

**Interreg**



Co-funded by  
the European Union

**Greece – Bulgaria**

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# **Frequently Asked Questions**

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The category Communication does not have any FAQs

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The category Documents does not have any FAQs

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The category Verifications does not have any FAQs



# CALL FOR TARGETED PROJECT PROPOSAL \_ CAPITALIZATION OF PROJECT "FLOOD GUARD" OF THE 2014-2020 PROGRAMMING PERIOD

## **Application (Procedure & Documents)**

The category Application (Procedure & Documents) does not have any FAQs

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The category Eligible Area does not have any FAQs

# 1st Call for Common Project Proposals

## Application (Procedure & Documents)

### MIS user account & rights

If someone from one unit of an organization creates a new account, will he/she be able to “see” and submit all the proposals made by the organization? Is it possible to modify and submit only one proposal?

The user with “Submit AF” role can see (and submit) all proposals.

The user without “Submit AF” and access to all proposals of the organization can see his proposal at any status and all proposals after their approval by the MA. The user without “Submit AF” and access only to his projects can see only his proposals/projects.

### Concept Note

Since there are 4 potential beneficiaries tables in the concept note - can we remove the unnecessary ones if there are only two partners (for example...)? Or do we write N/A in the tables?

You may add or omit tables if necessary in this section of the concept note depending on the number of partners you have in your project proposal.

### Supporting Documents

What kind of supporting documents do we need to present to justify the specific budget lines? At Stage A Concept note and at Stage B Project Proposals?

No supporting documents are required at this stage (Stage A). All needed supporting documents will be submitted in Stage B according to the relevant information which will be given analytically in the relevant Call for Project Proposals.

### Project Proposal signing

The proposal is prepared by all beneficiaries and is submitted by the Lead Beneficiary. Should it be signed only by the lead beneficiary?

The project proposal should be signed only by the legal representative of the Lead Beneficiary

### **MIS registration for Concept Note submission**

Should all beneficiaries be registered in MIS?

For the submission of the Concept Note, only the Lead Beneficiary is necessary to be registered in the MIS.

However, for the submission of the Application Form – at the STAGE B' of the procedure – all the Beneficiaries should be registered in the MIS. We strongly recommend, all Potential Beneficiaries to be registered in the MIS from the beginning of the procedure.

## **Budget**

### **Budget limitations**

In RSO 4.2 Life-long learning we still have the limitation of 600.000 ?

There is no limitation in the ToR of the 1st Call regarding this issue. It is a recommendation.

### **Soft Measures**

Taking into account the recommendation for budget of soft measures up to 600 000 EUR per project, is it possible to submit a completely „soft“ project, containing only soft actions and measures ? If yes, how is it supposed to comply with the minimum project budget of 1 000 000 EUR? This question is highly important for Specific objective: RSO4.2, which in fact contains only soft indicative actions and it is logical that projects under this objective should be soft projects, and adding investment actions to them will most probably be artificial and will put into question the effective usage of programme funds?

According to the Terms of Reference of the 1st Call for Project Proposals paragraph 7.14 “It is strongly recommended that the total Budget of expenditure in categories 2,4,8 and 10 (soft measures), cannot exceed the amount of 600.000€. Nevertheless, we will accept projects exceeding the amount of 600.000€, if well justified, in these categories. However, RSO 4.2 does envisage actions which would result to the purchase of equipment or even expenditure related to infrastructure according to the Programme Document (page 74). Please don't declare any “artificial” actions to your project as it will be easily detected by the assessors and will result to the rejection of your proposal. Please read pg.73 of the Operational Programme for more information regarding specific objective 4.2. The aim is to receive project proposals that would leave tangible results and that their sustainability would be ensured after the lifetime of the project.

## **Staff Costs limits**

What is the limit for Staff if it is Real costs? If the staff costs is Flat rate, what is it meant by: "up to 20 % of the direct costs other than the direct staff costs of the operation". What does "direct staff costs mean"?

No limit is set in the Call for project proposals for real costs budgeted under the budget line "Staff costs".

However, the budget of each beneficiary and project should be well balanced in terms of budget lines and activities.

If flat rate is used for staff costs, the percentage should be up to 20% and is calculated on the budget lines "external expertise and services", "equipment" and "infrastructure and works" costs of the beneficiary's budget.

Direct staff costs are those costs that are directly related to the implementation of the project

## **Flat Rate vs Real Costs**

The choice of flat rate or real cost has to be applied to the whole partnership or at partner level?

The choice of flat rate or real costs under specific budget lines is declared per beneficiary for each project.

## **Flat rate #2**

If an organization prefers in one project the flat rate for travel, can it choose a real cost methodology in another project at the same time?

The flat rate for "travel and accommodation" costs applies per project and per beneficiary. The same beneficiary can choose flat rate option for "travel and accommodation costs" in one project and real cost option in another project for the same budget category of costs.

# **Eligibility of Activities**

## **Circular Economy**

The goals of the circular economy also involve utilizing waste for clean energy (e.g., heating from agricultural residues). We don't see to have an intervention category for these actions. Can such initiatives by municipalities be incorporated into any existing intervention field?

In general if the relevance of each project proposal fits the aim of the specific objective given at the Programme Document is subject to assessment. We advise you to consult the Programme Document (pg.37-48) to judge if your project proposal is relevant.

### **Project Webpage**

Separate project webpage for the interreg project on the official page of the beneficiary, this applies for all beneficiaries or only for the LB?

According to Regulation (EU) 2021/1059: Interreg Regulation/Article 36:

“Each partner of an Interreg operation or each body implementing a financing instrument shall acknowledge support from an Interreg fund, including resources reused for financial instruments in accordance with Article 62 of Regulation (EU) 2021/1060, to the Interreg operation by:

providing on the partner’s official website or social media sites, where such sites exist, a short description of the Interreg operation, proportionate to the level of support provided by an Interreg fund, including its aims and results, and highlighting the financial support from the Interreg fund”.

If the project consortium decides that only the LB (or any other PB) will create this page dedicated to the project on their official website, then the least all other PBs have to do is: add on their official website a banner with the project logo which will be an active link redirecting the user to the page dedicated to the project on the website of the LB (or in general on the website of the PB who was in charge to create the page dedicated to the project on their official website).

### **Project Websites eligibility**

Can the PBs create a project website?

Project websites are not eligible under this call and for the programming period 2021-2027 in general. Instead, each project will have a dedicated page on the programme website where all project news, events and deliverables will be uploaded/published. In addition, all Project Beneficiaries should provide on their official website a short description of the project, including its aims and results and highlighting the financial support of the Programme (Regulation (EU) 2021/1059: Interreg Regulation/Article 36).

### **Capitalisation actions**

Is it eligible as a capitalization action to widely implement already co-funded tools demonstrating added value and transfer potential?

Capitalization is welcome. However, there must be no double-financing.

### **Activities outside the eligible area**

An institution located outside the eligible area can participate under conditions. Can it include deliverables of “equipment” and “infrastructure” in its budget? Or no equipment and no infrastructure can take place outside the eligible area?

Regarding the “infrastructure” please check par. 1 of the ToR and the Programme & Project Implementation Manual page 53 “Infrastructure located outside the Programme area, even if it is directly related to the project either for the development or for implementation, shall not be eligible”.

“Equipment” may be considered as eligible if it will be used in favor of the programme’s area.

## **Eligibility of Beneficiaries**

### **Project Beneficiaries per Project**

What is the preferred number of beneficiaries? Is the participation of local or central governmental bodies compulsory or highly recommended?

The minimum number of participants in a project proposal is (2) – on of each partner country – and the maximum number of participants in a project proposal is five (5). The number and the type of participants within this limits depends of the scope of the project, the activities proposed for financing and the authorization of the participating organizations and will be evaluated during the evaluation procedure.

### **Branch**

If a project partner is registered outside of the Programme’s eligible area but has an officially registered branch inside the Programme Area is it considered an eligible partner for this call?

In the Terms of Reference of the 1st Call for Common Project Proposals: Paragraph 5. ELIGIBILITY OF APPLICANTS: Organisations located outside the Programme area but having local/regional subsidiary/branch office established in the Programme area are eligible only for Greek Project partners.

Bulgarian partners must have their legal registration located in the eligible Programme area.

## **Lead Beneficiary criteria**

Are there any specific criteria, in order to appoint a Lead Beneficiary?

A Lead Beneficiary will be designated by all partners participating in a project to ensure implementation of the entire project (carry out the tasks laid down in Article 26 of Interreg Regulation) and will sign a Subsidy Contract with the Managing Authority.

The Lead Partner must be located either in Greece-Bulgaria:

- be a legal entity.
- hold a dedicated bank account for the project.
- be legally able to transfer funds to foreign countries.
- have a technical and financial capacity and competency to manage the proposed common project.

## **NGO eligibility**

Can an NGO with relatively low balance sheets participate in the Greece-Bulgaria Programme as Beneficiary?

Each Project Beneficiary must submit specific documents to prove its eligibility, administrative and financial capacity. The partnership scheme and the administration and financial capacity of the Project Beneficiaries are part of the evaluation procedure at STAGE B.

## **Programming Agreements**

ONLY FOR GREEK BENEFICIARIES - Can Municipalities, Universities and other bodies conclude Programming Agreements (???????????????? ??????????) in Greece-Bulgaria Programme?

The case of assuming responsibility for the implementation of a Project instead of the owner of the project, by another body, is provided for in Article 8, point 3 of the YPASVD of INTERREG Programmes 2021-2027 (Government Gazette 3281/Issue B'/17.05.2023), as follows:

“In the cases of actions for which the responsibility for the implementation of the action is assumed by another entity as beneficiary instead of the project owner on the basis of a programming agreement, in accordance with article 44 of Law 4412/2016, as it applies each time, the eligible costs are paid for the act by the project owner or by the beneficiary, depending on what is specified in the programming contract,...”.

Furthermore, the YPASVD lists in detail (points a to h) the conditions that must be met in order the relevant Programming Agreement and the costs derived from it to be eligible.

In addition, article 44 of Law 4412/2016 states that:

“Article 44. Technical competence of contracting authorities in public works contracts and

studies

1. The contracting authorities who judge that they do not have technical competence, or their technical competence is incomplete, may in particular:

- a) enter into programming agreement, within the meaning of paragraph 6 of Article 12, for concluding, supervising, and overseeing a public procurement for work or study,
- b) conclude contracts for the provision of technical services within the meaning of article 52 and
- c) be supported by the EKAA of par. 1a of article 41 in the context of its exercise of ancillary purchasing activities.

2. The contracting authority is responsible to the project owner for the proper performance of its duties and to third parties it is jointly and severally liable with the project owner. If the programming agreement does not specify otherwise, it represents the project owner in court and out of court against third parties during the exercise of its duties until the end of the contract. The ruling bodies are determined by the programming agreement.”

Therefore, from the above it is clear that the conclusion of Programming Agreements is allowed only in cases in which conditions of Article 44 of Law 4412/2016 are met and exclusively for the services described in paragraph 1a of Article 44.

More specifically, the following should apply cumulatively:

- a) documented non-existence or inadequate existence of Technical Competency of a Contracting Authority/ potential Beneficiary,
- b) assumption of responsibility by another body, exclusively for the services referred to in Article 44 par.1, i.e. “for concluding, supervising and overseeing a public procurement for work or study”, and not for the provision of other services.

The potential Beneficiary should document, during the submission of the proposal in Stage B, the need to conclude a Programming Agreement in the context of the above.

In Project Selection Criteria for the evaluation of project proposals for funding are included criteria concerning the ability of the potential Beneficiaries to respond to the implementation of the projects, in which case the above approach should be taken into account during the process of submitting the proposals that will include Programming Agreements.

## **Eligibility of Expenditures**

### **Expenses outside the eligible area**

Is there a percentage of expenses for actions outside the eligible area? I am interested in participating in exhibitions in Europe and case visits of good practices.



There is no percentage of expenses set in the Call, for actions outside the eligible area. However, these actions should be well justified and approved by the MA.

### **Land Purchase**

According to page 54 of the P&PM “Purchase of land (over 10% of total eligible cost) is not eligible”. What is the exact meaning and how this rule applies on the project level?

According to article 64 para 1 (b) of EU Regulation 1060/2021 ARE NOT ELIGIBLE “the purchase of land for an amount exceeding 10 % of the total eligible expenditure for the operation concerned; for derelict sites and for those formerly in industrial use which comprise buildings, that limit shall be increased to 15 %; for financial instruments, those percentages shall apply to the programme contribution paid to the final recipient or, in case of guarantees, to the amount of the underlying loan”

Meaning that the cost for land purchase is eligible if this cost does not exceed the 10% of the eligible TOTAL PROJECT'S COST.

### **VAT eligibility**

Is VAT an eligible expense?

VAT is eligible expense for all projects with budget under 5.000.000€ for all types of beneficiaries.

### **Budget Lines**

What is the difference between ‘Equipment’ and ‘Infrastructure & Works’ budget lines?

The budget line ‘Equipment costs’ refers to expenditure for the financing of equipment purchased, rented or leased by a partner, necessary to achieve objectives of the project.

The budget line ‘Infrastructure & Works costs’ refers to expenditure for the financing of infrastructure and construction works related to investments in infrastructure that do not fall into the scope of other budget lines.

### **Eligibility Period for Expenses**

What is project expenses eligibility period?

The expenses eligibility period starts at January 1st, 2021, and after the signature of the Subsidy Contract.

Projects' activities which have started being implemented before the signing of the Subsidy Contract, and in any case after 1/1/2021, should not have been concluded before the application for funding at the present Call for Project Proposals.  
The last date for the expense's eligibility period is December 31st, 2029.

## **Eligible Area**

The category Eligible Area does not have any FAQs