

QUESTIONS AND ANSWERS

Open Call for Project Proposals in the framework of (INTERREG VI-A) IPA Bulgaria – Serbia Programme 2021-2027

Call Reference: No 2021TC16IPCB007 – 2025 – 6

Priority 2 “Integrated Development of the Border Region”

Specific Objective RSO 5.2. Fostering the integrated and inclusive social, economic and environmental local development, culture, natural heritage, sustainable tourism and security, in areas other than urban areas

Specific objective 1: Expand and improve service provision

| No. | Question received | Answer provided |
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| | <p>Received at the Info day in Sofia, 25.06.2025</p> <p>Calculation of the Service Impact Index – if the MA reserves the right to reduce the number of users in case it deems the numbers unrealistically high, does this mean that the MA will adjust the numbers in the opposite direction, i.e. in case the number of end users has been underestimated the MA increases the number to what it considers realistic?</p> | <p>Yes. One of the key responsibilities of the Managing Authority is to safeguard the application of EU financial principles, including realism, efficiency, and cost-effectiveness. In line with this responsibility, and in its capacity as Contracting Authority, the MA may adjust elements of the project proposal - such as indicator values - to ensure they are consistent with these principles. This applies both when proposed figures appear unrealistically high and when they seem significantly underestimated.</p> |
| | <p>Received at the Info day in Sofia, 25.06.2025</p> <p>Please clarify in relation to Project Preparation Costs: (1) the</p> | <p>For projects with planned costs under BC5 and/or BC6, the PPC is capped at EUR 12,000 per project proposal. For all other projects, the PPC is fixed at EUR 2 500.</p> |



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| <p>amounts eligible for reimbursement, (2) the eligibility of expenditures covered by this budget category and (3) the distribution among partners.</p> | <p>The whole amount must be included in the lead partner's budget at the application stage.</p> <p>The partnership should fairly distribute the preparation costs among partners. The allocation of PPC must be clearly specified in the Project Partnership Agreement (Annex 1).</p> <p>PPC covers the following services:</p> <ul style="list-style-type: none"> ▪ Consultancy and development of technical documentation (e.g., feasibility studies, detailed design, technical/work design stage drawings). ▪ Elaboration of the project proposal, application form, translation of documents, taxes, and other charges; ▪ Other necessary costs for submitting a valid application and contracting. |
| <p>Received at the Info day in Sofia, 25.06.2025</p> <p>If a project envisages development of a software, please clarify the budget category in which the expenditure shall be budgeted.</p> | <p>BC 4 external services includes costs for expertise and services provided by entities or individuals outside the project partners, directly linked to the project and essential for its successful implementation. The scope of external support required will vary depending on the project's specific needs and objectives. All eligible cost types are specified in Article 42 of the Interreg Regulation.</p> <p>More concretely, it depends on the specifics of the software development and how it is planned and procured within the project.</p> <ul style="list-style-type: none"> • If the software development is contracted as a stand-alone service (for example, the development of a custom application or digital platform), it should be budgeted under Budget Category 4: External expertise and services. This applies when the service is focused on programming, design, testing, and delivery of the software only. • However, if the software is part of a broader package that also includes |

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| | | <p>hardware, such as when the project purchases IT equipment together with pre-installed or specially developed software, the entire contract (software + hardware) is treated as a single supply order. In this case, the expenditure should be included under Budget Category 6: Equipment/Supply.</p> <p>In all cases, applicants are encouraged to clearly describe the planned activity in the Application Form to help ensure correct budgeting and smooth verification later on.</p> |
| | <p>Received at the Info day in Sofia, 25.06.2025</p> <p>In relation to Project Preparation Costs, when the project needs external services for the development of technical specifications on the basis of which offers will be collected and presented, which is the relevant PPC amount to be included in the budget - 12000 or 2500 euro?</p> | <p>The applicable lump sum for Project Preparation Costs (PPC) depends on the nature of the project deliverables and the Budget Category (BC) under which the technical specifications are being developed.</p> <ul style="list-style-type: none"> • If the technical specifications are intended for products or services planned under Budget Category 4 (External expertise and services), the project is entitled to a fixed PPC amount of EUR 2,500. • If the technical specifications are related to planned investments under Budget Category 5 (Infrastructure) and/or Budget Category 6 (Equipment/Supply), the project is capped at EUR 12,000 in PPC. <p>In short, the PPC ceiling is determined by the type of deliverables the specifications are prepared for, as reflected in the relevant budget category</p> <p>The development of the technical specifications shall be an activity during project implementation under BC4. For the purposes of budgeting, initial market research shall be enough.</p> <p>For planned supplies, a market analysis is required. The lead or project partner must obtain and present at least three solicited offers from independent providers, along with website references where available. The offers must be comparable in terms of technical characteristics and accompanied by a uniform request for offer. Bulgarian partners may, as an alternative to three offers, provide at least three extracts from national/EU public procurement systems</p> |



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| | | <p>for similar supplies with identical technical specifications. Budgeted expenditures derived from the market analysis should reflect the average price of the received offers/extracts.</p> <p>For highly specialized equipment with a limited pool of suppliers, where traditional market research is not feasible, applicants must provide historical data from previous similar contracts to verify cost reasonability.</p> |
| | <p>Received at the Info day in Sofia, 25.06.2025</p> <p>Applicants must submit a copy of a letter issued by the relevant competent body clearly stating whether an Environmental Impact Assessment (EIA) for the project investment is necessary or not. As per the relevant internal procedure, the document issued by the competent body specifically refers to the Water Management and Environmental Compliance. Do applicants need to submit a separate letter re. water management compliance from the competent Basin Directorate?</p> | <p>In order to reduce administrative burden, the Water Management and Environmental Compliance has been planned in two steps:</p> <ol style="list-style-type: none"> Step 1: Environmental Impact Assessment (EIA): <ul style="list-style-type: none"> If EIA is not required, submit a letter from the competent authority confirming this. If EIA is required, submit a copy of the approved EIA. Step 2 only in cases when EIA opinion (outcome of step 1) 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 Plans. <p>Under Step 2, Bulgarian partners are required to submit an explanatory note detailing measures to prevent water pollution in emergency situations. This note should complement the relevant provisions established by the competent authorities, or provide such measures where no specific provisions are defined.</p> |
| | <p>Received at the Info day in Sofia, 25.06.2025</p> <p>In relation to the additional documents to be submitted by the applicants, namely documents verifying legality and programme eligibility of project investments, is it permissible for the applicants to submit a proposal at engineering phase?</p> | <p>If infrastructure is planned, Applicants are only required to submit Approved Detailed Works Design (Работен проект, Projekat za građevinsku dozvolu – PGD).</p> |
| | <p>Received via email, 26.06.2025</p> | <p>All project partners must be registered and actively operating within the</p> |



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| <p>Our organization is a non-governmental organization registered in France. Are diaspora organizations, like ours, eligible to participate in this call, or participation is limited exclusively to NGOs registered in the Republic of Serbia?</p> | <p>Programme area at least 3 years prior to the application. An exception of the geographical eligibility applies to national or regional public authorities whose legally defined area of competence extends to the Programme area, as well as to structures of central public authorities located within the Programme area that cannot be registered as legal entities—in such cases, the central authority shall serve as the project partner. Project partners located outside the programme area but within Bulgaria and Serbia may also be eligible. However, their involvement must bring a clear benefit to the project (e.g., an NGO holding the copyright for a digital solution essential to the project), and their activities must be explicitly implemented in the cross-border area. Such participation is considered exceptional and must be duly justified. The adequacy and relevance of these partners will be assessed under the Partnership criterion of the Quality Assessment.</p> |
| <p>Received via email, 01.07.2025</p> <p>A public utility company from southern Serbia is interested in submitting a project proposal to test new ways of motivating citizens to pre-sort their household waste.</p> <p>Public utility companies are obliged to establish systems for household waste pre-selection, but they have so far struggled to implement them successfully. Likewise, in Bulgaria, public utilities are required to create such systems but face similar challenges.</p> <p>Would it be permissible under this Call for Proposals to submit a project aiming to develop and test innovative methods for motivating citizens to pre-sort their household waste?</p> | <p>Applicants are free to propose project solutions that align with the objectives and requirements of the call. The only content restrictions apply to initiatives related to tourism and wildfire prevention, which are not eligible under this call.</p> <p>The objective of the present call is to collect project proposals that address identified territorial needs and capitalize on existing potentials to enhance cross-border service provision in relation to expanding and improving service provision. This includes the development of new services, the improvement and adaptation of existing ones, and the introduction of innovative solutions that increase accessibility, efficiency, and quality. Proposals should focus on ensuring equal access to essential services, fostering social and economic cohesion, and leveraging technological advancements to complement infrastructural upgrades.</p> <p>In this sense, the project idea falls under the scope of the call, however, it is up to the applicants to justify the proposed activities and innovative methods that bring the expected results against the programme indicators.</p> |

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| | <p>Received at the Info day in Pirot, 27.06.2025</p> <p>Regarding the project preparation costs (PPC), if they are budgeted under the Lead partner who is from Serbia, when the respective amount is transferred to the Bulgarian partner, is it reduced by 15%, corresponding to the Serbian national co-financing share?</p> | <p>No. The Serbian Lead Partner is required to transfer 100% of the Bulgarian partner's share of the Project Preparation Costs (PPC), without applying any reduction, and in full accordance with the PPC distribution set out in the Project Partnership Agreement (Annex 1). The 15% national co-financing applicable to Serbian partners, which in practice goes as a private contribution, does not affect the PPC share allocated to Bulgarian partners.</p> <p>The whole amount must be included in the lead partner's budget at the application stage.</p> <p>The partnership should fairly distribute the preparation costs among partners. The allocation of PPC must be clearly specified in the Project Partnership Agreement (Annex 1).</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. Once the PPC lump sum is reimbursed by the Programme (85%), the lead partner is responsible for distributing the corresponding shares to the other project partners, according to what has been agreed in the Project Partnership Agreement (PPA).</p> |
| | <p>Received at the Info day in Pirot, 27.06.2025</p> <p>Is it allowed under this project proposal to foreseen the purchase of gifts, for example as prizes for competitions organized within the project?</p> | <p>As a general rule, the cost of gifts is ineligible, as indicated on p.22 of the Guidelines for Applicants and in line with Article 38(3) of the Interreg Regulation. However, if such items are used as promotional items (e.g., branded materials distributed for visibility and communication purposes) may be eligible if their purpose is clearly defined and they are included as part of procured services related to events, trainings, or awareness-raising activities. This is in line with Article 42(e) of the Regulation, which allows costs for promotion, communication, publicity, and information activities directly linked to the operation.</p> <p>Similarly, the competition prizes may be considered eligible - provided the competition is clearly linked to the project's objectives and implemented</p> |

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| | | <p>through a transparent and documented process.</p> <p>Therefore, the eligibility depends on the intended purpose and context—prizes for competitions must serve a project-relevant goal, and promotional items must support communication activities.</p> |
| <p>Received at the Info day in Pirot, 27.06.2025</p> <p>Could you please clarify what is meant by non-commercial Services of General Interest (SGI), and how are revenue and profit defined under this Call?</p> | | <p>Non-commercial SGI under this Call refer to services that are provided primarily to meet the general needs of the population, rather than for generating profit. These include activities that improve the availability, accessibility, affordability, quality, and safety of essential services in the cross-border area, often involving cooperation, capacity building, digital solutions, and other soft measures. While investments (such as equipment or small-scale infrastructure) can also be included, the key point is that these services are intended for public benefit, not for commercial revenue or financial gain for the service provider. While some incidental revenue (e.g. symbolic fees or co-payments) may occur, profit-making is not the purpose or result of the service. Any revenue generated must be used solely to sustain or enhance the service itself, not for commercial exploitation or distribution of profits.</p> <p>In line with EU State Aid rules, non-commercial means that the service does not distort competition or function as a market-based activity. Applicants must ensure that their project proposals are clearly focused on public value, accessibility, and sustainability, rather than on income generation.</p> <p>Regarding revenue and profit: The no-profit principle applies to all projects under this Call, meaning that the total income from the grant plus any revenues directly generated by the project must not exceed the total eligible costs. If the project generates revenues during implementation — such as through user fees for services, rental income, penalties from contractors, or bank</p> |



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| | | <p>interest on pre-financing — these amounts will be deducted from the final grant payment to ensure compliance with this rule.</p> <p>All project partners are required to monitor and report any revenues, and submit a declaration at the final reporting stage.</p> <p>It is important to note that this principle does not apply to non-governmental organizations (NGOs), as per Article 195(3)(c) of Regulation 2024/2509 EU. For NGOs, the no-profit rule is waived under this regulation.</p> |
| | <p>Received at the Info day in Pirot, 27.06.2025</p> <p>Is there a defined minimum project budget under the Call for project proposals for Services of General Interest?</p> | <p>There is no defined minimum budget for the project, nor a minimum budget per partner. However, it is important to note that projects with budgets below EUR 500,000 must deliver at least one pilot action (RCO84), one jointly developed solution (RCO116), and one solution taken up or up-scaled (RCR104).</p> <p>Projects with budgets between EUR 500,000 and EUR 1,000,000 must deliver more than one pilot actions (output indicator RCO84), jointly developed solutions (output indicator RCO116) and solutions taken-up (result indicator RCR104).</p> |
| | <p>Received at the Info day in Pirot, 27.06.2025</p> <p>When we budget for the purchase of equipment, we do it based on market research by providing three offers for the planned procurement. Considering that a significant amount of time may pass between project contracting and the actual procurement procedure, how can we protect ourselves against possible price increases?</p> | <p>To account for future inflation and price fluctuations, the budgeted expenditures for works and supplies may be increased by applying the average national inflation rate over the last three years prior to the application submission. The maximum allowed increase is 10%.</p> |
| | <p>Received at the Info day in Pirot, 27.06.2025</p> <p>How long will the selection process take, and when can we expect the contracts to be signed?</p> | <p>According to the indicative timetable, the selection process will last approximately 4 months, following the application period. Grant award decisions are expected between December 2025 and January 2026, so it is anticipated that contracts will be signed in the first quarter of 2026.</p> |

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| | <p>Received at the Info day in Pirot, 27.06.2025</p> <p>In case one of the project activities involves construction works for which the Building permit has expired, what can we do?</p> | <p>According to the Programme requirements, if the project foresees construction works, the Building permit for these works must be submitted and must be final and valid at the time of project submission. An expired building permit is not acceptable.</p> |

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Clarify the eligibility conditions for project partners in a project proposal under conditions:

If the lead partner is a legal entity, a secondary budget administrator, and ranked as an executive agency. The Serbian partner is located in Belgrade and has the status of a state agency. Can this partner be eligible, given that Belgrade is not part of the program's priority territorial scope?

Additionally, clarify whether a partner with NGO status and headquartered in Belgrade is an eligible partner under the current call. If the organization possesses the necessary expertise and institutional capacity, which is key to the successful implementation of the planned project activities and the achievement of the project's objectives is sufficient.

Furthermore, in case second Bulgarian partner – located outside the priority territorial scope but within the country. Is the justification for their participation, based on their expertise and added value to the project, a sufficient enough condition?

In response to the question regarding the eligibility of participation by an organization/institution based in Sofia or Belgrade, should be consider the following:

Although these locations fall outside the scope of the eligible cross-border region, the participation of partners registered outside the Programme territory—but within Bulgaria or Serbia—is possible. However, such participation is considered an exception and must be thoroughly justified by demonstrating clear added value to the project, such as specific expertise, know-how, intellectual property rights, or a relevant network of contacts.

It is also required that all activities carried out by such partner(s) take place entirely within the eligible cross-border region.

The relevance and appropriateness of such partner(s) will be reviewed and assessed as part of the project's quality evaluation.

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What are the precise conditions or project types under which each lump sum amount applies?

Lump sums for project preparation is established for INTERREG-IPA Programmes:

- 12.000,00 euro for project preparation expenditures related to initiatives involving the construction or modernization of infrastructure; or the supply of specialized equipment (off-road firefighting vehicles, trash deposit trucks for mountainous areas, etc.). This category includes also delivery of specialized ICT hardware (individual solutions for specific activities that require preparatory calculations and infrastructural analysis) and custom made solutions as well as specific production related machinery and equipment directly connected with production lines or conveyer systems.
- 2.500,00 euro for project preparation expenditures for projects without an investment in infrastructure and delivery of standardized equipment like ICT hardware for general solutions (PCs, laptops, network equipment for general use).



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Are supporting documents required at submission or contracting stage for these preparation costs, despite them being reimbursed as lump sums?

In regards to the project preparation costs the following clarifications should be considered: No supporting documentation is required yet justification of the selected lump sum could be requested during evaluation process. Thus the costs must be clearly linked to project preparation activities, such as the following types of expenditures which eligible under the Project Preparation Costs category, provided they are properly documented, clearly linked to the preparation of the project, and comply with the applicable procurement and eligibility rules:

1. Costs for development of project documentation, including Feasibility studies; Market analyses; Environmental assessments (if applicable); Cost-benefit analyses; Technical or architectural designs (if required by law); Bill of quantities; Permits and legal clearances related to the investment.
2. Costs related to the preparation of the application, such as: External consultancy services for drafting the project proposal; Translation of documents; Legal or financial expertise necessary for project preparation.
3. Costs for partnership building, including: Meetings and travel related to the establishment of cross-border partnerships; Organization of preparatory workshops or coordination events.

These costs must be incurred before the submission of the project but can only be reimbursed after approval of the project and signing of the subsidy contract, and only if included in the approved project budget