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Record of questions

Information days (workshops) / Information campaign



in the framework of the

(INTERREG VI-A) IPA Bulgaria – Serbia Programme 2021-2027, CCI Number: 2021TC16IPCB007-2024-2



No.	Question	Answer
A	GENERAL	
1	<p>Received during the online consultations</p> <p>Will it be possible the total budget of a concept note to be raised when applying with a full project proposal?</p>	<p>Please be minded that the increasing of the overall budget of the concept not is not allowed.</p> <p>In case that during the developing of full project proposal and the detailed budget breakdown, the applicants find the need for increasing of budget the only possibility is to inclusion of additional own co-financing in the respective partners' budget. The inclusion of additional own contribution will be subject to verification.</p> <p>Any potential changes in the budget categories should not influence and decrease the scope of investments (minimum 60% of the total eligible costs) as well as all the requirements of the call for the budgetary parameters and the mandatory budget allocation criteria are respected.</p>
2	<p>Received during the online consultations</p> <p>The call states that no less than 60% should be the investment component (construction activities and supplies). Will it be permissible if one partner wants only construction, the other only supplies and the other only</p>	<p>The Guide for application (GfA) with concept notes stipulates that eligible concept notes should contain a compulsory combination of investment (works only or works and supply) and soft types of actions (e.g. services). The investment component must be a minimum 60% of the total eligible costs of the project budget. The GfA does not set percentage ranges for works and/or supplies to achieve the minimum threshold of 60% investment component among partners.</p>

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	services? Does the expenditures percentage apply to each partner individually or is it considered as a whole within the entire project?	
B	STAFF	
3	<p>Received during the online consultations</p> <p>The staff costs are foreseen as flat rates. What kind of documents have to be presented for the staff assignment during the implementation phase?</p>	<p>Project partners are not required to provide documentation demonstrating that staff costs for project management purposes have been incurred and paid. However, if the project has been contracted, project partners must provide an official document (e.g. order) proving that a project team has been appointed and is operational. More comprehensive information on this requirement will be provided in the Project Implementation Manual. At this stage you only have to budget the percentage for the staff costs (up to 20% of the BC 4, 5 and 6) and to describe what kind of staff shall be needed (for example: project manager, coordinator etc.).</p> <p>Of course, the staff should be employed in accordance with the relevant national legislation and all documents should be kept by the organisation for any audits by bodies not connected with the project implementation itself.</p>
4	<p>Received during the online consultations</p> <p>Can we have simultaneously staff, budgeted under BC1 and external experts (manager, coordinator etc), budgeted by BC4?</p>	<p>The staff costs cannot be budget simultaneously under both budget categories - BC1 and BC4, as it would be considered as double-financing. BC1 Staff costs are intended to cover the costs of staff involved in project management, project activities, or both.</p> <p>However, if the project partner must subcontract some tasks related to project management or implementation of activities to a third party, those costs should be reported under BC4 External Expertise and Services Costs. In such a case, BC 1 should have no budgeted costs.</p> <p>For instance, it is eligible to take the project financial management and accountancy services out of BC1 and budget them under BC4 in accordance with Article 42 of the Interreg regulation. Some other specific competences contributing to the achievement of project management objectives (e.g., PR and communication services) can also be awarded to an external entity under</p>

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		BC4. However, typical project management functions, such as manager, coordinator, and technical assistant, cannot be budgeted under BC4 and must remain under the scope of BC1. In any case, it is not eligible to budget the same project management functions under the two budget categories due to double funding issues.
5	Received during the online consultations Can the project team be municipal employees?	Yes, municipal employees can be part of the project team. However, the project partners must ensure that the selection and appointment of project team members comply with national legislation.
6	Received during the online consultations Are the civil contracts eligible for assignment of project staff under BC1 Staff costs?	Whether civil contracts are eligible to prove staff costs depends on national regulations. For Bulgarian organizations, only employment contracts or appointment decisions (in the case of civil servants) are eligible for remuneration under BC1 Staff costs. Therefore, civil contracts are ineligible under BC1 for Bulgarian organizations.
C	BUDGET	
7	Received during the online consultations Is it possible to transfer funds between partners when preparing the full project proposal, provided that the overall budget of the Concept Note remains unchanged?	Yes, it is possible to transfer funds between partners when preparing the full project proposal, provided that the overall budget of the Concept Note is not changed,. Changes in budget parameters between the Concept Note and the full project proposal (FPP) are allowed if they are duly justified and meet the following conditions: The maximum percentages for budget categories (BC) 1, 2, and 3 and the minimum percentage for the investment component (BC 5 and BC 6) must be observed: <ul style="list-style-type: none"> • BC 1 Staff costs – up to 20% of the eligible costs under BC 4, BC 5, and BC 6 of the total project budget of the respective partner. • BC 2 Office and administrative costs – up to 15% of the staff costs. • BC 3 Travel and accommodation costs – up to 15% of the staff costs.

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		<ul style="list-style-type: none"> BC 5 and BC 6 (cumulatively) – minimum 60% of the total eligible costs. <p>Applicants must justify all proposed budget changes in a free text format and include this justification as part of the FPP submission package.</p> <p>The scope, location and partner/s responsible for investment components cannot be changed.</p>
8	Received during the online consultations Is it possible for each project partner to choose a different percentage for the expenditures budgeted as “flat rates”?	<p>Each partner can choose a different percentage for the expenditures budgeted as “flat rates.” However, the percentages cannot exceed the maximum rates allowed for the call. No further justification or supporting documents are needed from the project partners. The financial and all other parameters of the project partnership must be clearly outlined in the Partnership Agreement.</p>
9	Received during the online consultations Can we use the real cost option for BC 1 staff costs remuneration?	<p>No, the flat rate is the only option available for BC 1 Staff costs remuneration.</p>
10	Received during the online consultations What does it mean ‘Flat rate’ budgeting for the staff costs? During the implementation period and the FLC verification what kind of documents shall be required for the appointed staff?	<p>The reimbursed amount under BC1 shall be calculated automatically as the chosen percentage of the beneficiary’s budget based on the sum of the declared eligible costs under BC4, BC 5 and BC6 in each FLC verification request. You are not obliged to present to the FLCs any documents for the justification of this amount.</p> <p>At the beginning of the project implementation you should present to JS a declaration/order for the appointment of staff, as JS should know whom to contact. Of course, the staff should be employed in accordance with the relevant national legislation and all documents should be kept by the organisation for any audits by bodies not connected with the project implementation itself.</p>
11	Received during the online consultations Regarding point A5.4 – Supply of equipment of the Contracting guide, in case of	<p>Market analysis based on soliciting offers (along with website references) obtained from at least three independent providers. These offers should be comparable in terms of requested technical characteristics, and as such, they must be accompanied by a uniform request for offer.</p>

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	<p>procurement of highly specialized equipment with insufficient evidence in the national procurement systems and no historical data for concluded contracts from previous similar deliveries (of the partner or publicly declared by any other public body in the country), what type of document should be submitted to justify the total amount planned for the supply?</p>	
12	<p>Received during the online consultations</p> <p>How will the project preparation costs (BC 7) be divided between the lead partner and the other project partners?</p>	<p>The process for dividing Project preparation costs (BC 7) between partners is a matter of inter-partner negotiations and should be clearly described, along with the distributed amounts, in the Project Partnership Agreement (Annex 1). A fair approach is to balance the partners' needs and their contributions to the project objectives and indicators. The amount for project preparation is lump sum and capped at EUR 12 000. The amount must be included in the lead partner's budget at the application stage.</p>
	<p>Received via E-mail to the JS Main office:</p> <p>I have a question regarding budget line 4 "External expertise and services". In the contract guide for identified candidates for the development and submission of full project proposals on page 34 it is written that for the justification of the costs planned as a total amount under budget category 4. Each project partner must provide a justification for the calculation of the amount</p>	<p>It is not obligatory to collect bids in order to fill in Annex 8. If the applicant wants to support the calculated price for the respected service with some additional documents or information, its up to them.</p> <p>Also, keep in mind that according to page 43 of the Guide: „Budget review and optimization may occur if the proposed project costs are deemed ineligible, not fully aligned with the project content, not conducive to achieving project objectives and programme indicators/targets or not justified in terms of volume and prices. This review and optimization will be carried out by the Screening Working Group.“</p>

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	<p>(Annex 8). In this regard, I would like to ask, does this mean that in order to prove the amount of expenditure we only need to present Annex 8. Justification for calculating the amount of expenditure planned as a lump sum without applying bids which are only mandatory for the equipment , evident from p.18 of the manual?</p>	
D	PROCUREMENT PROCEDURES	
13	<p>Received during the online consultations</p> <p>Do JS/MA/FLC carry out preliminary control of the tender procedures?</p>	<p>No, there will not be an ex-ante control over the preparation and launching of procurement procedures. The project partners bear sole responsibility for implementing procurement procedures in accordance with Programme rules.</p>
14	<p>Received during the online consultations</p> <p>Can we launch a procurement procedure „with unsecured funding“ prior of the signing of the Subsidy contract? That way we shall have more time if some appeals incurred for the procedures.</p>	<p>Bulgarian partners are permitted to launch procurement procedures even when funding is not yet secured, in accordance with Article 114 of the Public Procurement Act. Methodological instructions from the Bulgarian Public Procurement Agency regarding the implementation of this article are publicly available. However, applicants should be aware that the Joint Secretariat (JS) approves the procurement plan of the project only after the project has been contracted. If the JS identifies discrepancies in the procurement plan and tender procedures have already been announced under Article 114, the responsible partner bears the risk in such situations.</p>
15	<p>Received during the online consultations</p> <p>In the Concept Note, we planned the total sum of the investment, but after calculating the average price based on three offers, this price differs. How can we proceed in this</p>	<p>If there is a difference between the planned sum in the Concept Note and the calculated sum based on the offers, you must submit a justification explaining the reason for the difference. Since increasing the overall budget of the Concept Note is not allowed, you may consider including additional own contribution (co-financing) to cover the differences based on provided offers. Alternatively, you can optimize other expenditures in your budget to ensure it fits within</p>

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	case?	the total budget of the Concept Note.
16	<p>Received during the online consultations</p> <p>How can we define the type of procedure if it involves works and supplies for the same site?</p>	<p>BG partners: You must follow the requirements of the Public Procurement Act when determining the type of procedure.</p> <p>RS partners: For the award of works and supplies to beneficiaries, located in the Republic of Serbia, alignment with the provisions outlined in Annex II of the Financing agreement between the European Commission and Serbia must be ensured, and the partners are encouraged utilize PRAG templates until further notice. Additional practical guidance on public procurement for Serbian partners will be detailed in the Project Implementation Manual.</p> <p>If the investment foresees both infrastructure works and purchase of equipment (in case the delivery of equipment is necessary for the construction and functioning of the site) and planned construction works dominate, then the supply could be included in the investment design and, respectively, in the BoQ for the works.</p>
17	<p>Received during the online consultations</p> <p>It is not possible to gather offers from different companies for the author's control of the building works due to the author's rights as provided by the legislation.</p>	Only the offer from the authors of the investment design project needs to be presented for the author's control. In this case the rule for „the three offers“ is not applicable.
18	<p>Received during the online consultations</p> <p>Conducting market research or requesting offers is recommended?</p>	<p>You need to perform a market analysis for the planned supply based on three offers provided by independent suppliers or three extracts from national/EU public procurements systems for a similar supply with identical technical specifications. In case of highly specialized equipment, historical data from concluded contracts for previous similar supplies can be used.</p> <p>The Lead Partner or project partner must obtain offers from at least three independent suppliers, and these offers should be comparable in terms of technical specifications. If obtaining three offers in Bulgaria is not possible, three examples from national or EU public procurement</p>

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		<p>system for similar supplies with the same technical specifications may be provided. The project budget should reflect the average of the received offers or examples. To account for future price increases and inflation, you can increase the budget by up to 10% based on the average national inflation rate from the last three years before you submit your application.</p>
19	<p>Received via phone to the JS Branch office:</p> <p>On page 19 of the Contracting Guide there is a paragraph related to market research, where is an obligation listed to publicly disclose „all information exchanged during the market consultation and historical data gathering (only for specialized equipment) phases on their official website.“. In Serbia, there isn't such obligation, and actually, it would substantially narrow down the market, prolong the market research process, and could also be regarded as discriminatory.</p>	<p>In accordance with Bulgarian legislation, the Bulgarian contracting authority must ensure that participants in market consultations or in the preparation of procedures do not receive preferential treatment. Minimum measures include publishing all exchanged information and results on the buyer's profile. If direct publication isn't possible, the profile should indicate where this information can be found.</p> <p>However, all partners are reminded that future tendering procedures should be based on the information gathered through market research and reflected in the projects' budgets. These procedures should uphold the principles of sound financial management, equal treatment, non-discrimination, competition, and proportionality.</p>
E	WORKS AND SUPPLY	
20	<p>Received during the online consultations</p> <p>Are there any requirements for the Bill of Quantities?</p>	<p>A detailed list of all construction works (Bill of Quantities) provided for in the project must be submitted. The Bill of Quantities must be stamped and signed by the certified designers responsible for the different parts of the project design. The document must be presented as scanned original copies in PDF format, an English translation signed by the respective partner to confirm it is a true copy, and an editable file in EXCEL format. The Bill of Quantities should include details regarding the type of construction works, the unit of measurement (e.g., meters, square meters, etc.), the estimated quantity needed, the unit price (cost per unit), the total cost</p>

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		<p>for each type of work, and the total cost for all works listed. A detailed breakdown by type of construction work, by each investment site (location), and by parts of the work designs, if applicable, must be provided. It should clearly state whether VAT (Value Added Tax) is included in the prices or not. If the Bill of Quantities is in the local currency of the project partner, it should include a column showing the unit price in EUR and a column showing the total amount in EUR for each type of construction/repair work.</p> <p>For Serbian partners: the local currency is converted into EUR using the monthly exchange rate of the European Commission (info Euro website) for the month of the submission of the project proposal.</p>
21	<p>Received during the online consultations</p> <p>Is it mandatory for the applicants to submit detailed installation plans or schemes for the equipment as part of the project proposal, and are there any specific requirements associated with these plans or schemes?</p>	<p>The role of equipment installation sketches/schemes/drawings is to comprehensively clarify the investment idea of the project. According to the Contracting guide - 1.2.4 Additional documents supporting the full project proposals - A6.4 Supply of equipment, detailed plans/schemes for positioning, according to the nature of equipment delivered, both outdoors in public spaces and indoors (respectively in accordance with the approved detailed urban development plan or as part of the respective detailed investment project in accordance with Ordinance 4/21.05.2001 on the scope and content of investment projects for Bulgarian partners), must be submitted. These plans/schemes should be approved by the competent authority in accordance with national legislation, where applicable.</p>
F	JEMS	
22	<p>Received during the online consultations</p> <p>Is it possible two persons to fill in data in JEMS at the same time?</p>	<p>Yes, it is possible for more than one person to edit information in JEMS simultaneously. However, please keep in mind that among those editing the same field at the same time, only the last person to click the SAVE button will determine the final information in that field.</p> <p>We recommend that partners appoint only one person to oversee all information in the fields</p>

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		<p>before submitting the application.</p> <p>In the PRIVILEGES section, the person with MANAGE rights can assign EDIT or VIEW rights to other users at any time. To add a new user, a registration in JEMS must first be completed for that user. Please contact the JS for assistance with the registration of a new user.</p>
23	<p>Received during the online consultations</p> <p>Shall some information by the concept note be transferred to the full project proposal?</p>	<p>All the information provided in the sections of the concept note in JEMS will automatically transfer to the FPP application. Therefore, applicants do not need to rewrite the entire project proposal in the AF. Instead, they only need to fill in the sections of the FPP AF that were not part of the concept note application. However, since the application form for the concept note was offline (in Word format) and attached to the JEMS application, applicants must now transfer the content of the offline concept idea's application form to the JEMS application form of the FPP. During this process, project partners can further elaborate on their project idea, consolidate their partnerships, and develop a detailed work plan in line with the recommendations provided in the notification letter with the outcomes of the concept note stage.</p> <p>Yes, some main information and the definition of the projects partners shall be transferred by the concept note to the FPP. You can edit the information but cannot rearrange the partners.</p>
24	<p>Received during the online consultations</p> <p>Can we insert decimals in the percentage rates of the flat rates for BC 1, 2 and 3?</p>	<p>BC1, BC 2 and BC 3 are defined as flat rate (please see page 11 of the Contracting Guide) . You can insert any number between 1 and the maximum %, but no decimals are allowed.</p>
25	<p>Received via phone to the JS Branch office</p> <p>In our Concept Note, we have planned one project specific objective. However, in the development of FPP, and according to the</p>	<p>The specified objective in the Concept note is the overall objective of the project proposal and should not be altered. When developing your project work plan in the FPP, you need to propose work packages, each strategically aligned with a specific project objective. This alignment is done only in the FPP, as a project work plan was not required at the concept note stage. Therefore, the overall objective of the project should remain as stated in the concept note, while the specific objectives can be developed and detailed further in the FPP.</p>

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	<p>structure of JEMS, each work package should list one project specific objective. Should we stick to that already developed project specific objective, and write it in all work packages, or should we define one project specific objective per each work package, that will be achieved when all activities in the work package are implemented and outputs delivered, as required by JEMS?</p>	<p>The project specific objective listed in the Concept Note is in fact the aim of the project, and cannot be changed. However, in the developed FPP, the achievement of the already defined aim can be broken down into smaller specific objectives, and a separate project specific objective should be assigned to each separate work package. Remember that a defined by you certain specific objective cannot be assigned to several work packages.</p>
G	APPLICATION DOCUMENTS	
26	<p>Received during the online consultations</p> <p>Is it necessary to attach the completed Attachment 1 – Template of the application form to the documents when submitting the AF?</p>	<p>Attachment 1 – Template of the Application is only for informational purposes and guidance on how to fill out the AF. However, when submitting the FPP, you can attach the Jems-generated PDF version of the AF. The AF version must be signed on each page by the lead partner or signed with a qualified electronic signature the AF version is signed by the lead partner. The version of the AF should be signed on each page by the Lead partner or signed with qualified electronic signature.</p>
27	<p>Received during the online consultations</p> <p>As a municipality, are we required to complete Annex 5?</p>	<p>All project partners must fill in and submit Annex 5 “State Aid Declaration”</p>
28	<p>Received during the online consultations</p> <p>Should a procedure for the coordination of the construction documentation with the Bulgarian Ministry of Culture (National</p>	<p>Yes, it is imperative to initiate this procedure as soon as possible (in accordance with Art. 83 and Art. 84 of the Bulgarian Protection of Cultural Heritage Act). Failure to present all requested permits concerning construction works (please refer to section A5.2 Permits, page 37 of the Contracting Guide) within the specified time during the screening process will result in the</p>

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<p>Institute of Immovable Cultural Heritage), in the presence of works activities on a site - monument of culture, be initiated on the stage of development of FPP?</p>	<p>project being ineligible for funding. The building permits can be submitted after the FPP submission, but once requested during the screening process, they must be provided within the specified period, which is 90 calendar days from the start of the screening procedure.</p>
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