



QUESTIONS AND ANSWERS

Open Call for Project Proposals

Call Reference: No 2021TC16IPCB007 – 2025 – 4

under Priority 1: Competitive Border Region

with the specific objective RSO1.3. "Enhancing sustainable growth and competitiveness of SMEs and job creation in SMEs, including by productive investments."

in the framework of (INTERREG VI-A) IPA Bulgaria – Serbia Programme 2021-2027, CCI Number: 2021TC16IPCB007

No.	Question received	Answer provided
I. <u>Eligibility of Applicants and Activities</u>		
1	<p>Received on 12.03.2025 via e-mail:</p> <p>Is it eligible under the call "soft" kind of projects, which includes investment component under 60% of the project's budget?</p>	<p>According to the Guidelines for Applicants, the current call under Priority 1, Competitive border region, Specific Objective 1.3 (Enhancing sustainable growth and competitiveness of SMEs and job creation in SMEs, including by productive investments) only supports "investment", Section: "2.2.3 Eligible Activities only supports "investment" projects. This means that project proposals must mainly include investment activities such as works, supply, and equipment (Budget Category 5 – Equipment and Budget Category 6 – Infrastructure and works).</p> <p>Key requirement:</p> <ul style="list-style-type: none"> The investment component must be at least 60% of the total eligible



		<p>costs of the entire project.</p> <ul style="list-style-type: none"> The remaining up to 40% can be used for "soft measures" such as studies, networking, training, service development, and awareness-raising activities. <p>Therefore, if a project does not meet the minimum 60% investment requirement, it would not be eligible under this call.</p>
2	<p>Received on 12.03.2025 via e-mail:</p> <p>The Guidelines for Applicants, under section 7 "Project Preparation Costs," state that eligible preparation costs include the elaboration of technical documentation, which encompasses an energy audit. However, nowhere else in the program is it mentioned that an energy audit is required for a given enterprise. Does this mean that while the cost of an energy audit is eligible for reimbursement as part of project preparation, it is not a mandatory requirement for all applicants?</p>	<p>The Guidelines for Applicants, under Section 7 "Project Preparation Costs," explicitly state that eligible preparation costs include those related to the elaboration of technical documentation, which encompasses an energy audit, feasibility studies, detailed design, and technical drawings. These costs are eligible for reimbursement but are not mandatory for all applicants.</p> <p>Applicants may choose to conduct an energy audit to support their decision-making when selecting specific equipment, preparing an energy efficiency assessment, or evaluating potential energy-saving measures. However, the energy audit is not a mandatory requirement, as specified in Section B: "Supporting Documents," which outlines both required and optional documents.</p>
3	<p>Received on 12.03.2025 via e-mail:</p> <p>"Serbian SMEs are not eligible if they are not majority domestically owned (at least 51%). The company acting as a project partner from Serbia must be at least 51% owned by a Serbian citizen."</p> <p>Are we eligible if we are Serbian company that is owned by US company that is more than 51% owned by a Serbian citizens?</p> <p>With this structure, we already applied for the European</p>	<p>According to the Guidelines for Applicants, in order for a Serbian SME to be eligible, it must be at least 51% majority-owned by a Serbian citizen.</p> <p>In your case, appears that your company is registered in Serbia but is owned by a U.S. company, which is itself majority-owned (more than 51%) by Serbian citizens. While this structure suggests an indirect majority Serbian ownership, the Guidelines do not explicitly address such cases. Therefore, the final decision on eligibility will be made by the relevant program bodies during the project evaluation process.</p> <p>It is crucial that the ownership structure is clearly and unambiguously visible in the Serbian Business Registers Agency (APR), as this will be an important</p>



	Commission EIC grant and received the Seal of Excellence.	<p>factor in determining eligibility. Additionally, aside from ownership requirements, your company must meet the SME definition criteria and fulfill the five eligibility conditions outlined in Section 2.1 of the Guidelines.</p> <p>We recommend providing a detailed explanation of the ownership structure and all relevant documentation during the application process, to ensure a wellinformed assessment by the Assessment working group during the project evaluation stage.</p>
4	<p>Received on 26.03.2025 via e-mail:</p> <p>What does the text in the Guide of Applicants mean: The project must include at least one SME from each country and meet the eligibility criteria of the Program?</p>	<p>The text in the Guidelines for Applicants means that each project applying for funding under the Interreg VI-A IPA Bulgaria-Serbia 2021-2027 Programme must include at least one partner from Bulgaria and at least one from Serbia. The eligibility criteria ensure that projects contribute to cross-border cooperation within the Programme's territorial scope by fostering partnerships between enterprises from both countries.</p>
5	<p>Received on 29.03.2025 via e-mail:</p> <p>Can municipal public enterprises from Serbia, which are classified as small and medium-sized enterprises, be partners in the project?</p>	<p>This Call for proposals is primarily oriented towards private enterprises (at least 51% private capital) with a profit-making orientation and the Serbian SMEs must be at least 51% ownership of Serbian citizen. Public ownership may give certain advantages to enterprises, notably financial, over other enterprises that are financed by private capital.</p> <p>A public company is a company that performs activities of general interest, that are defined as such by the law of Serbia, in the areas of: mining and energy, transport, electronic communications, publication of the official gazette of the Republic of Serbia and publication of textbooks, nuclear facilities, weapons and military equipment, use, management, protection, arrangement and improvement of goods of general interest and goods in general use (water, roads, forests, navigable rivers, lakes, coasts, spas, wildlife, protected areas, etc.), management waste and other areas. The goal of establishing a public company is to operates for the purpose of ensuring the</p>



		<p>permanent performance of activities of general interest and regular satisfaction of the needs of citizens as well as development and improvement of those activities of general interest.</p> <p>This new approach of programme support, such as direct support to MSMEs, can enhance SMEs performance and scale-up, as well as their contributions to inclusive growth, mostly in the light of the negative impact of the Covid pandemic.</p> <p>Specific objectives of the Call, under priority 1 is “Enhancing sustainable growth and competitiveness of SMEs and job creation in SMEs, including by productive investments”, and, in order to concentrate the use of limited resources in the most efficient way, the programme support is limited to micro, small and medium-sized enterprises within the meaning of Commission Recommendation 2003/361/EC.</p>
6	Received on 28.03.2025 at the Information Day in Sofia Are there any exceptions to the requirement for a 10-year rental agreement?	<p>There are no exceptions to the requirement for a 10-year rental agreement. All investment activities must be carried out on partner-owned property or secured through a long-term lease agreement with a minimum duration of 10 years from the date of submission of the project proposal.</p>
7	Can you advise the types of sources of information that may be used when completing Annex 8 Climate proofing self-assessment. For instance in relation to investments associated with acquiring manufacturing equipment and machinery only and not including construction works for infrastructure please confirm this annex does not need to be submitted. In addition, can you give an advise to where Annex A8.1 Explanatory note for climate proofing assessment is uploaded?	<p>1. Use of Sources for Completing Annex 8</p> <p>When completing Annex 8, applicants are encouraged to use reliable and relevant sources of information to justify their responses. These may include:</p> <ul style="list-style-type: none"> National and regional climate strategies and adaptation plans, such as the National Climate Change Adaptation Strategy and Action Plan for Bulgaria - https://www.moew.government.bg/static/media/ups/categories/attachments/Strategy%20and%20Action%20Plan%20-%20Full%20Report%20-%20%20ENd3b215dfec16a8be016bfa529bcb6936.pdf; Sector-specific guidelines, e.g., those related to energy efficiency,



		<p>green manufacturing, or environmental impact for the manufacturing sector;</p> <ul style="list-style-type: none"> • EU guidance documents, including the Technical Guidance on Climate Proofing of Infrastructure (2021/C 373/01)- https://ec.europa.eu/newsroom/cipr/items/722278/en • Product specifications and manufacturer information about the equipment or machinery being procured, particularly if it demonstrates energy efficiency or low-emission performance; • Environmental or energy audits, if available. <p>2. Applicability of Annex 8 for Equipment-Only Investments</p> <p>In accordance with the current programme guidance, Annex 8 – Climate Proofing Self-Assessment is required primarily for operations involving infrastructure or construction works.</p> <p>For investments that only involve the acquisition of manufacturing equipment and machinery, and do not include any construction, renovation, or infrastructure development, submission of Annex 8 is not required. However, applicants are still encouraged to consider environmental sustainability and energy efficiency in their project proposals.</p> <p>3. Accessing Annex A8.1 – Explanatory Note</p> <p>The explanatory note to support applicants in completing Annex 8 – titled Annex A8.1 – Explanatory Note for Climate Proofing Assessment – is available for download from the official programme website under the relevant Call for Proposals documentation section. Please refer to the “Application Package” or “Annexes” sub-section where all supporting documents are published. If you are unable to locate it, please let us know and we will provide the direct link.</p>
8	Can you provide a direction to where Annex C. Subsidy contract - draft version (for information purposes only) could be downloaded from?	The application package is available at https://ipa-bgrs.mrrb.bg/en/term/10/node/133 .



		For informational purposes only, the Draft of the Subsidy contract can be found in the within the RAR folder Annexes .
9	<p>Received on 15.04.2025 at the Partnersearch Forum in Vratsa:</p> <p>Can you please refer us to the successful projects under the BG-TR programme, as examples of projects that are supported? Where can be seen relevant successful projects for SME?</p>	The contracting procedure is currently under way. Once it has been completed, MA will publish the list of funded projects with a short description of each project. The publication is tentatively expected in mid-May. For additional information on funded projects, applicants are encouraged to consult the keep.eu database
10	<p>Received on 15.04.2025 at the Partnersearch Forum in Vratsa:</p> <p>How can an applicant check the history and references of another company that they intend to enter into a partnership with?</p>	The Managing Authority/Joint Secretariat does not conduct pre-verification of company references. Candidates who wish to perform such checks are advised to consult the respective Chambers of Commerce in Bulgaria and Serbia. Additionally, financial reports of companies are publicly accessible. In Bulgaria, company information can also be found on the public registry at https://portal.registryagency.bg/CR/en/reports/VerificationPersonOrg
11	<p>Received on 15.04.2025 at the Partnersearch Forum in Vratsa:</p> <p>If a company is registered in Sofia City but operates in Vidin, is it eligible?</p>	According to Guidelines for Applicants, Section 2.1 – Eligibility of Applicants Eligible applicants must be legal entities that were both registered and actively operating within the programme’s eligible cross-border area between Bulgaria and Serbia by 31 December 2021.
12	<p>Received on 15.04.2025 at the Partnersearch Forum in Vratsa:</p> <p>What is the eligible document for the construction activities, as current reconstruction, which do not require building permit?</p>	Statement by the competent authority, which declares that the envisaged repair works do not require issue of construction permit - issued in original language and English translation signed/ signed with qualified electronic signature by respective partner as true copy. A statement by the chief architect of the municipality.
13	<p>Received on 15.04.2025 at the Partnersearch Forum in Vratsa:</p> <p>What is the eligible ratio between investments components and soft measures?</p>	Under this call for proposals “investment” projects are eligible for funding it means that the project proposals should mainly include investment activities - works, supply, etc. (representing Budget category 5 – Equipment and Budget category 6 Infrastructure and works). The investment component should be at least 60% of the total eligible costs of the entire project. Each project under SO1.3 must include investment activities and soft measures. The eligible costs for soft measures shall not

		exceed more than 40% of the total eligible project.
14	<p>Received on 15.04.2025 at the Partnersearch Forum in Vratsa:</p> <p>Could you please provide examples for investment/infrastructure and soft measure?</p>	<p>Examples of Investment / Infrastructure Activities</p> <p>These must make up at least 60% of the total eligible costs:</p> <ul style="list-style-type: none"> - Purchase of specialized production equipment – e.g., machines, tools, or manufacturing technology that enhances production efficiency or quality. - Installation of IT systems – e.g., ERP, digital inventory systems, or automation solutions. - Modernization of existing facilities – e.g., renovations to improve production lines (excluding new building construction). - Technological upgrades – e.g., energy-efficient machinery or digital manufacturing tools. - Equipment for monitoring and quality control – such as sensors, laboratory instruments, etc. - Investments in packaging machinery or production process improvements. <p>Examples of Soft Measure Activities</p> <p>These can account for up to 40% of total eligible project costs:</p> <ul style="list-style-type: none"> - Marketing and promotion – e.g., developing marketing strategies, creating promotional materials, or launching online campaigns.; - Participation in international fairs or exhibitions – including preparation and booth setup.; - Training and upskilling – courses or workshops for staff on digital tools, production methods, or quality control.; - Business networking – organizing or participating in cross-border B2B meetings, trade missions, or industry forums.;



		<ul style="list-style-type: none"> - Market research or feasibility studies – for expanding into new markets or introducing new products.
15	<p>Received on 15.04.2025 at the Partnersearch Forum in Vratsa:</p> <p>If the project budget is 100,000 Euro is in this amount should be incl. the soft measures or only the investments?</p>	<p>It should be combination between investment components and soft measures, if the project budget is 100 000 Euro all the components should be incl. ratio, divided in this amount. Minimum percent for the investment (BC 5 Supply of equipment and BC 6 Infrastructure and works required part is 60%.</p>
16	<p>Received on 15.04.2025 at the Partnersearch Forum in Vratsa:</p> <p>How companies in different sectors can collaborate?</p>	<p>Companies from different sectors can collaborate under the programme as long as the joint project contributes to the programme's objectives—namely, enhancing SME competitiveness and creating jobs—and both companies meet all eligibility criteria.</p>
17	<p>Received on 15.04.2025 at the Partnersearch Forum in Vratsa:</p> <p>How can you choose the lead partner in the project?</p>	<p>Partnership of two entities (a Lead Partner and one Project Partner), with at least one SME from each side of the border. A single undertaking can participate in only one project proposal. It is decision made between the project partners to choose the lead partner.</p>
18	<p>Received on 15.04.2025 at the Partnersearch Forum in Vratsa:</p> <p>Since Serbian partners are supposed to provide 15% co-financing, what does this percentage cover in terms of costs? Can this be e.g. a transformer station? Or expansion of the transformer station?</p>	<p>"Transformer stations or their expansion—if related to changes in capacity—are considered ineligible costs.</p> <p>The 15% co-financing rate applies to the total project budget, not to individual budget lines.</p>
19	<p>Received on 15.04.2025 at the Partnersearch Forum in Vratsa:</p> <p>Is the laying of concrete fundamentals for production needs eligible?</p>	<p>Laying concrete foundations for production needs can be eligible, but only under certain conditions. Based on the guidelines for the Interreg VI-A IPA Bulgaria–Serbia Programme, such work would fall under infrastructure and works costs, which are eligible as long as they directly support the project's investment objective</p>
20	<p>Received on 15.04.2025 at the Partnersearch Forum in Vratsa:</p>	<p>Forklift is eligible cost under BC 5 Supply of equipment.</p>



	Is it the purchasing of a forklift eligible cost?	
21	<p>Received on 15.04.2025 at the Partnersearch Forum in Vratsa:</p> <p>What is the timeline for reimbursement of expenditures?</p>	<p>The reimbursement of funds will be performed by the Managing Authority (MA) after the verification process. The reimbursement of expenditures for execution of the operation is based on verifications by controllers and approval of the project progress report for the respective reporting period. Only after the verification of expenditures and approval of the progress report can the Lead Partner (LP) request reimbursement from the MA.</p> <p>However, the LP may request an advance payment in two installments: the first (10% of the total subsidy) can be requested within 45 days after the subsidy contract enters into force, and the second (another 10%) after a project partner has awarded a sub-contract for an investment activity. These advance payments are optional and limited to a total of 20% of the subsidy. All received advance payments must later be justified with verified expenditures before further reimbursements can be made.</p> <p>More details could be find in Annex C Subsidy Contract BG-RS.docx, which is part of the document package available at the following link on the programme's website:</p> <p>https://ipa-bgrs.mrrb.bg/sites/default/files/documents/2025-03/GfA_10032025.rar</p>
22	<p>Received on 15.04.2025 at the Partnersearch Forum in Vratsa:</p> <p>What is the amount of the advance payment and when is it transferred?</p>	<p>The advance payment provision 10% of the amount after contracting the project, additionally 10% after contracting the investment supply.</p>
23	<p>Received on 15.04.2025 at the Partnersearch Forum in Vratsa:</p> <p>Are projects aiming at using solar energy in the production of goods (bakery) which goods are later exported eligible?</p>	<p>If the company installs the necessary equipment and uses the energy produced for for its own production needs, the activity is eligible. Export of electricity produced from the installation as an activity by itself is not eligible.</p>



24	<p>Received on 15.04.2025 at the Partnersearch Forum in Vratsa:</p> <p>Can you please confirm that the candidate is required to have been operational for the last three years to be eligible.</p>	<p>According to Guidelines for Applicants, Section 2.1 – Eligibility of Applicants Eligible applicants must be legal entities that were both registered and actively operating within the programme’s eligible cross-border area between Bulgaria and Serbia by 31 December 2021</p>
25	<p>Received on 16.04.2025 via e-mail:</p> <p>Could you please provide PDF versions of the following:</p> <p>PDF Application format</p> <p>PDF Budget format</p>	<p>The Application Form, including the Budget, is available online exclusively in JEMS.: https://jems-bgrs.mrrb.bg/no-auth/login?ref=%2Fapp%2Fdashboard</p>
26	<p>Received on 16.04.2025 via e-mail:</p> <p>Can you please give us a contact person or contact where we can get more information regarding participation in new programme?</p>	<p>Slavijan Kostadinov Head of the Joint Secretariat Tel: +359 2 9405 666</p>
27	<p>Received on 24.04.2025 at the Info Day in Kyustendil:</p> <p>A wine producing company is planning the purchase of equipment to allow for the expansion of production. However, the land is not the property of the company.</p>	<p>In this case, the company needs to provide a lease agreement for a minimum duration of 10 years (to guarantee sustainability of project results)</p>
28	<p>Received on 24.04.2025 at the Info Day in Kyustendil:</p> <p>Please confirm that no additional documents are to be submitted by the applicant where the relevant competent body has issued a letter clearly stating that an Environmental Impact Assessment (EIA) for the project investment is not necessary.</p>	<p>Applicants must submit a copy of a letter issued by the relevant competent body clearly stating that an Environmental Impact Assessment (EIA) for the project investment is not necessary. Alternatively, if the competent authority confirms the need for an EIA, a copy of a positive EIA is required.</p> <p>In cases when the EIA opinion requires obtaining consent from the competent Basin Directorate, a copy of a letter from the relevant Basin Directorate confirming project compliance with the River Basin Management Plans and Flood Risk Management</p>



		Plans has to be provided.
29	<p>Received on 24.04.2025 at the Info Day in Kyustendil:</p> <p>How can the programme bodies facilitate the search of project partners?</p>	<p>The MA and the JS organize a number of events for promotion of the Call for project proposals for direct support to SMEs. An example of such events is the Partner search forum that provides an opportunity for organizations that wish to apply, but do not yet have established partnership relationships, to establish contact with other interested organizations.</p> <p>In terms of IT and communication tools, a database of interested companies has been created and can be accessed at https://ipa-bgrs.mrrb.bg/en/term/10/node/143</p> <p>In addition, there is a closed Facebook group for partner search which candidates can join.</p>
30	<p>Received on 07.05.2025 via e-mail:</p> <p>Is it eligible to participate as a project partner under the call a Serbian company with Code of its main economic activity for 2023 in 16.10 “Sawmilling and planing of wood” of NACE Rev.2.?</p>	<p>Based on the Guidelines for Applicants, Section 2.1 Eligibility of Applicants, Serbian SMEs and entrepreneurs are eligible to participate in the call if their main economic activity falls under Division C.16 “Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials” of NACE Rev.2. This includes C.16.10 – Sawmilling and planing of wood, which is explicitly part of Division C.16.</p> <p>According to the Guidelines, applicants are eligible if they meet all of the following:</p> <ol style="list-style-type: none"> 1. Are legally established entities operating in the programme area; 2. Are registered and operating not later than 31.12.2021; 3. Meet the criteria for SMEs as per EU and national legislation; 4. Have their main economic activity in Division C (Manufacturing), including C.16; 5. Are directly responsible for project preparation and management. <p>Therefore, a Serbian company with the main economic activity code 16.10</p>



		<p>“Sawmilling and planing of wood”, as part of Division C.16, is eligible to participate as a project partner under the call, provided it fulfills the other general eligibility criteria outlined in Section 2.1 of the Guidelines for Applicants</p>
31	<p>Received on 07.05.2025 via e-mail:</p> <p>Please confirm (explain) that it is not obligatory the 2 partners under the project (from Bulgarian and Serbian side) to have one and same code of NACE Rev.2.?</p>	<p>Each partner must independently meet the NACE eligibility requirement under Applicants, Section 2.1 Eligibility of Applicants, Serbian SMEs and entrepreneurs, but their codes can be different, as long as both are from the eligible sectors listed in the Guidelines.</p> <p>This allows complementary partnerships between enterprises in different but related industries, which supports the Programme’s goal of cross-border collaboration and value chain development</p>
32	<p>Received on 07.05.2025 via e-mail:</p> <p>Please confirm (explain) that the 2 partners under the project (from Bulgarian and Serbian side) is eligible to plan in its budgets under the project, investments in different equipment related with the production activity of each of the candidates, which is important for improve the capacity and competitiveness of each partner? For example, is it eligible one of the partners, which acting in the area of metal details treatment (in class C24), to purchase a new and modern lathe for its production process, but the other partner, which acting in area of furniture production (in class C31), to purchase a Cutting machine?</p>	<p>According to Section 2.2.3 – Eligible Activities, under Priority 1 (SO1.3) “Enhancing sustainable growth and competitiveness of SMEs and job creation in SMEs, including by productive investments,” the Programme supports:</p> <ul style="list-style-type: none"> • Technological and organizational investments aimed at increasing productivity, product/service quality, and production capacity; • Procurement of specialized equipment and technologies, tailored to each SME’s operational needs; • Projects in which at least 60% of the total eligible costs must be allocated to investment components (e.g., equipment and infrastructure). <p>Both partners are allowed and encouraged to invest in different types of production-related equipment, as long as each investment:</p> <ul style="list-style-type: none"> • Is appropriate for their own sector, • Is within the eligible cost categories,



		<ul style="list-style-type: none"> Supports the objectives of Priority 1 (SO1.3): enhancing SME competitiveness and job creation through productive investments.
33	<p>Received on 19.05.2025 via e-mail:</p> <p>With regard to the Interreg Bulgaria-Serbia programme and the requirement that the economic activity code of both partners must be included in the list of eligible economic activity codes under the programme, my question is: shall the main economic activity code be on the list of eligible economic activity codes at the date of application or for the last completed financial year? Is a partner company from Serbia, which had a code in trade the previous year, but at the end of that year was carrying out a different activity (among the eligible under the programme), eligible to participate as a partner with its new activity code changed in 2025?</p>	<p>According to the Guidelines for Applicants, section 2.1. Eligibility of SMEs and entrepreneurs, p.18, partners shall have a main economic activity in Division C Manufacturing; Division E Waste management; Division J Information and communications; Division M Professional Scientific and Technical Activities, in accordance with Statistical Classification of Economic Activities in the European Community (NACE rev.2).</p> <p>The main economic activity, i.e. the relevant code from the list of eligible divisions as per the breakdown provided, shall be the one for the last completed financial year.</p>
IV. Budget Forecast		
34	<p>Received on 12.03.2025 via e-mail:</p> <p>According to the Guideline for applicants, regarding the justification of the amount for supply of equipment under the project, the LP and PP needs to be present 3 offers for each kind of the equipment planned within the project. Please, explain based on the prices of the 3 offers for some asset, which price/amount we need to take in account for the project - the lowest price from the 3 offers or the middle arithmetic prices from the 3 offers? For example: if we have the following 3 offers for an equipment "X" - offer 1 for 1000 euro, offer 2 for 1500 euro and offer 3 for 2000 euro, which amount we need to put in</p>	<p>When the preferred market analysis method involves obtaining three offers, the amount included in the project budget must be based on the arithmetic/average price of the three offers.</p> <p>Furthermore, as outlined in the Guidelines for Applicants, the average price should be calculated at the partner level, taking into account the national inflation rate, if necessary.</p>



	the budget - 1000 euro (lowest) or 1500 (middle)?	
35	<p>Received on 12.03.2025 via e-mail:</p> <p>Regarding the justification of the market analyses for supply of equipment, instead of the official offers, is it eligible to be presented print screens from internet sites or extraction of catalogues for justification of the amount and technical specifications of the planned equipment?</p>	<p>According to the Guidelines for Applicants, the market analysis must provide a clear and credible justification for the estimated costs and technical specifications of the planned equipment. While official offers from suppliers are the preferred method, alternative sources such as print screens from internet sites or extracts from catalogues may be accepted under the following conditions:</p> <ul style="list-style-type: none"> - The extracted information must be relevant, up to date, and clearly indicate the supplier, price, and technical specifications of the equipment. - The source (website, catalogue, etc.) should be verifiable, meaning that the provided information must allow for independent confirmation. - The information should be presented in a structured manner that facilitates evaluation and comparison during the assessment process. <p>However, please note that the final decision on the acceptability of such documentation will be made during the evaluation stage, based on its clarity, reliability, and compliance with programme requirements.</p>
36	<p>Received on 12.03.2025 via e-mail:</p> <p>Is it eligible the lump sum of 12 000 euro for preparation to be used for covering only for the elaboration of project proposal and application form?</p>	<p>The lump sum can be used for the elaboration of the project proposal and application form, as these are explicitly mentioned as eligible preparation costs. However, the guidelines indicate that preparation costs may also cover other expenses such as consultancy, technical documentation, translations, taxes, and other charges. While the lump sum is provided as a fixed amount regardless of actual costs incurred, it is advisable to ensure that all necessary preparation expenses are covered within this sum.</p> <p>Also, please bear in mind that the amount shall be included in the respective project lead partner's budget at the application stage.</p>
37	Received on 12.03.2025 via e-mail:	The project preparation expenditures must be incurred no later than the project



	Is it needed the project preparation costs to be carried out and paid before or on the date of submission of the project proposals, to be eligible and reimbursed?	<p>proposal submission date. To be eligible for reimbursement, the project has to be approved for financing by the Monitoring Committee and to be concluded Subsidy contract with the Managing Authority. The reimbursement is in a form of a lump sum of EUR 12 000 (project preparation expenditures for projects).</p> <p>The amount shall be included in the respective project lead partner's budget at the application stage and reported by the lead partner in the first partner report at implementation stage.</p>
38	<p>Received on 12.03.2025 via e-mail:</p> <p>Is it obligatory to put in the project's budget project preparation costs? If we do not to use this type of costs, can we just not to put it on the project's budget?</p>	<p>Including project preparation costs in the project's budget is not obligatory. The guidelines state that the lump sum for preparation costs shall be included in the lead partner's budget at the application stage, but they do not indicate that it is mandatory. If the project partners decide not to use this type of cost, they can simply exclude it from the project's budget. However, once included, the lump sum must be distributed among partners in a fair and transparent manner, as stated in the Project Partnership Agreement.</p>
39	<p>Received on 29.03.2025 via e-mail:</p> <p>The Guidelines for applicants explains that the project must have an investment component that should be at least 60% of the total eligible costs of the entire project. This also includes the purchase of equipment. Does each partner purchase equipment for themselves or does the equipment have to be jointly owned and used by both partners?</p>	<p>Each partner can purchase equipment for themselves, but the equipment must be used for the project and meet the overall investment requirement of at least 60% of the total eligible costs on project level. Joint ownership is not required.</p>
40	<p>Received on 28.03.2025 at the Information Day in Sofia</p> <p>Is an advance payment foreseen, and if so, what will be its amount?</p>	<p>Yes, an advance payment is foreseen, amounting to 20% of the total amount of the subsidy. The advance is paid in two tranches: 10% is transferred after the Subsidy Contract enters into force, upon receiving a request for the advance payment and the rest 10% of the total amount of the subsidy after one of the project partners awarded a sub-contract for investment activity and LP submitted a request for advance payment and a copy of the notification letter to the successful tenderer or a copy of contract for investment activity.</p>



41	Received on 28.03.2025 at the Information Day in Sofia How will the funds be reimbursed to the beneficiaries during the project?	The funds will be reimbursed to the beneficiaries based on verifications by National Controllers (NC). The Project Partners (PPs) will report their expenditures, which will be checked and validated by the controllers designated by the Managing Authority (MA) or National Authority (NA). The Lead Partner (LP) will submit a Request for Payment to the MA within the deadlines specified in the Subsidy Contract. Once the expenditures are verified, the MA will transfer the reimbursed funds to the LP's designated project bank account. The LP is then responsible for transferring the respective funds to each project partner in accordance with the approved request for payment and the deadlines set in the Partnership Agreement.
42	Received on 28.03.2025 at the Information Day in Sofia Are there any requirements for the company's revenues?	The financial capacity of the SMEs is subject to technical evaluation. Please refer to Attachment 5 for more details.
43	Received on 28.03.2025 at the Information Day in Sofia Is it permissible to generate revenue within the project?	<p>Revenue generation may be permissible, but it must strictly adhere to the non-profit principle—meaning all income should be used to sustain project activities, not for private or commercial gain. The grant amount representing the EU funds and national co-financing funds may not have the purpose or effect of producing a profit for the project partners. Profit is defined as a surplus of the grant amount received and the revenue generated by the operation over the total amount of eligible expenditures incurred by the project partner and verified by the Managing authority. If this calculation results in a profit for the project partner, the Managing authority will reduce the final amount of the grant with the profit generated.</p> <p>To ensure compliance with the no-profit principle and facilitate proper financial verification, each project partner must maintain detailed, timely, adequate, and traceable records of any revenue generated during the implementation period. At the final expenditure reporting stage, each partner will be required to submit a declaration of generated revenues, accompanied by relevant supporting documentation.</p>



44	<p>Received on 31.03.2025 via e-mail:</p> <p>According to the point 3.2. “Supporting documents” from the Guideline for applicants, the partners should present (B3): A Profit and Loss account and Balance sheet for the last 3 years preceding the application as per National Legislation for each partner. In the case of linked enterprises all required above financial statements have to be submitted for all the linked enterprises. In this regard, do we understand you correctly, that if some of the partners have linked enterprises, as a part of the Application form, we need to present the above mention documents and for them?</p>	<p>According to point 3.2. "Supporting documents" from the Guideline for applicants, if any of the partners have linked or partner enterprises, the Profit and Loss account and Balance Sheet for the last three years must be submitted for both the partners and their linked enterprises, in accordance with national legislation.</p>
45	<p>Received on 31.03.2025 via e-mail:</p> <p>Which financial year do you define as a last financial year for the purpose of the call – 2023? In case that some of the partners officially apply its financial reports for 2024 year, that means that 2024 year will be the last for him. In such case do they need to present a Certificate for a main economic activity for 2024? Do we need to present the relevant financial reports for 2024, 2023 and 2022 years?</p>	<p>In the context of the application form submission deadline (June 11, 2025), if a Bulgarian company follows the standard deadlines, by that time, the financial report for 2024 will not yet be officially submitted (unless it is voluntarily submitted earlier). The submission of the annual financial report is mandatory under the Law on Statistics, the National Statistical Program for 2025, the Corporate Income Tax Act (CITA), and the Personal Income Tax Act (PITA), within the period from January 1 to June 30, 2025.</p> <p>This means that for most Bulgarian companies, 2023 will be the last officially completed financial year. Therefore, they must present the financial reports for 2023, 2022, and 2021. If a partner has submitted the 2024 report earlier, then 2024 will be their last financial year, and they will need to present the reports for 2024, 2023, and 2022.</p>
46	<p>Received on 24.04.2025 at the Info Day in Kyustendil:</p>	<p>The exact percentage of the flat rate has to be determined by each project partner and</p>



	<p>Budget category 1 (BC1) – Staff Costs is a flat rate of the total eligible costs under BC 4, BC 5, and BC 6 from the respective partner's project budget. Can BC1 be 0 (zero) in the project budget at application stage?</p>	<p>yes, it can be 0 (zero). However, please bear in mind that the percentage remains unchanged for the entire project implementation period.</p>
47	<p>Received on 24.04.2025 at the Info Day in Kyustendil:</p> <p>Projects approved by the Programme's Monitoring Committee and contracted by the MA are entitled to reimbursement of Project Preparation Costs (PPC) in the form of a lump sum. Since the amount is in the form of a lump sum, are applicants required to submit supporting documents in order for the amount to be reimbursed?</p>	<p>The lump sum has to be added to the lead partner's reported expenditure in the first report and shall be verified and reimbursed to the lead partner. No supporting documents are required to be submitted by the beneficiary. However, such documents shall be kept on file and be available upon request.</p>
48	<p>Received on 24.04.2025 at the Info Day in Kyustendil:</p> <p>Where a project is developing a new software as a brand new product, shall this development be envisaged and budgeted for under "External expertise and services" or under "equipment"?</p>	<p>The choice of budget category will depend on the nature of the activities and the product (software) itself. Therefore, candidates are advised to provide very clear description in order to justify the choice of the respective budget category.</p>
49	<p>Received on 24.04.2025 at the Info Day in Kyustendil:</p> <p>What is the eligible grant amount a candidate can receive in case the de minimis received over the last three years exceeds the threshold?</p>	<p>According to Commission Regulation (EU) 2023/2831 on the application of Articles 107 and 108 of the Treaty on the Functioning of the European Union to de minimis aid (the "de minimis Regulation"), the total amount of de minimis aid granted to a single undertaking must not exceed EUR 300,000 over any period of three years.</p> <p>If a candidate organisation has already received de minimis aid equal to EUR 300,000 within the relevant three-year reference period, it is not eligible to receive any further de minimis aid under the present call.</p>
50	<p>Received on 24.04.2025 at the Info Day in Kyustendil:</p> <p>Is VAT eligible and what is the procedure for its recovery?</p>	<p>The expenditures for VAT is eligible for operations the total cost of which is below EUR 5 000 000 (including VAT).</p> <p>The respective national VAT legislation must be taken into consideration when budgeting project costs by each project partner in the project proposal.</p>



51	<p>Received on 25.04.2025 via e-mail:</p> <p>According to Guidelines for applicants, the amount for project preparation costs shall be included in the respective project lead partner's budget at the application stage and reported by the lead partner in the first partner report at implementation stage. The reimbursement is in a form of a lump sum up to EUR 12 000 (project preparation expenditures for projects).</p> <p>In case that total budget of project preparation is 10.000 EUR (6.000 eur LP1 and 4.000 EUR PP2), all amounts will be included in LP1 Budget and after grant approval, 4000 euro will be transferred to PP2.</p> <p>So, if the budget of LP1 is 193.000 EUR, preparation costs will increase its budget for 10.000 EUR in application stage although the total budget for LP1 is EUR 199,000 EUR (193.000+6.000=199.000 EUR). Real LP1 budget not exceed the maximum available grant amount per partner, which is not the case if the entire amount for project preparation is added (193,000.00+10,000= 203,000).</p> <p>Please for explanation and instructions?</p> <p>Is it allowed additional contribution by the partner in the project?</p>	<p>According to the Guidelines for Applicants project preparation costs are reimbursed as a lump sum of EUR 12,000 and must be included in the Lead Partner's budget at the application stage. Even if these costs are shared between the Lead Partner (LP1) and another partner—for example, EUR 6,000 by LP1 and EUR 6,000 by PP2—the full amount must still be reflected in LP1's budget and reported solely by the Lead Partner in the first reporting period. After the project is approved, the relevant portion (e.g. EUR 6,000) may then be transferred to PP2 based on the Project Partnership agreement between partners.</p>
52	<p>Received on 18.05.2025 via e-mail: :</p> <p>In the GfA for the call (page 32) is pointed that: In case the expenditures shall be reimbursed as unit costs, so defined costs according to the duration of the event and number of participants should be respected:</p> <p>18,00 EURO per participant in one day events;</p>	<p>The relevant unit costs that shall be respected are the ones stipulated in the Guidelines for Applicants:</p> <ul style="list-style-type: none"> ▪ 18,00 EURO per participant in one day events; ▪ 73,00 EURO per participant in multi-day events <p>Ref. Guidelines for Applicants, p.32, section Service costs, form of</p>



	<p>73,00 EURO per participant in multi-day events.</p> <p>On the presentation for Eligibility of the expenditures from the informational event in Sofia from 28.03.2025 (slide 7) was pointed that the unit cost per participant in one day events is 14 euro. Please give you clarification which amount is correct?</p>	<p>reimbursement.</p>
53	<p>Received on 18.05.2025 via e-mail:</p> <p>Regarding the Eligibility of the expenditures for Service costs (costs for event organizations), is it correct our understanding that we can choose what form of reimbursement of the costs we can use – real costs or unit costs?</p> <p>1. On one hand, is it eligible, if we decide to reimburse the costs basis on a real cost, it means we can plan our expenditures for the related services and we need to tendering, take invoices, protocols, photos, etc for the purpose of the verification? If that is eligible, can we put in the budget expenditures for:</p> <ul style="list-style-type: none"> - rent of hall (per hour or per day); - rent of equipment; - transport; - catering; - transport; - accommodation; - materials for the event; <p>In that case, is there some referent costs and limits for the different type of services, which we need to keep for in the</p>	<p>Partners can report Service costs (costs for event organizations) covered by BC4. External expertise and services costs on the basis of unit cost or real costs. Partners can choose to apply any of the two forms of reimbursement, or both.</p> <p>Services costs can be the following:</p> <ul style="list-style-type: none"> ▪ Expenses for rent of hall for meetings, trainings, conferences, etc.; ▪ Expenses for rent of equipment - translation equipment, audio equipment, IT equipment, etc.; ▪ The expenditure for rent of vehicle for participants in the events (car, van, minibus, bus, etc.); ▪ Expenses for coffee breaks, refreshments, lunches and dinners for participants in the events; ▪ Accommodation costs; ▪ Expenses for purchase of consumables and materials for the participants in the events - paper, files, folders, cases, CDs, printing of invitations, agenda, presentations, etc. <p>In case the expenditures shall be reimbursed on the basis of real costs, all supporting documents proving successfully implementation of the event, achieving the outputs, number of participants and etc. must be available for control purpose at the verification stage.</p> <p>On the other hand, if the expenditures are to be reimbursed as unit costs—as</p>



	<p>budget?</p> <p>2. On the other hand, if we use the reimbursement on basis on the unit costs, do we need to held tendering and to provide on the verification stage the relevant documents? Also do we need to describe in details what the costs cover or just is enough to put in the budget the units (for example 10 persons) and the unit costs (18 euro) and so we have 180 euro for organization of a X meeting?</p> <p>3. Is it eligible to use both type of reimbursement in the budget: plan an event based on the real costs and planning other event based On the other hand, if we use the reimbursement on basis on the unit costs, do we need to held tendering and to provide on the verification stage the relevant documents? Also do we need to describe in details what the costs cover or just is enough to put in the budget the units (for example 10 persons) and the unit costs (18 euro) and so we have 180 euro for organization of a X meeting?</p>	<p>defined in the Guidelines for Application—the duration of the event and the number of participants must be duly observed. Supporting documents demonstrating the successful implementation of the event, achievement of the expected outputs, and verification of the number of participants must be available for review during the verification stage.</p> <p>Amounts to be budgeted are the responsibility of the project partners and have to be clearly explained and justified.</p> <p>The projects partners bear the sole responsibility for the implementation of the procurement procedures in conformity with the Programme rules, their project, the Public procurement act of the Republic of Bulgaria, Council of Ministers decree № 4/11.01.2024, and the Practical Guide on contract procedures for European Union external actions. These procedures shall be in line with the annual procurement plan of the organizations and shall not be subject to artificial splitting of tenders.</p>
54	<p>Received on 18.05.2025 via e-mail:</p> <p>Is it B5. Justification for expenditures planned as lump sum costs under Budget category 4, obligatory to be presented? Do we need to present filled annex B5. Justification for expenditures planned as lump sum costs under Budget category 4, for the following amounts defined in BL 4 of the project: amounts for the publicity measures planned in the project; amounts for travel and accommodation expenditure for planned events in the</p>	<p>The submission of B5. Justification for expenditures planned as lump sum costs under Budget category 4 is mandatory, as specified in section 3.2. Supporting documents of the Guidelines for Applicants (p.38)</p>



	project, in case we use the option for real costs?	
55	<p>Received on 21.05.2025 via e-mail:</p> <p>1. In section 3.2 “Supporting documents” of the Guidelines for applicants, it is stated that technical specifications for supplies with units, unit and total prices in euros must be provided, issued in the original language and translated into English, signed (or digitally signed with a qualified electronic signature) by the partner as a certified true copy. It is also mentioned that technical specifications are not required for equipment used for project management purposes.</p> <p>Could you please clarify what exactly is meant by “technical specifications”? Would an Excel document listing the equipment, quantities, unit and total prices, and technical characteristics be sufficient?</p> <p>2. Additionally, the same section of the document states that at least three official offers from different suppliers (licensed, where applicable) must be provided for planned supplies. These offers must be signed by the suppliers, issued in the original language and translated into English, and then certified by the partner as a true copy.</p> <p>Could you confirm whether it is mandatory to submit three offers even when the procurement value is below EUR 20,000, taking into account that according to the Contract Procedures for European Union External Action (Section 2.6.1. “Which procurement procedure to apply – Procurement”), a single tender procedure may be applied for contracts for supplies, services,</p>	<p>1. In case of supply of equipment, the applicants should present detailed technical specifications that should be clear enough for determination of the seeking deliverables.</p> <p>2. The projects partners bear the sole responsibility for the implementation of the procurement procedures in conformity with the Programme rules, their project, the Public procurement act of the Republic of Bulgaria, Council of Ministers decree № 4/11.01.2024, and the Practical Guide on contract procedures for European Union external actions. These procedures shall be in line with the annual procurement plan of the organizations and shall not be subject to artificial splitting of tenders.</p> <p>3. The GfA specify that it is in the technical specifications for supplies that the trademarks and models must not be indicated</p> <p>4. The flat rates of EUR 18/73 can be applied when organizing training sessions for the project partners ‘staff, provided that such a training is an approved project activity and the staff members are attending as participants and not as project team members.</p> <p>5. For meetings between project partners, BC3 Travel and accommodation costs shall be applied.</p>



	<p>and works?</p> <p>3. The same section also highlights that technical specifications must not disclose any trademarks.</p> <p>Does this rule also apply to the offers submitted? If yes, how can we submit the offers without disclosing trademarks?</p> <p>4. In section 2.3 “Eligibility of expenditures” (4. External expertise and services costs), it is stated that for event organization costs, a flat rate of EUR 18 per participant for one-day events, and EUR 73 per participant for multi-day events, may be applied.</p> <p>Can the flat rates of EUR 18/73 also be applied when organizing training sessions for our staff/partners’ staff?</p> <p>5. For meetings between project partners and travel between SRB-BG and BG-SRB, is it possible to apply a flat-rate reimbursement?</p>	
<u>VI. Other</u>		
56	<p>Received on 26.03.2025 via e-mail:</p> <p>Can the applicants under the Call for Proposals for direct support to SMEs apply without attending the Information Day on 28.03.2025 ?</p>	<p>Attending the Information Day on March 28, 2025, for the Call for Proposals under the Interreg IPA Bulgaria – Serbia Programme is not a mandatory requirement for applicants. While participation can provide valuable insights into the application process, eligibility criteria, and project expectations, applicants can still apply without attending. However, it is essential to carefully review the Application Package and Guidelines for Applicants available on the Programme's official website to ensure compliance with all requirements. For the convenience of applicants, the presentations from the Information Day will be uploaded to the Programme's website.</p>



57	<p>Received on 26.03.2025 via e-mail:</p> <p>The deadline for receiving project proposals under the Call is 11.06.2025, but when does application process start?</p>	<p>The application process starts when the Call for Proposals is published, which occurs before the submission deadline of June 11, 2025. Applicants should prepare a joint project proposal with a partner from the other country, decide which of them will be the Lead Partner, and then register in the information system of the Programme - https://jems-bgrs.mrrb.bg/. The project proposal must be submitted before the deadline 11.06.2025, 5 PM EEST, after this deadline the system will not accept project proposals</p>
58	<p>Received on 26.03.2025 via e-mail:</p> <p>Please, define the steps for applying under the Call?</p>	<p>STEP BY STEP APPLICATION PROCESS</p> <p>Step 1: Call-related events Discover the call-related events you were able to attend to get answers to your questions about the call for proposals.</p> <ul style="list-style-type: none"> • Information Day - March 28, 2025, 13:30, Sofia, at the Ministry of Regional Development and Public Works building • Information Day with a planned date of April 9, 2025, in Nis, Serbia • Partnership Forum with a planned date of April 15, 2025, in Bulgaria • Webinar in May <p>Step 2: Check for the best match It all starts with your idea. The first thing on your list is to check that it fits well within our thematic framework of the Priority 1, Specific Objective 1.3 3. “Enhancing sustainable growth and competitiveness of SMEs and job creation in SMEs, including by productive investments“</p> <p>Step 3: Find partners and develop together your project idea Look for partners with shared interest and create your project partnership. Also, once your partners are on board, they can help develop your application further by adding new facets to your idea, based on their own expertise.</p>

**Step 4: Registering in JEMS**

Each Lead partner must be registered in the **Joint Electronic Monitoring System (JEMS)** <https://jems-bgrs.mrrb.bg/>. The Lead partner is responsible for submitting the project proposal and handling primary administrative tasks. Detailed information for the Application Form is provided in <https://jems.interact.eu/manual/> section User Manual, Application/Project details, Application Form.

Step 5: Develop your Application Form

- **Project Activities and Project budget** - The right approach to estimating a reasonable project budget is to first plan the activities to be carried out and then plan the budget on the basis of those activities. Therefore, the overall budget has to be in line with the activities planned, the project's duration and the number of partners involved.
- A project consists of **Work Packages**, activities, **deliverables**, and **outputs** to achieve its objectives. Since these terms are often confused, this section clarifies their meaning, defines possible activities and deliverables, and sets quality standards to ensure relevant and useful results for the Programme. The project's success depends on the quality of its **activities, outputs, and deliverables**.
- **Output indicators** are used to measure and monitor project outputs and they can be selected by the applicants under the Thematic Work Packages whenever relevant for the project proposal.
- **Result indicator** is used to measure the expected results of the project, i.e. the change in the local situation as direct consequence of the project implementation, the immediate advantage for beneficiaries or end users and the behavioural change.

Step 6: Get help and support

Find answers to your questions - The applicants may submit questions of



		<p>substance in written form up to 21 calendar days before the deadline for submission of proposal. The JS will reply no later than 14 calendar days before the deadline for the submission of proposals. All questions received by the potential applicants, together with their answers, will be published on the Programme website: https://ipa-bgrs.mrrb.bg/</p> <p>Check out the most frequently asked questions about preparing a project application.</p> <p>Step 7: Submit the Application Form together with all necessary Attachments (See GfA)</p> <p>Once you have finalised your online application and designated an Authorised Signatory (if applicable), it is time to submit your application! The lead partner submits the project proposal through JEMS. All partners must confirm their participation by signing declarations. Completed proposals must be submitted by June 11, 2025, through the JEMS platform.</p> <p>Please note: We advise you to do this well ahead of the submission deadline, to avoid technical issues in the last minute.</p>
59	<p>Received on 28.03.2025 at the Information Day in Sofia</p> <p>Will bank guarantees be required from the partners?</p>	<p>Bank guarantees are not required from the partners as part of the application or project implementation process. The Programme does not specify the need for such guarantees for participation or funding.</p>
60	<p>Received on 28.03.2025 at the Information Day in Sofia</p> <p>Can experts other than the typical positions for coordinator and project manager be included in the project management team?</p>	<p>Yes, experts other than the typical positions for coordinator and project manager can be included in the project management team, as long as their appointment complies with the respective national legislation and they are needed for project implementation. The project partner has the right to determine the positions and staff needed for the proper functioning of the project team, as well as the staff required for the implementation of specific project activities. However, the appointment of staff and their roles must be in line with the legal requirements, and any changes to the staff during the project implementation should be managed by the project partner.</p>
61	<p>Received on 31.03.2025 via e-mail:</p>	<p>According to point 3.2. "Supporting Documents" from the Guideline for</p>



	<p>According to the point 3.2. “Supporting documents” from the Guideline for applicants, the partners should present (B1): A Decision of the Managing or Steering Boards, Board of Directors or any similar body or managing person depending on the legal form of the SME regarding the project development, implementation and ensuring the sustainability of the project results. This decision have to indicate the legal representative of the partner. In this regard, is it acceptable, in case that the SME is a Single company ltd, Limited company or JSC (on Bulgarian ЕООД, ООД или АД) that kind of document to be in form of an Order (Заповед) from the person which represent the company – a manager/executive director?</p>	<p>Applicants, the required decision must come from the Managing or Steering Boards, Board of Directors, or a similar body or managing person, depending on the legal form of the SME.</p> <p>In line with Bulgarian legislation:</p> <ul style="list-style-type: none"> • For a Single Member Limited Liability Company (ЕООД) – the document should be in the form of a Decision (Решение) issued by the sole owner. • For a Limited Liability Company (ООД) – the document should be in the form of Minutes of Meeting (Протокол) from the General Meeting of shareholders. • For a Joint-Stock Company (АД) – the document should be a Decision (Решение) from the Board of Directors or the respective governing body. <p>Therefore, an Order (Заповед) from the manager or executive director alone would not be sufficient if the law requires a formal decision or protocol from the respective governing body.</p>
62	<p>Received on 31.03.2025 via e-mail:</p> <p>According to the point 3.2. “Supporting documents” from the Guideline for applicants, the partners should present (B2): A Certificates issued by the responsible Authority in each country verifying the main economic activity (according to NACE rev. 2, clearly indicating the main NACE activity and the complementary NACE activities. In this regard, for Bulgarian companies that should be a National Statistic Institute. Which is the responsible authority to issued that kind of certificate for Serbia?</p>	<p>The responsible authority that issues a certificates verifying the main economic activity of a company is Serbian Business Registers Agency.</p>



63	<p>Received on 31.03.2025 via e-mail:</p> <p>Can you provide a direction to where Annex C. Subsidy contract - draft version (for information purposes only) could be downloaded from?</p>	<p>The application package is available at https://ipa-bgrs.mrrb.bg/en/term/10/node/133.</p> <p>For informational purposes only, the Draft of the Subsidy contract can be found in the within the RAR folder Annexes.</p>
64	<p>Received on 07.05.2025 via e-mail:</p> <p>Please explain, which are the relevant Serbian documents (named on Serbian) of the following requested documents:</p> <ul style="list-style-type: none"> - <i>Profit and Loss account (Отчет за приходи и разходи)</i>, - <i>Balance sheet (Счетоводен баланс)</i>, - <i>Certificates for Headcount annual work unit (Отчет за заетите лица, средствата за работна заплата и други разходи за труд)</i> 	<ul style="list-style-type: none"> - Profit and Loss account in Serbian - <i>Биланс успеха</i> - Balance sheet in Serbian – <i>Биланс стања</i>, - Certificates for Headcount annual work unit – <i>Годишњи финансијски извештај</i>, containing the whole set of documents, according to the Law on Accounting.
65	<p>Received on 07.05.2025 via e-mail:</p> <p>According to the form of the accounting documents: do you need the presented accounting documents and the Certificate verifying the main economic activity (according to NACE rev. 2), to be signed and stamped?</p>	<p>Certificate issued by the responsible Authority in each country verifying the main economic activity (according to NACE rev. 2, clearly indicating the main NACE activity and the complementary NACE activities, is to be issued in the original language from the respective authority, in the manner in which that relevant institution issues that document.)</p>
66	<p>Received on 07.05.2025 via e-mail:</p> <p>About the accounting documents and the Certificate verifying the main economic activity from the Serbian partner, can we</p>	<p>According to point 3.2. "Supporting Documents" from the Guidelines for Applicants, it is stated that mandatory document B2 Certificate issued by the responsible Authority in each country verifying the main economic activity</p>

	download it form „АПР – Претрага евиденције финансијских извештаја“ (on https://fin.apr.gov.rs/JavnaPretraga/Home/Index) and signed/stamped as a true copy?	(according to NACE rev. 2, clearly indicating the main NACE activity and the complementary NACE activities, is to be issued in the original language from the respective authority, and English translation of the document should be signed / signed with qualified electronic signature by respective organization as true copy.
		Please also see the answer to question 60.
67	<p>Received on 05.05.2025 via e-mail:</p> <p>When implementing a project that includes the installation of photovoltaic panels for self-consumption on the roof of an existing production facility, is it necessary to provide a building permit and/or a document certifying that an Environmental Impact Assessment (EIA) has been conducted, in accordance with the requirements for projects under the procedure?</p>	<p>According to the <i>Guidelines for Applicants</i>, the requirements for providing a building permit and/or an Environmental Impact Assessment (EIA) depend on national legislation and the specific nature of the works.</p> <p>Building Permit:</p> <p>If the installation of photovoltaic panels on the roof of production facility is considered construction work that requires a building permit under the national legislation, applicants must submit:</p> <ul style="list-style-type: none"> • A valid Construction Permit (<i>Rešenje o građevinskoj dozvoli</i>) issued in accordance with Article 135 of the Law on Planning and Construction of the Republic of Serbia, or • A valid Decision on Approval of Execution of Works (<i>Rešenje o odobrenju izvođenja radova</i>) issued under Articles 144–146 of the same law. <p>If no construction permit is required, the applicant must provide:</p> <ul style="list-style-type: none"> • A statement by the competent authority confirming that the construction permit is not required, issued in the original language and with English translation. <p>Environmental Impact Assessment (EIA):</p> <p>If an EIA is required under national legislation, a positive EIA decision must be provided.</p> <p>If the EIA is not required, a statement from the relevant institution confirming this exemption must be submitted, issued in the original language and translated into English.</p>

		All documents must be submitted signed or with a qualified electronic signature by the respective project partner, as true copies.
68	<p>Received on 13.05.2025 via e-mail:</p> <p>Does the partners should to spend money firstly, and after that EU Fund will reimburse money based on documentation and criteria, or EU Fund pay money per approved project, and after that applicants/partners need to justify each project cost?</p>	<p>The reimbursement of funds will be performed by the Managing Authority (MA) after the verification process. The reimbursement of expenditures for execution of the operation is based on verifications by controllers and approval of the project progress report for the respective reporting period. Only after the verification of expenditures and approval of the progress report can the Lead Partner (LP) request reimbursement from the MA.</p> <p>However, the LP may request an advance payment in two installments: the first (10% of the total subsidy) can be requested within 45 days after the subsidy contract enters into force, and the second (another 10%) after a project partner has awarded a sub-contract for an investment activity. These advance payments are optional and limited to a total of 20% of the subsidy. All received advance payments must later be justified with verified expenditures before further reimbursements can be made.</p> <p>More details could be find in Annex C Subsidy Contract BG-RS.docx, which is part of the document package available at the following link on the programme's website:</p> <p>https://ipa-bgrs.mrrb.bg/sites/default/files/documents/2025-03/GfA_10032025.rar</p>
69	<p>Received on 09.04.2025 during the Info day in Serbia:</p> <p>Can a company that is 75% owned by a foreign citizen apply?</p>	<p>According to point 3.1.1. " Ineligibility criteria" from the Guideline for applicants if the company is registered in Serbia, it must be at least 51% owned by a Serbian citizen to be eligible.</p>
70	<p>Received on 09.04.2025 during the Info day in Serbia:</p> <p>Is the ultimate or immediate ownership structure important?</p>	<p>Ownership structure is important to verify the majority domestic ownership, for Serbian applicants.</p> <p>According to the Guidelines for Applicants, the focus is on immediate</p>



		<p>ownership rather than ultimate (indirect) ownership.</p> <p>“Serbian SMEs are not eligible if they are not majority domestically owned (at least 51%). The company acting as a project partner from Serbia must be at least 51% owned by a Serbian citizen.”</p> <p>This means:</p> <ul style="list-style-type: none"> • The immediate direct ownership (shareholding) must show that at least 51% is held by Serbian citizens; • It does not specify ultimate beneficial ownership (UBO) through multiple layers of entities; • What matters is that, on record — typically in the Serbian Business Registers Agency — the majority shares (≥51%) are owned by individuals with Serbian citizenship. <p>Practical Implication:</p> <p>If a Serbian company is owned by another legal entity, it must be verified that the direct owner is majority-owned (≥51%) by Serbian citizens — otherwise, the SME would not be eligible.</p>
71	<p>Received on 09.04.2025 during the Info day in Serbia:</p> <p>Is it necessary to have only one partner on each side of the border? Or can it be more than two partners?</p>	<p>According to point 2.1. "Eligibility of SMEs and entrepreneurs" and 2.1.3. "Rules concerning partnership", from the Guideline for applicants, the project can include a maximum of two partners, including the Lead Partner — one partner per country is required.</p>
72	<p>Received on 09.04.2025 during the Info day in Serbia:</p>	<p>Single enterprise(linked or partner enterprises) may participate in only one</p>



	Can two linked enterprises submit a project proposal?	project proposal under this Call. Otherwise, all proposals will be disqualified.
73	Received on 09.04.2025 during the Info day in Serbia: Can one partner be a supplier to another project partner?	No. A partner can never act as a contractor in the any financed project at this Call for Proposals. A “partner” involved in the project implementation as “Lead Partner” or “project partner” is excluded from any forms of contracting to other partners within the project.
74	Received on 09.04.2025 during the Info day in Serbia: Is VAT eligible for Serbian partners?	Yes. According to point 2.3.6 "Eligible expenditures for VAT", the expenditures for VAT is eligible for operations, the total cost of which is below EUR 5 000 000 (including VAT). Therefore, VAT is eligible cost for Serbian partners.
75	Received on 09.04.2025 during the Info day in Serbia: Shall the additional documents be requested to prove the project preparation costs?	<p>No additional documents are needed, but the documents should be prepared and collected according to national legislation by the Beneficiary and in case of audit, they have to be present!</p> <p>Project approved for financing by the Monitoring Committee and have concluded Subsidy contract with the Managing Authority are entitled to receive the reimbursement of the preparation costs in a form of a lump sum of EUR 12 000 (project preparation expenditures for projects). The amount shall be included in the respective project lead partner’s budget at the application stage. With the first report, the lump sum for preparation costs shall be added to the lead partner’s reported expenditure, and shall be verified and reimbursed to the lead partner. The lump sum for preparation costs is allocated to the lead partner’s budget. Nevertheless, to reflect the partners’ involvement in the preparation of the application form in a fair and transparent way the partnership should share the preparation costs. The details of how preparation costs will be shared by the project partners need to be included in the Project Partnership Agreement (Annex 1).</p> <p>IMPORTANT The activities which have already been covered by any other EU funds are not eligible. The project partners should submit a declaration of</p>



		no double funding for project preparation (if planned such expenditures)
76	<p>Received on 09.04.2025 during the Info day in Serbia:</p> <p>Are the audit costs acceptable?</p>	<p>Audit costs for verification of the expenditure incurred and paid by the respective partner are not acceptable.</p> <p>If the question considers the audit as a service under “<i>Other specific expertise and services needed for the project</i>” and included and budgeted in the application form, this expenditure could be eligible if meets all other requirements for an external service.</p>
77	<p>Received on 09.04.2025 during the Info day in Serbia:</p> <p>Can the software be purchased through the project?</p>	<p>Yes, software purchases are eligible as part of equipment costs, provided they directly support project objectives.</p>
78	<p>Received on 09.04.2025 during the Info day in Serbia:</p> <p>Do the goods have to be of EU origin?</p>	<p>No specific requirement for EU origin is determined at this stage.</p> <p>Nevertheless, all procurement procedures during the project implementation, must comply with the applicable procurement rules.</p>
79	<p>Received on 09.04.2025 during the Info day in Serbia:</p> <p>Do the previous financial results affect the evaluation of the project proposal?</p>	<p>Yes, applicants must submit financial reports, and past financial performance may influence the evaluation score.</p>
80	<p>Received on 15.05.2025 via e-mail:</p> <p>In section 3.3. “Documents for information” from the Guidelines for the applicants is pointed a document A8.1 Explanatory note for climate proofing assessment (for information purpose only, but this document is not included in the published package with annexes for the call. Please check it and publish the document for information of the project candidates.</p> <p>Please explain, if the project proposal includes investments only for supply of equipment, do we need to present the annex under A8. “Climate proofing assessment”? If the answer is YES, do we</p>	<p>Please refer to the answer to Question 7.</p>



	<p>need to present the document for each partner (two annexes) or just to present only one filled A8 annex concerning the information for the whole project?</p>	
81	<p>Received on 20.05.2025 via e-mail:</p> <p>Regarding published open call under Priority 1 "Competitive border region" under the Interreg VI-A IPA Bulgaria–Serbia Programme 2021–2027, please give your clarifications on the following questions:</p> <p>1. Please explain is it needed Annex 3. Project Partner declaration and Annex 7. DNSH declaration, to be presented from each partner or only from a Lead partner?</p> <p>In the GfA for the call – section 3.1 (Annexes) is pointed the following:</p> <ul style="list-style-type: none"> - A3. Project Partner declaration – signed and dated and provided by each partner; - A7. DNSH declaration - signed and dated and provided by each partner; <p>But in the template of the declarations is stated that:</p> <ul style="list-style-type: none"> - Applicable only to Lead partner (page 2 on A3) - Name, surname and signature of the legal representative of the Lead partner (page 2 on A7) <p>2. In Annex 7 do we need to present the self-assessment for the compliance with the DNSH principles, for the whole project or each partner need to describe regarding its own investment under the project?</p>	<p>Annexes should be filled in according to the relevant template provided and submitted together with the Application form. All Annexes stipulated in the Guidelines for Applicants are mandatory as specified. Namely,</p> <ul style="list-style-type: none"> ▪ A3. Project Partner declaration – signed and dated and provided by each partner; ▪ A7. DNSH declaration - signed and dated and provided by each partner <p>A3. Project Partner declaration – “Applicable only to Lead Partner” and the following sentence are in [...] which indicates that this text can be deleted as applicable.</p> <p>A7. DNSH declaration provides a self-assessment by each partner regarding their own investment under the project.</p>



82	<p>Received on 18.05.2025 via e-mail:</p> <p>Regarding to filling the partner's information in JEMS: in Part B "Project partners" is requested information for PIC (EC Participant Register) of each partner. Is it obligatory to fill information in that field? Do we need to present PIC for each partner of the project?</p>	<p>The PIC (EC Participant Register) is applicable in case an organization wishes to participate in a call for proposals or tenders with eSubmission. This is not a requirement under this call.</p>
83	<p>Received on 15.05.2025 via e-mail:</p> <p>In section 3.3. "Documents for information" from the Guidelines for the applicants is pointed a document A8.1 Explanatory note for climate proofing assessment (for information purpose only, but this document is not included in the published package with annexes for the call. Please check it and publish the document for information of the project candidates.</p>	<p>With regard to Art 22, 4 (j) REGULATION (EU) 2021/1059, the assessment of project proposals and the investment site shall be made in conjunction with COMMISSION NOTICE (2021/C 373/01) Technical guidance on the climate proofing of infrastructure in the period 2021-2027.</p> <p>The Technical guidance can be downloaded from the following link: https://ec.europa.eu/newsroom/cipr/items/722278/en</p>
84	<p>Received on 15.05.2025 via e-mail:</p> <p>Please explain, if the project proposal includes investments only for supply of equipment, do we need to present the annex under A8. "Climate proofing assessment"? If the answer is YES, do we need to present the document for each partner (two annexes) or just to present only one filled A8 annex concerning the information for the whole project?</p>	<p>Annexes should be filled in according to the template and submitted together with the Application form. All Annexes stipulated in the Guidelines for Applicants are mandatory as specified. Namely,</p> <ul style="list-style-type: none"> ▪ A8. Climate proofing assessment (template *xlsx file) - signed and dated/electronically signed by each partner.

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