

TABLE WITH RECEIVED COMMENTS

on the Guidelines for applicants with project proposals of the Call for Services of general interest under the Territorial Strategy of (Interreg VI-A) IPA Bulgaria Serbia 2021-2027 Programme

Stakeholder	Resume of Comments/ Remarks:	Position of the MA/NA/OU	
		Accept/ Decline:	Justification:
Regional Development Agency Eastern Serbia	<p>Regarding the application package related to Guidelines for Applicants with project proposals for service of general interest on page 8 of the Guide, the section marked “IMPORTANT”, to be changed this section in such a way that each partner can participate in 2 projects.</p> <p>The proposal is for this section to be revised as follows:</p> <p>“Each applicant may participate:</p> <ul style="list-style-type: none"> - as a lead partner in only one project idea; - as a project partner in up to two project ideas; - as a lead partner in only one project idea and in one more project idea as a project partner” 	Not accepted	<p>In light of the specific context of this call for proposals, we consider it necessary to limit each organization to participation in only one project. This approach is based on the following considerations:</p> <ul style="list-style-type: none"> - Extremely Limited Budget Envelope <p>The total budget available under this call is only EUR 4 million, with a maximum of EUR 1 million per project. This inherently limits the number of projects we can fund to just 4 at most. Allowing organizations to apply in multiple proposals would concentrate potential benefits among fewer entities, rather than distributing opportunities more broadly.</p> <ul style="list-style-type: none"> - Encouraging Broader Participation and Diversity <p>Prioritizing unique applicants helps avoid repetition and opens the door to more organisations that may not have previously benefited from programme funding. Allowing multiple participations per organisation would likely result in a smaller and more repetitive pool of beneficiaries.</p> <ul style="list-style-type: none"> - Avoiding Unmanageable Volume and Unrealistic Expectations <p>Permitting organisations to participate in multiple proposals could lead to an artificially inflated number of applications, many of which cannot realistically be supported within the available financial envelope. This would increase administrative burden, dilute the competitive process, and create unrealistic expectations among applicants.</p>

<p>Regional Development Agency Eastern Serbia</p>	<p>Regarding the application package related to Guidelines for Applicants with project proposals for service of general interest on page 45 of the Guide, in the section - Stages of the selection process, in paragraph 1.</p> <p>Stage 1: Strategic Assessment (Scoring & Ranking performed by SB). In sub-paragraph: Scoring Process Options to be modified.</p> <p>The proposal is to change Option 2, because in the case of the proposed solution (one delegation - one score, final score calculated as the average of both delegations' scores), it would not be able to get a score if each delegation votes differently.</p> <p>The recommendation is for Option 2, the Decision from the vote in the previous call be applied:</p> <p>"The members of the Strategic Board take autonomous decisions with a simple majority (more than 50% of the votes) of the members who are present at the meeting"</p>	<p>Not accepted</p>	<p>Maintaining the "one delegation – one vote" rule is fundamental to preserving the balance of the partnership in cross-border cooperation programmes. It ensures equal representation of both countries, regardless of the number or structure of individual institutions or experts involved. Furthermore, this approach:</p> <ul style="list-style-type: none"> - Guarantees institutional parity - each delegation represents a national perspective and carries the collective responsibility for their country's position. Assigning one vote per delegation reflects this institutional equality. - Promotes accountability - with a single, consolidated vote, each delegation is clearly accountable for its decision. This clarity strengthens ownership and responsibility in joint decision-making. - Supports consensus-building - knowing that each delegation has one equal vote encourages negotiation and compromise before reaching a vote, promoting genuine consensus over simple numerical dominance. - Aligns with programme governance principles - most Interreg programmes are built on the principle of partnership between equals. The one delegation–one vote rule reflects and reinforces this principle in decision-making structures like the Programme Monitoring Committees.
<p>Ministry of Finance, Bulgaria</p>	<p>1. An amendment is required to the Declaration on de minimis and State aid, following the adoption of COMMISSION REGULATION (EU) 2024/3118 of 10 December 2024, which amends Regulation (EU) No 1408/2013</p> <p>2. Annex 1 of the application package and the Guidelines already contain most of the requirements of the Regulation. However, in order for the aid to be fully compliant with the rules on de minimis aid under Regulation (EU) No 2023/2831, all conditions must be fulfilled. To this end, in addition to the exclusion of "goods", the term "services" must also be added to the</p>	<p>Accepted</p>	<p>All comments have been addressed accordingly.</p>

	<p>exclusion clause in Article 1(1)(e) of the Regulation, as set out in the Guidelines.</p> <p>3. The provisions of Article 5(1) and (2) of the Regulation, as well as Article 6(2), (3), and (7) of Regulation (EU) No 2023/2831, must be properly integrated into the application package and documentation.</p> <p>4. In order to correctly implement the requirements of Article 6(3) and (7) of Regulation (EU) No 2023/2831—and in view of Article 2(4) of the Treaty, in conjunction with Article 19(3) of the State Aid Act (SAA)—you must ensure that records of the granted de minimis aid are maintained for a period of 10 years from the date of the last aid granted under the de minimis scheme. Furthermore, in the event of a request by the European Commission (EC), you must be able to provide the relevant information within the required time limit and in the format specified by the EC, in accordance with Article 6(7) of the Regulation.</p>		
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