

<p style="text-align: center;">Questions and Answers</p> <p style="text-align: center;">under Guide for identified applicants to develop and submit full project proposals (Call 1) (Contracting Guide)</p> <p style="text-align: center;">of the Targeted Call for development and submission of Full Project Proposals (FPP) under the Territorial Strategy</p> <p style="text-align: center;">of the Interreg VI-A IPA Bulgaria – North Macedonia Programme 2021-2027</p>			
No	INSTITUTION	QUESTION	ANSWER
1	BGMK0200012 Municipality of Delchevo 03.06.2024	How are the project preparation costs (BC 7) will be divided between the LP and the other project partners?	The methodology for dividing project preparation costs between partners is a matter of inter-partner negotiations and should be clearly described, along with the distributed amounts, in the Partnership Agreement. A fair approach to that is to balance the partners' needs and their contributions to the project objectives and indicators. Division of <i>Project preparation costs</i> (BC 7) among project partners are reflected in Annex 1 <i>Project Partnership Agreement</i> and within FFP's budget in JeMS. There should be indicated the total amount of funds for <i>Project preparation</i> under BC7 and corresponding distribution among LP and project partners involved.
2	BGMK0200028 Municipality of Kyustendil 04.06.2024	Can the process of implementation and reporting of BC 1 <i>Staff costs</i> be given away to external companies?	Certainly not. The purpose of BC 1 is to remunerate the staff of the project partner engaged in either project management, the implementation of project activities, or both. If, for some reason, the project partner needs to subcontract the management of the project to a third party, these costs should be incurred and reported under BC 4 <i>External expertise and Services costs</i> . In this case, BC 1 should be budgeted with no costs.
3	BGMK0200012 Municipality of Kriva Palanka	Is the process of funds transfer from the budget from one project partner to another/s possible on the stage of development of FPP?	On the stage of development of FPP, project partners can further elaborate on their project idea, consolidate their partnerships and develop a detailed budget for all partners. Proposed budget transfer among project partners is allowed.

	04.06.2024		According to the Contracting guide - <i>Eligibility of expenditures</i> , when detailing the budget, applicants may find the need to modify certain budget costs from their original values in the concept note due to various reasons. In this case, applicants should justify any proposed budget changes in a free written format. This justification should be included as part of the FPP submission package. Likewise, it should not alternate the maximum percentage for BC 1, 2 and 3 per project partner, and the minimum percentage for investment component (BC 5 and BC 6), as well as it should not lead to exceeding the overall budget of the concept note. Any potential budget change should not impact and diminish the scope of the project investment(s), the target groups, or the values of the indicators. Instead, it should either result in an increase in these parameters or maintain the original scope and targets as outlined in the concept note.
4	BGMK0200039 Municipality of Strumyani 05.06.2024	Which documents issued from a relevant Authority prove project partners co-financing (if any)?	During the development of the project proposal, no documents are required from project partners who intend to assign their own funds to their project budget share. Once the project is contracted, the co-financing amount becomes part of the total eligible project costs, with the same spending and reporting conditions as the project funds.
5	BGMK0200039 Municipality of Berovo 05.06.2024	Is VAT an eligible expenditure for Macedonian partners?	According to the Contracting guide - <i>Eligibility of expenditures</i> and <i>The budget template and types of costs</i> , the expenditure for VAT is eligible for operations the total cost of which is below EUR 5 000 000 (including VAT). VAT is an eligible expenditure for Macedonian partners when budgeting project costs, taking in mind respective national VAT legislation into consideration.

6	BGMK0200027 Regional Historical Museum – Kyustendil 07.06.2024	Should a procedure for the coordination of the construction documentation with the Ministry of Culture (National Institute of Immovable Cultural Heritage), in the presence of works activities on a site - monument of culture, be initiated on the stage of development of FPP?	Yes, it is imperative to initiate this procedure as soon as possible (in accordance with the Art. 83 and Art. 84 of Bulgarian Protection of Cultural Heritage Act). Failure to present all requested permits concerning construction works (please refer to section A6.2 <i>Permits</i> , page 39 of the Contracting Guide) within the specified time during the screening process will result in the project being ineligible for funding. The proposal can be submitted without building permits, but once requested during the screening process, they must be provided within a specified period.
7	BGMK0200044 Archaeological Museum – Sandanski 07.06.2024	Are the civil contracts eligible for assignment of project staff under BC1 <i>Staff costs</i> ?	Whether civil contracts are eligible to prove staff costs depends on national regulations. For Bulgarian organizations, only employment contracts or appointment decisions (in the case of civil servants) are eligible for remuneration under BC1 <i>Staff costs</i> . Therefore, civil contracts are ineligible. For more information according the order and method of assignment of duties to the members of the teams of the Bulgarian beneficiaries in the implementation of projects financed under the cross-border, transnational and interregional programs for territorial cooperation 2021 - 2027, please find the link below: https://ipa-bgmk.mrrb.bg/index.php/bg/node/167 .
8	BGMK0200027 Regional Historical Museum – Kyustendil 07.06.2024	What's the role of submission of equipment installation sketches under the project by applicants?	The role of equipment installation sketches/schemes/drawings is to comprehensively clarify the investment idea of the project. According to the Contracting guide - 1.2.4 <i>Additional documents supporting the full project proposals</i> - A6.4 <i>Supply of equipment</i> , detailed plans/schemes for positioning, according to the nature of equipment delivered, both outdoors in public spaces and indoors

			(respective in accordance with the approved detailed urban development plan or as a parts of the respective detailed investment project in accordance with the Ordinance 4/21.05.2001 on the scope and content of investment projects for Bulgarian partners), must be submitted. These plans/schemes should be approved by the competent authority in accordance with national legislation, where applicable.
9	BGMK0200046 East Planning Region 11.06.2024	Regarding point A6.3 – Working design of the Contracting guide, if the investment foresees the both infrastructure works and purchasing of equipment properly calculated and included in the Bill of quantity, part of the main design, prepared by an authorized designer (as a common practice in technical designs according to the Macedonian legislation since it is contributing to the purpose of the project investment), should it be divided while conducting the procurement procedures as two separate procedures: for investment work and for the appropriate equipment; or can it be published in one procurement with the specification in the Bill of quantity as developed by the main designer?	For the award of works and supply the beneficiaries, located in the Republic of North Macedonia, shall apply the rules and procurement procedures provided in the Practical guide on contract procedures for European Union external action (PRAG) https://wikis.ec.europa.eu/display/ExactExternalWiki/ePRA <u>G</u> If the investment foresees both infrastructure works and purchasing of equipment (in case the delivery of equipment is necessary for the construction and functioning of the site) and planned construction works dominates, then the supply could be included in the investment design and respectively in the BoQ for the works.
10	BGMK0200046 East Planning Region 11.06.2024	Regarding point A6.4 – Supply of equipment of the Contracting guide, in case of procurement of highly specialized equipment with insufficient evidence in the national procurement systems and no historical data for concluded contracts from previous similar	Market analysis in its form of soliciting offers (along with website references) obtained from at least three independent providers. These offers should be comparable in terms of requested technical characteristics, and as such, they must be accompanied by a uniform request for offer.

		deliveries (of the partner or publicly declared by any other public body in the country), what type of document should be submitted to justify the total amount planned for the supply?	
11	BGMK0200046 East Planning Region 11.06.2024	Regarding point A8 – Justification for the proposed budget changes, since the Bill of Quantities of the foreseen investment activities are still in the process of revision, we have to expect that the total amount for the investment activities will be slightly different than the amount declared in the concept phase budget form. Since we have declared to provide additional co-financing for the exceeding amount over the total provisionally approved budget, and if the total amount of all revised BoQ is lower than the previously declared, do we need to submit justification for the proposed budget change, or it is not needed since it will be deducted from the own co-financing amount? The amount requested by the Programme (both by the IPA CBC and Automatic public funds) remains the same.	Please, just make sure that the amount of the final project’s investment component will not be lower than 60% of the total eligible costs and that you meet the other contracting conditions described in section 1.1 of the Contracting Guide. Any budgetary changes necessary during the transition period from concept note to full proposal should be justified and well integrated into the final project’s intervention logic. Regarding co-financing, once the project is contracted, the co-financing amount becomes part of the total eligible project costs, subject to the same spending and reporting conditions as the project funds. The reimbursement of programme funds will be up to the grant requested and verified (if needed), minus the co-financing, ensuring that the percentage of the support intensity is not exceeded.
12	BGMK0200046 East Planning Region 11.06.2024	Regarding JeMS, was found the difficult to insert decimals in percentages of the flat rates; instructions on how to insert the decimal percentage rates need to be provided.	If a flat rate is selected, the applicable rate is either fixed or can be lowered by the applicant, depending on whether the setting for the rate is “fixed” or “up to” in the Budget settings of a call. In this call, Staff Cost Flat rate is set to be “up to” and a number between 1 – 20% can be entered only as a whole number (no decimals are possible).

13	BGMK0200046 East Planning Region 11.06.2024	<p>Regarding JeMS, if partner co-financing is planned for the amount above the approved budget in the concept note phase, the system summarizes accordingly the individually inserted budgets per partner. However, when trying to divide the amounts per source (section Partner overview – Partner XY – tab Co-financing – Origin of partner contribution), the system does not allow for the own co-financing (other than the automatic public contribution) to be inserted as the exceeding amount over the provisionally approved budget. Whenever an amount is inserted, it displays an error message “The total of contribution must match the total partner contribution (difference XX euros)”. The only way of funding sources, as per 11.06.2024, is the distinguishing between the EU co-financing rate (85%) and the national co-financing (15%). Please provide instructions on how to properly insert the own partner co-financing rate other than the automatic public contribution.</p>	<p>Further evaluation shows that project BGMK0200046 have selected in AF section E.1 Project lump sums “Preparation costs (non-investment) which is pre-defined 2 500 Euro. This option can be changed in the same section E.1 Project lump sums -> Programme lump sum (first column) -> Preparation costs (Investment).</p> <p>You can add additional source of partner contribution by pressing “Add new own contribution origin”. New raw will be displayed asking for the source of contribution, legal status and respective amount.</p> <p>You need to have 2 sources of Partner contribution.</p> <p>The calculations are quite complicated but you need to:</p> <ol style="list-style-type: none"> 1. Calculate the difference between the total budget (TB) and the subsidy (S_t) – $CO_{own} = TB - S_t$ 2. Add the difference in the newly created source of additional own contribution – CO_{own} 3. Calculate the amount of eligible EU contribution (85 % of the subsidy) – $S_{EU} = S_t * 0,85$ 4. Calculate the percentage of the EU contribution towards the total budget – $P_{eu} = (S_{EU}/TB) * 100$ 5. Truncate down the resulting percentage to the second sign – if the result is 64,3076575 it should be truncated to 64,30 6. Insert P_{eu} in the system. The system will automatically calculate the total own contribution - CO_t 7. Calculate the difference between the total own contribution and the additional own contribution - $CO_t - CO_{own}$
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14	BGMK0200046 East Planning Region 11.06.2024	When entering the lump sum in JeMS for the project preparatory cost, even though it's an amount way below the maximum allowed amount of 12,000.00 euros, an error message is displayed "Please update the lump sum table: The sum of the amounts per partner must match the total lump sum costs.". Since none other than the lead partner will be declaring preparatory costs, the entered foreseen amount is flagged as incorrectly calculated and shows a negative gap that has to be corrected. Please provide instructions on how to continue.	<p>The amount for project preparation is lump sum and cannot be lower than the provided 12.000,00 EUR.</p> <p>Section E.1 of JeMS is used if you want to provide additional information about the distribution between the partners but the total amount amongst all partners is fixed to 12.000,00 euros.</p>

15	BGMK0200012 Municipality of Blagoevgrad 18.06.2024	For implementing Project activity 3. Infrastructure and works in Blagoevgrad we are planning to purchase special equipment, namely a telescope. What kind of procedure is required to be followed for the equipment to be justified?	<p>According to the Contracting guide - <i>A6.4 Supply of equipment</i>, when there is a requirement to procure highly specialized equipment (with insufficient evidence in national procurement systems) from a limited pool of suppliers, and conducting market research for the equipment cost is not feasible, an historical data for concluded contracts from previous similar deliveries must be provided by applicants. This data serves to verify that the budgeted equipment costs are reasonable.</p> <p>Furthermore, the project partner intending to supply equipment is required to submit a technical specification for the supplies. The detailed specification should be sufficiently clear for the identification of the desired deliverables. Detailed plans/schemes for positioning the delivered equipment, both outdoors in public spaces and indoors, must be submitted. These plans/schemes should be approved by the competent authority in accordance with national legislation, where applicable.</p>
16	BGMK0200046 East Planning Region 11.06.2024	Regarding point A6.2 – Permits of the Contracting guide, “...a letter serving the equivalent purpose in accordance with the applicable provisions of the National Water protection legislation.”, would it be sufficient to submit a Statement from the authorized person of the partner confirming that the foreseen investment activities are not affecting river, river basin or any water body catchment areas?	The requirement is based on the Opinion No.12-6/2022 of the Minister of Environment and Waters of the Republic of Bulgaria, under Environmental Assessment of the Interreg VI-A IPA Bulgaria - North Macedonia 2021-2027 and Territorial Strategy for Integrated Measures. In respect to the fact that in the territory of the Republic of North Macedonia there are no special plans for water management and flood protection, respectively lacks of similar regional administrative and control structures, the check for compliance of the investment projects with the complex territorial development plans and urban development plans is carried out by the competent approving authority,



			according to national legislation. Therefore, for investment measures within the territory of the Republic of North Macedonia, it is required to submit a statement from the authorized person of the project partner confirming that the proposed investment activities will not impact any river, river basin, or water body catchment areas.
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