, or is it optional?	As stated in the Guidelines for Applicants, the expenditures under Budget line 1 “Staff costs” and Budget Line 2 “Office and administration costs” should be planned as a flat rate. The maximum flat rate percentage allowed under each of these budget lines are indicated in the GfA, the respective percentage should be indicated in the budget by the project partner and shall remain the same for the entire project implementation period.
175	Can we include in office and administrative costs the costs for accounting services (accountant for the project)?	The accountant should be part of the management project team and the respective expenditures are covered by Budget line 1 “Staff costs”.
176	Do we need to provide promissory note or bank guarantee at the stage of signing the subsidy contract or beforehand?	There is no requirement for providing a promissory note or bank guarantee at the stage of signing of a subsidy contract if the project proposal is selected for financing.

<p>177</p>	<p>With regard to project application, we are planning to have 3 partners in total. Do we need to insert new page, i.e. PP3 in the excel application form or the information for the 3rd partner to be included in the sheet of PP2 below?</p>	<p>New page for project partner 3 should be added in the Application form. To do so, go to sheet “Checklist” of the Application Form file and from the drop-down list select the option “X” for Project partner 3. Separate sheets for providing information of the organization’s profile (sheet titled PP3) and for the PP3’s budget (Table 2 – detailed breakdown of budget lines – PP3 in EUR of project partner 3) will appear automatically in the AF.</p>
<p>178</p>	<p>When planning a project proposal under SO 2.2. “People to people networking” which contributes to OI 2.2.1 “Total number of youth networking initiatives supported by the Programme”, is it possible to plan project partner meetings, since on page 5 of Attachment 1 – fulfilment of Programme Indicators and ranking of Project Proposals to the GfA, it is said that “Project partners meetings are excluded from this OI”?</p>	<p>Project partner meetings could be planned as part of the project’s management activities under each Priority Axis and each Specific Objective. As stated in of “Attachment 1 – fulfilment of Programme Indicators and ranking of Project Proposals”, when defining the quantities of the selected OI 2.2.1 “Total number of youth networking initiatives supported by the Programme”, applicants should take into account that the project partners meeting could not be considered as networking initiatives.</p>
<p>179</p>	<p>Please confirm that a non-government organization which is situated and registered in the city of Sofia (outside the programme area) more than 12 months prior to the deadline, is eligible to apply as a lead partner under the Call with implementation of activities for the benefit of the programme area, with the following partnering configuration: The NGO in question – lead partner, 1 partner from the Serbian side within the programme area and one partner from the Bulgarian side within the programme area.</p>	<p>As it is specified in p. 2.6.1. How to review the Application Package of the Guidelines for Applicants, observing the principle of transparency and equal treatment of all potential applicants, the Managing Authority cannot give prior opinion on eligibility of specific applicants and specific activities, since those shall be subject to the assessment of the project proposal.</p> <p>As a general rule, the Lead Partner and its partners must comply with all of the general eligibility criteria, specified in p.2.5.1 of the Guidelines for Applicants. Exception to the eligibility rules of the Programme are allowed for applicants located outside the eligible cross-border regions, ensuring that the envisaged operations in the proposed project are for the benefit of the programme area. A legally established entity located outside the eligible cross-border area, but still on the territory of Bulgaria or Serbia, may participate under this Call for Proposals. In order to be eligible for financing, the project proposal involving partner/s located outside the eligible cross-border area must additionally include at least one partner from each side of the eligible cross-border region.“</p> <p>Regardless the fact where an organization is registered, if it fulfils all eligibility criteria and the requirement for the Lead partners to be registered on the territory of Bulgaria or Serbia at least 12 months prior to the deadline for submission of project proposals, it could be a Lead partner.</p>

<p>180</p>	<p>Please provide more clarification on the 20% limitation concerning the partners outside the programme area, which is stated on page 24, item 2.5.5. Activities location from the Guidelines for Application: “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. Compliance with this rule will be monitored at Programme level by the Programme Implementation Structures.”</p> <p>How shall we understand “20% from the Union on Programme level”?</p> <p>Can we consider that if the partner outside the programme area participates with budget, which is 20% of the total project budget, we have kept the above requirement “shall not exceed 20% of the support from the Union at Programme level”?</p>	<p>As stated in the Guidelines for applicants, the funds allocated to both project partners located outside the eligible cross-border area and activities outside the eligible cross-border area (performed by project partners from inside the eligible area) shall not exceed 20% of the available support from the Union at Programme level, not at project level.</p> <p>This means that at project level partners are not obliged to respect the 20% rule. i.e.:</p> <ul style="list-style-type: none"> - a project proposal could include partner/s from outside the eligible cross-border area. The budget of the respective partner shall be considered in its entirety, meaning that the whole budget of that project partner shall count towards the 20% rule at Programme level, regardless of where the envisaged activities are taking place; - a project proposal could include activities outside the eligible cross-border area (performed by project partners from inside the eligible area). In such cases, only the expenditures for those activities shall count towards the 20% rule at Programme level.
<p>181</p>	<p>We want to implement a project under PA2 “Youth”. Our project idea is related to the development of an online platform for inclusion of the unemployed young people from the cross-border region to the labour market. The question is which of the two specific objectives under PA2 should our project proposal address. The first option is to contribute to SO 2.1. “Skills & Entrepreneurship” and the activities will encompass “investments in ICT- facilities”</p>	<p>In the process of planning of the project proposal, each applicant should bear in mind that the project activities should contribute to achievement of the Programme’s output indicators. As set in p. 4.1 of the Guidelines for beneficiaries, for each Specific Objective there are a number of pre-defined Output Indicators and each proposal must contribute to the achievement of one or more output indicators. The decision which SO should the project proposal contribute to should be based on the character of the core project activities and on the specific result that could be achieved. Detailed list of all the specific objectives, output indicators and examples of their quantification is given in Attachment 1 - Fulfilment of Programme Indicators and Ranking of Project Proposals.</p> <p>“Soft-measure” projects are those projects which include expenditure for small scale construction and/or supply components in BL 5 “Equipment and Works” of no more than 50% of the total eligible cost of the entire project. Investment project, on the other hand, are projects that have small-scale construction and/or supply components</p>

	<p>development and upgrade” and the second one – to refer to SO 2.2. “People-to-people networking” and the activities should encompass “organisation of different events such as conferences, forums, seminars, etc.” Does the activity of developing of a platform make our project investment of “soft measure” project?</p>	<p>(representing Budget Line 5 – Equipment and Works), forming more than 50% of the total eligible cost of the entire project.</p> <p>In the particular case, you should bear in mind that if the planned online platform is going to be developed by using external service provider, the activity is to be considered as a service and the relevant expenditure should be included in BL4 “External expertise and services costs”, sub-line “Consultancy, studies, designs, website development etc.”. On the contrary, if the platform is an existing software product which you intend to purchase by its manufacturer, then the activity is to be considered as a supply and the relevant expenditure should be included in BL5 “Equipment and Works”, sub-line “Supply”.</p>
182	<p>We plan to create models for the sophistication of Bulgarian triadic customs, with which to make exhibitions. In connection with enhancing the sustainability of the project and organizing exhibitions after the end of the project, are these exhibitions eligible to be paid in order to cover the necessary expenses for the hall and transportation of the models? Revenues will not exceed costs, and there will be no profit generated.</p>	<p>According to p. 2.5.8. Eligibility of Expenditures of the GfA, one of the conditions for eligibility of the costs for the operations is they to be carried out during the implementation period of the operation (exception is made for project preparation expenditures). No expenditures incurred after the end of the project’s implementation period shall be verified and reimbursed under the Programme. The beneficiary has the responsibility to ensure the sustainability of the project results at its own expenses within a period of 5 years after the end of the project’s implementation period.</p>
183	<p>When we fill the activity in application form the location have to be chosen. We have a similar activity for the both partner. We can’t choose 2 location. Can we choose the location for the lead partner and in the description of activity explain that it will be implement in the both area.</p>	<p>Yes, you could choose the location for the Lead partner and in the description of the activity you could explain that the activity will be implemented in both areas.</p>
184	<p>We foresee the installation of small infrastructure (benches, tables, open-air classroom, etc.) on the territory of the State Hunting Farm “Vitoshko-Studena”. We have</p>	<p>According to Section 3.2 “Supporting documents (B)” of the GfA, p. B5 –Supporting documents concerning INVESTMENT ACTIVITIES ONLY, p .B5.1, in case the project envisages purchase of supplies which need to be permanently installed, it is necessary to submit an ownership act for municipal or state-owned property and decision/consent of the owner as well, clearly stating that the assets are given for free right of use for the purpose</p>

	received their consent as the owner of the territory but they cannot provide us with an ownership act due to the specific status of the forest territories within the Vitosha Nature Park - they are public state property. Could we not present an ownership act of, but some equivalent document?	of the project at least for 5 years after the end of the project. In any case, the activities proposed to be implemented should be in coherence with the national legislation.
185	In which section of the application form we have to describe the overall and specific objectives of the project?	<p>There are no concrete sections of the Application form to describe the overall and specific objectives of the project proposal. The specific objective under which the project proposal is applying should be indicated on the Cover page of the Application Form.</p> <p>Nevertheless, the overall and specific objectives of the project should be clearly demonstrated throughout the entire project description and should contribute to the achievement of the Programme's overall aim and selected specific objective.</p>
186	Is it necessary to submit three offers for the purchase of equipment / vehicles / construction of small infrastructure at the application stage?	Submission of offers as proof for calculation of the envisaged costs is not required at the project submission stage. The requirement that the Guidelines for Applicants includes is for justification of the lump sum costs through detailed description and calculation of the costs (see p. 3.2 "Supporting documents"). However, in case the project is proposed for financing, during the pre-contracting stage, additional information, including 3 offers from different service providers/suppliers, could be requested by the managing bodies in order to ensure transparent and market-oriented financial allocations at the project budgets.
187	Can we engage our employees in the implementation of project activities (other than project management) and pay them for this?	Contracting of employees of the partner organizations as external experts is eligible costs for the Bulgarian partners only in case the procurement principles and rules stipulated in Chapter 3 of Title II of Part Two of Delegated Regulation (EU) No 1268/2012 on the rules of application of Regulation (EU, Euratom) No 966/2012 of the European Parliament and of the Council on the financial rules applicable to the general budget of the Union and PRAG are observed.
188	Can the director be part of the project management team for example as a manager? Is there a limit on the number of experts who can be part of the project management team?	It is sole responsibility of the potential beneficiary to decide the number of experts and types of positions, part in the project management team. The appointment of the project staff is the sole responsibility of the beneficiaries themselves and has to be made in accordance with European and national legislation. In each case the beneficiary should respect the prohibition for conflict of interest, including the situation of "assigning yourself to yourself".

189	When is the deadline for asking of questions about the Second Call?	As specified in p. 2.6.1. How to review the Application Package of the GfA, the deadline for submitting questions is 21 days before the deadline for submitting of project proposals - 23.04.2018. All questions received by then will be posted on the Programme web site not later than 11 days before the deadline for submission of project proposals. It is our practice to send the replies also via e-mail, for your convenience.
190	If we are acting as a Lead partner located outside the eligible region, however, and if we have as partners organizations located within the eligible cross-border region in Bulgaria and Serbia, as well as all project activities will be implemented also within the eligible cross-border region – in this case how does the budget (of the Lead Partner) refer to the 20% rule?	<p>As per p. 2.5.5. “Activities location” of the Guidelines for Applicants:</p> <p>“The beneficiaries and operations should be located in at least one of the eligible NUTS level III regions in Bulgaria and the equivalent NUTS III regions in Serbia covered by the cross-border programme and specified in Section 1.1.1. An exception to this 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 and the conditions of Article 44(2) of Commission Implementing regulation (EU) No 447/2014 of 2 May 2014 are satisfied. To this end, the Programme shall finance operations involving beneficiaries located outside the eligible cross-border area, but still on the territory of Bulgaria or Serbia. At Programme level, the Joint Monitoring Committee will monitor the percentage of funds allocated to both project partners located outside the eligible cross-border area and activities outside the eligible cross-border area (performed by project partners from inside the eligible area) in order to ensure compliance with the 20% rule. At project level though, partners are not obliged to respect the 20% rule, meaning that:</p> <ul style="list-style-type: none"> • a project proposal could include partner/s from outside the eligible cross-border area. The budget of the respective partner shall be considered in its entirety, meaning that the whole budget of that project partner shall count towards the 20% rule at Programme level, regardless of where the envisaged activities are taking place; • a project proposal could include activities outside the eligible cross-border area (performed by project partners from inside the eligible area). In such cases, only the expenditures for those activities shall count towards the 20% rule at Programme level.
191	Under “Specific object 1.1 – Tourist attractiveness”, is it possible to fulfil an investment project, which envisions only the development of small-scale support infrastructure/ technical infrastructure to touristic attractions for natural or cultural heritage, without any actions for the objects’ preservation (i.e. restoration; maintenance;	Please see the answer to question 7.

	conservation, etc.)?)	
192	In accordance with the Guidelines there is no specific place in the Application form where to describe the project overall and specific objectives. However, in the technical and quality assessment grid it is indicated in 2.3, 2.4, 2.5 as part of the project activities and project intervention logic. Where shall we describe the objectives so that they are taken into consideration in the quality assessment?	The overall and specific objectives of the project should be clearly demonstrated throughout the entire project description and should contribute to the achievement of the Programme's overall aim and selected specific objective. Nevertheless, the logical consistency between the project objective, the proposed activities, and expected results/outputs should be clearly justified in p. 2.3, 2.4 and 2,5 of the Application form.
193	During the information days it was clarified that the value of the target group should be the biggest one. Please confirm and explain why!	The number of the target groups, final and direct beneficiaries depend on the proposed project activities. As set in the Guidelines for applicants, Application Form – Part II, p.2 .2. “target groups” are the groups/entities who will be positively affected by the project, “direct beneficiaries” are those directly involved in the project implementation and should be previously identified and quantified, and “final beneficiaries” are those who will benefit from the project in a long term. Given the above, target groups include all people to be possibly affected by the project and the direct beneficiaries should be part of these groups.
194	Could an applicant Bulgarian organization hire its own staff on a civil contract to implement activities different from or exceeding the scope of activities and duties in the labour contract?	<p>If employees of the partner organization are to be nominated to be part of the project management team, the appointment of members of this team is solely responsibility of the beneficiaries themselves and has to be made in accordance with European and national legislation. The members of the project staff for example are project manager, coordinator, accountant, assistant, etc. The employee could work full-time or part-time for the project.</p> <p>If employees of the partner organization are to be contracted as external experts, the relevant costs are eligible for Bulgarian partners only in case the procurement principles and rules stipulated in Chapter 3 of Title II of Part Two of Delegated Regulation (EU) No 1268/2012 on the rules of application of Regulation (EU, Euratom) No 966/2012 of the European Parliament and of the Council on the financial rules applicable to the general budget of the Union and PRAG are observed.</p>