



QUESTIONS AND ANSWERS

CALL 1 FOR APPLICATION WITH CONCEPT NOTES

Under the Territorial Strategy

Strategic objective 1 “Achieving sustainable and inclusive economic growth based on increased competitiveness of the local economy, digital and green transformation”

in the framework of (INTERREG VI-A) IPA Bulgaria – Türkiye Programme 2021-2027, CCI Number: 2021TC16IPCB005

No.	Question received	Answer provided
I. <u>JeMS and Registration</u>		
1	<p>Received on 22.05.2023 via e-mail: Notification on JeMs registration functionality.</p> <p>System message delivered after creating a new account and attempt to log into the platform: “Your user is not confirmed. Please check your mailbox for an email with a confirmation link. For further help, please contact the administrator. (error code: AUTH)”</p>	<p>Detailed guidance on how to access and register in the Joint Electronic Monitoring System (JeMs) of the Programme is provided in Annex 5 “JeMs – Technical guidance” to the Application package for Call 1 with concept notes under the Territorial Strategy of the INTERREG VI-A IPA Bulgaria-Türkiye Programme 2021-2027 available at http://www.ipacbc-bgtr.eu/.</p> <p>Applicants should follow consistently and entirely the instructions of section 1 “Access and registration” of the guide. Following the registration a confirmation e-mail is sent automatically to the e-mail address provided in the “Create new account” form. Only after clicking the link on the confirmation e-mail the applicant is able to log into the platform.</p> <p>In case a confirmation e-mail is not received, applicants are advised to check their spam folder and further, if needed, to contact the JeMs Helpdesk at mis_bgtr@mrrb.government.bg for assistance or inform the Operational Unit at the following e-mail: jshaskovo@mrrb.government.bg for the problem/s encountered.</p>



2	<p>Received on 14.06.2023 during the Info Day in Burgas</p> <p>If a project partner is a legally established non-profit organization in private benefit what should be checked in JeMs for the legal status of the partner?</p>	<p>You need to select option “private”. All NGOs, irrespective of the form of the benefit they are registered for, need to select option “private” under section B.1.1. Partner identity in Jems.</p>
3	<p>Received on 14.06.2023 during the Info Day in Burgas</p> <p>What e-mail address should we use to create an account in JeMs? An official e-mail address of the organization/institution of the respective partner or we can use personal e-mails?</p>	<p>According to Annex 5 “Technical Guidance for JeMs” applicants should make an initial registration in the platform. In doing this they are required to create a new account by providing an e-mail address that shall later serve to log in and receiving notifications in JeMs (please refer to p. 5 of Annex 5). Any full valid e-mail addresses are acceptable.</p> <p>Nevertheless, applicants are advised to use e-mail addresses that are functional and regularly used, and checked since they shall serve for official communication in JeMs with the project partners throughout the application process with concept notes.</p> <p>Please bear in mind also that once an account is created, the provided in the platform e-mail address shall also serve for the lead applicant to grant rights to an open application to other users (please refer to p. 9 of Annex 5).</p>
4	<p>Received on 14.06.2023 during the Info Day in Burgas</p> <p>Is the registration in JeMs only for the Bulgaria - Türkiye Programme? In case we have already created an account for another INTERREG Programme, for instance the Interreg VI-B NEXT Black Sea Basin Programme, should we use the same account</p>	<p>The platform that can be reached from the link: http://jems-bgtr.mrrb.bg/ is designated only to the INTERREG VI-A IPA Bulgaria- Türkiye Programme 2021-2027. Accounts created within the JeMs of other INTERREG programmes cannot be used for the joint electronic monitoring system of the INTERREG VI-A IPA Bulgaria- Türkiye Programme 2021-2027.</p>
5	<p>Received on 14.06.2023 during the Info Day in Burgas</p> <p>Shall all users registered under one account in JeMs receive notifications or it depends on granted access rights?</p>	<p>According to Annex 5 “Technical Guidance for JeMs” applicants should make an initial registration in the platform. In doing this they are required to create a new account by providing an e-mail address that shall later serve to log in and receiving notifications in JeMs (please refer to p. 5 of Annex 5). Any full valid e-mail addresses are acceptable.</p> <p>Once an account is created, the provided in the platform e-mail address shall</p>



also serve for the lead applicant to grant rights to an open application to other users (please refer to p. 9 of Annex 5). The lead applicant can grant access rights to an open application to other users, namely project partners and/or collaborators. To this end, they have first to register in Jems and then provide the lead applicant with their email addresses. The lead applicant can then enable new users in the “Project privileges” section by entering a full valid email address.

II. Eligibility of Applicants and Activities

1

Received on 09.06.2023. via e-mail:

An industrial zone operates on the territory of the city of Svilengrad - "Industrial Lands and Warehouses" EAD, which is registered in the city of Sofia and is a subsidiary of the “National Company Industrial Zones” EAD a holding company of the Ministry of Economy.

Is "Industrial Lands and Warehouses" EAD an eligible applicant under the Call?

Criteria for applicants’ eligibility under the Call 1 with concept notes under the Territorial Strategy of the INTERREG VI-A IPA Bulgaria- Türkiye Programme 2021-2027 are defined in the Guide for Application with Concept Notes (Call1) in part “Call 1 in a nutshell”, page 3 and part “4.5. Project partnership”, pages 16 and 17.

Lead Partners and project partners must comply with the general eligibility criteria to “be legally established local/regional bodies and authorities (incl. regional structures of central public authorities and statutory bodies); MSMEs – stands for micro, small and medium-sized enterprises as defined in European Union law (EU recommendation 2003/361); NGOs and other socio-economic partners; Academic, research, training and cultural institutions – page 16. Please, also see the [User Guide of the European Commission to the SME definition](#).

The eligible according to this general criteria Lead project partners and project partners need to be registered and operate in the programme area (page 3 and page 16). According to the Guide for Application with Concept Notes (page 16) “project partners located outside the programme area, but within Bulgaria and Türkiye, can also be eligible, however such partners shall bring a clear benefit to the programme area and shall meet any of the criteria for eligibility listed in part 4. “General requirements of the Call”. Their involvement is considered as exceptional and must be duly justified”.

Observing the principle of transparency and equal treatment of all potential applicants, the Operational Unit cannot give prior opinion on eligibility of specific applicants, since that shall be subject to the eligibility check of the



		<p>concept note. Moreover, without evidence for meeting the SME definition the Operational Unit is not in a position to provide an informed answer to this question. The assessment working group, after it is established, is the body that will possess the entire and complete information regarding each concept note and will have the final decision on the eligibility of applicants.</p>
2	<p>Received on 14.06.2023 via e-mail:</p> <p>According to Guide For Application With Concept Notes - 4 General requirements of the Call - 4.6 Scope of project activities "If the project idea envisages investment activities related to works and building new or rehabilitating existing infrastructure, those activities should be carried out exclusively on state or municipal owned property and only the owner of the respective property rights is entitled to contract the implementation of those activities, i.e. it should be a project partner".</p> <p>As Kirklareli Chamber of Commerce and Industry, the content of our project, which we want to apply for, includes investment works in the building 'belonging to our Chamber'. According to article 4 of the Law on Chambers and Commodity Exchanges No. 5174 dated 18/5/2004 – "Chambers; In order to meet the common needs of its members, to facilitate their professional activities, to ensure the development of the profession in accordance with the general interests, to protect the professional discipline, morality and solidarity in order to ensure honesty and trust in the relations of the members with each other and with the public, and to fulfil the duties given to the chambers by the legislation and the services written in this Law, are professional organizations established as public institutions with legal personality."</p> <p>Accordingly, we ask whether the building investment works 'belonging to our Chamber' that we will do in our project proposal are suitable according to Guide for Application With Concept Notes - 4 General requirements of the Call- 4.6 Scope</p>	<p>According to the Guide for Application with Concept Notes and the eligibility requirements for investment activities, works of building new or rehabilitating existing infrastructure should be carried out exclusively on state-owned or municipal property (p. 18 of the Guide for Application with Concept Notes (Call1)).</p> <p>The ownership of the properties that works shall be carried will be subject to eligibility check when applying with the full project proposal. Ownership act or certificate (or other legal document according to national legislation) issued in the name of the respective project partner clearly evidencing the municipal or state ownership of the tangible assets, which will be subject of works activities should be presented with the full project proposal.</p>



	of project activities?	
3	<p>Received on 14.06.2023 during the Info Day in Burgas</p> <p>Is it correct that investment activities may be carried only on state and municipal owned properties? Is it allowed SMEs to carry investment activities on their own properties?</p>	<p>The Guide for application with concept notes (GfA), section 4.6 (Scope of project activities), p. 18 explicitly states: If the project envisages investment activities in the form of building new or rehabilitating existing infrastructure, those activities should be carried out exclusively on state-owned or municipal property.</p>
4	<p>Received on 14.06.2023 during the Info Day in Burgas</p> <p>Is an enterprise with 100% state ownership eligible applicant under the current call?</p>	<p>According to the Guide for Application with concept Notes (Call 1) as eligible lead and project partners are specified MSMEs – micro, small and medium-sized enterprises as defined in the European Union Law (EU recommendation 2003/361/EC). The SMEs definition takes into account the following three criteria:</p> <ul style="list-style-type: none"> - Staff headcount - Annual turnover - Annual balance sheet total <p>The category of micro, small and medium-sized enterprises consists of enterprises which employ fewer than 250 people and have either an annual turnover not exceeding EUR 50 million or an annual balance sheet not exceeding EUR 43 million.</p> <p>In order to calculate whether the enterprise meets these thresholds, however, it needs to consider/establish whether it is an autonomous enterprise, a partner enterprise or a linked enterprise. The calculations for each of the three types of enterprise are different and will ultimately determine whether the enterprise meets the various ceilings established in the SME Definition.</p> <p>In this specific case, you need to take into account that an enterprise cannot be considered an enterprise falling into the category of SME in line with article 3 of the Bulgarian Small and Medium-sized Act that transposes the European Definition of SME if 25% or more of the capital or the number of votes in the general meeting are controlled directly or indirectly, jointly or separately, by one or more state bodies (article 4, par. 8 of the Bulgarian Small and Medium-sized Act).</p>



		<p>In addition, please bear in mind that in line with the principle of transparency and equal treatment of all potential applicants, the Operational Unit cannot give prior opinion on eligibility of specific applicants, since that shall be subject to the eligibility check of the concept note. Moreover, without evidence for meeting the SME definition the Operational Unit is not in a position to provide precise answer to this question.</p>
5	<p>Received on 14.06.2023 during the Info Day in Burgas</p> <p>Can a MSME whose field of activities is household waste processing apply for circular economy investments?</p>	<p>In line with the provisions of the Guide for application with concept notes (p. 16, 4.5 “Project Partnership”) MSMEs are not eligible to receive funding as lead or project partners under the current Call to implement actions of circular economy in order to demarcate this support from the one under Programme Priority 1 “Environmentally-friendly cross-border region”.</p> <p>In addition, please bear in mind that in line with the principle of transparency and equal treatment of all potential applicants, the Operational Unit cannot give prior opinion on the eligibility of specific applicants, since that shall be subject to the eligibility check of the concept note. The assessment working group, based on the thorough information and documents provided with the concept note, is the body that can pronounce the final opinion and decision on the eligibility of applicants.</p>
6	<p>Received on 14.06.2023 during the Info Day in Burgas</p> <p>What is understood by investments – works or supply or both? Can investment activities be related only to supply of equipment?</p>	<p>The Guide for application with concept notes stipulate that eligible concept notes should contain compulsory combination of investment (works only or works and supply) and soft type of actions (e.g. services). The investment component is minimum 70% of the total eligible costs. This criterion is subject to eligibility assessment in Step 1 of the identification process.</p> <p>The definition of the investment component, as required by the current Call 1 is, ‘works only or works and supply’. Sections ‘Call 1 in a nutshell’ (bullet “Financial aspects”), 4.1 (Contribution to the objectives of the Territorial Strategy), 4.6 (Scope of project activities) and 6 (Project ideas identification process) set out this definition.</p>
7	<p>Received on 14.06.2023 during the Info Day in Burgas</p> <p>Is it acceptable the scope of works to be limited for instance only to refurbishment of a single room?</p>	<p>The Guide for application with concept notes stipulate that eligible concept notes should contain compulsory combination of investment (works only or works and supply) and soft type of actions (e.g. services). The investment</p>



		<p>component is minimum 70% of the total eligible costs. This criterion is subject to eligibility assessment in Step 1 of the identification process.</p> <p>The definition of the investment component, as required by the current Call 1 is, ‘works only or works and supply’. Sections ‘Call 1 in a nutshell’ (bullet “Financial aspects”), 4.1 (Contribution to the objectives of the Territorial Strategy), 4.6 (Scope of project activities) and 6 (Project ideas identification process) set out this definition.</p> <p>In addition, please bear in mind that the assessment working group, after it is established, will be the body that possesses the entire and complete information regarding the respective concept note and it will be the one to have the final decision on the eligibility of applicants, activities and expenditures.</p>
<p>8</p>	<p>Received on 14.06.2023 during the Info Day in Burgas Is Municipality of Burgas eligible project partner?</p>	<p>Criteria for applicants’ eligibility under the Call 1 with concept notes under the Territorial Strategy of the INTERREG VI-A IPA Bulgaria- Türkiye Programme 2021-2027 are defined in the Guide for Application with Concept Notes (Call1) in part “Call 1 in a nutshell”, page 3 and part “4.5. Project partnership”, pages 16 and 17.</p> <p>Lead Partners and project partners must comply with the general eligibility criteria to “be legally established local/regional bodies and authorities (incl. regional structures of central public authorities and statutory bodies); MSMEs – stands for micro, small and medium-sized enterprises as defined in European Union law (EU recommendation 2003/361; NGOs and other socio-economic partners; Academic, research, training and cultural institutions – page 16.</p>
<p>9</p>	<p>Received on 14.06.2023 during the Info Day in Burgas Are works for access to an information point eligible in case they should be implemented in private ownership property?</p>	<p>GfA, section 4.6 (Scope of project activities), p. 18 explicitly says: If the project envisages investment activities in the form of building new or rehabilitating existing infrastructure, those activities should be carried out exclusively on state-owned or municipal property. Only the owner of the respective property rights, or the legal body that has already acquired the management rights of that particular property, is entitled to contract the implementation of those activities, i.e. it should be a project partner. Exemption from that rule, i.e.</p>



		when elements of the core infrastructure that pass through private properties are subject to project interventions, is allowed only when there is no alternative technical/engineering solution or the available alternative is economically unreasonable, i.e. when the cost of the investment outweighs the benefit to the community.
10	<p>Received on 15.06.2023 during the Info Day in Haskovo</p> <p>Are Chambers of commerce eligible applicants under the current call because of their legal status of an NGO? Is it obligatory for them to include as a project partner in their project idea to fulfil the requirement for at least 70% investments in works or works and supply? How this requirement is integrated with compatibility of MSMEs, business, tourism if at least 70% of the total budget should be investments in works or works and supply?</p>	<p>In line with the provisions of the Guide for application (GfA) with concept notes (p. 16, item 4.5 “Project Partnership”) the eligible applicants and project partners are specified as:</p> <ul style="list-style-type: none"> - Local/regional bodies and authorities (incl. Regional structures of central public authorities and statutory bodies); - MSMEs – micro, small and medium-sized enterprises as defined in the European Union law; - NGOs and other socio-economic partners; - Academic, research, training and cultural institutions. <p>The setup of project partnership should go in full compliance with the eligibility requirements of the Call, listed as ‘criteria for eligibility check’ – p.27-28. Please, pay careful attention to criteria 5, 10 and 11.</p>
11	<p>Received on 15.06.2023 during the Info Day in Haskovo</p> <p>Is it right that investments should be works or works and supply? Are investments in supply only eligible?</p>	<p>The correct definition of the investment component, as required by the current Call 1 is, ‘works only or works and supply’. Sections ‘Call 1 in a nutshell’ (bullet “Financial aspects”), 4.1 (Contribution to the objectives of the Territorial Strategy), 4.6 (Scope of project activities) and 6 (Project ideas identification process) set out the correct definition. Please, note that the statement ‘works and/or supply’ is a technical discrepancy and it has been left in only one place in the Guidelines for Applicants due to technical oversight.</p>
12	<p>Received on 15.06.2023 during the Info Day in Haskovo</p> <p>Can a NGO that has obtained building rights on a municipal property of Municipality of Harmanli apply under the current call with investment activities?</p>	<p>NGOs are eligible partners if they fulfill eligibility conditions set out in section 4.5. Project partnership. Answer to your question is provided in section 4.6. Scope of project activities, p. 18.</p>
13	<p>Received on 15.06.2023 during the Info Day in Haskovo</p>	<p>When developing their project ideas/concept notes applicants should take into</p>



	<p>If a municipality carries investments within project activities under the current call on its municipal property, can it deliver managing rights on that property after the end of the project to a project partner? And if not, what can be the role of that specific partner in the project?</p>	<p>account the rules and requirements set out in the Common Provisions Regulation (EU) No 2021/1060 of the European Parliament and of the Council that govern all the EU funded programmes, including the Interreg VI-A IPA Bulgaria – Türkiye Programme 2021-2027. More specifically, applicants should explore article 65 “Durability of operations” of the CPR which stipulates that the contribution from the EU Funds to an operation comprising investment in infrastructure or productive investment should be repaid, if within 5 years of the final payment to the beneficiary or within the period of time set out in State aid rules, where applicable, that operation is subject to any of the following:</p> <p>(a) a cessation or transfer of a productive activity outside the NUTS level 2 region in which it received support;</p> <p>(b) a change in ownership of an item of infrastructure which gives to a firm or a public body an undue advantage;</p> <p>(c) a substantial change affecting its nature, objectives or implementation conditions which would result in undermining its original objectives.</p>
<p>14</p>	<p>Received on 15.06.2023 during the Info Day in Haskovo</p> <p>Are branches/affiliates of universities eligible applicants under the current call?</p>	<p>Criteria for applicants’ eligibility under the Call 1 with concept notes under the Territorial Strategy of the INTERREG VI-A IPA Bulgaria- Türkiye Programme 2021-2027 are defined in the Guide for Application with Concept Notes (Call1) in part “Call 1 in a nutshell”, page 3 and part “4.5. Project partnership”, pages 16 and 17.</p> <p>Lead Partners and project partners must comply with the general eligibility criteria to be registered and operate in the programme area (page 3 and page 16). According to the Guide for Application with Concept Notes (page 16). In case a structure of local/regional/national authority is not and cannot act as a legal entity, its legally established central organisation, if such exists, shall be the project partner. (p.16)</p>
<p>15</p>	<p>Received on 15.06.2023 during the Info Day in Haskovo</p> <p>Is it obligatory activities of all project partners involved in a project idea to include investments?</p>	<p>This should be agreed by the project partners. The Guidelines for Application does not set rules about the distribution of competences and responsibilities between project partners.</p>
<p>16</p>	<p>Received on 30.06.2023 via e-mail:</p>	<p>Please refer to the answer provided to Question Nr. 1, Section II “Eligibility of Applicants and Activities”.</p>



	<p>Is an applicant whose administrative office is based in Sofia, but has a registered branch within the territorial focus of the Call, districts of Yambol and Haskovo, considered eligible to apply for the above-specified program?</p>	<p>Criteria for applicants' eligibility under the Call 1 with concept notes under the Territorial Strategy of the INTERREG VI-A IPA Bulgaria- Türkiye Programme 2021-2027 are defined in the Guide for Application with Concept Notes (Call1) in part "Call 1 in a nutshell", page 3 and part "4.5. Project partnership", pages 16 and 17.</p> <p>Please bear in mind that, observing the principle of transparency and equal treatment of all potential applicants, the Operational Unit cannot give prior opinion on eligibility of specific applicants, since that shall be subject to the eligibility check of the concept note. The assessment working group, after it is established, is the body that will possess the entire information regarding each concept note and will decide on the eligibility of applicants</p>
<p>III. Applicant's Guide and Annexes</p>		
<p>1</p>	<p>Received on 14.06.2023 during the Info Day in Burgas</p> <p>May you tell us where in the Application Form and how the indicators of the project idea contributes to are selected and filled in?</p>	<p>The specification to the indicators to which the project idea contributes is made in Annex 1 – "Application Form of a Concept Note", part C2. "Project relevance and context" when answering the question under point C2.2.2. "To which indicators your project idea will contribute?" Applicants select from the drop-down menu pairs of indicators that their project idea contributes to and in the field "Specification" provide justification describing or identifying precisely what the contribution consists of.</p> <p>Applicants are strongly advised before filling in the Application form to become acquainted in detail with the definition of indicators provided in Annex 4 "Indicator fishes" and the requirements of the call related to the contribution to indicators defined in part 4 "General requirements of the Call", point 4.1. "Contribution to the objectives of the Territorial Strategy" and point 4.2 "Contribution to Strategy indicators" in the Guide for Application with Concept Notes (Call1), pages 11-15.</p>
<p>2</p>	<p>Received on 14.06.2023 during the Info Day in Burgas</p> <p>In terms of time how long do we have to prepare full project proposals if our concept note/s is/are invited to submit a full project proposal?</p>	<p>For the indicative timeline of Call 1 with concept notes under the Territorial Strategy of the INTERREG VI-A IPA Bulgaria- Türkiye Programme 2021-2027 you may refer to the Guide for Application with Concept Notes (Call1), part 6.1 "Timeline", page 33.</p> <p>The assessment of concept notes is expected to end by 26th of September. In</p>



		<p>the period 26th of September 2023 – 30th of October 2023 administrative procedures for notifying all applicants with concept notes, endorsement of the list of identified concept notes and approval of the Application package for full project proposals shall be carried.</p> <p>The indicative launch of the targeted call for full project proposals is specified for November 2023.</p>
3	<p>Received on 14.06.2023 during the Info Day in Burgas</p> <p>According to the Guide for Application with Concept Notes a concept note should contribute to at least one of the two pairs of ERDF indicators. How a project idea falling in the first group of fields of intervention can contribute to the two pairs of indicators as no ERDF indicators are specified for them?</p>	<p>According to the eligibility requirements of the call, the concept notes need to contribute to at least one of the two pairs of ERDF indicators, while at the same time meeting the definition of integrated project – again, it is an eligibility criteria indicated in the eligibility grid on p.27. The statement on p. 7 ‘Each concept note needs to propose solutions to unleash and develop territorial potentials of the cross-border area to at least one of the types of interventions listed above’ indicates that applicants should not focus their project ideas on intervention fields that are not relevant to the strategic objective 1 “Achieving sustainable and inclusive economic growth based on increased competitiveness of the local economy, digital and green transformation” of the Programme’s Territorial Strategy.</p>
4	<p>Received on 14.06.2023 during the Info Day in Burgas</p> <p>According to the Guide for Application with Concept Notes NGOs and other socio-economic partners are eligible project partners. What is meant by other socio-economic partners?</p>	<p>‘Social partners’ is a term generally used in Europe to refer to representatives of management and labour (employer organisations and trade unions), and in some contexts public authorities, that engage in social dialogue. The term ‘European social partners’ specifically refers to those organisations at EU level which are engaged in European social dialogue, provided for under Articles 154 and 155 of the Treaty on the Functioning of the European Union (TFEU).</p> <p>Social and economic partners represent organizations that participate in the EU’s decision-making processes – these are not only the social partners but also other categories of economic and social activity in organised civil society, such as farmers’ organisations, small businesses, organisations representing consumers, the crafts sector, the professions, social enterprises, the scientific and academic community, and voluntary bodies.</p>
5	<p>Received on 14.06.2023 during the Info Day in Burgas</p>	<p>The indicative timeline of Call 1 with concept notes under the Territorial Strategy of the INTERREG VI-A IPA Bulgaria- Türkiye Programme 2021-2027</p>



	<p>Shall the application package for full project proposals be published before the deadline for submission of concept notes under the current call?</p>	<p>is included in the Guide for Application with Concept Notes (Call1), part 6.1 “Timeline”, page 33.</p> <p>As specified in the indicative timeline the launch of the targeted call for full project proposals is bound to certain administrative procedures for approval of the Application package for full project proposals (FPP). It is expected Guidelines for applicants for FPP to be attached to the invitation for submission of FPP. The indicative period for launching the targeted call for full project proposals is set to November 2023. The GfA for FPP will be attached to the invitation for submission of FPP</p>
6	<p>Received on 14.06.2023 during the Info Day in Burgas</p> <p>How long will be the period between the launching of the call for full project proposals and the deadline for submission of the full project proposals?</p>	<p>For the indicative timeline of Call 1 with concept notes under the Territorial Strategy of the INTERREG VI-A IPA Bulgaria- Türkiye Programme 2021-2027 you may refer to the Guide for Application with Concept Notes (Call1), part 6.1 “Timeline”, page 33. There it is written that the indicative launch of the targeted call for full project proposals is scheduled for November 2023 (minimum three months for application).</p>
7	<p>Received on 15.06.2023 during the Info Day in Haskovo</p> <p>Is decision of the Municipal Council regarding the application with a project idea necessary when a municipality submits a concept note or it should be presented when applying with a full project proposal? Can the mayor sign required documents without decision from the Municipal Council?</p>	<p>The application with a concept note under Call 1 with Concept Notes under the Territorial Strategy of the INTERREG VI-A IPA Bulgaria- Türkiye Programme 2021-2027 does not require submission of any other documents except for those listed in part 5. “Application Process” pages 25-26 of the Guide for Application with Concept Notes (Call1). With their concept notes project partners sign and submit a Letter of commitment that is a legal and binding document for their participation in the implementation of the full project proposal.</p> <p>At all stages of the development process of their concept notes and subsequently full project proposals, applicants are advised to adhere to the respective national legislation in addition to the European legislation governing the provision of EU grants.</p>
8	<p>Received on 15.06.2023 during the Info Day in Haskovo</p> <p>According to the Guide for Applications with Concept Notes all project actions related to works and building new or rehabilitating existing infrastructure would need to obtain</p>	<p>In part 4.6. “Scope of project activities” of the Guide for Application with Concept Notes (Call1) – p. 17, it is specified that the application form of a concept note does not require thorough description of project activities. Applicants are advised to carefully plan the implementation of activities, especially works or works and supply activities. The scope of these activities</p>



	<p>environmental impact (EI) screening decisions? Does it imply that all required EI procedures should be carried before submission of a concept note?</p>	<p>needs to be developed in full accord with the European and national environmental legislation, including its secondary acts. The applicants should be aware of the steps that they need to take from the project idea development to the submission of a full project proposal and make sure these steps are in full compliance with the respective national EI legislation. This consideration is central for the Project Maturity Development Plan, which needs to be submitted along with the concept note.</p> <p>Although it is not necessary environmental screening to have been carried out prior to the submission of the concept note, detailed and realistic planning in the Project Maturity Development Plan of required environmental assessment actions to be taken is important for demonstration of the possibility of a project idea to timely grow into a ready-to-implement project proposal in case a concept note is invited to apply with a full project proposal.</p>
9	<p>Received on 15.06.2023 during the Info Day in Haskovo</p> <p>When will answers to the questions of applicants be published?</p>	<p>As set up in part 5 “Application process” of the Guide for Application with Concept Notes (Call1) applicants may submit questions in writing in regard to their application up to 10 calendar days prior to the deadline for submission of concept notes.</p> <p>The OU is making a transcript of all questions received during the information days held as well as those submitted on the e-mail address of the Operational Unit and will publish the answers as soon as possible accordingly for the applicants to take into account when developing their concepts.</p> <p>The latest deadline for publishing the answers is specified in the Guide for application with concept notes as no later than 5 calendar days prior to the deadline for the submission of concept notes.</p>
10	<p>Received on 15.06.2023 during the Info Day in Haskovo</p> <p>Is it possible that the deadline for submission of concept notes be extended?</p>	<p>At this point there is no indication for necessity to extend the deadline for submission of concept notes.</p>
11	<p>Received on 15.06.2023 during the Info Day in Haskovo</p> <p>Which procurement rules should a Bulgarian NGO apply in sub-contracting project activities?</p>	<p>The award of contracts for service, supply and works to contractors is subject to the procurement rules in accordance with Article 58 of Regulation (EU) 2021/1059 of the European Parliament and of the Council of 24 June 2021 on specific provisions for the European territorial cooperation goal (Interreg)</p>



supported by the European Regional Development Fund and external financing instruments.

When a project partner is located in Bulgaria and is a contracting authority or a contracting entity within the meaning of the Union law applicable to public procurement procedures, it shall apply national laws, regulations and administrative provisions (Public Procurement Act (Закон за обществените поръчки) and Government decree No. 160/2016 for determining the rules for review and evaluation of offers and the conclusion of contracts in the selection procedure with a public invitation from beneficiaries of grants from the European structural and investment funds.

The provisions of the Public Procurement Act shall be applied for the award of goods, works or services by contracting authorities, located in Bulgaria, and falling within the meaning of Article 5 of the same law.

In cases of contacting authorities, located in Bulgaria, other than those stipulated in Article 5 of the Public Procurement Act, the provisions of Government decree No. 160/2016 for determining the rules for review and evaluation of offers and the conclusion of contracts in the selection procedure with a public invitation from beneficiaries of grants from the European structural and investment funds shall be applied.

12 **Received on 15.06.2023 during the Info Day in Haskovo**

It is said in the Guide for Applications with Concept Notes that when a project partner applies with 2 project ideas the target groups in both should differ. What does this mean – the target group is the group that directly benefits from the project or indirectly in a broader sense? Does it mean that in case the whole population of the CB area is set as a target group applying with a second project idea is not eligible?

The mandatory for Call 1 Common Output Indicator RCO74 “Population covered by projects in the framework of strategies for integrated territorial development” counts the number of persons covered by projects supported by the Programme in the framework of the Territorial strategy. Double counting of population covered by several projects for the same strategy in the same specific objective should be eliminated.

In light of the above, and in order to observe the requirements set in the Guide for application with concept notes, when defining the target groups for the specific concept notes and especially when trying to differentiate the target groups in case of 2 concept notes, applicants should take into account the following:

It is useful to use a ‘stakeholder analysis’ grid to place the different target groups involved according to their current level of engagement/ interest in the



		<p>issue tackled by the respective project and their ability to influence and measure the specific deliverables of the intervention. In this respect direct addresses benefitting from the positive change that is sought with the development and future implementation of the project could be considered as possible way of setting the specific target groups for the specific concept notes. In addition, please see section C.2.4. of the Application form where you need to select one of the pre-defined target groups from the drop-down list. There is no 'whole population of the SB area' as a pre-defined target group.</p>
13	<p>Received on 19.06.2023 via e-mail:</p> <p>1. The Guide for Application with Concept Notes does not clearly state what is included in the investment component. The guidelines refer to "construction and/or supply" once (p. 3), the other mentions are "only construction or construction and supplies" (p. 4, 11, 18).</p> <p>In the announcement of the Call on the Joint Secretariat's web site is said "строителство и/или доставки", respectively "works and/or supply" in the English version of the text. http://www.ipacbc-bgtr.eu/bg/integrated-territorial-strategy-calls-proposals-news/startira-purvatapokana-za-proektni</p> <p>During the information days held on June 14th and 15th, 2023 in Burgas and Haskovo, the experts from the Operational Unit explicitly stated that the inclusion of construction as part of the investment component is mandatory.</p> <p>I am asking for a specific answer which is true "construction and/or supply" or "construction and supply" or "only construction or construction and supply?"</p> <p>Since according to the guidelines the investment component is 70% of the total budget, and that the project budget is min €500,000 and max €1,000,000, it is extremely important to be clear and precisely defined what the investment component includes.</p>	<p>1. The correct definition of the investment component, as required by the current Call 1 is, 'works only or works and supply'. Sections 'Call 1 in a nutshell' (bullet "Financial aspects"), 4.1 (Contribution to the objectives of the Territorial Strategy), 4.6 (Scope of project activities) and 6 (Project ideas identification process) set out the correct definition. Please, note that the statement 'works and/or supply' is incorrect and it has been left in only one place in the Guidelines for Applicants due to technical oversight.</p> <p>2.1. GfA, section 4.6 (Scope of project activities), p. 18 explicitly says: If the project envisages investment activities in the form of building new or rehabilitating existing infrastructure, those activities should be carried out exclusively on state-owned or municipal property.</p> <p>2.2 Nowhere in the GfA has been said that building new or rehabilitating existing infrastructure is a mandatory component of the concept notes. However, please note that the contribution of the concept note to one of the two ERDF indicators (RCO58 and RCO77) is mandatory, i.e. it is an eligibility requirement. For more information about the indicators definitions, please consult Annex 4 'Indicators fiches'. The GfA specifies the definition of core infrastructure that might be subject to works – p.18, footnote 3. There is no EU common definition of the general term 'infrastructure'. It is specified in different sectoral EU regulations in accordance with the various thematic scope of the EU funded project interventions.</p>



2. On page 18 of the Guide for Application with Concept Notes it is stated that " Ако проектът предвижда инвестиционни дейности под формата на изграждане на нова или рехабилитация на съществуваща инфраструктура, тези дейности следва да се извършват изключително върху държавна или общинска собственост" ("If the project envisages investment activities in the form of building new or rehabilitating existing infrastructure, those activities should be carried out exclusively on state-owned or municipal property").

The text of the Guide regarding infrastructure corresponds to Art. 67 of the Bulgarian Spatial Act, according to which "Underground and above-ground common networks and facilities of the technical infrastructure are designed and built in municipal and state land properties. When this is impossible, the networks and facilities of the technical infrastructure are built in land properties - owned by individuals and legal entities, pursuant to Art. 199 or Art. 205".

In the guidelines there is no requirement regarding the ownership, i.e. state or municipal, for works, but only in relation to infrastructure. However, at the information days, it was explicitly stated that works should be carried out only on properties with state or municipal ownership.

Please answer the following questions:

Should works be carried only on state or municipal property? If yes, where exactly is this stated in the Guide?

Is works or rehabilitation of existing infrastructure a mandatory element of the investment? In Annex 1.1 - Budget, column BC 6 includes "Инфраструктура и строителство" (BC 6 - Infrastructure and works). In the guidelines for infrastructure it is state "if such is envisaged" Which is true?

What is meant by "infrastructure" in this case?

2.3. As explained in the above answer - There is no EU common definition of the general term 'infrastructure'. It is specified in different sectoral EU regulations in pursuit of different objectives, as well as in accordance with the various thematic scope of the EU funded project interventions.

2.4 Infrastructure is a broad concept encompassing buildings, network infrastructure, and a range of built systems and assets. Nevertheless, the GfA gives an indication as how the tourism infrastructure to be understood – please, carefully read the text on p. 9 which says: 'Please, pay attention that you need to think of your tourism project ideas as an integrated effort to simultaneously improve the tourism infrastructure (sites, accessibility) and related services and products in a wider thematic and territorial perspective.'

3. Nowhere in the GfA has been said that the participation of a municipality or the state is mandatory. Also, make sure you get acquainted with the EU definition of as integrated project, as provided on p. 8 in the GfA.

4.1 Neither of the documents of Call 1 application package contains statement that the investment component should be no less than 60% of the total project costs. You can find the correct percentage of the investment component of a concept note (no less than 70% of the total project costs) throughout the entire Call 1 application package.

4.2 The GfA does not set percentage ranges of works and supply to achieve the minimum threshold of 70% investment component.

5. This should be agreed by the project partners. The GfA does not set rules about the distribution of competences and responsibilities between project partners.

6.1 p. 5 in the GfA specifies that 'this Guide explains the practical steps that are needed from planning to submitting a project idea (hereinafter also referred to as concept note).' Therefore, Call 1 does not set rules and



The requirements for the elements of the technical infrastructure are specified in Art. 64, para. 1 of Bulgarian Spatial Act. Are these elements meant in the meaning of "infrastructure" according to the Guide for Application?

What is meant by "tourism infrastructure" mentioned on page 9 of the Guide? Is tourism infrastructure included in the general term for "infrastructure"?

3. According to Bulgarian legislation - Art. 64, para. 3 of the Bulgarian Spatial Act, the facilities of the technical infrastructure are built, maintained and repaired by and at the expense of the state, the municipalities or the relevant operating companies. According to the mentioned provision, when technical infrastructure activities are included in the project, the participation of the state, municipalities or relevant operating companies is mandatory.

However, it is not clear from the guidelines whether infrastructure is a mandatory activity (according to the guidelines it is not, but according to Annex 1.1 – Budget it rather is). According to the clarifications regarding the infrastructure and works, provided at the information days, and in particular regarding the ownership of the properties for implementation of works (i.e., the requirements for the infrastructure have been equated with works), it turns out that according to the launched call, the participation of a municipality or other state body that manages state or municipal property is mandatory. Such a requirement is not explicitly stated in the Guide, but in practice the implementation of a project under the call without municipal or state administration is impossible.

In this regard, I am asking for an answer to the following questions:

Is the participation of a municipality or a state body that manages state or municipal property mandatory, given the

conditions for preparing full project proposals (FPP). The GfA for FPP will be attached to the invitation for submission of FPP.

6.2 Please, consult section 6 (Project ideas identification process) of the GfA and more precisely p. 26, where it is said that the collection of concept notes under Call 1 is called 'identification process' because it does not end with project selection and funding decisions. Therefore, this first phase is not a call for selection of projects. Its purpose is to identify project ideas that will be further develop as regular Interreg projects. As it is clearly evident from the current GfA (please, make sure you get acquainted with Annex 3 Project Maturity Development Plan), submitting project ideas in advanced stage of implementation is not mandatory, nor it brings advantage in the identification process.

6.3 Again, as it is clearly evident from the current GfA, there is no requirement for the project partners to submit any technical documents in support of their future project works and construction.

7. The Strategy board of the Territorial strategy already approved this Guide for application with concept notes and does not envisage changes or prolongation of the application process.



guidelines and the clarifications made at the information days?

If participation is mandatory, why is this not stated in the Guide?

If participation is not mandatory, and given the explanations given at the information days, please provide clear and specific explanations of how works are carried out on state or municipal property without the participation of a state or municipal authority?

4. In Annex 1.1 – Budget it is stated that the investment component must be no less than 60% of the total budget. According to the Guide the investment component should be no less than 70% of the total budget. Which is true? Is there a requirement as to what percentage of the total investment must be works? Is it acceptable, for example, for works to be 10% and supplies to be 60% of the investment amount (total 70% of the total budget)?

5. Is it eligible that only one of project partners implements works?

6. What are the necessary documents and what are the rules for development of the full project proposal, upon receipt of an invitation? It was explained at the information days that the conditions and documents for the second stage are still being developed and are not ready. A call for the selection of project proposals in a two-stage procedure should be announced after the documents, rules and conditions for the two stages have been drawn up and announced.

In this regard, please answer the following questions:

Is it allowed to have a change in activities or in the indicative budget when submitting the full project proposal?

If yes, what changes are permitted and in what percentage or other ratio?



	<p>For works, are works designs required, in which phase (conceptual, technical or final) and at which stage of the selection procedure?</p> <p>Regarding the inclusion of works and/or infrastructure, at which stage is the decision of the owner/principal required – upon submission of the concept note or upon submission of the full project proposal. At the information day in Haskovo, it was explained that a Decision of the Municipal Council (when it concerns municipal property) is not necessary when submitting the concept note, but at the second stage. Please confirm explicitly that no decision of the owner/principal of the state or municipal property is required when submitting the concept note.</p> <p>7. Are changes of the Guide planned, respectively change of the application deadlines? If yes – in what terms and will there be a change in the application period? If the Guide shall not be changed, is the removal of conflicting texts, additions and substantial changes to the Guides permissible to be made through questions and answers? What is the legal basis and legal effect of the answers to questions and clarifications, making substantial changes to texts of the Guide?</p> <p>In case changes in the Guide and application deadlines are not envisaged, how the Operational Unit and the Strategy Board of the Territorial Strategy under the Interreg Bulgaria-Türkiye 2021-2027 Programme will guarantee a transparent distribution of the total budget for the call in the amount of 13,423,529 euros, in accordance with the requirements of Regulation (EU) 2021/1059?</p>	
14	<p>Received on 19.06.2023 via e-mail:</p> <p>1. According to the application guidelines /p. 18/ construction activities are carried out only on buildings that are state or municipal property, but the word public was added to the</p>	<p>1. GfA, section 4.6 (Scope of project activities), p. 18 explicitly states: If the project envisages investment activities in the form of building new or rehabilitating existing infrastructure, those activities should be carried out exclusively on state-owned or municipal property.</p>



	<p>presentation of the guidelines in Bulgarian. If the property or building is municipal private property, is it eligible under the invitation?</p> <p>2. The call states that no less than 70% should be construction activities and supplies, the question is will it be permissible if one partner wants only construction, the other only supplies and the other only services? Does the expenditures percentage apply to each partner individually or is it considered as a whole within the entire project?</p>	<p>2. The Guide for application with concept notes stipulates that eligible concept notes should contain compulsory combination of investment (works only or works and supply) and soft type of actions (e.g. services). The investment component is minimum 70% of the total eligible costs. The GfA does not set percentage ranges for construction, works and supplies to achieve the minimum threshold of 70% investment component among partners.</p>
<p>15</p>	<p>Received on 30.06.2023 via e-mail:</p> <p>1. Regarding the mandatory indicators of the call in the issued answers you are responding to the questions by this way:</p> <p>Question 3 /III. Applicant’s Guide and Annexes/:</p> <p>According to the Guide for Application with Concept Notes a concept note should contribute to at least one of the two pairs of ERDF indicators. How a project idea falling in the first group of fields of intervention can contribute to the two pairs of indicators as no ERDF indicators are specified for them?</p> <p>Answer: According to the eligibility requirements of the call, the concept notes need to contribute to at least one of the two pairs of ERDF indicators, while at the same time meeting the definition of integrated project – again, it is an eligibility criteria indicated in the eligibility grid on p.27. The statement on p. 7 ‘Each concept note needs to propose solutions to unleash and develop territorial potentials of the cross-border area to at least one of the types of interventions listed above’ indicates that applicants should not focus their project ideas on intervention fields that are not relevant to the strategic objective 1 “Achieving sustainable and inclusive economic growth based on increased competitiveness of the local economy, digital and green</p>	<p>1. 1. As stipulated in the Guide for Application with Concept Notes (part 4.2. “Contribution to Strategy Indicators”, page 13) „at minimum, each project idea must contribute to the achievement of the targets of the mandatory pairs of indicators, including the targets of one of the two pairs of ERDF indicators”.</p> <p>The pairing of indicators in terms of output indicator/s and result indicator/s that project partners need to consider and that cannot be modified is given in the table “Pairing of indicators” on page 12 of the Guide for Application with Concept Notes. For detailed definition of indicators you can refer to Annex 4 “Indicator fishes”.</p> <p>As can be seen from the table, the pairs of ERDF indicators are RCO58 “Dedicated cycling infrastructure supported (output indicator)-RCR64 ”Annual users of dedicated cycling infrastructure” (result indicator) and RCO77 “Number of cultural and tourism sites supported” (output indicator) - RCR77 “Visitors of cultural and tourism sites supported” (result indicator). There is one more ERDF output indicator which is mandatory for each concept note - RCO74 “Population covered by projects in the framework of strategies for integrated territorial development” and that has no paired result indicator.</p> <p>While each concept note should contribute to the achievement of the RCO74 ERDF output indicator, the contribution to the other two pairs of ERDF indicators is dependent on the project idea itself and the intervention logic of the solutions proposed by this idea.</p>



transformation” of the Programme’s Territorial Strategy.

and

Question 13 / III. Applicant’s Guide and Annexes/:

...

Answer: 2.2 Nowhere in the GfA it is stated that building new or rehabilitating existing infrastructure is a mandatory component of the concept notes. However, please note that the contribution of the concept note to one of the two ERDF indicators (RCO58 and RCO77) is mandatory, i.e. it is an eligibility requirement. For more information about the indicator definitions, please consult Annex 4 ‘Indicators fiches’. The GfA specifies the definition of core infrastructure that might be subject to works – p.18, footnote 3. There is no EU common definition of the general term ‘infrastructure’. It is specified in different sectoral EU regulations in accordance with the various thematic scope of the EU funded project interventions.

So, on the basis of the given answers of these two questions and as it is indicated and understandable from the Guidelines of the Call for the Concept Notes, the concept notes should contribute to one of the two ERDF indicators (RCO58 and RCO77), because it is an eligibility requirement.

By this way actually you are eliminating eligibility of the Concept Notes given under the Type of Intervention: Competitiveness and business environment, Digitalisation and climate neutrality of the local economy, Employability and labour market adaptability, because these two mentioned ERDF indicators (RCO58 and RCO77) are connected only to the Type of

It should be noted that the contribution to indicator targets is only possible by implementing concrete project actions, meaning that indicators are not an end in themselves and should be linked with project activities.

Please, also pay attention to the fact that the concept of Integrated Territorial Development is embedded in the Territorial Strategy and underpins the achievement of the objectives of the current call. To this end, integrated and multi-sectoral approach should be sought when generating your project ideas, meaning that at least one of the following conditions should be fulfilled:

- a) the project involves different sectors (such as social, economic and environmental sectors);
- b) the project involves different administrative territories (ex: municipalities);
- c) the project involves several types of stakeholders (public authorities, private actors, NGOs).

In addition, the types of interventions listed on page 7 of the Guide for Application with Concept Notes and again related to indicators in the table on page 13 derive from the five sector-driven specific objectives, which Strategic Objective 1 of the Territorial Strategy aims.

However, it should be kept in mind that only their cumulative achievement shall lead to the integrated development to reach a desired change in cross-border region and there comes the requirement for each concept note to comply with the definition of integrated project.

In this sense, project ideas should not be separated as contributing to only one or the other group of interventions as listed in the table on page 13 and page 14. Please, read in more detail the paragraph before the table on page 13 where the linkages between strategic objective, fields of interventions and indicators are illustrated.

1.2. In line with part 6 “Project ideas identification process”, p. 26 of the Guide for Application with Concept Notes, the Eligibility assessment consists of 2 consecutive steps. Step 1 is an eligibility check and Step 2 is an evaluation of the contribution of each concept note to the achievement of Objective 1 of the



Intervention: Tourism Development Ecosystem practices and services in the management of natural assets with tourism potential.

In the Info day organized in Burgas you clearly described that the potential applicants with the Concept Notes submitted under the Type of Intervention: Competitiveness and business environment, Digitalisation and climate neutrality of the local economy, Employability and labour market adaptability, could indicate that responds to the Output Indicator: RCO74 Population covered by projects in the framework of strategies for integrated territorial development, that actually is NOT one of the indicative investment ERDF indicators - RCO58 and RCO77.

Additionally, in the published and made presentations you clearly indicate that the Mandatory Output and Results Indicators are:

- RCO84
- RCO116
- RCO74
- RCR104

except actually those that you are evaluating as mandatory and as eligibility requirements: RCO58 and RCO77.

In this case, could you please explain clearly what you mean by this requirement:

The project idea contains the mandatory pair/s of indicators, including at least one of the two pairs of ERDF indicators

Territorial Strategy. According to the Guide for Application with Concept Notes (part 4.2. “Contribution to Strategy Indicators”, page 15) “During the identification process, the Strategy Board will rank two lists of project concepts, each corresponding to the two groups of types of interventions”. The evaluation during step 2 of the eligibility assessment shall be carried out according to the assessment grid “Description of coefficients under eligibility step 2 of the project ideas identification process” (page 28 of the Guide for Application with Concept Notes) and based on the Territorial Strategy document.

This step from the identification process according to the Guide for Application with Concept Notes (part 6. “Project identification process”, page 29) ends with a summary report (not with ranking list/s) prepared by the Operational Unit about the final coefficients of all concept notes that meet the call’s objective. Only applicants, whose project ideas have received a final score of 60 or more points (p.33) will be invited to submit full project proposal or included in a reserve list of project ideas. The two lists of project concepts, each corresponding to the two groups of types of interventions are not taken into account for the calculation of the final scores (please, carefully read section 6. Project ideas identification process). These two lists of project concepts will be made only for statistical purposes.

2. The application with a concept note under Call 1 with Concept Notes under the Territorial Strategy of the INTERREG VI-A IPA Bulgaria - Türkiye Programme 2021-2027 does not require submission of any other documents except for those listed in part 5. “Application Process” pages 25-26 of the Guide for Application with Concept Notes (Call1).

During the identification process – step 1 of the eligibility assessment, checks only whether the Project Maturity Development Plan is dully filled and submitted are performed (you can refer to point 12 of the table on page 28).

At the quality assessment stage the evaluation is carried out according to the matrix of criteria given in the table on pages 30-32 of the Guide for Application with Concept Notes. As can be seen the scoring of the concept notes is made



(investment indicators) /p.11/; At minimum, each project idea must contribute to the achievement of the targets of the mandatory pairs of indicators, including the targets of one of the two pairs of ERDF indicators./13/; - The scope of the project activities includes mandatory combination of investment (works only or works and supply) and soft type of actions (e.g. services). At minimum, each project idea must contribute to the achievement of the targets of the mandatory pairs of indicators, including the targets of one of the two pairs of ERDF indicators./18/; The project idea contains the mandatory pair/s of indicators including at least one of the two pairs of ERDF indicators (investment indicators) /p.28/.

and how the potential applicants will ensure achievement of the criteria to be covered at least one of the investment indicators ERDF RCO58 and RCO77 in the project submitted under the first group of interventions: Competitiveness and business environment, Digitalisation and climate neutrality of the local economy, Employability and labour market adaptability?

It is very important to clarify all mandatory output and result indicators that should be achieved under the both type of interventions, because on the base of all requirements mentioned in the current version of the Guidelines for Applicants, the potential applicants will be evaluated as eligible if they applied only under the second group of intervention, namely Tourism Development Ecosystem practices and services in the management of natural assets with tourism potential.

This issue is good to be clarified as soon as possible because, according to the Guidelines: During the identification process, the Strategy Board will rank two lists of project concepts, each

based on the assessors' independent judgement on how realistic the Project Maturity Development Plan is and on how consistent the Plan is with the project idea. The maximum score of 20 points under this criterion is obtained if the Plan includes the following three conditions: all actions required by law are included in the Plan (condition 1), there is a clear division of partners' responsibilities (condition 2) and it involves a feasible timeline (condition 3). It is incorrectly assumed that in order to obtain the maximum score on the Maturity criteria, project partners need to already have licenses, design, permits, and approvals. Nowhere in the GfA is such condition mentioned.

As stipulated in the Guide for Application with Concept Notes (part 4.7. "Scope of project costs", page 22) costs under Budget Category 7 "Project preparation costs" may be incurred only when submitting the full project proposals.

According to the indicative timeline (page 33 of the Guide for Application with Concept Notes) the approval of the Application package for full project proposals is expected to end by 30th of October 2023 followed by the launch of the targeted call for full project proposals envisaged for November 2023. The eligibility period, meaning the starting and end date of the eligibility of costs under Budget Category 7 shall be specified in the Application package for full project proposals.

3. The Managing Authority, National Authority and Operational unit have done series of announcements and information events which provided detailed and timely information for the planned public call for proposals and the envisaged content of the application package as well as opportunities for setting up partnerships.

On 30.03.2023 the Strategy Board of the Territorial Strategy under the (Interreg VI-A) IPA Bulgaria - Türkiye Programme 2021-2027 adopted a Methodology for Identification of Project Ideas and a Guide for Application with Concept Notes. The Guide for Application with Concept Notes was discussed by the Strategy board members and the approved documents were an important step in the actual implementation of the Strategy. The news was



corresponding to the two groups of types of interventions. And, actually the evaluation commission could not evaluate the concept notes from the first type of intervention as eligible, following the criteria mentioned in the current version of the Guidelines.

2. According to the Guidelines:

BC 7 Project Preparation costs - these costs are not eligible under the present Call. They may be incurred only when submitting full project proposals for an amount up to 12 000 euro (lump sum) per application. Project preparation costs are limited to the following services:

- consultancy, elaboration of technical documentation (incl. feasibility studies, detailed design, technical drawings, etc.);
- elaboration of project proposal and application form, translation of documents, taxes and other charges);
- other costs necessary to submit a valid application form.

There is no written description for the exact date from which these costs are incurred, especially for elaboration of technical documentation (incl. feasibility studies, detailed design, technical drawings, etc.) and could be evaluated as eligible.

In the Info day in Burgas it was mentioned by the Program team that these costs will be accepted as eligible if they are incurred after the date of notifying the applicants with successful concept notes, e.i. indicative after 30.10.2023 and with the launching of the call for the full applications.

So, during the info day it was clarified that the costs made in the

published on the Programme web-site on 31.03.2023.

From the period 11.04.2023 - 27.04.2023 public consultations were held on the published draft Guide for application with Concept Notes under the Territorial Strategy of the Programme. As a result, a series of comments and recommendations were received but none that address the issue of limited period for preparation of the concept notes. For reference, please consult the TABLE WITH RECEIVED COMMENTS within the public consultations on the Application package of Call 1 for application with concept notes under the Territorial Strategy of the (Interreg VI-A) IPA Bulgaria - Türkiye Programme 2021 – 2027 that is published on the web-site. In light of this, and in view of the need for reaching the financial targets and milestones of the Programme in the upcoming years, extension of the deadline for submission of concept notes is not justified. Moreover, through the public consultations, potential applicants were informed about the funding opportunity, the indicative time-frame for launching of the call, the period for concept notes preparation and the rules of the current Call for proposals. Thus, the potential applicants had at their disposal approximately 3,5 months to formulate project ideas, search for partners and successfully prepare a concept note.

4. The Information Campaign dedicated to support the candidates on the First Call for application with Concept Notes under the Territorial Strategy of the (Interreg VI-A) IPA Bulgaria -Türkiye Programme 2021-2027 was launched on 26.05.2023. It included the following information events: Information day in Kırklareli, Republic of Türkiye (07.06.2023), Partnership forum in Kırklareli, Republic of Türkiye (08.06.2023), Information days in Burgas, Republic of Bulgaria (14.06.2023), Haskovo, Republic of Bulgaria (15.06.2023) and final information day in Yambol, Republic of Bulgaria (23.06.2023).

As specified, on Turkish territory there were two events dedicated to the launched First Call for concept notes under the Territorial Strategy:

a) Information day, held on 7th of June 2023 in Kırklareli. The whole information day was carried out in Turkish language and during the event potential applicants were acquainted with the objectives and priorities of the Call, the specific requirements of the Guide for application, the process of



frame of these 3 months for the preparation of the full project proposals will be evaluated as eligible, including for the elaboration of the technical documentation.

In this case, actually the program falls into the conflict with its own evaluation criteria and is putting the potential concept note applicants with already completed technical documentation in a financially disadvantaged position compared to those that are applying with the indicative/conceptual feasibility studies and uncompleted technical documentations.

Please, have in mind that in the Guidelines is mentioned that:

If, however, the project ideas who have included the two pairs of ERDF indicators are not enough to support the ranking of the remaining equally scored concept notes, the latter will be ranked according to the obtained score on the criteria 'Maturity of the project idea', i.e. project ideas with higher score on the Maturity criteria will be ranked first.

and the Maturity criteria actually is giving the max points to the projects with already clear and realistic plans - that already have needful licenses, design, permits, approvals ...

In this case, could you please indicate a clear date for the eligibility of the project preparation costs including technical design projects, incurred for example after the date of approval of the Programme's Territorial Strategy, adopted by the Strategy Board on the 2nd of December 2022.

Because the project applicants with already developed technical design projects and that responding to all needful licenses and permissions for the starting of their investments, actually will not benefit from the eligible costs described under BC 7 Project Preparation costs, especially for preparation of the technical

assessment of the concept notes, the financial aspects of the concept notes, the requirements towards the documentation to be presented and the process of submission of the proposals in the Joint electronic monitoring system. The information behind the Powerpoint presentations provided at the Information day in Kırklareli was spoken and delivered in Turkish language, thus giving the opportunity for persons less knowledgeable in English to become well acquainted with the matters. Although the published agenda for the information day didn't specifically include in it a session dedicated to "Questions and answers", potential applicants were given the opportunity to raise their questions of substance after each delivered presentation on the topic in the agenda. The questions and issues raised in Turkish language by the participants were addressed in Turkish language by the representatives of the National Authority and the representatives from the Operational Unit – branch Edirne. The Powerpoint presentations at the Information day in Kırklareli and the Information days in Burgas, Haskovo and Yambol have one and the same contents, and with the conclusion of the Information campaign they were published on the Programme web-site to be available and accessible for all interested parties.

b) Partnership forum, conducted on 8th of June 2023 in Kırklareli, dedicated to provision of opportunity for establishment of partnerships between potential applicants from Türkiye and Bulgaria for preparation and implementation of joint projects. Potential applicants were acquainted with the principles of successful partnerships under the (Interreg VI-A) IPA Bulgaria – Türkiye Programme 2021 - 2027, the significance of the partnership in the process of assessment and implementation of the projects, the eligibility of partners, etc. There were provided advices for creation of successful partnerships and generating successful project ideas. This first session of the Partnership Forum was the only session that was carried out in English language. For the sessions that followed after that, potential applicants were given the opportunity to present briefly their project ideas in their native language (translation from Turkish to Bulgarian and vice versa facilitated this process), to say the types of partners they are searching for from the opposite side of the border. During an interactive session (also facilitated by translators) potential applicants, divided into 5 groups, had the opportunity to meet face to



projects.

3. The provided period from 2 months is very short for the preparation of the Concept notes, which actually will be the ground of the full applications with the Joint Development feature/principle, actually is not realistic and seriously limits the opportunity of the potential partners from both sides of the border to jointly develop their project ideas. Actually this rule for Joint Development of the project naturally is applying at the stage of preparation of the Concept Notes, and not so much at the stage of preparation of the full project application, because all project activities, joint cooperation and responsibilities of the partners should be clearly defined with the aim to be prepared successful Concept notes, and this for sure is taking a time. Actually at this stage of Concept Notes preparation the applicants from both sides need more time to find potential partners and to define all these joint issues, which does not apply to the full application stage. At the full application stage there is a time for preparation of the full application documentation, but this administrative procedure is taking less time than the elaboration of the joint project idea, determination of the needs and expectations of the potential partners and establishing suitable partnership and project corporation of organizations/institutions from different countries.

4. The Agenda of the Info day organized at the Turkish side of the program actually did not include any 'Question and Answer' sessions and the Turkish potential beneficiaries did not receive opportunity to ask their questions and to receive as much as possible clarifications by the Program team members in their native language.

In contrast, the agendas of the all three Info days realized at the

face with other organizations with similar interests and envisage initial steps for establishment of the partnership. The interactive sessions were guided by the staff of the Operational Unit, who also clarified the new moments in the approach of Programme implementation in terms of Priority 2 „Integrated development of the Cross-border region“, thus providing technical support to partnerships and project ideas formulation.

More than 115 participants from Türkiye and Bulgaria took part in the Partnership forum in Kirklareli, thus demonstrating significant interest in applications with concept notes in the beginning of the period for submission of project ideas under the First Call for application with concept notes under the Territorial Strategy.

In addition, the whole information, news, press-releases, etc. about the information campaign is published regularly on the web-site in Section 2020+ and News Section as well as the social media channels: Facebook, YouTube channel of the Programme.

In conclusion, we would like to point out the possibility provided in the Guide for application with concept notes (Call 1) for all applicants to submit their questions in writing up to 10 calendar days prior to the deadline for submission of concept notes. The Operational Unit has to reply no later than 5 calendar days prior to the deadline for the submission of concept notes.

Last but not least, the application form of the concept note requires significantly limited volume of information of the project idea and here is the essence of the call – we invite project partners to submit strategic ideas and not ready-to-go proposals.



Bulgarian part of the programme were carried out in Bulgarian language, accordingly oriented especially for the Bulgarian beneficiaries, by including two 'Question and Answer' sessions per event and the Bulgarian potential beneficiaries found a ground and possibility to provide their questions directly to the program experts during the info days.

Additionally - the presentations made during the Info day in Türkiye were in English language unlike those made in Bulgaria, that were in the native language of the Bulgarian potential applicants, e.i. in Bulgarian language.

These differences in the made info events automatically lead to that the programme did not follow and adhere to the principles of transparency and equal opportunities to all potential beneficiaries and is putting the Turkish potential applicants in a disadvantaged situation.

In Türkiye, there is a certain need for an additional Info day to be done under all conditions provided to the Bulgarian potential beneficiaries: with 'Question and Answer' sessions and with presentations in Turkish language.

Because of these and many other multitude unspecified issues and unclear requirements in the Guidelines and because there is need for many clarifications in the Guidelines for applicants, and additionally, there is certain need to be taken into consideration the fact that the duration of 2 months for the preparation and submission of Concept Notes includes the 9 day official holiday in Republic of Türkiye, we will appreciate if the programme managing authority could take a decision for the extension of the deadline for application under Call 1 for Concept Notes.



IV. Budget Forecast

1	<p>Received on 14.06.2023 during the Info Day in Burgas</p> <p>Will changes to the budget forecast of the concept note be allowed at the full project proposal stage? For example, transfer of amounts between budget categories?</p>	<p>Applicants should bear in mind that while changes to the budget forecast of the concept note at the stage of submission of full project proposals are possible, they should carefully consider the eligibility of project costs in terms of type of costs and budgetary ranges and ceilings.</p>
2	<p>Received on 14.06.2023 during the Info Day in Burgas</p> <p>In case of inflation, who will take the indexation?</p>	<p>The programme does not have earmarked funds to cover additional project costs that may be incurred beyond the subsidy contract.</p>
3	<p>Received on 14.06.2023 during the Info Day in Burgas</p> <p>Will it be possible the total budget of a concept note to be raised when applying with a full project proposal?</p>	<p>Call 1 does not set rules and conditions for preparing full project proposals (FPP). The Guidelines for applicants for submission of FPP will be attached to the invitation for submission of FPP.</p>
4	<p>Received on 14.06.2023 during the Info Day in Burgas</p> <p>Is there a specific place in the application form that the total budget of the concept note is filled in?</p>	<p>The total budget of the concept note is automatically calculated in the budget forecast table – Annex 1.1 to the Guide for Application with Concept Notes (Call1) based on the data you fill in for each project partner under respective budget categories.</p>
5	<p>Received on 15.06.2023 during the Info Day in Haskovo</p> <p>Are changes in the indicative budget of a project idea allowed when applying with a full project proposal? Are there limits set for such changes?</p>	<p>Applicants should bear in mind that while changes to the budget forecast of the concept note at the stage of submission of full project proposals are possible, they should carefully consider the eligibility of project costs in terms of type of costs and budgetary ranges and ceilings.</p>
6	<p>Received on 15.06.2023 during the Info Day in Haskovo</p> <p>Can an estimated budget forecast for works be drawn in case no working designs are required at the concept notes stage?</p>	<p>Yes, that is why Annex 1.1. is described and named as Budget forecast.</p>

V. Assessment Process

1	<p>Received on 14.06.2023 during the Info Day in Burgas</p> <p>What measures are taken to prevent any conflict of interest in case Strategy Board members apply with concept notes under the current call? The provisions of the Rules of procedure</p>	<p>The provisions of the Rules of procedure of the Strategy Board (art. 8) envisage in case a Strategy Board member finds him/herself in conflict of interest, he/she shall follow the procedure described in the Code of Conduct which is annexed to the Rules of Procedure – Annex 2 – i.e. who finds that he or she has a conflict of interest shall immediately take the necessary steps to</p>
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	<p>of the Strategy Board (art. 8) envisage in case a Strategy Board member finds him/herself in conflict of interest, he/she shall follow the procedure described in the Code of Conduct which is annexed to the Rules of Procedure – Annex 2 – i.e. who finds that he or she has a conflict of interest shall immediately take the necessary steps to address it, or if the member or the support expert is unable to resolve the conflict of interest, he or she shall report this to the Head of the Managing Authority of the Programme in writing and will withdraw from the assessment process for the respective concept note for which conflict of interest is existent.</p>	<p>address it, or if the member or the support expert is unable to resolve the conflict of interest, he or she shall report this to the Head of the Managing Authority of the Programme in writing.</p>
2	<p>Received on 14.06.2023 during the Info Day in Burgas</p> <p>Does it mean that a concept note should receive a coefficient of at least 0,75 at the eligibility step 2 so as to be able to receive final score of 60 points after the end of the quality assessment?</p>	<p>In order for a concept note to reach the threshold of 60 points to proceed with the identification process, it needs to receive a minimum coefficient of 0,75 for its contribution to the Territorial Strategy.</p>