

No.	Question as received	Translation (if the case)	Reply
		Full Application Form	
AF.1	Va rog sa imi spuneti unde pot sa gasesc Cererea de finantare (Application Form) pentru pasul 2 din cadrul celui de-al 3-lea Apel de proiecte. In pachetul cu documente nu exista si este mult mai usor de lucrat pe un model actualizat.	Can you please tell me where can I find the Application form for the second step within the third call for proposals. It does not exist within the package of documents yet it is so much easier to work on an updated draft.	Please be informed that the 3rd call for proposals is a two-steps call, for which the Expressions of Interest (corresponding to Step 1) and full Application Form (corresponding to Step 2) will be submitted online, through the programme electronic monitoring system called e-MS. In case the expression of interest is accepted by the Monitoring Committee for step 2 of the call, the full application form is to be filled in and submitted via e-MS system. The system will link the Step 1 AF - expression of interest with the Step 2 AF. Only applicants selected by the Monitoring Committee for phase 2 of the call, are invited/are expected to fill-in and submit a full application form in the e-MS system. The deadline for uploading the full Application forms (phase two) in the system is 16th of October 2017, 16:00 hours.
AF.2	Pentru o expresie de interese selectata pentru faza 2, este permisa schimbarea duratei de implementare a proiectului? De exemplu in EoI s-a precizat o durata de 24 de luni, dar dupa detalierea exacta a tuturor activitatilor a rezultat ca proiectul poate fi implementat si in 18 luni, si partenerii de proiect au optat pentru intervalul de 18 luni.	Is it possible to change the implementation period of a project within an expression of interest, selected for the second step? For instance, within the expression of interest it is specified that the duration is 24 months, but after precise detailing of all project activities it resulted that the project can be implemented in 18 months, the project partners have opted for the period of 18 months as well.	According to the provisions of the Applicant's Guide, the duration of a project should not exceed the maximum of months foreseen for the respective priority axis/specific objective for which your project applies. As regards reducing the initially foreseen period for implementation, please be informed that the Applicant's Guide does not foresee such provision.
AF.3	The result indicator have been set by us and evaluated in Phase 1 of the application process. Does that mean that in Phase 2 we are not allowed to reassess it (in a positive direction)? Or if we do, will this be taken into consideration in the Phase 2 evaluation process?		The contribution of your EoI to the achievement of the Programme result indicator has been already evaluated and respective score was granted. However, if there will be modifications of the contribution to the result indicator (in a positive direction), the applicant's package does not foresee its evaluation in the second stage.



AF.4	Is there a word template of the full AF and is yes, where to find it?		The 3rd call for proposals is a two-steps call, for which the Expressions of Interest (corresponding to Step 1) and full Application Form (corresponding to Step 2) will be submitted online, through the programme electronic monitoring system called e-MS. In case the expression of interest is accepted by the Monitoring Committee for step 2 of the call, the full application form is to be filled in and submitted via e-MS system. The system will link the Step 1 AF - expression of interest with the Step 2 AF. Only applicants selected by the Monitoring Committee for phase 2 of the call, are invited/are expected to fill-in and submit a full application form in the e-MS system. The deadline for uploading the full Application forms (phase two) in the system is 16th of October 2017, 16:00 hours.
AF.5	Търся примерната таблица на бюджет, разработена на Ексел, която закръглява числата и изчислява % на разходите, която да се сложи примерно в раздел шаблони или да бъде като самостоятелен файл в пакета за кандидатстване.	I'm looking for the example budget table developed on Excel, rounding off numbers and calculates in % of costs, which to be inserted in section templates or to be as a separate file in the package for application.	Please be aware that the 3rd call for proposals is a two- steps call, for which the Expressions of Interest (corresponding to Step 1) and the full Application form (corresponding to Step 2) will be submitted online, through the programme electronic monitoring system called e-MS. The budget will be filled in e-MS, according to the rules established in the applicant pack.
AF.6	At "deliverables" section, do we have to list all technical specifications and permits for all the equipment, even for the ones that are on the list of ceilings, in Annex D?		All the technical specifications for all the equipment have to be listed in section "Deliverables" in case they are based on three offers or an independent evaluation of the cost. Please pay attention that the technical specifications should be relevant to the needs for your project activities and the same as provided in the offers or in the independent evaluation. As regards the equipment that is on the list of ceilings, there is no need the technical specifications to be listed, but in the description of the equipment it should be clearly mentioned that it is based on the Annex D. List of Ceilings.



AF.7	В рамките на меките проекти разходите за закупуване на оборудване не могат да бъдат надвишават 50 % от общата стойност на целия допустим бюджет на проекта. 1.1. Това включва, както финансирането от ЕФРР, така и националното съфинансиране по проекта, нали така? 1.2. Изискването за не повече от 50 % само за общата стойност на целия бюджет на проекта ли се отнася? Или изискването за не повече от 50 % се отнася и за отделните бюджети на отделните партньори по проекта? Пример: Обща стойност на проекта: 480 000 евро. Максимален бюджет за оборудване: 240 000 евро. Бюджет на Партньор 2: 190 000 евро. Може ли в бюджета на партньор 2 например да имаме разходи за оборудване, които са на стойност 100 000 евро, което е повече от 50 % от стойността на бюджета на партньор 2, но е по-малко от 50 % от стойността на общия допустим бюджет на целия проект?	1. Within a soft project the costs for purchase of equipment cannot exceed 50% from the total value of the entire eligible budget of the project. 1.1 Which includes the financing from the ERDF as well as the national co - financing, right? 1.2 Does the requirement of no more than 50% refer only to the total value of the project budget? Or the requirement of no more than 50% refers to the separate budgets of the project partners as well? For example: Total value of the project: 480 000 euro Maximum budget for equipment: 240 000 euro Budget of Partner 2: 190 000 euro Can we have, within the Partner 2 budget, for example, expenditures for equipment for the worth of 100 000 euro which is more than 50 % from the value of Partners' 2 budget but it is less than 50% from the total eligible budget of the entire project?	Please be informed that the equipment purchase threshold of 50% for soft projects is applied to the total eligible value of the project.
AF.8	В рамките на мек проект, изискването за не повече от 15% разходи за персонал (респективно 4,5 % за административни разходи) от изчислителната база само за общия бюджет на проекта ли се отнася, или се отнася и за отделните бюджети на партньорите по проекта? Пример: Обща стойност на проекта: 480 000 евро. Разходи за персонал за целия проект: 72 000 евро (15 % от 480 000 евро). Бюджет на Партньор 2: 190 000 евро. Разходи за персонал в бюджета на Партньор 2: Максимум 28 500 евро (15% от 190 000 евро) ли трябва бъдат или може да бъдат и повече?	Within a soft project the requirement of no more than 15% for staff costs (respectively, 4.5% for administration costs) from the calculation basis refers only to the total project budget or does it refer to the separate partner budgets as well? For example: Total value of the project: 480 000 euro Staff costs for the entire project: 72 000 euro (15% from 480 000 euro) Budget of Partner 2: 190 000 euro Staff costs within the budget of Partner 2: Maximum 28 500 euro (15% from 190 000 euro). Should that be the amount or can it be more than 28 500 euro?	Please note that the percentage of flat rate (15% for staff cost and 4.5% for office and administrative costs) is applied on the calculation basis which consist of the following eligible direct costs - Travel and accommodation, External expertise and services, Equipment, Infrastructure and works - for each partner.



AF.9	Как се формира класирането на проектите след като приключи оценката на втора фаза. Събират се оценките от фаза 1 (заявление за интерес) и фаза 2 (пълна апликационна форма). Или се взема предвид оценката само от фаза 2 (пълна апликационна форма)?	How is formed the ranking of the projects after completion of the evaluation of phase two? To the score from phase 1 (expression of interest) will be added the score from phase 2 (full application form) or under consideration will be taken only the score from phase 2 (full application form)?	In relation to the ranking of projects the Guide states that: "The projects are pre-ranked in descending order according to the score awarded and, taking into consideration also the contribution to Programme indicators (output and result), grouped into two categories: 1. projects proposed for financing; 2. projects proposed for rejection. The contribution to Programme indicators (output and result) shall be taken into consideration at selection. After the pre-ranking, the projects are forwarded to the Monitoring Committee, which selects the projects for financing and approves the list of rejected projects." Also, please note that according to Applicant's Guide, in order to be considered for financing, the applications must respect the administrative and eligibility criteria and receive at least 60 points at the technical and financial evaluation. The evaluation shall be performed according to the criteria set within Annex C - Evaluation Grids of the Application Form. The score awarded is the result of the evaluation process of the full application form in phase 2.
AF.10	In urma evaluarii de catre experti s-a constatat ca banii nu sunt suficienti pentru ambele monumente istorice, prin urmare pentru a folosi cu maxima eficienta fondurile, va propunem sa acceptati modificarea obiectivelor proiectului in sensul renovarii si restaurarii complete a unui singur monument, pentru cealalta biserica urmand a se incerca obtinerea de fonduri din alte programe, in scopul includerii si acesteia in circuitul turistic, asa cum a fost gandit initial proiectul.	After a rigorous expertize we found that the amount that was estimated in first place won't be enough for both historical monuments, so to maximally use the funds, we propose you to accept the modification of the project's objectives for the renovation and complete restoration of a single monument, as for the other church we will try to obtain funds from other programs, in order to include it in the touristic circuit, as was the case in the original project.	According to the provisions of the Applicant's Guide and its Annexes (Annex M - e-MS Manual for applicants - call 2_step 2) the fields that have been already filled in during phase 1 can be amended only if necessary and in case of unforeseen events with provided duly justification. In this regard, you can propose for renovation and complete restoration of only one single monument by duly justifying the reasons for the decision taken. However, please be aware that based on the information provided by you in the first step your Eol has been assessed and recommended for step 2. Therefore, the information cannot be deleted or added without having a dully justification of what imposed the modification proposed.



AF.11	We are preparing a project, where only the Bulgarian partner has an infrastructure component. The Romanian partner participates with soft activities. According to the rules of the programme, the project is considered hard, because more than half of its total budget will be used for the construction works "hard" projects (projects with works components or involving investments with a concrete impact to the cross-border area or which grants more than half of its total eligible budget to purchase of equipment)." Please clarify in this case how do we have to budget the staff costs and the office administration costs of the Romanian partner (who does not have an infrastructure component), because we have to select manually the percentage in the EMS system: § Staff costs: as a fix flat rate of 15% for soft projects or 5% for hard projects § Office administration costs: as a fix flat-rate of 4.5 % for soft projects or and 1% for hard projects	In accordance with the provisions of the Applicant's Guide, a hard project is a "Project that has an investment/works component or which grants more than half of its total eligible budget for the purchase of equipment", as you yourself mentioned within the e-mail. Therefore, having in mind that your project is hard (considering the work component of the Bulgarian partner) the flat rate that will be applied for both the project beneficiaries is 5% for staff costs and 1% for office and administrative costs. Please be informed that although the Romanian partner does not have a work component, still the fixed flat rate for staff costs and office and administrative costs will be applied as for the hard project.
AF. 12	Considering the second phase of the Call for Proposals under Interreg V-A Romania-Bulgaria Programme, I have the following question: Please, confirm that it is not necessary to strictly follow the activities which we have identified during the first phase of application, and some slight changes can happen due to the detailed budgeting.	The activities described in the first stage can be modified, but without changing the main objective of the project.



	Beneficiaries within project declared in EoI (Step 1), approved for Step 2 of Call for proposals No 3, contribution to output indicator I9-Number of integrated tourism products/services created - 8 integrated tourism services	Please be informed that when elaborating the full application form you should update the information in
AF.13	and 1 integrated tourism product, totaling number of contribution to the I9 output indicator - 9. With Notification letter selection for step 2, No 12545/04.08.2017, Lead beneficiary was notified that the number of the Eol contribution to output indicator I9-Number of integrated tourism products/services created is deducted to 3. Bearing in mind that not from the Notification letter nor from its annexes becomes clear which of the proposed services and products are counted as contribution to the respective indicator and how did the assessors came to the number of contribution to I9 - 3, project beneficiaries would like to know: Could the contribution of the project proposal be recalculated in Step 2 Submission of full application form, and respectively the initial higher number of contribution to be defended and justified?	regard to the contribution of your project proposal to the achievement of the output indicators of the Programme by observing the results of the evaluation process: the declared tourism services "digital wine hall", "common scientific online wine educational tool" and "educational online wine game" were considered as only one type of digital tourist service and not 3. Considering that during the evaluation process you had the opportunity to justify the number of contribution to the output indicators, having in mind that clarifications were requested in this regard and no additional information was provided by you, it is recommended not to recalculate the contribution to the output indicators."
AF.14	The situation description: at stage 1 the output indicator was lowered being considered as overestimated. The question is: Does the applicant have to update the figures only to "Programme Result Indicators" or he/she has to update inside the entire Application form - comments about that indicator, justifications, e.g. Programme Result Indicators?	Please be informed that you should update all the sections within the application form by updating the figures and the information related to the actual contribution of your EoI to the programme indicators.



Suntem in faza a doua de dezvoltare a proiectului, fiind acceptati dupa faza EOI si ne confruntam cu o situatia fata de care va rugam sa ne transmiteti opinia dumneavoastra:

Liderul de parteneriat a asumat reabilitarea unei lungimi de drum judetean de 12,53 km aflat in integralitate, conform HG privind atestarea domeniului public al judetului in administrarea Liderului de parteneriat. Insa la ridicarile topo realizate in teren pentru elaborarea DALI, s-a constatat ca pe o distanta de 300 m respectivul drum judetean travereseaza judetul Ilfov (iar tronsonul respectiv de drum este intabulat in evidentele OCPI Ilfov, avand ca administrator liderul de proiect), judet care nu face parte din aria eligibila a programului.

Beneficiarul doreste sa realizeze reabilitarea acestui tronson de drum pe cheltuiala sa (avand in administrarea sa legal stabilita acest tronson de drum, cum am aratat) pentru a asigura coerenta si beneficiul investitiei. Ceea ce am dori sa stim este daca, data fiind situatia concreta din teren, se va mai considera atins indicatorul asumat in EOI (respectiv 12,53 km pentru liderul de parteneriat) si daca investitia pentru respectivul tronson de drum poate fi incadrata la cheltuieli neeligibile in cadrul acestui proiect sau nu trebuie mentionata la cheltuieli neeligibile si mentionata exclusiv la proiecte complementare la sectiunea Context.

De asemenea, am dori sa stim, in cazul in care varianta de raspuns este ca respectivul tronson de drum de 300 m nu va putea fi considerat in indicatorul de proiect, daca diminuarea I1 - Lungimea totala a drumurilor reabilitate si modernizate cu 300 m fata de lungimea asumata in EOI poate conduce la descalificarea proiectului.

We are in the second stage of the project development, being accepted after the EOI phase and we are facing a situation in which we ask you to send us your opinion:

The lead beneficiary undertook the rehabilitation of a county road with length of 12.53 km, which according to the GD on the attestation of the public domain of the county, is administered completely by the Lead Partner. However, at the topo excavations made in the field for the elaboration of DALI, it was found that for a distance of 300 m the respective county road crosses the border of Ilfov County (the respective section of the road is registered in the records of OCPI Ilfov, having as administrator the lead beneficiary), a county that is not part of the eligible area of the program.

The beneficiary wishes to undertake the rehabilitation of this road section at its expense (this road section is being administered by LB, as we have shown) in order to ensure the consistency and benefit of the investment. What we would like to know is whether, given the concrete situation, the assumed indicator within the EoI will be considered as achieved (12.53 km for the lead beneficiary) and if the investment for that section of road can be framed at ineligible expenditures within this project or it should not be mentioned as ineligible expenditures but mentioned exclusively in complementary projects within section Context. Also, we would like to know if the decrease of the 11 - Total length of reconstructed or upgraded roads with 300 m compared to the to the length assumed within the EoI can lead to the disqualification of the project in case in which the answer is that the 300 m road section cannot be taken in consideration as part of the project indicator.

The contribution of your project proposal to the achievement of the programme output indicators will be analyzed and will be subject to acceptance / rejection from the Assessment Working Group based on the justifications provided by you within the application form. According to the provisions of the Applicant's Guide and its Annexes (Annex M - e-MS Manual for applicants - call 2_step 2) the fields that have been already filled in during phase 1 can be amended only if necessary and in case of unforeseen events with provided duly justification.

Second, in case the expenditures for modernization of the 300 m road section will be supported by the Lead Beneficiary, than you must frame the expenditures within the non-eligible expenditures category. However, please be aware of the following provision of the Applicant's Guide: "in case a project has to be implemented partially outside the eligible area, it has to prove that it is for the benefit of the programme area. The share of the costs incurred outside of the eligible area (related to any activity or any category of expenditure) shall be limited to 20% of the total eligible project budget, irrespective of the location of the partner."

Last but not least, the disqualification of your project due to the reduction of the contribution to the achievement of the output indicators of the programme will be subject to acceptance / rejection from the Assessment Working Group.

AF.15



		Eligibility of expenditures	
EE.1	Can the general management of the protect be externalized and thus the manager of the project be an external expert.		Please be informed that you can externalize the project management according to the provisions of the Applicant's Guide and its annexes.



	issues related to engionity and scoring				
EE.2	Va rog sa ne ajutati cu urmatoarele clarificari: - Pentru dezvoltarea unei aplicatii web based, va rog sa ne spuneti care este perioada pentru care trebuie asigurata mentenanta? - Mentenanta este eligibila? - Daca includem in cererea de finanatare si mentenanta aferenta aplicatiei, in momentul in care se deruleaza procedura de achizitie, este necesara spargere pe cele 2 componente (dezvoltare, respectiv mentenanta)?	Please help us with the following clarifications: - Can you please tell us what should be the ensured maintenance period for a developed web based application? - Is the maintenance eligible? - If the maintenance is included within the application form, should the procurement procedure be separated in two (development and maintenance) when launched.	 Please bear in mind when foreseeing the maintenance period of the web based application, that you should consider the maintenance of the respective project output for the entire sustainability period of the project as well. The Partnership is responsible for ownership and further maintenance and use of the outputs and results after project duration has ended. Regarding the second question, please note that the maintenance costs for the respective web -based application is indicated in the List of eligible expenditures as an eligible cost. However, bear in mind that only the costs for maintenance services provided during the project implementation period (and paid out at the latest in two months after the end of the project implementation period, but no later than 31.12.2023) are eligible and can be reimbursed by the Programme. The costs for ensuring the sustainability of the project outputs and results is the obligation of the beneficiaries. We cannot give you a prior opinion regarding a possible division of the web based application and associated maintenance during procurement process. The object of the contract, estimated value and applicable procurement procedure should be determined by the beneficiary considering the applicable legislation in force. Anyway, the way the public procurement will be carried out is an implementation-related issue, which has no implications for the description of the services (or equipment or works) at this stage, as there is no automatic correspondence between the items presented in the Application Form and the contracts to be awarded afterwards in the stage of implementation. At this point we would recommend that the costs for development and maintenance are separately estimated and justified (by providing evidence of the market price) so that their compliance with the eligibility requirements for sound financial management can be properly assessed. 		



EE.3	Is it possible part of the project management of the project to be external? For example, the idea is Project manager and project accountant to be staff of the applicant, the other positions to be external management, which would be assigned through contract with external subcontractor.		According to Annex E. List of eligible expenditures, both "Staff costs" and "External expertise and services costs", represent eligible expenditures within the third call for proposals for the Interreg V-A Ro-Bg Programme. In this regard, the project management can be externalized in accordance with provisions of the Applicant's Guide and its annexes.
EE.4	If the system uses flat rate for staff cost, but one partner wants to externalize consultancy service for project management, is eligible to externalize consultancy services and also to keep the flat rate for staff cost?		Please be informed that, according to Annex E. List of eligible expenditures, both "Staff costs" and "External expertise and services costs", represent eligible expenditures within the third call for proposals for the Interreg V-A Ro-Bg Programme. In this regard, the project management can be externalized in accordance with provisions of the Applicant's Guide and its annexes.
EE.5	Va rog sa imi spuneti daca este eligibila dezvoltarea unei aplicatii web-based pentru telefoane mobile? Am vazut in lista cu plafonarea cheltuielilor eligibile ca apare doar "Realizare pagina web si platforma online", iar in Lista cheltuielilor eligibile apare "a) IT systems and website development, modifications and updates". Poate fi incadrata aici? La ce anume se refera IT systems?	Please tell me if the development of a web-based application for mobile phones is eligible? I have seen in the list of eligible expenditures that only "Creating the web page and the online platform" appears, and in the List of eligible expenditures it appears "a) IT systems and website development, modifications and updates". Can it be framed here? What does IT systems mean?	In regard to your question, please be informed that expenditures related to the development of a web-based application for mobile phones can be considered as eligible if it contributes to the achievement of the project objective and indicators. In case the service is not found in the list of ceilings, please be aware that according to the Applicant's Guide provisions the "projects must submit evidence about the market price of that particular item (either 3 offers from operators well-known on the market - print-screens from websites of such operators are accepted, prints from national systems on public procurements are accepted - or an independent evaluation of the cost of that particular item)".
EE.6	According to the Applicant's guide, page 36 "In case one item is not found in Annex D, the projects must submitor an independent evaluation of the cost of that particular item." Please confirm that the designer of the Technical design is independent evaluator.		In regard to your question related to presenting of an independent evaluation of a cost of an item, we would like to inform you that the designer of the Technical design may be considered as independent evaluator in case the respective person has the necessary competences and experience in elaboration of technical documentation.



EE.7	Va rog sa imi spuneti daca eligibila participare la o expozitie desfasurata in Bucuresti. Daca sunt decontabile cheltuielile presupuse de deplasare (transport etc.)	Please inform me if it is eligible to participate at an exposition in Bucharest. Could the travel expenditures be reimbursed?	costs incurred outside of the eligible area (related to any activity or any category of expenditure) shall be limited to 20% of the total eligible project budget, irrespective of the location of the partner.
EE.8	Допустимо ли е разходите за външно управление на проекта, да бъдат извършени от разходите за staff cost, които се изплащат като flat rate и които бенефициентът няма задължението да отчита и доказва, съгласно "EC Guidance on Simplified Cost Options"?	Are the expenditures for external project management eligible under budgetary chapter Staff Cost for which are paid as flat rate and for which the beneficiary is not obliged to report and to present proofs according to the "EC Guidance on Simplified Costs"?	No, the expenditures for external project management are not eligible under budget line "Staff costs". The services for external project management must be included in the budget line "External expertise and services", while the budget line "Staff costs" is dedicated only to the members of the project management team created from the employees of the respective organization/institution. In this regard, please consult Annex E - List of eligible expenditures.
EE.9	In proiect, partenerul bulgar are achizitia unui spatiu pentru derularea activitatilor proiectului si punct de informare. Din pacate partenerul bulgar a semnat pre-contractul pentru achizitia spatiului. Va rog sa ne spuneti daca, in situatia data, mai este eligibila pe proiect aceasta achizitie, dat fiind faptul ca nu a efectuat nicio plata, doar a semnat pre-contractul. Achizita acestui spatiu a incadrat proiectul la categoria hard.	Within the project the Bulgarian partner has foreseen the acquisition of building for implementation of project activities and information point. Unfortunately, the Bulgarian partner has signed the pre-contract for the building acquisition. Please inform us if in this situation the respective acquisition is still eligible, considering the fact that no payment has been made ad only the pre-contract has been signed? The acquisition of this building framed the project in the category of hard projects.	First of all, please be informed that acquisition of a building is not eligible under the "Project preparation" budget line, but it may be considered as an eligible cost if it is foreseen as an activity performed during project implementation. The final decision on eligibility will be taken by the AWG, based on actual documents provided in assessment. Depending on the actual content/provisions of the precontract signed, will be assessed the eligibility condition from the list of eligible expenditures, namely "is committed by the beneficiary after project approval by the Monitoring Committee and the last day of implementation period and is paid out by the beneficiary at the latest in 2 months after the end of the project implementation period". Still, in order to justify the price you must respect the AG requirements (independent evaluation of the costs or three offers). "Independent evaluations are to be provided only in case of special items, where 3 offers cannot be provided".



EE.10	We have signed a contract in August for consultancy in writing the full Application form. The contract is split in 2, as it follows: half of the money to be paid this month and half of the payment to be done after the decision of MC for approval the project for founding. In this case, please tell us, how should we input into budget section for "Project preparation" the amount foreseen in this contract and what amount is eligible for reimbursement?	Please be informed that according to the provisions of Annex E - List of eligible expenditures "Preparation costs are eligible if they were incurred between 1.01.2014 and the submission of the Application Form for the First and Second call for proposals and full application form submission date for the Third call". In this case, within section "Project Preparation" should be included the whole amount of the contract. As regards to the second part of the question, please note that an expenditure is incurred when the activity that has generated the expenditure has been completed or the services foreseen in a contract have been provided. By contrast, an expenditure has been paid when the corresponding amount has been debited from the accounts of the beneficiary and transferred to the accounts of the contractor. Therefore, considering the above mentioned, please be informed that costs incurred after 16.10.2017 will not be considered as eligible for budget category "Project preparation".		
EE.11	In the Annex E, p.3, it is stated that: Article 7. Project preparation costs (1) Preparation costs are eligible in amount of maximum 10% of direct costs at project level. (2) Preparation costs shall be reimbursed based on real cost principle (supported by documents) and shall include costs related to the following categories of expenditures Could you, please, explain how to justify costs for already drawn up preliminary design? What documents should we provide?	The costs related to the drawn up preliminary design can be justified in this phase of the project (Step 2 AF - full application form) by submitting relevant documents related to the commitment of such costs (e.g.: contract for elaboration of the preliminary design/technical projects, delivery - receipt protocol of the preliminary design/technical projects, other documents). During the project implementation period, if the application form will be selected and contracted for the reimbursement of the expenditures made for project preparation, you will have to also present documents such as.: invoice, payment order, etc		
	Applicant's Guide			



AG.1	I would like to ask you if it is possible to have additional partner joined to a project, selected for development at phase 2.	According to the Applicant Guide - Annex M, the partnerships can be modified in phase 2 only in case of unforeseen events and with duly justification. In this case, annexes 1-6 to the Expression of Interests (step 1) must be uploaded in the system and will be subject of administrative and eligibility check. Information regarding this aspect is included in the Applicant's Guide, Annex M (http://www.interregrobg.eu/en/calls-for-proposals/opencalls.html).
AG.2	Regarding the requirements for submission of technical documentation needed for investment projects under V-A Romania-Bulgaria Programme, third Call for Proposals, second phase, please specify the following: On page 42 (Section i. How to fill in Annexes, Annex (es) 2 to the Application Form - Feasibility studies / equivalent technical documents) it is written that "During evaluation, translations of certain elements may be required". Considering this, will you accept for the needs of the application translation in English only of the following: Bill of Quantities and summary of the Investment design, signed by the Applicant?	No, translation of any of the respective annexes may be requested by the assessors, if considered necessary.



AG.3	Представеният от нас проект само от два партньора по приоритетна ос 1.1 бе одобрен за подаване на АФ във фаза 2. Междувременно, нашият партньор получи финансиране за реконструкцията на същия пътен участък и декларираните от нас обстоятелства в Анекс А.ЕОІ 1 в частта, че финансовата подкрепа от Програмата е необходима за изпълнението на проекта стават неприложими. Това налага смяна на партньора. Същевременно, поради наличие на краен срок, ние не сме в състояние да осигурим партньор с готова документация за реконструкция на пътен участък. Нашият въпрос е дали е допустимо по правилата на програмата да подменим партньора с нов, който да участва само с меките мерки, предвидени за изпълнение в подаденото предложение във фаза 1, като се има предвид, че бюджета предвиден за партньора бе 25% от целия бюджет, а сега ще се намали още повече.	Our project submitted by only two partners under Priority Axis 1.1 was approved for Phase 2 submission. In the meantime our partner received funding for the reconstruction of the same road section and the circumstances that we declared in Annex A.EOI 1 in the part that the financial support from the Program is necessary for the implementation of the project become inapplicable. This requires a change of partner. At the same time, due to a deadline, we are unable to provide a partner with ready documentation for roadside reconstruction. Our question is whether it is permissible under the program rules to replace the partner with a new one, who to take part only with the soft measures, foreseen for implementation in the phase 1 submission, given that the budget provided for the partner was 25% of the total budget, and now it will be further reduced.	In accordance with provision of AG, partnership "can be modified in phase two only in case of unforeseen events and with duly justification". Regarding second question, please be aware that only AWG can decide on the eligibility of applicants and actions, based on the submitted full application form via e-MS.
AG.4	In section i. How to fill in Annexes, Annex(es) 2 to the Application Form - Feasibility studies / equivalent technical documents, page 42 of the Guidelines for Application, it is stated: "During evaluation, translations of certain elements may be required" 1 Considering the above, please confirm that for the application phase it is not required to translate into English the Detailed Bill of Quantities, the Explanatory notes and the graphical parts under all parts of the design, which means: they can be submitted in either Bulgarian or Romanian Language and this will be accepted by the Evaluation Committee; 2 Please, specify the certain element of the investment design, which may be required during evaluation, and give more information in what cases such translation will be required.		Please be informed that translation of any of the respective annexes may be requested by the assessors, if considered necessary.



AG.5	In section i. How to fill in Annexes, Annex 5 to the Expression of Interest - Declarations of commitment, page 41 of the Guidelines for Application, it is stated: "a Decision of Local Council regarding the project development and implementation has to be provided as well during the pre-contractual phase." Considering the above, please, conform that: 1: the Decision of Local Council regarding the project development and implementation must not be submitted in the application phase and it will be needed only in case of approval of the project, before signing of the Grant contract? 2: If the Decision of Local Council regarding the project development and implementation should be submitted in case of approval of the project, before signing of the Grant contract, when should it be issued (before the date of the application 16.10.2017 or after approval of the project		Please be aware that during phase 1 - submission of Expressions of Interest a declaration had to be submitted (Declaration of Commitment) and the actual document (decision of Local Council) will be submitted in the precontractual phase.
AG.6	ргороsal by the Evaluation Committee? Във връзка с кандидатстване на община по третата покана за подаване на проектни предложения по програма Interreg V-A Romania- Bulgaria и подготовка на пълни проектни предложения (step 2), възникна следния въпрос: В Ръководството за кандидатстване за трета покана, на стр. 44 е описано как да бъде попълнено/подготвено Annex(es) 2 to the Application Form - Feasibility studies / equivalent technical documents, като никъде не е разписано, дали трябва да бъде представен превод на английски език. В текста е описано че ,,По време на оценяването, могат да се изискват преводи на някои елементи". В такъв случай Annex(es) 2 to the Application Form - Feasibility studies / equivalent technical documents, нужно ли е да бъде представен на английски език?	Regarding the application of a municipality within the third call for proposals under the Interreg V-A Romania - Bulgaria Programme and the preparation of the full application forms (step 2) the following question has arisen: Within the Guide for the third call, on page 44 it is described how Annex (es) 2 to the Application Form - Feasibility Studies/Equivalent technical documents should be filled in/prepared but it is not mentioned if an English translation should be submitted also. Within the text it is said that "During evaluation, translations of certain elements may be required.". In this case, is it necessary Annex (es) 2 to the Application Form - Feasibility Studies/Equivalent technical documents to be submitted in English language?	No, translation of certain elements of Annex 2 to the Application Form - Feasibility studies / equivalent technical documents may be requested by the assessors, if considered necessary.



AG.7	In the Guide for the third call for proposals there is no indicative date for signing contracts with the beneficiaries who will be selected in the end of second phase. This creates confusion when fixing the exact dates for the imitation of the project. 1. What is the indicative date to sign the contracts with the beneficiaries? 2. If a delay is not caused by the fault of the beneficiaries, will the JS automatically extend the duration or should we try to foresee these circumstances?	The project duration will remain the same as the one foreseen by you within the Application form (as period of months). The project implementation period itself will start the day after the date when the contract becomes effective and this is the start date for calculating the implementation period. However, you do have the right to make expenditures immediately after the MC decision of selecting you project (full application form). Although the system inquires on precise start and end dates, relevant for signing the contract will be the period you've estimated (eg: 18 months) and not the date you have indicated in the E-MS. The start date will be, as mentioned before, the actual date of signing the contract. Therefore, even if the actual date of signing is later than the one you have estimated, the project duration actually remains unchanged. As regards the date for signing the financing contract with a beneficiary, please be informed that it will be established after the following stages will be completed: evaluation process, decision of the Monitoring Committee for financing the project and contracting phase. This data will be updated in contracting stage. The beneficiaries will be dully informed in the contracting phase, when to update the start and end date of the project.
AG.8	According to the Applicant's Guidelines: "In case of participation of Bulgarian municipalities a Decision of Local Council regarding the project development and implementation has to be provided as well during the precontractual phase." Please specify when the decision should be dated - before the submission of the AF or before precontracting after selection? Should the Local Council issue two separate decisions - one for development before submission of AF and one for implementation before contracting?	There are no provisions within the AG related to the date of issuing of the Decision of Local Council. Therefore, the decision can be annexed to the full application form (if available at this stage), but if no, the latest during the precontractual phase.



AG.9	In the Call for proposals in 2015, a traffic study was required to be submitted for transport projects. Is it still required in the 3rd call for proposals and if that is the case, is it referred to by a different name, since the phrase "traffic study" is not mentioned anywhere in the Applicant's Guide for the 3rd call?		According to the provisions of the Applicant's Guide, a Traffic Study is not requested at this stage, however please bear in mind that during the evaluation phase, the evaluators may ask for supplementary documentation, in order to clarify certain aspects.
AG.10	In situatia in care este necesara inlocuirea unui partener din proiect, avem nevoie de o aprobare prealabila a eligibilitatii acestuia? TRebuie facut vreun demers inainte de depunerea cererii de finantare (pasul 2)? Sau facem inlocuirea lui, refacem anexele aferente depuse in etapa 1 si evaluarea eligibilitatii lui se face in cadrul etapei a 2a (evaluarea intregii cereri de finantare).	In case it is necessary to replace a partner in the project, do we need a prior approval of his eligibility? Should it be made any action before submitting the application form (step 2)? Or, we make the replacement, revise the respective annexes submitted in the first stage and the evaluation of its eligibility should be made during the 2nd stage (evaluation of the full application form).	Please be aware that in accordance with the provisions of the AG, partnerships "can be modified in phase two only in case of unforeseen events and with duly justification". In case the replacement of the partner is inevitable, the annexes 1-6 to the Expression of Interests (step 1) must be uploaded in the system for the new partner and will be subject of administrative and eligibility check. In addition, please note that only AWG can decide on the eligibility of applicants and actions, based on the submitted full application form via the e-MS.
AG.11	Following the refusal of the Council of Ministers from Bulgaria to support the participation of a District Administration in a project and given the possibility in e-MS Manual to modify the section B in case of unforeseen events, the modification concerns the Lead partner which is District Administration, what steps technically have to be done - may we use the same acronym and the same account, if the area, the results and the indicators for the project, as well as the final end users and the final beneficiary are not changed?		In accordance with the provisions of the AG, partnerships "can be modified in phase two only in case of unforeseen events and with duly justification". In case the replacement of the partner is inevitable, the annexes 1-6 to the Expression of Interests (step 1) must be uploaded in the system for the new partner and will be subject of administrative and eligibility check. In addition, please note that only AWG can decide on the eligibility of applicants and actions, based on the submitted full application form via the e-MS. In case the account which submitted the EoI needs to be changed, this could be done if the beneficiaries request this modification.



F			At the time of the submission of the project, the	
	AG.12	La momentul depunerii proiectului, biserica, desi nu detinea acte de proprietatea, se gasea in administrarea comunei, ca obiectiv de cult, a carei intretinere si reparatii curente era sustinuta din bugetul local. Dupa selecarea ideilor de proiecte al celui de-al treilea call, Parohia a obtinut actele de proprietate asupra bisericii din sat. In acest caz, Parohia poate intra ca partener in proiect, fiind beneficiara directa a lucrarilor de renovare si restaurare, comuna sustinand in continuare financiar conform prevederilor legale activitatile legate de culte? Prin urmare, comuna va suporta in continuare cofinantarea pentru partea romana din proiect.	At the time of the submission of the project, the Church, although it did not own property documents, was in the administration of the commune, according to the law, as a public utility objectve, whose maintenance and repair was supported by the local budget. After the third call, the Parish obtained the ownership documents of the church in the village. So, at this time, the Parish can be a project partner, being the direct beneficiary of the renovation and restoration works, the commune is still supporting financially the activities related to the cults according to the legal provisions? Therefore, the commune will continue to support the co-financing for the Romanian part of the project.	In accordance with the provisions of the Applicant's Guide, Annex M, the partnerships can be modified in phase 2 only in case of unforeseen events and with duly justification. In this case, annexes 1-6 to the Expression of Interests (step 1) must be uploaded in the system and will be subject of administrative and eligibility check. Information regarding this aspect is included in the Applicant's Guide, Annex M (http://www.interregrobg.eu/en/calls-for-proposals/opencalls.html). Please be aware that only the Assessment Working Group can decide on the eligibility of applicants and actions, based on the submitted full application form via e-MS.
	AG.13	We have a technical document - investment design (project) - with date of elaboration 10.2014. In the Applicant's Guide for the Third Call for proposals, on p. 45, it is stated that "The Feasibility Study or equivalent technical documents should not have been elaborated or updated more than three years before the deadline for the submission of the project proposal (the document must bear the date of elaboration/revision)." In continuation of the question that was asked regarding this matter during the Info day in Pleven on 21st of September 2017, could you please confirm in writing that in this case 10.2014 will be considered as 31.10.2014 so that we meet the deadline requirements?		In regard to your question related to validity of technical documents at the moment of submission of the full application form, please be informed that your technical documentation, elaborated in October 2014 meets the deadline requirements for not being elaborated or updated with more than three years before the deadline for the submission of the project proposal, as the Applicant's Guide provides.



AG.14	According to the provisions of the Applicant Guide published for the third Call for proposals launched under Interreg V A Romania-Bulgaria Programme, when estimating the value of the equipments to be purchased, by using 3 offers, its average shoud be calculated at the Inforeuro exchange rate from the month of the deadline for the second step. Having regard to this specific provisions mentioned above, please specify us if the same rule applies for the prices/expenses mentioned within the technical documentation to be submitted together with the Application form (second step) e.g. DALI or feasibility study. More specifically, I mean to the need of use the Inforeuro exchange rate from the month of the deadline for the second step for the conversion of the respective sum which are included within the technical documentation.	, i
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AG.15	Our municipality applies with a project under PA 1. The project concerns rehabilitation and modernization of TEN-T infrastructure. The project is RO-BG 396. Our Romanian partner just informed us that they will not be able to finish their technical design services (D.A.L.I.) because of failed tender procedure and therefore they quit the project. Is it possible to change our Romanian partner under PA1? If it is possible how are we supposed to proceed?	We would like to inform you that in accordance with the provisions of the Applicant's Guide, Annex M, the partnerships can be modified in phase 2 only in case of unforeseen events and with duly justification. In this case, annexes 1-6 to the Expression of Interests (step 1) must be uploaded in the system and will be subject of administrative and eligibility check. Information regarding this aspect is included in the Applicant's Guide, Annex M (http://www.interregrobg.eu/en/calls-for-proposals/open-calls.html). Please pay attention to the fact that in case of replacing the partner with another partner within an investment project, in which the investment object is the ownership/lease of the withdrawn partner, you must make sure that the objective investment is not changed and the new partner can legally and physically take over the partner's activities related to the investment object, declared in the submitted in phase 1 Expression of Interest.
AG.16	In our project only one of the partners has a work/construction component. The other partner is involved in the project with soft activities. Preparing the detailed budget, it turns out that the budget for construction/works will be less than 50 percent from the whole project budget. Please, conform that no matter that the work/construction component is less than 50 percent, our project can be considered as hard project, having in mind the definition in the Guidelines "hard" projects (projects with works components or involving investments with a concrete impact to the cross-border area or which grants more than half of its total eligible budget to purchase of equipment).	Please be aware that only the Assessment Working Group can decide on the eligibility of applicants and actions, based on the submitted full application form via e-MS. A project with a work component is a hard project, irrespective of the value of the respective work component.



4	AG.17	Can the envisaged date for starting the project be amended? For example, we have written 2.10.2017. When trying to change it the systems gives a note that there is an existing period. This brings us to conclusions that it cannot be changed at this stage and all periods will be calculated very wrong based on it. No SAVE button was clicked. So we ask for your competent opinion.		after the date when the contract becomes effective. In this regard, although the system inquires on precise start and end dates, relevant for signing the contract will be the period you've estimated (ex: 18 months or 34 months) and not the date you have indicated in the E-MS. The start date will be, as mentioned before, the actual date of signing the contract. Therefore, you do not have to change the date for starting the project at this stage. Please be informed that the map included within Guide is only indicative and according with the provisions of the
	AG.18	Conform ghidului solicitantului vor fi finantate doar drumurile cu impact asupra granitei si care fac conexiunea intre nodurile secundare si tertiare cu infrastructura TEN-T (de baza sau cuprinzatoare). Pe harta aferenta ghidului (pe care v-o atasez) sunt marcate aceste drumuri cu verde. Intrebarea este daca sunt eligibile doar drumurile marcate cu verde pe harta sau si alte drumuri care fac legatura intre drumurile marcate cu verde?	According to the Applicant's Guide, only roads with border impact and which make connection between the secondary and tertiary nodes with TEN-T infrastructure (core or comprehensive) will be funded. On the map related to the guide (attached) these roads are marked with green. The question is, if only the roads marked with green on the map are eligible or also other roads which connect the roads marked with green?	Applicant's Guide only roads proving cross border impact and connecting secondary or tertiary nodes to TEN-T infrastructure (core or comprehensive) will be financed! In addition please be aware that the 3rd call for proposals is a two-step call, for which the Expressions of Interest (corresponding to Step 1) and full Application Form (corresponding to Step 2) will be submitted online, through the programme electronic monitoring system called e-MS. In case the expression of interest is accepted by the Monitoring Committee for step 2 of the call, the full application form is to be filled in and submitted via e-MSsystem. The system will link the Step 1 AF -expression of interest with the Step 2 AF. Only applications selected by the Monitoring Committee for phase 2 of the call, are invited/are expected to filled-in and submitted as full application form in the e-MS system and will include only those roads / section of road that are already included within the infrastructure objectives of these selected applications (at Step 1 AF - expression of interest). Also, please be informed that, according to the provisions of the Applicant's Guide and its Annexes (Annex M - e-MS Manual for applicants - call 2_step 2) the fields that have been already filled in during Step 1 AF - expression of interest can be amended only if necessary and in case of unforeseen events with provided duly justification.
	<u>Annexes</u>			



A.1	Във връзка с кандидатстването на община по третата покана за подаване на проектни предложения по програма Interreg V-A Romania-Bulgaria и подготовка на пълни проектни предложения (step 2) и по-точно изготвяне на проекти в идейна фаза, моля да ни отговорите дали е необходимо количественостойностната сметка да е подробна или да е по окрупнени показатели. В идейната фаза е трудно изготвянето на подробна КСС. Окрупнената КСС може да бъде прецизирана и детайлизирана при изготвянето на инвестиционните проекти в работна фаза.	Regarding the application of a municipality for the third call for project proposals under the Interreg V-A Romania-Bulgaria Programme and the preparation of the complete project proposals (step 2) and more precisely project preparation in the conceptual phase, please answer whether it is necessary the bill of quantities and values to be detailed or it can be based on consolidated indicators. In the design phase, it is difficult to produce a detailed Bill of Q&V. The consolidated Bill of Q&V can be refined and detailed in the preparation of the investment projects in the working phase.	According to the provisions of the Applicant's Guide, section II.3 How to apply for funding, i. How to fill in Annexes: "Annex (es) 2 to the Application Form - Feasibility studies / equivalent technical documents (only for investment projects) will be annexed to the Application Form. For Romanian beneficiaries it should be annexed: feasibility study for new investments/DALI plus energy audit plus technical expertise for upgrading/reconstruction. For Bulgarian beneficiaries it should be annexed: preliminary design (including estimation of bill of quantities and values) or technical design.
A.2	Our project is for development of a road local infrastructure - streets in RO municipality and municipal road in BG municipality, and our understanding is that a Cost benefit analysis is not required for our project - is that right?		According to the provisions of the Applicant's Guide, the Cost-Benefit Analysis is mandatory for all applications including infrastructure/investments generating any revenues as it is an evaluation instrument regarding the advantages of the investments from the point of view of all interested target groups, on the basis of the monetary values for all positive and negative consequences of the investment. In regard to the investment projects related to risk prevention and development of local road infrastructure the Cost benefit analysis is not required.
A.3	Referitor la anexele ce trebuie atasate cererii: in cazul in care proiectul prevede doar achizitia de echipamente mai precis piese de mobilier urban si amplasarea lor pe trasee turistice, deci nu intra sub incidenta cadrului legal care prevede necesitatea unui SF/DALI, mai este necesar sa atasam o Lista de cantitati si costuri, eventual cu un Plan de amplasament? Daca da, este suficient sa fie realizate aceste documente de catre Solicitant (Primarie) sau trebuie realizate de un furnizor independent din afara aparatului administrativ al Primariei?	In regard to the annexes which should be attached to the application form: in case in which the project foresees only the purchase equipment and more precisely, pieces of urban furniture and their positioning on tourist routes, therefore it does not fall within the legal framework for which is required Feasibility Study/DALI, is it still necessary to be presented a list of quantities and values, eventually together with a Positioning plan. If, yes, will it be enough this documents to be elaborated by the applicant (City Hall) or it should they be elaborated by an independent supplier from outside of the City Hall Administration.	The Applicant's Guide states that: "the works/investments, for which the national legislation does not provide for the elaboration of a Feasibility Study/DALI or investment design, the applicants, should submit a detailed Bill of Quantities and Costs accompanied by the plans and measurements of the object of intervention, used for estimating the necessary works and costs. If Bills of Quantities not provided, one clarification may be requested"



Referitor la 2 Studii de Fezabilitate intocmite in anul 2015, privind imbunatatirea utilizarii durabile a patrimoniului natural si a resurselor precum si a patrimoniului cultural, in cadrul Masurii 2 - O regiune verde.

Astfel intrucat proiectarea s-a efectuat in anul 2015 - conform HG 28/2008, va rog sa ne precizati daca acestea

trebuie sa fie actualizate conform HG 907/2017.

Two Feasibility Studies which were elaborated in 2015 regarding the improvement of the sustainable use of natural heritage and resources, as well as cultural heritage, under the priority axis 2 - A green regions. Since the design was done in 2015 - according to GD 28/2008, please let us know if they need to be updated according to GD 907/2017.

The Applicant's guide foresee that the feasibility studies or the equivalent technical documents should not have been elaborated or updated more than three years before the deadline for the submission of the project proposal (the document must bear the date of elaboration/revision). Of course, it is mandatory to observe the national relevant legislation in elaboration / revision of the abovementioned documentation. In this regard, observing the GD no. 907/2016 is mandatory, as GD no. 28/2008 is no longer in force. Still, in case your situation can be framed within the exceptions foreseen by article. 15, para. 1 of the GD no. 907/2016, than the provisions of GD no. 28/2008 will still apply.



A.5	In section i. How to fill in Annexes, Annex(es) 2 to the Application Form - Feasibility studies / equivalent technical documents, page 42 of the Guidelines for Application, it is stated: "The works/investments, for which the national legislation does not provide for the elaboration of a Feasibility Study/DALI or investment design, the applicants should submit a detailed Bill of Quantities and Costs accompanied by the plans and measurements of the object of intervention, used for estimating the necessary works and costs." On the other hand, in section III Pre-Contractual conditions, page 49, it is written: "Legal agreements/ approvals related to Annex 2, which are subject of conditioning the selection; Energetic audit of the buildings, by exception also have to be submitted the latest within this phase." Considering the above, please confirm: 1 that by Energetic audit of the buildings, you mean the DALI plus energy audit plus technical expertise for upgrading/reconstruction, required by the Romanian Beneficiaries; 2 If for the investment (initiated by the Bulgarian partner), the national legislation does not provide for elaboration of investment design, the elaboration of energy audit is not required neither in the Application phase (deadline)	In accordance with the provisions of the Applicant's Guide, "for Bulgarian beneficiaries it should be annexed: preliminary design (including estimation of bill of quantities and values) or technical design" and "for Romanian beneficiaries it should be annexed: feasibility study for new investments/DALI plus energy audit plus technical expertise for upgrading/reconstruction". Also, according to the same document "The elaboration and approval of the feasibility studies or equivalent technical documents must observe the national provisions in this matter (see Annex L Relevant national and EU legislation)".
	required neither in the Application phase (deadline 16.10.2017), nor in the Precontractual phase'.	
A.6	In by any case the feasibility study that will form the basis of the financing application is elaborated in September, 2015 and the proposed solutions do not change by updating it, in order to be in accordance with the provisions of the Financing Guide, the agreements obtained at the date of elaboration of the study are valid? We here refer especially to the agreements issued by the Ministry of Culture, which is not valid but in which it is clearly stated that it is granted "FAVORABLE OPINION" for the presented documentation, with the following recommendations"	The Applicant's guide foresee that the feasibility studies or the equivalent technical documents should not have been elaborated or updated more than three years before the deadline for the submission of the project proposal (the document must bear the date of elaboration/revision). In regard to the agreements, part of the technical documentation, please be informed that the documents should observe the conditions of legality and validity according to the national relevant legislation in force.



A.7	Is there a Programme - approved template of the "Declaration on the right of property/ concession/ administration/ rent/ loan on the land and/or building" which has to be attached to the AF or applicants shall compose the declaration in free text?		With reference to your first question, please be informed that within the Applicant's Guide and its annexes there is no such template for declaration. The respective Declaration is to be submitted during pre-contractual phase.
A.8	Regarding translation of annexes such as support letters, offers, etc. is it obligatory to provide and English translation if the documents are issued in Bulgarian or Romanian?		According to the provisions of the Applicant's Guide only Annex (es) 2 to the Application Form - Feasibility studies / equivalent technical documents could be submitted in Bulgarian or Romanian language, still translation of specific elements can be requested if considered necessary. Translation in EN for the rest of the Annexes issued in other language than EN is mandatory. Therefore, the English translation of annexes such as support letters, offers etc. has to be provided.
A.9	Am vazut ca analiza cost beneficiu se realizeaza pentru proiectele de investitii (cu exceptia celor legate de prevenirea riscurilor și dezvoltarea infrastructurii rutiere locale). Achizitionarea a doua infochioscuri reprezinta o investititie. Asta inseamna ca trebuie sa facem analiza cost beneficiu? Va rog sa ne clarificati termenul de investitie, pe acest apel.	I have seen that the Cost Benefit Analysis is made for investment projects (with the exception of those for risk prevention and development of local road infrastructure). The purchase of two info kiosks represents an investment. Does this mean that a Cost Benefit Analysis should be elaborated? Please, clarify the term of investment for this call for proposals.	According to the provisions of the Applicant's Guide: 1. Investment project - A project whose results involve the achievement of an objective by investing capital, which means that their main component is to carry out a work, without excluding the procurement of services (as consultancy or technical assistance) or goods (procurement of necessary equipment for the respective objective) related to the respective objective. 2. Cost Benefit Analysis is mandatory for all applications including infrastructure/ investments generating any revenues as it is an evaluation instrument regarding the advantages of the investments from the point of view of all interested target groups, on the basis of the monetary values for all positive and negative consequences of the investment.
A.10	Is there available an updated guideline, list of ceilings and a modified Annex M, as you announced after the CM decision on 2 nd of August? If yes, can you please help us with a link?		The updated Applicant's package including the Applicant's Guide, Annex D. List of Ceilings and Annex M. E-MS manual for applicants, was uploaded on 03.08.2017 on the programme website www.interregrobg.eu in section "Calls for proposals"/"Open calls" available at the following link: http://www.interregrobg.eu/en/calls-for-proposals/open-calls.html .



In vederea continuarii proiectului, pentru transmiterea cererii de finantare complete, va rugam sa ne precizati daca:

- in calitate de proprietar (administrator) al imobilului pe care se va construi cladirea, B2 poate sa fie responsabil cu intocmirea analizei cost-beneficiu privind investitia, precum si cu intocmirea caietului de sarcini si derularea procedurii de achizitie de servicii de realizare a studiului de fezabilitate pentru proiectul de investitii. Aceasta activitate de realizarea a studiului de fezabilitate va fi responsabilitatea B2, din comisia de evaluare a ofertelor facand parte si reprezentanti ai LB;
- studiul de fezabilitate realizat de catre B2 pentru obiectivul de investitii mai sus mentionat poate servi drept baza (tehnica, economica si financiara) pentru realizarea proiectului tehnic si al executiei lucrarii de catre liderul beneficiar. Activitatea privind realizarea proiectului tehnic si executia lucrarii va fi responsabilitatea LB, din comisia de evaluare a ofertelor facand parte si reprezentanti ai B2 si se va desfasura dupa ce LB va deveni administrator al imobilului.

With reference to the continuation of the project, submission of full application form, please let us know if:

- the B2, in its' capacity of owner of the property where the building will be constructed, can be responsible for the elaboration of the Cost -Benefit Analysis regarding the investment, as well as for drawing up the specifications and carrying out the procedure for the acquisition of services for the elaboration of the feasibility study for the investment project. For the activity of elaboration of the feasibility study responsible will be Beneficiary 2 and within the commission for evaluation of offers there will be representatives of the Lead Beneficiary;
- the feasibility study, elaborated by Beneficiary 2 for the above mentioned object of investment can serve as the basis (technical, economic and financial) for the technical project and the execution of the works by the Lead Beneficiary. The activity of elaboration of the technical project and execution of works will be the responsibility of the Lead Beneficiary, within the commission for offers, evaluation of being included representatives of Beneficiary 2 and will be carried out after the LB will be the administrator of the property.

Please be informed that according to the provisions of the Applicant's Giude:

- The Cost benefit analysis is not required for investment projects related to risk prevention and development of local road infrastructure.
- For investment projects, the Documents certifying the right of property/ concession/ administration/ rent/ loan on the land and/or building and English translation (if issued in other language than English) will be presented in the pre-contracting phase, at the latest in one month after selection. In case the documents are not presented in the deadline, the Managing Authority may decide to reject the projects. When submitting the application form, the LB will declare that the partners have the necessary rights (see above) on the land and/or building. For investment projects, the applicants must prove during pre-contractual phase they hold a right under the property law over the land and/or building by the following documents:

The applicant is the owner of the land and/or building: for public authorities:

- the legal act (e.g. government decision, law, government ordinance, decision of local counties, Council of Ministers Decrees etc.) stating the public property on the land and/or building;
- documents related to the registration of property of the respective applicant on the land and/or building in the relevant public registers.

The applicant has received the land and/or building in concession or holds any other right under the property law: for public authorities:

- the legal act (e.g. government decision, law, government ordinance, decision of local counties, contracts etc.) proving the concession or the real property right; it must be proved that the duration of the concession or the real property right of the land is in line with the provisions of article 71, paragraph 1 from



			Regulation 1303/2013 and that the owner has given its
			written agreement saying that the applicant may perform
			the investment.
			- declaration from the land and/or building owner that the
			land and/or building is:
			o free of any encumbrances;
			o not the object of an pending litigation;
			o not the object of a claim according to the
			relevant national legislation.
			- documents related to the registration of the land and/or
			building in the relevant public registers - to be submitted
			before contracting of the project."
			In regard to your request to specify if the Beneficiary 2 can
			be responsible for development of technical documentation
			for construction of the center, please be informed that
			being the current owner of the land on which the building will be constructed, the Beneficiary 2 can develop the
			documents. After the Lead Beneficiary will become the
			owner of the land in question, the realized technical
			documentation must be handed over to them.
	Applicant's Guide, Item II.3.i. How to fill in Annexes,		assumentation must be nanded over to them.
	Annex 1 to the Application Form - Cost-Benefit Analysis,		
	page 41.		As the project involves reconstruction and restoration of
	The project involves reconstruction and restoration of two		two buildings - one at the Bulgarian side and another at the
A.12	buildings - one at the Bulgarian side and another at the		Romanian side, the both buildings being separate
7.4	Romanian side. Do we need to prepare and submit cost-		investment objects, you must prepare and submit cost-
	benefit analyses for each of these building, or it should be		benefit analyses for each building and not for the whole
	for the whole project in general?		project in general.
	Tor the whote project in general:		
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A.13	Applicant's Guide, Item II.3.i. How to fill in Annexes, Annex(es) 2 to the Application Form -Feasibility studies / equivalent technical documents, pages 41-42. For projects involving infrastructure works it is required to submit at least a feasibility study/DALI for RO beneficiaries and preliminary design - for BG beneficiaries. The Applicant's Guide requires that these documents "should be accompanied by the legal agreements and approvals". The question is whether it is meant to submit at this phase of application also the permit for construction?	In accordance with the provisions of the Applicant's Guide for the third call for proposals the Feasibility Study or equivalent technical documents should be accompanied by the legal agreements and approvals. In case legal agreements and approvals are not submitted together with the Feasibility study/equivalent technical documents, the respective agreements/approvals will be subject of conditions for signing the subsidy contract. All the documents subject to conditioning of signing of the subsidy contract that will be notified within the Notification for selection under conditions must be provided within the deadline indicated by the JS in the notification letter for selecting projects.
A.14	Applicant's Guide, Item II.3.i. How to fill in Annexes, Annex 5 and 6 to the Application Form, page 43. It is not clear what is the difference between the required information or documents submitted under Annex 5 - Environmental Impact Report and Annex 6 - Environmental Impact Study? If only a description of the estimated impacts on the environment is required under Annex 5, what is the format of presenting the information or it is free format? If Annex 6 is the Environmental Impact Assessment itself, it is stated that it is not necessary to present it at the application stage, but later at the pre-contracting negotiations stage if the project is selected for financing. Is our understanding correct?	In regard to your next question please be aware that the format of presenting of the description of the project's impact on the environment (Annex 5 to the Application Form - Environmental Impact Report), which must be submitted together with the Application Form, is not predetermined. In relation to presenting of Annex 6 to the Application Form - Environmental Impact Study, considering the following provision of the Applicant's Guide "For the applications which need a study containing data on the estimated impact on the environment of the investment project as required by the national legislation, the submission of the document



A.15	The Bulgarian partner is preparing an infrastructural project, with the respective technical documentation - technical design in our case. We are worried that for the time of sumbission of the project we may not have the construction permit entered into force, because the precedure for the construction permit to enter into force in Bulgaria takes a period of 14 days. Please confirm that at the time of submission of the project you will accept if we provide only the issued construction permit (not entered into force). And during the pre contractual phase, is we are selected, we can provide the construction permit entered into force.	In accordance with the provisions of the Applicant's Guide for the third call for proposals the Feasibility Study or equivalent technical documents should be accompanied by the legal agreements and approvals. In case legal agreements and approvals are not submitted together with the Feasibility study/equivalent technical documents, the respective agreements/approvals will be subject of conditions for signing the subsidy contract. All the documents subject to conditioning of signing of the subsidy contract that will be notified within the Notification for selection under conditions must be provided within the deadline indicated by the JS in the notification letter for selecting projects.
A.16	My question description is: - inside the Guide the following annexes are described at page 55: A. AF 5. Environmental Impact Report (if the case); A. AF 6. Environmental Impact Study (if the case) - in the body of standardized files (downloadable) there is a file called "A AF 6 - Environmental impact report " My concerns/question is = The latter file ("A AF 6 - Environmental impact report") is referring to A. AF 5. Environmental Impact Report (if the case)? OR "A AF 6 - Environmental impact report " is in fact the structure A. AF 6. Environmental Impact Study (if the case)? - I ask you because there is the word "report" allocated to NUMBER AF6 (in standard files) but in the same time it is allocated to NUMBER AF5 (in guide) instead to AF6 as would be normal in order to keep the numeration.	In regard to your question, we would like to inform you that the names of the annexes (Annex AF 5. Environmental Impact Report and Annex AF 6. Environmental Impact Study) inside the Applicant's Guide are reversed. Therefore, the file AF 6 - Environmental impact report is actually referring to the Annex AF 6. Environmental Impact Study from the Guide.



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A.17	In the Applicant's Guide for the Third Call for proposals, on p. 45, it is stated that "The Feasibility Study or equivalent technical documents should not have been elaborated or updated more than three years before the deadline for the submission of the project proposal (the document must bear the date of elaboration/revision)." Please tell us if the same requirement applies to the designs (projects) such as investment designs/projects, detailed technical designs, preliminary designs, etc.? In case the abovementioned applies to the designs, please tell us which date on the document is considered the final date from which we count three years back - the date indicating when the document was elaborated or the date indicating when the document was approved by the Chief Architect of the Municipality?	According to the provisions of the Guide from page 27 "The feasibility studies or the equivalent technical documents shall be prepared/updated with maximum 3 years before the application form submission date.", apply for all types of technical documentation. The final date from which the 3 years should be counted, is the elaboration date of the document - page 42 "The Feasibility Study or equivalent technical documents should not have been elaborated or updated more than three years before the deadline for the submission of the project proposal (the document must bear the date of elaboration/revision).
A.18	If a beneficiary provides Annex 4 to the Application Form - Environmental agreement - an official statement/act from the competent environment authority stating that the investment project observes the legal provisions of environment protection (For Bulgarian beneficiaries - a letter from the competent body that a procedure under chapter VI of the Environment Protection Act is not required), does this mean that the beneficiary is not required to provide Annex 5 - Environment Impact Report and Annex 6 - Environment Study Impact?	The provisions of the Applicant's Guide from page 43: "Annex 5 to the Application Form - Environmental Impact Report (mandatory for applications including infrastructure related activities) and English translation (if issued in other language than English) will be annexed to the Application Form." and "Annex 6 to the Application Form - Environmental Impact Study (for applications including infrastructure related) and English translation (if issued in other language than English) will be annexed to the Application Form. The Bulgarian beneficiaries have to present the Environmental Impact Assessment (if necessary according the Bulgarian legislation). According to the provisions of AG Annexes 5 and 6 are required in case a study containing data on the estimated impact on the environment of the investment project as required by the national legislation is needed. The letter that a procedure under chapter VI of the Environment Protection Act "ECOLOGICAL ASSESSMENT" and ENVIRONMENTAL IMPACT ASSESSMENT and ENVIRONMENTAL IMPACT ASSESSMENT as not required issued by the competent body verifies that a study containing data on the estimated impact on the environment of the investment project is not required.



A.19	Моля да уточните дали има таван на разходите за проектиране на туристически атракциони и в случай, че да - как точно е формулиран той в Annex D List of ceilings, тъй като там фигурират тавани за услуги по проектиране и конструиране на системи за контрол и управление на движението, геоинженерни и топографски услуги?	I am kindly asking you to specify if there is a ceiling for the expenditures for design of tourist attractions and, if so, exactly how is it formulated in Annex D List of ceilings, as there are ceilings for design and construction services for traffic control and management systems, geoengineering and topographic services?	According to the provisions of the Applicant's Guide in case one item is not found in Annex D, the projects must submit evidence about the market price of that particular item (either 3 offers from operators well-known on the market - print-screens from websites of such operators are accepted, prints from national systems on public procurements are accepted - or an independent evaluation of the cost of that particular item).
A.20	In the Guidelines for project implementation it is said that "in case equipment is not on the list or beneficiary duly justifies enhanced/superior technical specifications for an item, 3 offers or an independent evaluation of the cost will be provided. Independent evaluations are to be provided only in case of special items, where 3 offers cannot be provided. They are provided by an expert, a person that has the know-how on that particular item" In or case, we have planned activities which are not included in the list with list of Ceilings for expenditure), namely a festival and a interactive web based platform (virtual museum), for which we have to provide either offers, or independent evaluation of the costs. Considering this, please explain: How detailed do you expect the offers for the festival to be? Is it enough to specify the number of the days of the festival, the global price for the needed materials and the budget for the engaged groups/artists? How detailed do you expect the offers for the web based platform to be? Is it enough to specify the number of experts and working days		According to the Applicant's Guide there is no rule regarding the content and how detailed offers should be.



A.21	In case of organization of festival and web based platform please explain, what do you expect the independent evaluation of the cost to be like?	The provisions of the Guide regarding this question are "In case the service which is going to be purchased is not following the list of ceilings, the proposal to exceed the ceiling will be analysed, when a proper and clear justification is provided, as well as the related supporting documents (including 3 offers or an independent evaluation of the cost). Independent evaluations are to be provided in case of special items, where 3 offers cannot be provided. They are provided by an expert, a person that has the know-how on that particular item.
A.22	If possible, I kindly ask for a support answer. Description: E.g. One museum has own buildings and access tickets. The museum intends to build a new hall annex with the following specific aspects (please consider as an case study): it uses an entrance path into the hall annex, using a door from the old buildings; it will be used for e.g. workshops that are not charged upon participants it will present some collections periodically a possible maximum revenue of 20k RON (is estimated due to 2000 visitors that visits both old buildings and also the new hall annex and the ticket is RON 10). cost of construction at 400k eur operating cost are obviously above the possible revenue (from entrance tickets) So: Could this situation as a non-generating investments, because "generating revenues which are consistently lower than operating costs during the whole reference period"?	According to the provisions of the Applicant's Guide in the preparation phase, in the applicanton form, the applicants shall mention if their project is revenue generating (project revenues comprise cash inflows from private users (i.e. not including availability payments made by the procuring authority) for the use of the service (or part of the service) provided by the project, as well as any cash from the sale or rent of buildings. Therefore, it has to be determined and justified by the beneficiaries in the Application Form whether the project has positive or negative net revenue. If a project's revenue is less than its operating costs (i.e. negative net revenue), the project is no longer considered a revenue-generating project (independent of whether or not the infrastructure asset has a positive residual value). The project's generated net revenues are deducted from the investment cost, thus establishing the eligible costs of the project. The project's budget included in the application form shall not include the net revenue. Net revenue shall be mentioned however, in the application form. In case the beneficiary estimates that no net revenue is produced by its project, then the project will be declared as non-revenue generating. However, if any revenue is generated, the Cost-Benefit Analysis, proving that there are no net revenues has to be submitted! In the implementation phase, a monitoring of the generated revenues shall be done throughout the implementation period of the project or for the next 3 years following the completion of the project.



A.23	I have question regarding third call. My question is If one of the two partners has envisage a work component in the project, but the other one do not envisages a work component, only a soft measures. In this case is necessary to present a Cost Benefit analysis both partners, or is necessary only partner who have a work component in his activity to present a Cost Benefit analysis	interested target groups, on the basis of the monetary values for all positive and negative consequences of the investment. In this regard, considering your question, please be informed that the Cost-Benefit Analysis is
A.24	Please advise whether we need to submit again in the eMS system the declarations and the partners legal documents that were already submitted during the first step. Do partners need to re-sign the declarations again? In case the project is soft and does not have an investment part, i.e. the annexes related to cost-benefit analysis, environmental permissions and studies, documents for ownership of land are not applicable, do we need to upload anything else in this section besides the already uploaded declarations and legal documents (in case it is not necessary to re-upload them again)?	dectarations and the partners tegat documents, these documents being already submitted in the first stage and assessed by the Assessment Working Group. In regard to the other obligatory annexes needed to be presented at second stage, please be informed that in case of a soft project you should present only those annexes requested for soft projects (for example: Annex 7 to the Application Form - Overview of the equipment, services and works to be purchased). The Appears 1 - 6 to the



A.25	Ще кандидатстваме с изготвен идеен проект. Апликационната форма предвижда дейност Инженеринг, която включва разработване на технически/работен проект. В този случай, изисква ли се предоставяне на разрешение за строеж или е възможно това разрешение за строеж да бъде издадено след стартиране на проекта, съответно разработване на технически/работен проект.	We will apply with an elaborated preliminary design. Within the Application form is envisaged an activity Engineering which includes the elaboration of a technical/working design. In this case is it required a building permit or is it possible this building permit to be issued after the beginning of the project, respectively after the elaboration of the technical/working design.	In accordance with the provisions of the Applicant's Guide, the "Annex 3 to the Application Form (RO beneficiaries only) - Urban planning permit (mandatory for applications including infrastructure related activities - only Romanian beneficiaries) will be annexed to the Application Form. Only Romanian beneficiaries have to submit the urban planning permit." Further, considering the provisions of the Bulgarian national legislation in force, Special Planning Act, art. 142, para (1): The investment projects are subject to consultation and approval and are grounds for issuance of a building permit, the building permit shall be submitted after the elaboration of the technical documentation during the project
A.26	We would like to kindly ask you a question regarding Cost-Benefit Analysis. If there is a project on Axis 3, with no infrastructure works, but with procurement of specific equipment for intervention in risk situations, do we have to submit a Cost-Benefit Analysis?		implementation. Please be informed that Cost benefit analysis is not required for investment projects related to risk prevention and development of local road infrastructure. The Cost-Benefit Analysis is mandatory for all applications including infrastructure/investments generating any revenues as it is an evaluation instrument regarding the advantages of the investments from the point of view of all interested target groups, on the basis of the monetary values for all positive and negative consequences of the investment.
A.27	In the COST BENEFIT ANALYSIS there is a paragraph recommending "The time horizon to be considered for the financial analysis of projects financed under this priority axis is recommended to be 20 years." - but in the to Annex 1 to Commission Delegated Regulation (EU) No. 480/2014, the Reference period is 15 years. So, in your view, the time horizon for analysis should be 20 years (as recommended in the template) or 15 years (as Annex 1)? Or I misinterpreted something and I really need support to clarify such aspects.		Please be informed that the paragraph "The time horizon to be considered for the financial analysis of projects financed under this priority axis is recommended to be 20 years." within Annex 1. Cost Benefit Analysis to the full application form is a recommendation, as you mentioned yourself. However, in order to establish the reference period of the financial analysis of projects, please be informed that you should refer to Annex 1 to the Commission Delegated Regulation (EU) No. 480/2014, this aspect being indicated within Annex 1. Cost Benefit Analysis.



A.28	If we want to include an expert in our project, in budget line external expertise , for example an infrastructural expert, do we have to submit 3 offers for the formation of his/her payment	In regard to including of an infrastructural expert in the project, in the budget line "External expertise and services", please be informed that such service is included in Annex D. List of ceilings. However, in case the service which is going to be purchased is not following the list of ceilings, then the proposal to exceed the ceiling will be analyzed, when a proper and clear justification is provided, as well as the related supporting documents (including 3 offers or an independent evaluation of the cost). The proposal will be analyzed and will be subject to acceptance / rejection from the evaluators.
A.29	Is the Partnership Agreement a mandatory document to be presented on this stage of application (16.10.2017) or it will be only required after the approval of the project on the 2nd stage?	No. The Partnership Agreement is not obligatory to be presented on this stage - submission of the full application form. The Partnership Agreement that stipulates the rights and duties of the partners must be signed by all partners in a project before the signing of the subsidy contract with the MA. The partners may decide, with prior agreement of the MA, to stipulate additional or more restrictive provisions than those mentioned in the model partnership agreement. A model of partnership agreement (Annex J) is annexed to the Applicant's Guide, available on the programme website.



A.30	We have construction works on a landslide and we would like to know if we need to have an official agreement of the technical project or compliance assessment report and permit for works on this stage. We have a technical project: which part of it do you want to attach to the application on the 2nd stage? What other documents do you need related to the technical project? Which information is mandatory to be translated in English as we have all documents in Bulgarian.	the legal agreements and approvals. In case legal agreements and approvals are not submitted together with the Feasibility study/equivalent technical documents, the respective agreements/approvals will be subject of conditions for signing the subsidy contract. All the documents subject to conditioning of signing of the subsidy contract that will be notified within the Notification for
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Only Romanian beneficiaries have to submit the urban planning permit". Therefore, it is not obligatory at this stage to attach the document to the full application form. 4. Other documents - the Application Form. Environmental Impact Report (mandatory for applications including infrastructure related activities) and English) will be annexed to the Application Form - Environmental Impact Study (for applications including infrastructure related activities) and English) will be annexed to the Application Form - Environmental Impact Study (for applications including infrastructure related) and English) will be annexed to the Application Form - Environmental Impact Study (for applications including infrastructure related) and English) will be annexed to the Application Form. The Bulgarian beneficiaries have to present the Environmental Impact Assessment (if necessary according to the Bulgarian legislation)". In case the equipment is a component part of the investment project and described in the General Estimate, then it is not obligatory also to be separately described in Annex A.7. Overview of the equipment services and works to be purchased by each beneficiary, because their value will be part of the total investment object, then it must be detailed within Annex A.F. 7?			Only Romanian honoficiaries have to submit the urban
stage to attach the document to the full application form. 4. Other documents - the Applicant's Guide states that: "Annex 5 to the Application Form - Environmental Impact Report (mandatory for applications including infrastructure related activities) and English translation (if issued in other language than English) will be annexed to the Application Form." and "Annex 6 to the Application Form - Environmental Impact Study (for applications including infrastructure related) and English translation (if issued in other language than English) will be annexed to the Application Form. The Bulgarian beneficiaries have to present the Environmental Impact Assessment (if necessary according to the Bulgarian legislation)". In case the equipment is a component part of the investment project and described in the General Estimate, then it is not obligatory also to be separately described in investment activities, the necessary equipment, such as delivery of air conditioning equipment, sound system, video wall, etc., is also provided. Is this equipment needed to be described separately in Annex AF 7? In case the equipment is expective annex). In case the equipment is not related to the investment object, then it must be detailed will be part of the total investment object, then it must be detailed to the investment object, then it must be detailed			
4. Other documents - the Applicant's Guide states that: "Annex 5 to the Application Form - Environmental Impact Report (mandatory for applications including infrastructure related activities) and English translation (if issued in other language than English) will be annexed to the Application Form." and "Annex 6 to the Application Form." and "Annex 6 to the Application Form." Environmental Impact Study (for applications including infrastructure related) and English translation (if issued in other language than English) will be annexed to the Application Form. The Bulgarian beneficiaries have to present the Environmental Impact Assessment (if necessary according to the Bulgarian legislation)". In case the equipment is a component part of the investment project and described in the General Estimate, then it is not obligatory also to be separately described in Annex A.7. Overview of the equipment services and works to be purchased by each beneficiary, because their value wall, etc., is also provided. Is this equipment needed to be described separately in Annex AF 7? 4. Other documents - the Application Form - Environmental Impact Assessment (if issued in other language than English) will be annexed to the Application Form. The Bulgarian beneficiaries have to present the Environmental Impact Assessment (if necessary according to the Bulgarian legislation)". In case the equipment is a component part of the investment project and described in the General Estimate, then it is not obligatory also to be separately described in Annex AF 7. Overview of the equipment services and works to be purchased by each beneficiary, because their value will be part of the total investment object (marked with W in the respective annex). In case the equipment is not related to the investment object, then it must be detailed			
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			within Annex 7.



A.32	Annex AF 6 from Applicants Guide for 3rd call- 2 august 2017 (the template) is actually Annex 5 to the Application Form - Environmental Impact Report (mandatory for applications including infrastructure related activities) and English translation (if issued in other language than English) will be annexed to the Application Form. (page 46 of 56 of Guide)?	Please be informed that similar question has been previously answered and included within the list of questions and answers available on the Programme website (please see questions and answers A14, A16, A18 at http://www.interregrobg.eu/images/fisiere/calls/call%203 %20QandA%202/List%20of%20QA%20-%203rd%20call%202nd%20step%2003%2010%202017.pdf). According to these, Annex 5 to the Application Form - Environmental Impact Report (mandatory for applications including infrastructure related activities) and English translation (if issued in other language than English) and "Annex 6 to the Application Form - Environmental Impact Study (for applications including infrastructure related) and English translation (if issued in other language than English) will be annexed to the Application Form. The Bulgarian beneficiaries have to present the Environmental Impact Assessment (if necessary according the Bulgarian legislation). Also, we would like to underline the fact that, as previously answered, the names of the annexes (Annex AF 5. Environmental Impact Report and Annex AF 6. Environmental Impact Study) inside the Applicant's Guide are reversed. Therefore, the file AF 6 - Environmental impact report is actually referring to the Annex AF 6. Environmental Impact Studyly from the Guide. Please be informed that for the works you will check the
A.33	Regarding filling in Annex 7- Overview of E,S,W- which column should we put a check mark in for different works? (land preparation works, utilities, site organisation-expenditures estimated in Feasibility study, cost standards)	column "independent evaluation" as the estimated values will be based on the technical documentation for the respective infrastructure works (Feasibility study, DALI, preliminary design, technical design, etc.). There is no need for breakdown of the different category of works included within the general estimate of the investment works.



A.34	Изисква ли се да бъде описано СМР в Анекс АБ 7 и към него да бъдат приложени 3 оферти, при положение, че към апликационната форма се прилага идеен проект с Количествено - стойностни сметки, които се използват като база при изготвянето на бюджета?	Is it necessary to describe the construction works in Annex AF 7 and to submit 3 offers, given that a preliminary design is attached to the Application form with bills of quantities and values, which are used as the basis for the budget preparation?	Within Annex A.7. Overview of the equipment, services and works to be purchased by each beneficiary, you should provide the total amount of the construction works (per services - if you foresee to modernize/renovate/rehabilitate more than one object). As regards your question whether three offers should be attached to the Annex A.7, it is not necessary to present them provided that the Bill of quantities will be attached to the preliminary design.
A.35	In cadrul implementarii proiectului se propune realizarea unei constructii reprezentand "Amplasament dropie" pentru care se demareaza procedura de obtinere a certificatului de urbanism (C.U.). Conform procedurilor si termenelor ce vizeaza obtinerea C.U. suntem in imposibilitate de a ne incadra pana la data de 16.10.2017 cu obtinerea C.U., dar putem anexa dosarul constituit si depus pentru obtinerea C.U. Intrebarea punctuala este: putem depune doar cu documentatia tehnica pentru C.U. si dovada (numar de inregistrare) depunerii pentru obtinerea acesteia la forul competent?	representing a "Drop location" (Amplasament dropie) is foreseen for which the procedure for obtaining the urban planning permit is started. According to the procedures and deadlines related to obtaining the urban planning permit we will not be able to obtain the permit until 16th of October 2017, still, we can attach the file which we have submitted in order to obtain the urban planning	According to the Applicant's Guide provisions, the "Annex 3 to the Application Form (RO beneficiaries only) - Urban planning permit (mandatory for applications including infrastructure related activities - only Romanian beneficiaries) will be annexed to the Application Form. Only Romanian beneficiaries have to submit the urban planning permit.



A.36	Am dori sa ne comunicati forma in care putem incarca pe platforma documentatia tehnica legata de infrastructura. Partea desenata cuprinde un numar mare de planse, iar acestea sunt de asemenea intr-un format fizic de mare dimensiune (A2, A1, A0). Programul de proiectare (autocad) ne poate furniza plansele direct in format pdf, dar bineinteles acestea nu sunt semnate. Plansele listate si semnate de specialisti ar putea fi scanate, dar rezulta fisiere de mari dimensiuni, iar intreaga documentatie devine uriasa. Va rugam sa ne spuneti daca putem incarca partea scrisa cu semnaturi, in format pdf, iar partea desenata in formatul pdf furnizat de softul de proiectare si nesemnate, iar documentatia originala, cu semnaturi, sa existe la sediul Beneficiarului, putand fi consultata si confruntata in orice moment. Regarding Annex 7, we have the following question:	We would like to know how to upload the technical documentation related to the infrastructure on the platform? The part of the designs contains a large number of drawings which have large dimension themselves (A2, A1, A0). The design program (autocad) can provide the plans directly in pdf format, but of course they are not signed. Drawings listed and signed by specialists could be scanned, but the scanned files will be with big dimension, and the entire documentation becomes huge. Please tell us if we can upload the written part with signatures in pdf format provided by the design software and unsigned, and the original documentation, with signatures, can be found at the Beneficiary's headquarters and can be consulted and confronted in any moment.	Please be informed that the technical documentation should be accompanied by the legal agreements and approvals, as the Applicant's Guide foresees. As regards your proposal the original technical documentation to be available at the headquarters of the beneficiary "in order be consulted at any time", please be informed that this option is not in line with the rules applicable for this call for proposals.			
A.37	Which of the three options in Annex 7 - Ceiling (Annex D), 3 offers, Independent evaluation should we check as a basis for estimating the value of construction works given that we have a drawn up Bill of quantities part of the preliminary design?		Please be informed that for the works you will check the column "independent evaluation" as the estimated value will be based on the Bill of Quantities, part of the preliminary design."			
A.38	My question is related to "Annex 7 to the Application Form - Overview of the equipment, services and works to be purchased". Is there a need for it to be signed and stamped by beneficiary representative?		According to the Guide the annexes should be signed and stamped by the legal representative of the lead beneficiary or of the beneficiary to which the annex refers (in case of annexes which should be annexed for each beneficiary) or by an empowered person (a letter of empowerment will be attached), where the format of the annexes requires. There is no such requirement in case of Annex 7 (the template does not foresee for signature or stamp).			
		<u>e-MS</u>	e-MS			



eMS.1	In the eMS the fields, where information has been already filled in during Phase 1, are unlocked for editing. In the Applicant's Guide third call, p. 39 it is written that they can be amended "Only if necessary". How should we understand that? Does this mean that we can add text, delete text or edit the current text and how will this influence the evaluation process of Phase 2?	According to the provisions of the Applicant's Guide and its Annexes (Annex M - e-MS Manual for applicants - call 2_step 2) the fields that have been already filled in during phase 1 can be amended only if necessary and in case of unforeseen events with provided duly justification. Please be aware that based on the information provided by you in the first step your Eol has been assessed and recommended for step 2. Therefore, the information cannot be deleted or added without having a dully justification of what imposed the modification proposed.
eMS.2	If the equipment which will be purchased under the soft project is 15 %, must to be created "Investment"Work Package?	According to Annex M - e-MS manual for applicants, there are five different types of WPs to be used by the project for activities planning and the Investment work package is mandatory only for hard projects with works components.
eMS.3	In the e-ms, when you click on the Application forms for the projects under PA 1, you see Application form version 0 next to the name of the project and when you click on the Application forms for the projects under PA 2, you see Application version 1 next to the name of the project. Does this mean that there are differences in the application forms, depending on the type of the project axes? If, yes, could you, please point out what the differences are and if they are indicated anywhere in Annex M e-ms manual for applicants?	The number of the version is irrelevant from the applicant point of view. For your information, the system may create more versions of a document, depending on the type of actions that were taken inside the system during different stages. However, the system is built in such a way that it is allowing users to work only on the last version of documents, so it is a certainty that you are now working on the application form version that was approved after Step 1 of the call (irrespective of the version number that is shown on the screen).



eMS.4	In the Work package/Activities list there is an obligatory Work Package Communication, where according to the instructions from the e-MS Manual for Applicants we are expected to describe the following activities: - Start-up activities including communication strategy - Publication(s) - Public Event(s) - Promotional material - Digital activities Our project plans to create a tourist attraction - museum in or case, and apart from the construction activities, we plan to implement promotional activities, aiming to popularize the museum (web site of the museum, catalogue with exponents, etc.). We also have planned to prepare tourist packages, which to be published on brochures and maps. Please explain if we have to include these promotional activities in WP Communication, or you would accept if they are described in the WP Implementation, following the logical sequence of the activities. We have planned to implement another type of communication activities, aiming to popularize the project - press conference, brochures for the project etc., which will be included in WP Communication.		Considering that the e-MS logic is to separate the communication activities from the other activities, it is best to respect this logic. You can link the communication activities with the other activities by mentioning their correlation in the description field.
eMS.5	Необходимо ли е инвестиционната компонента да присъства както в пакет I (Investment), така и в пакет T (Implementation) или е достатъчно да бъде описана само в WP I (Investment)?	The investment component must be described only in the WP Investment or it has to be submitted in both work packages Investment and Implementation?	·
eMS.6	For each activity what does Target Value stands for? The amount/value of the activity in EUR or the quantity (how many times we plan to make this activity)? Ex.: If our activity is: Project meetings for precise definition of the tasks of the team members The target Value must be EUR amount or quantity of meeting?		The target value from the activities section is for the deliverables/services/equipment/works and it refers to the quantity of the respective item and not to the amount of the activity. Please consult Annex M. E-MS manual for applicants, Section D. Workplan.



eMS.7	We are writing to you because we are not able to access e-MS system, as you can see in the attachment. We think that it is an error on server as we couldn't find on your website an announcement regarding this issue.	This type of error may have appeared during Friday due to some firewall/server issues, but only for a matter of seconds. Access into the system is possible after a refresh in this situation. If you still encounter any other difficulties in connecting to the eMS, please let us know.
eMS.8	We have problems with eMS, which is happening to our partners also. We can not save that information in the system and some texts disappeared. With different words, we introduced last days few texts and some paragraph just disappeared. Also, when we are trying to add some text into the system, even if it is typing or copy-paste from word document, and we press save button, the information are not saved. We tried for very many times to save some small sentences and we weren't ale to save them all.	In regard to the difficulties encountered in the e-MS, please be advised of the following: 1. Try saving the filled in information step by step, since this is what commonly triggers such an error. 2. Try using Firefox browser, since that as well might solve the problem.
eMS.9	What shall we input in the field "Unit Type"? Shall we input for example "number", "days" or to enter for example "Accounting service", "Training organization", etc. Or the code from Annex D?	The field "Unit type" refers to the type of unit the service/equipment will be measured, however considering that you will insert a general budget it is hard to include all unit types, therefore it is not mandatory to fill in the respective field. However, "please be aware that the budget should be filled in with enough details in the Comment section for the Joint Secretariat to be able to assess if the budget is realistic and if it links to the activity plan" (Annex M).
eMS.10	Is it obligatory to add only deliverables with a value? Can we add a deliverable with no corresponding budget? For example if we put a deliverable "7 project reports" or "Project implementation plan and monitoring plan", things we implement and deliver but have no costs budgeted for them and are done by the project staff?	According to Annex M "project deliverables = the physical evidence of what has been produced through an activity or the physical evidence/support of the project main output that was produced through an activity". Within the Activities section, for each Work Package you need to describe each deliverable, regardless of the fact that it is budgeted or not. The target value of each deliverable refers to its quantification, not the budget.



eMS.11	I am writing to you as I found a big problem while was reading the pdf of the project. In pdf, at WP, between outputs and activities appear: target groups per main outputs and durability and transferability of main outputs. If I am looking into the system, I cannot find anywhere those sections to be able to fill them, as you can see in the attached prt screens. Also, I cheeked annex M and couldn't find any refer to those sections How can I fill in those sections?	Please be informed that there is no issue in e-MS regarding the aspect presented. Our programme does not require the applicants to link the outputs with the target groups, therefore the target groups are described separately in the system under section "Workplan - Target Groups", for evaluation the assessors will check the information within that section. The generated PDF file of the Application is general and it applies to all Programmes, therefore there might be some sections which might be left blank as opposed to what appears in the system.
eMS.12	I've attached a printscreen with the budget-in progress. Please tell us how can we introduce multiple expenditures for the same period? The system allows just one expenditure per period, but in the same period we have also transportation expenditures and accomodation expenditures for the respective budget line. To say the least, on other budget lines we have to introduce 5-6 different expenditures in i Period for the respective partner. How do we proceed? We make an amount and in the comment box we explain each expenditure?	Please take into consideration the provisions of Annex M to the Applicant's Guide, Section E - Budget: "The budget is shown in the system from three different aspects: 1. the budget lines + WP/activities, 2. Budget lines + project implementation periods and 3. Project implementation periods + WP/activities. You must fill in the budget only from perspective 1. When filling in the table, the e-MS will transfer the information to the other two tables as well." Therefore, after defining the reporting periods, please fill in only the first table from the budget section of e-MS, there you will insert data for each budget line per period. However, the e-MS system does not require you to insert each expenditure, the amounts included in the respective table should be the sum of all expenditures for each budget line, activity and period. It is not a detailed budget of the expenditures."
eMS.13	For a project having both eligible and non-eligible expenditures, Annex M e-MS manual for applicants - call 3_Step1 and Step 2 states that we should mention the non-eligible value within the section Project Focus. Our question is: the non-eligible value is to be mentioned only in the Section Project Focus, or we should include it also in the Budget section? And if we must included it within the Budget section how will we calculate the contributions?	Please be informed that the non-eligible expenditures should be described only in section "Project focus" as according to the Annex M. E-MS manual for applicants: "For each Partner please provide explanations (amount and text) for the non-eligible expenditure, if such expenditures exist (including correlation with the Feasibility study, where applicable)."



In the course of our work and experience to submit a complete application form, we found out that the following fields are automatically generated after Section "Project main output" in each WP from Workplan section in PDF file generated by the E-Ms system: 1. "Target groups per main outputs" in which are two sections: 1.1. Who will use the main output and 1.2. How you will involve target groups (and other shareholder) in the development of the project main outputs? and Please be informed that there is no issue in e-MS regarding 2. "Durability and transferability of main outputs" including the aspect presented. Our programme does not require the 2.1 "How will the project main outputs be further used once applicants to link the outputs with the target groups, the project has been finalized? Please describe concrete therefore the target groups are described separately in the measures (including eg. institutional structures, financial system under section "Workplan - Target Groups", for sources etc.) taken during and after project implementation eMS.14 evaluation the assessors will check the information within to ensure the durability of the project main outputs. If that section. relevant, please explain who will be responsible and/or the The generated PDF file of the Application is general and it owner of the output. NB. Take note of rules governing applies to all Programmes, therefore there might be some ownership of outputs linked to investments (items of sections which might be left blank as opposed to what infrastructure) in line with Art 71 CPR." and 2.2. "How will appears in the system. the project ensure that the project outputs are applicable and replicable by other organisations/regions/countries outside of the current partnership? Please describe to what extent it will be possible to transfer the outputs to other organisations/regions/countries outside of the current partnership." We are sending a scan of the generated PDF to demonstrate the appearance of these empty fields (file named "Second page marked in yellow with empty fields.pdf").



In the system, in the Section Workplan, in the WPs for implementation and invetsment there is no field to provide such information. We are sending you a consecutive preview of the system to demostrate the fact that is no field to be filled in with this information or that there is no button to add fileds with these names: "Durability and transferability of main outputs" and "Target groups per main outputs" (file named "WP - system view"). We understand that the E-Ms system automatically links different sections to improve the quality of the work process. When we fill in the information in section "Project Focus", field "Durability of project outputs and results", after generating new PDF file from E-Ms system, those sections "Durability and transferability of main outputs" and "Target groups per main outputs" after each Section "Project main output" in each WP are still empty. Our problem is that we can't find any section, where we can fill in the information, regarding the above stated questions (those automatically generated in PDF file of AF). We were excecively searching the Annex M - E-Ms manual for applicants and there is no appropriate instruction or any description about the two sections: 1. "Target groups per main outputs" and 2. "Durability and transferability of main outputs" and their subsections/questions. HOW CAN WE OVERCOME THIS TECHNICAL ISSUE IN ORDER TO SUBMIT A COMPLETE AF - STEP 2, WHICH WILL BE ELIGIBLE TO PASS THE ADMINSITRATIVE CKECK, WHEN THE SYSTEM DOES NOT ALLOW US TO DO SO?



eMS.15	What does "Activity M - NA FOR RO-BG" mean in 1. the budget lines + WP/activities table? Is this column for the cost of the M PROJECT MANAGEMENT work package? But what "NA FOR RO-BG" means? Not applicable? Shall we plan budget costs in this does "Activity M - NA FOR RO-BG" column or not? In which column to plan the project costs related to project management, such as business trips, equipment related to project management?		Within the budget section, "Activity M - NA FOR RO-BG" is related to the Work package "M PROJECT MANAGEMENT" from the activities list. This is the section were you will introduce the costs related to the Project Management, if any.
		<u>Equipment</u>	
Eq. 1	Are there available requirements the goods purchased under the projects to have EU member state origin?		Within the Applicant's Guide there are no such restrictions foreseen
		<u>Budget</u>	
B.1	In our project, we are preparing a huge cultural event with participants from both partners. In order to organize the travelling of the participants to the place of the events (the guests), we plan to select a company, which will perform the whole logistics (transportation of the participants, accommodation and daily expenses). Please, confirm that in this case, we have to put the amount in budget line "External expertise and services", while in budget line "Travel and accommodation" we have to put the money needed for travelling, accommodation and daily expenses of the project team only.		In regard to framing of expenditures for organization of events, we would like to inform you that you understanding on this issue is correct, and more precisely, the amount for organization of an event (transportation of the participants, accommodation, daily expenses) should be included in the budget line "External expertise and services" and the expenditures needed for travelling, accommodation and daily expenses of the project team should be included in the budget line "Travel and accommodation".
B.2	I would like to ask you could we decrease the approved flat rates for staff costs (5% for hard Project) and for office and administrative costs (1% for hard Projects) in case we are sure that we will not be able to spend them?		The fixed flat rates for staff costs (5% for hard Project) and for office and administrative costs (1% for hard Projects) cannot be modified irrespective of whether the entire amount will be spent or not. Please be aware that the flat rates will remain the same for all beneficiaries for the entire project implementation period!



	issues related to eligibility and scoring			
В.3	Va rog sa ma ajutati cu o clarificare privind incadrarea unei cheltuieli in buget. Este vorba de consultanta pentru scrierea proiectului. Conform contractului, consultanta presupune scrierea cererii de finantare (cele 2 etape), raspunsul la eventualele clarificari primite in perioada de evaluare si consultanta la intocmirea documentelor necesare pentru contractare. In acelasi timp se mentioneaza faptul ca cheltuielile care pot fi incadrate in categoria pregatirea proiectului trebuie sa fie inregistrate intre 01.01.2014 si momentul depunerii cererii de finantare, respectiv 16.10.2017. In aceasta situatie cum putem incadra cheltuielile presupuse de contractul de consultanta in perioada 16.10.2017 si pana la semnarea contractului de finantare?	Please help me with a clarification related to framing of an expenditure within the budget. I am referring to the consultancy for project preparation. According to the contract, the consultancy involves writing the application form (both stages), the answer to the possible clarifications received during the assessment process and consultancy in the preparation of the documents required during the contracting process. At the same time, it is mentioned that expenditures that can be included in the project preparation category must be registered between 01.01.2014 and the moment of submitting the application form, respectively 16.10.2017. In this situation, how can we cover the costs foreseen within the contract for consultancy services between 16.10.2017 and until signing of the financing contract?	Please be informed that in accordance with Annex E. List of eligible expenditures "Preparation costs are eligible if they were incurred between 1.01.2014 and the submission of the Application Form for the First and Second call for proposals and full application form submission date for the Third call." An expenditure is incurred when the activity that has generated the expenditure has been completed or the services foreseen in a contract have been provided. By contrast, an expenditure has been paid when the corresponding amount has been debited from the accounts of the beneficiary and transferred to the accounts of the contractor. Therefore, considering the above mentioned, please be informed that costs incurred after 16.10.2017 will not be considered as eligible for budget category "Project preparation". Other provision included in Annex. E regarding eligibility of an expenditure requires that "is committed by the beneficiary after project approval by the Monitoring Committee and the last day of implementation period and is paid out by the beneficiary at the latest in 2 months after the end of the project implementation period, but no later than 31.12.2023." In conclusion, costs foreseen within the contract for consultancy services between 16.10.2017 and until signing of the financing contract, with the cost committed before MC decision on selection (contract was signed before the submission of the full AF) may not be considered as eligible costs	
B.4	В проекта предвиждаме изнесено обучение на целевата група, която включва персонала по проекта, служители от същата администрация и други членове на целевата група, които не са служители на администрацията. Може ли да предвидим за тях пътни, дневни и квартирни средства в перо Travel and accommodation cost	Within the project is envisaged an externalized training for the target group, which includes project staff, employees from the same administration and other target group members who are not employees of the administration. Can we foresee expenditures for travel, daily allowances and accommodation for them within the Travel and accommodation budget chapter?	In regard to your question please be informed that the expenditures for travel, daily allowances and accommodation for the project team members, shall be included in the budget category "Travel and accommodation". As regards assuring participation of the representatives of the target groups of your project proposal at an externalized training, please be informed that the related expenditures are eligible under the budget category "External expertise and services".	



B.5	Can we budget lower flat rate for staff costs - for example 2.5%?	In regard to your question, we would like to inform you that the fixed flat rates for staff costs cannot be modified. Please be aware that the flat rates will remain the same for all beneficiaries for the entire project implementation period!
B.6	When estimating the value of a deliverable based on 3 offers can we round the amount so the budget to be more rounded? For example if the estimated value is 17 500.80 Eur to input 17 500 Eur?	According to the provisions of the Applicant's Guide: "In case of 3 offers, the budgeted prices must not exceed the average value of the 3 offers (calculated at the Inforeuro exchange rate from the month of the deadline for the second step)". The budget should reflect the exact value of each deliverable, in order for the evaluators to properly assess the application.
B.7	As the periods are defined on 3 months basis and this will be the Schedule of the project is it admissible to put values of contracts as they are planned to be paid to the external provider? For example - 20% advance payment, 40 % after a stage implementation, Final payment, etc, all to be based on the specific contract with the provider? In a case when there are 3 trainings and after one has passed we will pay based on the implementation. And so on.	When defining the budget per periods you need to take into consideration when the expenditures will be performed, in order to make forecasts as close to reality as possible.



	Does the staff cost should be 5%, or must not exceed 5% from the direct costs for hard projects? Does the Office and administrative costs should be 1% or must not exceed 1% from the direct costs for hard projects?		
B.8	According to Annex F "Staff costs - will be reimbursed based on a fix flat rate of 15% for soft projects and 5% for hard projects, applied to the calculation basis, as mentioned above. Office and administrative costs - will be reimbursed based on a fix flat-rate of 4.5 % for soft projects and 1% for hard projects applied to the calculation basis, as mentioned above." According to Annex E "Article 8 Staff costs (1) Staff costs shall be reimbursed as a flat rate of maximum 15% of direct costs for soft projects. For hard projects the flat rate shall not exceed 5% of direct costs." and "(1) For applications submitted under the first and second call for proposals, office and administrative expenditure shall be reimbursed as a flat rate of maximum 5% of direct costs for soft projects and maximum 1% of direct costs for soft projects and projects. For applications submitted under the third call for proposals, the office and administrative expenditure shall be reimbursed as a fix flat rate of 4.5% of direct costs for soft projects and a fix flat-rate of 1% of direct costs for hard projects."	Please be informed that application third call for proposals should respect condition related to flat rate "For a under the third call for proposals, reimbursed as a fix flat rate of 15% projects and a fix flat rate of 5% projects. For applications submitted for proposals, the office and adminishall be reimbursed as a fix flat rate for soft projects and a fix flat-rate for hard projects" (reference to A expenditures)."	ect the following applications submitted Staff costs shall be for of direct costs for hard and and articles are submitted staff costs for hard and and articles are submitted to the following staff of the following staff of the following staff of the following submitted to the following submitted staff of the following staff of the following submitted staff of t
B.9	On p. 36 of the Applicant's Guide it is stated that: "In case of 3 offers, the budgeted prices must not exceed the average value of the 3 offers" Please explain whether we should budget all our prices for different items using the same methodology or we can use different ways of budgeting, i.e. can we use the average value of the 3 offers in one case to budget the price and then in another case can we use the lowest offer price which does not exceed the average value of the 3 offers.	Please be informed that when personal should be used the same methodol expenditures within the budget, nat the budgeted prices must not except the 3 offers" as the Applicant's Gui	ogy for calculation of all mely "In case of 3 offers, eed the average value of



	4,7	issues related to eligibility and scoring	•
B.10	My questions are related to the fix flat rate of Staff costs and Office and administrative costs for hard projects: 1. Could the flat rate (% of direct costs) of Staff costs be under 5%, eg. 4.3% for hard projects and respectively could the Office and administrative costs be under 1%, eg. 0.8% of the direct costs for hard project? 2. Same question stands for soft projects: Could the flat rate for Staff costs be lower that 15% (eg. 13%) and the Office and administrative expenditures be lower that 4.5% (eg. 4%)? My question arrised due to the fact that E-MS system allowes changing that %(section Budget) and the provisions in Annex F - Simplified costs in which is stated that: "The following specific flat rates shall apply for the third call for proposals of INTERREG V-A Romania-Bulgaria: Staff costs - will be reimbursed based on a fix flat rate of 15% for soft projects and 5% for hard projects, applied to the calculation basis, as mentioned above. Office and administrative costs - will be reimbursed based on a fix flat-rate of 4.5 % for soft projects and 1% for hard projects applied to the calculation basis, as mentioned above." At the same time in Annex E - List of eligible expenditures_POST is stated maximum percentage of the respective expendatures: Article 8 Staff costs (1) Staff costs shall be reimbursed as a flat rate of maximum 15% of direct costs for soft projects. For hard projects the flat rate shall not exceed 5% of direct costs. For applications submitted under the second call for proposals, the beneficiaries may opt to use real costs for staff costs the option belongs to the beneficiaries. For applications submitted under the third call for proposals, Staff costs for soft projects and a fix flat rate of 15% of direct costs for soft projects and a fix flat rate of 5% of direct costs for soft projects and a fix flat rate of 5% of direct costs for soft projects and a fix flat rate of 15% of direct costs for soft projects and be reimbursed as a fix flat rate of 5% of direct costs for soft project		The fixed flat rates for staff costs cannot be modified. Please be aware that the flat rates will remain the same for all beneficiaries for the entire project implementation period. Please insert in the e-MS the correct percentage according to the Applicant Guide provisions."

hard projects.



	For applications submitted under the third call for proposals, the office and administrative expenditure shall be reimbursed as a fix flat rate of 4.5% of direct costs for soft projects and a fix flat-rate of 1% of direct costs for hard projects.		
B.11	Va rugam sa ne clarificati daca exista posibilitatea ca pentru unul dintre parteneri sa fie prevazut in buget rata procentuala de 5% pentru costurile de personal (flate rate) si pentru celalat partener sa fie numai servicii de consultanta externalizata (respectiv sa nu aiba deloc flate rate pentru costurile de personal).	Can you please clarify if there is a possibility for one of the partners to be foreseen flat rate of 5% for staff costs within the budget and for the other partner only external consultancy services (i.e. that partner will not have at all flat rate for staff costs).	According to Annex E. List of eligible expenditures, both "Staff costs" and "External expertise and services costs", represent eligible expenditures within the third call for proposals for the Interreg V-A Ro-Bg Programme. In this regard, the project management can be externalized in accordance with provisions of the Applicant's Guide and its annexes. Still, the flat rate financing means in practice to apply a percentage (fixed ex ante) to a calculation basis, consisting in the following eligible direct costs: Travel and accommodation, External expertise and services, Equipment, Infrastructure and works. Please be informed that the fixed flat rates for staff costs cannot be modified and will remain the same for all beneficiaries for the entire project implementation period!
B.12	In cazul in care nu dorim sa avem deloc costuri de personal (staff costs), exista posibilitatea sa nu bugetam deloc cei 5% flat rate? Sau este obligatorie sa existe in buget aceasta suma de 5% pentru cheltuieli de personal in cazul proiectelor de investitii chiar daca partenerii ar dori sa nu aiba astfel de costuri in cadrul proiectului?	staff costs in the budget in case of investment	In regard to your question, we would like to inform you that the flat rate financing means in practice to apply a percentage (fixed ex ante) to a calculation basis, consisting in the following eligible direct costs: Travel and accommodation, External expertise and services, Equipment, Infrastructure and works. Please be informed that the fixed flat rates for staff costs cannot be modified and will remain the same for all beneficiaries for the entire project implementation period!