

## QUESTIONS AND ANSWERS

### OPEN CALL FOR PROJECT PROPOSALS

NO 2021TC16IPCB006 – 2025 – 4

#### SO1 “INCREASE THE COMPETITIVENESS OF THE LOCAL ECONOMY AND IMPROVE THE BUSINESS ENVIRONMENT” UNDER PRIORITY 3: “INTEGRATED DEVELOPMENT OF THE BORDER REGION”

No.	Question received	Answer provided
1	<p>Received on 9 June 2025 via e-mail:</p> <p>“Are expenditures made and PAID before signing a subsidy contract eligible for reimbursement?</p> <p>Like for example - Project preparation costs?”</p>	<p>As a general rule, expenditures are eligible for reimbursement only if they are incurred and paid during the implementation period of the project and in accordance with the provisions set out in the Annex C Draft of subsidy contract.</p> <p>However, an exception applies in accordance with Section 2.3.3 – Budget Category 7: Project Preparation Costs of the Guidelines for Applicants. The costs must be clearly linked to project preparation activities, such as:</p> <p>The following types of expenditures are eligible under the <b>Project Preparation Costs</b> category, provided they are properly documented, clearly linked to the preparation of the project, and comply with the applicable procurement and eligibility rules:</p> <ol style="list-style-type: none"><li>1. <b>Costs for development of project documentation</b>, including:<ul style="list-style-type: none"><li>○ Feasibility studies;</li><li>○ Market analyses;</li><li>○ Environmental assessments (if applicable);</li><li>○ Cost-benefit analyses;</li><li>○ Technical or architectural designs (if required by law);</li><li>○ Bill of quantities;</li></ul></li></ol>

		<ul style="list-style-type: none"> <li>○ Permits and legal clearances related to the investment.</li> </ul> <p>2. <b>Costs related to the preparation of the application</b>, such as:</p> <ul style="list-style-type: none"> <li>○ External consultancy services for drafting the project proposal;</li> <li>○ Translation of documents;</li> <li>○ Legal or financial expertise necessary for project preparation.</li> </ul> <p>3. <b>Costs for partnership building</b>, including:</p> <ul style="list-style-type: none"> <li>○ Meetings and travel related to the establishment of cross-border partnerships;</li> <li>○ Organization of preparatory workshops or coordination events.</li> </ul> <p>These costs must be incurred before the submission of the project but can only be reimbursed <b>after approval of the project and signing of the subsidy contract</b>, and <b>only if included in the approved project budget</b></p>
2	<p><b>Received on 10 June 2025 via e-mail:</b></p> <p>"In regards to the Open Call for Project Proposals for SME's under Priority3 - Integrated Development of the Border Region with the specific objective (SO) 1: "Increase the competitiveness of the local economy and improve the business environment" under the INTERREG VI-A IPA Bulgaria – North Macedonia Programme 2021-2027 I would like to ask the following questions regarding the application process and eligibility requirements of potential applicants:</p> <p>1. You require either a market analysis of similar equipment OR three official offers from different licensed/authorised providers that fully meet the technical specifications. Could you please specify:</p> <ul style="list-style-type: none"> <li>• What format and structure should the market analysis follow?</li> <li>• What specific content must be included in the market analysis?</li> <li>• What documentation standards are expected?</li> </ul>	<p>1. The marketing analysis should comply with the technical specifications of the equipment. In cases where the equipment is widely available – screenshots from supplier websites/online stores with prices, technical specifications, and access dates should be included. Data from previously completed similar activities by the enterprise, if available – is also a suitable approach to verify the realism of the values. When using data from previous deliveries/activities – official payment documents (e.g., invoices, payment orders, etc.) must be attached to confirm the value. All documents and photos must be dated, the source must be clear, and they must correspond to the specifications.</p> <p>Also, If a potential supplier submits an official offer during the application phase, are they permitted to participate in the subsequent tender procedure once the project is approved, or does this create a conflict of interest that would exclude them? A supplier could participate in the future tender only if their prior involvement did not give them an unfair advantage or create a conflict of interest that cannot be mitigated. In such cases, the information provided to the participants (potential suppliers) during the application phase shall be publicly available. This ensures transparency and equal access for all</p>

<p>Also, If a potential supplier submits an official offer during the application phase, are they permitted to participate in the subsequent tender procedure once the project is approved, or does this create a conflict of interest that would exclude them?</p> <p>2. Will there be restrictions on the country of origin for the equipment being procured? Specifically, I would like you to clarify if suppliers from non-EU countries (such as Turkey, China, Israel, Serbia, etc.) will be excluded from participating in the tender process due to rule of origin requirements or other regulations/sanctions, etc.</p> <p>3. In reference to the general eligibility criteria stating that applicants must qualify as micro, small, or medium-sized enterprises (SMEs) in line with EU Recommendation 2003/361 and the respective national legislation, we would appreciate your clarification on the following: In case there are differences between the SME thresholds defined by EU law and those set by national legislation (e.g. number of employees, turnover, or balance sheet total), which set of criteria should be used for verifying eligibility under this call?"</p>	<p>potential bidders in the subsequent tender procedure. By disclosing the information submitted at the earlier stage, the contracting authority can prevent any undue advantage and respect the principles of fair competition and equal treatment.</p> <p>2. Under the (Interreg VI-A) IPA Bulgaria – North Macedonia Programme, procurement must follow the rules set out in <b>Decree No. 4 of 11 January 2024 (PMS No. 4/2024)</b> and EU external action regulations, <b>particularly where IPA (Instrument for Pre-Accession Assistance) funding is involved.</b></p> <p>According to the applicable procurement rules:</p> <p><b>Suppliers are generally eligible if they are established in:</b></p> <ul style="list-style-type: none"> <li>○ EU Member States, <b>or</b></li> <li>○ IPA III beneficiary countries (including North Macedonia, Serbia, Turkey, etc.), <b>or</b></li> <li>○ Countries covered by the EU's Instrument for Pre-accession or Neighbourhood policy, <b>or</b></li> <li>○ Countries having reciprocal access under international agreements with the EU.</li> </ul> <p>Furthermore, the following <b>restrictions and conditions must be observed:</b></p> <ul style="list-style-type: none"> <li>• Suppliers must not be subject to <b>EU sanctions</b> (e.g. under Council Regulation (EU) No 2022/576, which prohibits support to entities linked to the Russian state).</li> <li>• Contractors must comply with the <b>rules of origin and nationality</b> as per <b>PRAG (Practical Guide to contract procedures for EU external actions)</b>, unless a waiver is granted.</li> </ul> <p>The 2021–2027 programme framework does not set a specific requirements regarding the origin of goods and materials. When awarding contracts and</p>
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		<p>implementing activities under the project, all beneficiaries must comply with the Programme rules and relevant</p> <p>3. In accordance with the general eligibility criteria outlined in the <b>Guidelines for Applicants</b>, all applicants must qualify as <b>micro, small, or medium-sized enterprises (SMEs)</b> based on:</p> <ul style="list-style-type: none"> <li>• <b>EU Recommendation 2003/361</b>, and</li> <li>• The <b>respective national legislation</b> of the applicant's country of registration.</li> </ul> <p>Where there are differences between the thresholds defined by EU law and those in national legislation (e.g. regarding the number of employees, annual turnover, or balance sheet total), the <b>criteria set out in the applicable national legislation shall prevail</b> for the purposes of verifying SME status under this call.</p> <p>The <b>Attachment 4: SME Definition User Guide</b> is available as a reference tool to support this assessment, particularly with regard to the EU-level criteria.</p>
3	<p><b>Received on 12 June 2025 via e-mail:</b></p> <p>"In relation to the published call for cross-border cooperation, we would like to kindly ask whether it is acceptable for a company to apply if it is registered with its headquarters in Kavadarci, Republic of North Macedonia, but its entire production process takes place in Valandovo, Republic of North Macedonia, which is duly recorded in the property deed.</p>	<p>According GfA, Section 2.1 Eligibility of SMEs, Partners must meet all the following conditions:</p> <ol style="list-style-type: none"> <li>1. Be legally established entities under the national laws of their country.</li> <li>2. Be registered and operational by December 31, 2022, within the Bulgaria–North Macedonia program area.</li> <li>3. Qualify as micro, small, or medium-sized enterprises (SMEs) according to EU Recommendation 2003/361 and respective national legislation, with at least 51% private capital.</li> <li>4. Have their <b>main economic activity</b> in one of the following sectors as per NACE rev. 2.1:</li> </ol>

	<p>Additionally, the company is registered under an activity code for the cultivation of agricultural crops but is also engaged in the processing of agricultural products into final food products.”</p>	<ul style="list-style-type: none"> <li>○ <b>Manufacturing (C):</b> Includes food products, beverages, textiles, apparel, leather, wood products, paper, printing, rubber/plastic products, metals, fabricated metal products, electronics, electrical equipment, machinery, vehicles, furniture, repair and maintenance.</li> <li>○ <b>Water supply, sewerage, waste management and remediation (E):</b> Non-hazardous waste collection, materials recovery, landfilling, remediation services.</li> <li>○ <b>Accommodation and foodservices (I):</b> Hotels, holiday and short-stay accommodations.</li> <li>○ <b>Transportation and storage (H):</b> Warehousing and storage.</li> <li>○ <b>Human health and social work activities (R):</b> All related codes.</li> <li>○ <b>Arts, sports and recreation (S):</b> All related codes.</li> </ul> <p>5. Be directly responsible for preparing and managing the project, not acting as intermediaries</p>
4	<p><b>Received on 13 June 2025 via e-mail:</b></p> <p>“I would like to request clarification regarding the eligibility of applicants under the current call for proposals.</p> <p>If a company is legally registered in a NACE sector that is not among the eligible ones (e.g., 46.39, trade), but it operates a registered branch office located in the eligible programme region and operating under an eligible NACE code (e.g., 22.22 – manufacture of plastic packaging), and the proposed investment will be fully implemented within this branch – is such an applicant considered eligible?”</p>	<p>The requirement according to the GfA is that applicants must “<i>be <b>legally established entities</b> according to the national legislation of the state on whose territory they are located;</i>”</p> <p>‘Legal entity’ means a natural person or an entity created and recognized by law as a legal person. It must have legal personality and, acting on its own account and in its own name, be able to exercise rights and be subject to obligations.</p> <p>‘Branches’ — Are not regarded as legal entities, since they do not have legal personality distinct from that of their mother-company. The fact that they are registered in national official registers is not relevant. It will be their mother-company that will be considered as legal entity for the purposes of the legal entity validation. (as per Rules for legal entity validation, LEAR appointment and financial capacity assessment <a href="https://ec.europa.eu/info/funding-tenders/opportunities/docs/2021-2027/common/guidance/rules-lev-lear-fca_en.pdf">https://ec.europa.eu/info/funding-tenders/opportunities/docs/2021-2027/common/guidance/rules-lev-lear-fca_en.pdf</a> Meaning that a branch is</p>

		<p>not considered as a separate legal entity, rather it is considered as the same entity as its parent.</p> <p>A branch of a SME, which is registered at Chambers of Commerce in eligible area and operate in eligible area, even tax registration is done, remains part of the main organization but <b>does not have legal independence/is not a legal entity</b>. It can be concluded that the branch of a SME is not eligible according the p. 2.1. from the Guidelines for Application.</p>
5	<p><b>Received on 20 June 2025 via e-mail:</b></p> <p>“Please answer to us following questions:</p> <ol style="list-style-type: none"> <li>1. The facility in which my company operates is owned by me (as founder and manager) and my wife. Can I pay rent for this facility if I conclude a 10-year contract for the use of the business facility for the company's needs?</li> <li>2. Does the SME have to participate in the financing of project activities? If so, what percentage and what part of the budget is recommended?</li> <li>3. Can a state university, as a scientific institution, be a partner in the project or not”</li> </ol>	<p>1. <i>In case the project proposal envisages rental costs:</i></p> <p>The described contracting practice—whereby a company pays rent to its own founder, manager, or other related persons—is strongly discouraged. Such arrangements pose a clear potential conflict of interest and undermine the principles of transparency, objectivity, and fair competition. These concerns are especially critical in the context of public procurement or projects financed by the European Union, where strict compliance with ethical and financial integrity standards is required. Failure to adhere to these principles may lead to financial corrections and recovery of funds.</p> <p><i>In case the project proposal envisages the performance of investment activities:</i></p> <p>According to the Guidelines for applicants all investment activities have to be performed on respective partner-owned property or secured through a long-term lease agreement with minimum duration of 10 years as of the date of submission of the project proposal. The Guidelines do not impose any restrictions regarding the contracting parties between whom the lease agreement is concluded.</p> <p>2. The public support provided under the (Interreg VI-A) IPA Bulgaria – North Macedonia Programme is granted at 100% intensity, and no co-financing is required. However, each SME may choose to contribute additional own co-financing to support the project’s implementation. Any such own contribution will be subject to verification.</p> <p>3. Only SMEs are eligible as partners under this specific call.</p>

		<p>Under Section 2.1, the Guidelines explicitly state that eligible applicants must:</p> <ol style="list-style-type: none"> <li>1. Be legally established entities under the national laws of their country.</li> <li>2. Be registered and operational by December 31, 2022, within the Bulgaria–North Macedonia program area.</li> <li>3. Qualify as micro, small, or medium-sized enterprises (SMEs) according to EU Recommendation 2003/361 and respective national legislation, with at least 51% private capital.</li> <li>4. Have their main economic activity in one of the following sectors as per NACE rev. 2.1: <ul style="list-style-type: none"> <li>-Manufacturing (C): Includes food products, beverages, textiles, apparel, leather, wood products, paper, printing, rubber/plastic products, metals, fabricated metal products, electronics, electrical equipment, machinery, vehicles, furniture, repair and maintenance.</li> <li>- Water supply, sewerage, waste management and remediation (E): Non-hazardous waste collection, materials recovery, landfilling, remediation services.</li> <li>- Accommodation and foodservices (I): Hotels, holiday and short-stay accommodations.</li> <li>- Transportation and storage (H): Warehousing and storage.</li> <li>- Human health and social work activities (R): All related codes.</li> <li>- Arts, sports and recreation (S): All related codes.</li> </ul> </li> <li>5. Be directly responsible for preparing and managing the project, not acting as intermediaries.</li> </ol> <p>State universities or research institutions are not eligible partners under this call.</p> <p>However, they may provide external expertise or services (e.g. training, analysis, R&amp;D) through subcontracting (Budget Category 4: External Expertise).</p>
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6	<p><b>Received on 26 June 2025 via e-mail:</b></p> <p>“Can I submit a food processing project with the main code 15.500 - Mixed farming? (Of course, I would also open an additional activity)”</p>	Please refer to the answer provided for Question 3
7	<p><b>Received on 27 June 2025 via e-mail:</b></p> <p>“We plan to submit a project proposal for two topics. The first topic should be "Integrated technological line for sustainable drying and smart packaging of agro-products" , and the second topic should be Digitization of Air-based Solar Heating and AIR purification. Two companies from Macedonia and two from Bulgaria will participate. The lead partner from Macedonia produces dryers and air collectors, the first partner produces packaging equipment in Bulgaria, the second Macedonian partner assembles IT equipment, the third partner produces controllers for solar systems, and other hardware equipment.</p> <p>Is the proposal in accordance with the project rules?”</p>	<p>Based on the Guidelines for Applicants for the Interreg VI-A IPA Bulgaria – North Macedonia Programme (Priority 3, SO1), your proposed project appears <b>to be in line</b> with the programme rules.</p> <p>Moreover, both topics described “Integrated technological line for sustainable drying and smart packaging of agro-products,” and, “Digitization of Air-based Solar Heating and AIR purification,” both align well with the Specific Objective 1 (SO1): Increase the competitiveness of the local economy and improve the business environment.</p> <p>The described company activities (manufacture of dryers, air collectors, packaging, IT, and solar controllers) appear to fall within the eligible sectors. However, please observe the following criteria’s as well:</p> <ul style="list-style-type: none"> <li>- Verify SME registration, legal status, ownership and eligibility under NACE codes.</li> <li>- Ensure project duration is between 12–24 months.</li> <li>- Relevant technical designs, environmental assessments, and investment justifications, especially for works or equipment.</li> <li>- Clearly demonstrate cross-border benefits and integration in the application and inclusion of “soft measures”.</li> </ul>
8	<p><b>Received on 30 June 2025 via e-mail:</b></p> <p>“I would like to kindly ask for clarification regarding the eligibility of certain types of projects for the upcoming call:</p> <p>Hotel:</p> <p>Is it possible to apply with a hotel that is currently under construction? The support that we will ask covers only the interior furnishing of the hotel.</p>	Please refer to the answer provided for Question 3



	<p>Given that the hotel is still in development, the applicant does not currently generate revenue from this business code. Would such a candidate be considered eligible for application?</p> <p>Olive Oil Production:</p> <p>The registered business activity code is "Olive Cultivation", however, the olives are cultivated exclusively for the production of olive oil and not for direct sale. Total revenue of the company is from olive oil sale. The production facility has already been built, and the project would involve the installation of a production line. Would this type of project be considered acceptable?"</p>	
9	<p><b>Received on 30 June 2025 via e-mail:</b></p> <p>"We were reviewing the Interreg OPEN CALL FOR PROJECT PROPOSALS for SME's (Bulgaria – North Macedonia) and were wondering if non-profits are eligible to be co-applicants/partners on this call? We did not find that option in the guidelines (it seems as they are not) but considering that also capacity building is foreseen in this call, it was not quite clear to us"</p>	Please refer to the answer provided for Question 3
10	<p><b>Received on 4 July 2025 via e-mail:</b></p> <p>Regarding the call BG- MK for SME's please clarify these questions:</p> <ol style="list-style-type: none"> <li>1. we have difficulties in opening the document Explanatory notes for Annex 8 <a href="https://ipa-bgmk.mrrb.bg/index.php/en/node/260">https://ipa-bgmk.mrrb.bg/index.php/en/node/260</a>. Could please point us on the right link and give us detailed explanations how to fill Annex 8 - Phase 1.</li> <li>2. If one of the partners in the project decides to hire experts for project management - BK4, the contract with experts should be signed before applying or after.</li> </ol>	<p>1. Please try downloading the document <b>"Explanatory notes for Annex 8"</b> in <b>Word format</b> from the <b>same link in the post</b>, located in the post below: <a href="https://ipa-bgmk.mrrb.bg/index.php/en/node/260">https://ipa-bgmk.mrrb.bg/index.php/en/node/260</a></p> <p>Once you open the page, scroll down to find the <b>Word version</b>, which is easier to access and edit.</p> <p>As for <b>detailed instructions on how to fill in Annex 8 – Phase 1</b>, we will provide you with step-by-step guidance shortly in a separate reply.</p> <p>2. The contract with the experts should be signed after signing the Subsidy Contract.</p>

	<p>3. Is it applicable if one of the partners decides to hire experts for project management - BK4 - and the other partner goes with personal resources - BK1.</p>	<p>3. Each partner can choose the most appropriate budget category for project management activities based on their internal capacity and needs.</p>
11	<p><b>Received on 4 July 2025 via e-mail:</b></p> <p>We are Almero doo from Gostivar, Polog region and we produce mattresses. We have a branch office in Shtip. Can we participate in the IPA program with the subsidiary for the production of non-ecological sponges in the cross-border cooperation program with Bulgaria?</p>	<p><b>1. Programme Area Eligibility and Registration</b></p> <p>Your location and the location of your branch are crucial for eligibility:</p> <ul style="list-style-type: none"> <li>• The Programme area in North Macedonia comprises the North-East, the East, and the South-East NUTS III statistical regions, consisting of 27 municipalities.</li> <li>• To be eligible, entities must be "registered and operating not later than 31.12.2022 in the programme area". They must also be "legally established entities according to the national legislation of the state on whose territory they are located".</li> </ul> <p>The requirement according to the GfA is that applicants must “be legally established entities according to the national legislation of the state on whose territory they are located;”</p> <p>‘Legal entity’ means a natural person or an entity created and recognized by law as a legal person. It must have legal personality and, acting on its own account and in its own name, be able to exercise rights and be subject to obligations.</p> <p>‘Branches’ — Are not regarded as legal entities, since they do not have legal personality distinct from that of their mother-company. The fact that they are registered in national official registers is not relevant. It will be their mother-company that will be considered as legal entity for the purposes of the legal entity validation. (as per Rules for legal entity validation, LEAR appointment and financial capacity assessment <a href="https://ec.europa.eu/info/funding-tenders/opportunities/docs/2021-2027/common/guidance/rules-lev-lear-fca_en.pdf">https://ec.europa.eu/info/funding-tenders/opportunities/docs/2021-2027/common/guidance/rules-lev-lear-fca_en.pdf</a> Meaning that a branch is</p>

		<p>not considered as a separate legal entity, rather it is considered as the same entity as its parent.</p> <p><b>2. Eligibility of Main Economic Activity (NACE Codes)</b></p> <p>Main economic activities, mattress production and sponge production, fall under the C MANUFACTURING division in the Statistical Classification of Economic Activities in the European Community (NACE rev.2.1), which is an eligible division for this call.</p> <ul style="list-style-type: none"> <li>• Manufacture of rubber and plastic products (C.22) could potentially cover sponge production, depending on the materials used.</li> </ul> <p>Therefore, your general economic activities appear to be in line with the Programme's requirements, provided they are your main economic activity as verified by official certificates.</p> <p>The information regarding eligible NACE codes for economic activity can be found in <b>Section 2.1 "Eligibility of SMEs and entrepreneurs"</b> of the "Guidelines for Applicants".</p> <p>More specifically, this information is detailed as <b>criterion 4)</b> under this section. This criterion describes the required main economic activities according to the Statistical Classification of Economic Activities in the European Community (NACE rev.2.1). The list of eligible divisions/classes <b>begins on Page 19 and continues on Page 20</b> of the document.</p>
12	<p><b>Received on 8 July 2025 via e-mail:</b></p> <p>Hereby I would like to ask for clarification regarding the assessment of financial stability following the Open Call for SMEs under Priority 3 of the cross-border cooperation program:</p>	<p>1. The financial indicators used in the Financial Stability Coefficient (FSC) are calculated at the project level, using the average values of the indicators for each project partner. This approach ensures a fair and unified scoring process for the project as a whole.</p>

	<p>In Attachment 5 three indicators are indicated, which are involved in the calculation of the coefficient for financial stability: Gross added value, EBITDA and the ratio of weighted EBITDA to the value of allowable costs. The way to calculate each of the indicators is also given, indicating that the coefficients must be calculated for the project as a whole on the basis of the average values for each of the partners.</p> <p>There is also a rule that "If the Lead Partner or one of the partners in the project receives a score of 0 according to one or more criteria for financial capacity", then this partner must be excluded from the project, and if there are only two partners, the project is cancelled.</p> <p>Question 1: The assessment of financial stability according to individual indicators is done for each partner separately and monitored for a possible assessment of zero points, and then averaged, or is only the averaged assessment taken into account? Please explain.</p> <p>Question 2: If the assessment of financial stability according to individual indicators is made for each partner, then according to the indicator "weighted EBITDA ratio to the value of the allowable costs" is it calculated on the basis of the total allowable costs for the entire project or only for the budget of the respective partner? I am asking for clarification on the above two questions and in the event that the intentions are necessary, to direct them by competence to the TCM Directorate in MRRB for the preparation of corrected Attachment 5, where these clarifications will find their place.</p>	<p>However, to ensure the financial reliability of all participants, each partner is also assessed individually against the same financial indicators. This serves the purpose of identifying if any partner receives a score of zero (0) for any individual financial indicator.</p> <p>2. The indicator "Comparability between the weighted EBITDA value and the total eligible project costs" is primarily calculated at the project level, consistent with the approach used for the other two indicators.</p> <p>This means: The average weighted EBITDA of all partners is compared to the total eligible project costs to determine the project-level score.</p> <p>However, as with the other indicators, an individual calculation is also required per partner to determine whether any partner's individual weighted EBITDA, when compared to their own share of eligible costs, results in a score of zero (0).</p>
13	<p><b>Received on 8 July 2025 via e-mail:</b></p> <p>My name is ....., Owner of AMDE TECH PLTD, a European SME specializing in the recycling and refurbishment of mobile devices and electronic components. We recently learned about the Interreg VI-A IPA Bulgaria–North Macedonia Programme 2021–2027, Priority 3 (Specific Objective 1) aimed at increasing SME competitiveness and fostering cross-border cooperation.</p>	<p><b>1. Eligibility Criteria for Companies Active in Mobile Device Recycling and Repair</b></p> <p>For AMDE TECH PLTD to be eligible for funding under this programme, it must cumulatively meet several criteria:</p> <ul style="list-style-type: none"> <li>• <b>Legal Establishment and Operational Presence in the Programme Area:</b> Your company must be a <b>legally established entity</b> according to the national legislation of the state where it is located. Crucially,</li> </ul>

<p>Could you please provide more information on this call, in particular:</p> <ol style="list-style-type: none"> <li>1. Eligibility criteria for companies active in mobile device recycling and repair.</li> <li>2. Application procedures and key deadlines.</li> <li>3. Opportunities for participation without existing Macedonian partners, or support in finding a suitable local partner.</li> </ol> <p>We are very interested in contributing our expertise in circular-economy solutions for mobile electronics and would welcome any guidance you can offer.</p>	<p>it must also be <b>registered and operating not later than 31.12.2022 in the programme area</b> between Bulgaria and North Macedonia.</p> <ul style="list-style-type: none"> <li>○ The <b>Programme area in Bulgaria</b> includes the NUTS III districts of Blagoevgrad and Kyustendil (23 municipalities).</li> <li>○ The <b>Programme area in North Macedonia</b> includes the North-East, East, and South-East NUTS III statistical regions (27 municipalities)</li> </ul> <ul style="list-style-type: none"> <li>• <b>Main Economic Activity (NACE Codes):</b> Your main economic activity, "recycling and refurbishment of mobile devices and electronic components," falls under eligible NACE rev.2.1 divisions.</li> <li>• <b>C MANUFACTURING</b> is an eligible division. Specifically, <b>C.26 Manufacture of computer, electronic and optical products</b> is listed as eligible, and refurbishment could fall under this or potentially <b>C.32 Other manufacturing</b>.</li> <li>• The information regarding eligible NACE codes for economic activity can be found in <b>Section 2.1 "Eligibility of SMEs and entrepreneurs"</b> of the "Guidelines for Applicants".</li> <li>• More specifically, this information is detailed as <b>criterion 4)</b> under this section. This criterion describes the required main economic activities according to the Statistical Classification of Economic Activities in the European Community (NACE rev.2.1). The list of eligible divisions/classes <b>begins on Page 19 and continues on Page 20</b> of the document.</li> </ul> <p><b>2. Application Procedures and Key Deadlines</b></p> <ul style="list-style-type: none"> <li>• <b>Submission Deadline:</b> The <b>deadline for submission</b> of project proposals in the JEMS system is <b>September 15, 2025, at 17:00 EEST</b> (Bulgarian local time). Applications submitted after this deadline will be automatically rejected.</li> <li>• <b>Application System:</b> Project proposals <b>must be submitted entirely in electronic form</b> using the Joint Electronic Monitoring System (JEMS) at <a href="https://jems-bgmk.mrrb.bg/">https://jems-bgmk.mrrb.bg/</a>. No paper submission is required.</li> </ul>
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- **Language:** The **Application Form and all Annexes must be filled in English**. Supporting documents issued by national/local authorities should be attached in their original language, accompanied by a **translation into English**. The translated version will prevail for evaluation purposes.
- **Guidelines and Documents:** It is highly recommended to **carefully read the "Guidelines for Applicants"** and the adopted Programme Document, available on the Programme website (<https://ipa-bgmk.mrrb.bg/>).
- **Project Duration and Funding:**
  - Projects under SO1 have a duration of **between 12 to 24 months**.
  - The minimum grant amount per project is **300,000 EUR**, with a maximum of **600,000 EUR**.
  - Each partner SME can request a minimum of **100,000 EUR** and a maximum of **300,000 EUR**.
  - The EU contribution is 85%, with a 15% national public co-financing from both Bulgaria and North Macedonia.
- **Investment Component:** Your project proposal should **mainly include investment activities** (works, supply, etc.) representing at least **65% of the total eligible costs**.
- **"Soft Measures":** Projects must also include "soft measures" (e.g., studies, trainings, networking, awareness-raising campaigns), but their eligible costs **shall not exceed 35% of the total eligible project cost**.
- **Required Documents:** A comprehensive list of mandatory Annexes (A1-A9) and Supporting Documents (B1-B7) is provided in the Guidelines, covering legal status, financial statements, NACE certificates, de minimis aid declarations, DNSH declarations, and specific documentation for investment activities (e.g., ownership/lease agreements, environmental permits/statements, technical designs, market analyses for equipment).

		<p><b>3. Opportunities for Participation Without Existing Macedonian Partners, or Support in Finding a Suitable Local Partner</b></p> <ul style="list-style-type: none"> <li> <b>Mandatory Cross-border Partnership:</b> The programme is a cross-border cooperation initiative. It is an <b>absolute mandatory requirement</b> that the project <b>must include at least one partner SME from each side of the border region</b> (i.e., one from Bulgaria and one from North Macedonia) acting in full spirit of cooperation. <b>Failure to comply with this requirement will lead to elimination</b> at the eligibility assessment stage. <ul style="list-style-type: none"> <li>Partners must cooperate mandatorily in <b>joint development</b> (project designed together) and <b>joint implementation</b> (activities carried out and coordinated between partners), and additionally in one or both of <b>joint financing</b> or <b>joint staffing</b>.</li> <li>The minimum number of partners in a project is two (2), including the Lead Partner, while the maximum shall not exceed four (4).</li> </ul> </li> </ul>
14	<p><b>Received on 8 July 2025 via e-mail:</b></p> <p>1. Project preparation costs?  - According to the guideline - The details of how preparation costs will be shared by the project partners need to be included in the Project Partnership Agreement. Is there anything else that has to be additionally added to the PPA except the project preparation costs?  - Also, a declaration of no double funding for project preparation has to be submitted. Is there an accredited template for it, or the document should be drafted by the applicants?  - Should the project preparation costs be paid before being reported for reimbursement or not?</p> <p>2. Climate proofing self-assessment</p>	<p>1.1 Project Partnership Agreement (PPA) must explicitly describe how the project preparation costs will be shared among the project partners. The project preparation expenditures must be incurred no later than the project 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).  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> <p>1.2 The Partner Declaration (Annex A3) already includes provisions on double funding, and it applies to all expenditures, including those related to project preparation. No separate declaration is required beyond the existing template.</p>

<p>- In the annexes there is an excel document A8 – Climate proofing self-assessment. In the guideline section 3.3 – Documents for information it is mentioned about an explanatory note for climate proofing assessment (A8.1). I couldn't find that kind of document in the annexes?</p> <p>- Is annex A8 – Climate proofing self-assessment mandatory for every type of investment or only for construction activities?</p> <p>3. B6 – Supporting documents concerning INVESTMENT activities</p> <p>- Are all listed documents (B6.1 – B6.7) listed in the guideline mandatory only for construction activities or both for construction and supply of equipment?</p> <p>- B6.4 – Which public institution in Bulgaria is issuing the letter stating that the project proposal is eligible according to the current River Basin Management Plans and Flood Risk Management Plans ? Please confirm that this document is asked only for the Bulgarian partners (as stated in the Guideline) , as in the Info-session presentation in Blagoevgrad it was presented like this : Копие от писмо, в което се посочва, че проектното предложение е допустимо съгласно действащите планове за управление на Речните басейни; Планове за управление на риска от наводнения</p> <p>(БГ)/Планове за управление на басейни и документи с еквивалентно значение (МК);</p> <p>- B6-5 – Explanatory note for the envisaged prevention measures for avoiding pollution of water bodies in emergency organization (if applicable) – Please clarify this type of needed document / note ?</p> <p>4. Annex 7 – DSNH Self – assessment</p> <p>- At page 41 of the guideline it is stated that Annex 7 – DSNH Declaration should be signed, dated and provided by each partner. However, in the documents package, there is a template for Annex 7 referring only to the Lead partner.</p>	<p>2.</p> <p><b>GfA 3.2. Supporting Documents (B)</b></p> <p>Annex A8 Climate proofing self-assessment must be filled and presented for the investment activities only.</p> <p><b>GfA 2.2 Eligibility of Activities - 2.2.3 Eligible Activities</b></p> <p>Investment component includes operations budgeted within BC 5. Equipment costs and BC 6. Costs for infrastructure and works according to the <b>GfA p.2.3.3. List and description of Eligible Expenditures per budget categories.</b></p> <p>3.</p> <p><b>GfA 3.2. Supporting Documents (B)</b></p> <p>In addition to all annexes (A1-A8 and supporting documents (B1-B5), the supporting documents (B6.1 – B6.7) must be presented for the investment activities only - BC 5. Equipment costs and BC 6. Costs for infrastructure and works – and in line with the national legislations.</p> <p><b>GfA 3.2. Supporting Documents (B) - B6. Supporting documents concerning INVESTMENT ACTIVITIES</b></p> <p>Supporting document B6.4. Copy of letter issued by the relevant body clearly stating that the project proposal is eligible according to the current River Basin Management Plans and Flood Risk Management Plans must be issued by The Basin Directorate “West Belomorski Region” (BDBR) - for Bulgarian partners. For Macedonian partners applicable is the relevant body according to the national legislation.</p> <p><b>GfA 3.2. Supporting Documents (B) - B6. Supporting documents concerning INVESTMENT ACTIVITIES</b></p> <p>Supporting document B6.5. Explanatory note for the envisaged prevention measures for avoiding pollution of water bodies in emergency situations by respective organization - issued in original language and English translation signed/ signed with qualified electronic signature by respective partner as true copy – presented as a free format document and if applicable.</p> <p>4.</p> <p><b>GfA 3.1. Annexes (A)</b></p>
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	<p>Is annex 7 mandatory for all the partners (we just change Lead partner with Project partner) or it has to be signed, dated and provided only be the Lead partner?</p> <p>5. Blagoevgrad info – day presentation - In this presentation uploaded on your official website there is on slide for the mandatory supporting documents (B1 – B5). There is only a slide for the annexes (A) and the supporting documents concerning INVESTMENT ACTIVITIES (B6.1 – B6.7 and B7)</p> <p>Can you please send a list of the mandatory supporting documents in Bulgarian language?</p>	<p>DSNH declaration – signed and dated should be filled in according to the template and provided by each project partner. Annex 7 Self-assessment for compliance with the DSNH principle must be submitted by all partners.</p> <p>5. <b>GfA 3.2. Supporting Documents (B)</b></p> <p>Supporting documents should be provided and submitted together with the Application form. For Bulgarian language, please refer to the slide 32 from presentation “Eligibility of Applicants Activities Expenditures”.</p>
15	<p><b>Received on 9 July 2025 via e-mail:</b></p> <p>Our company wants to apply under the open call for proposals for SME, INTERREG VI-A IPA Bulgaria – North Macedonia Programme 2021-2027. The company is operating under the following code: 46.87 Wholesale of waste and scrap according to the Statistical Classification of Economic Activities in the European Community (NACE rev.2.1). Part of our activity is the collection of non-hazardous waste (paper, metal etc.), which is included under code 38.11 under the procedure. Is our company an eligible candidate under the current call for proposals? Do we need to undertake a procedure for adding code 38.11 to our license or won't be necessary?</p>	<p>One of the mandatory general eligibility criteria for SMEs and entrepreneurs is that the company must have its <b>main economic activity</b> in specific divisions according to the Statistical Classification of Economic Activities in the European Community (NACE rev.2.1).</p> <ul style="list-style-type: none"> <li>• <b>Your company's stated NACE code: 46.87 "Wholesale of waste and scrap"</b> Upon reviewing the list of eligible NACE rev.2.1 divisions in the source document, NACE code <b>46.87 is not explicitly listed</b> as an eligible "main economic activity."</li> <li>• <b>Your activity: "collection of non-hazardous waste (paper, metal etc.), which is included under code 38.11"</b> <ul style="list-style-type: none"> <li>○ NACE code <b>E.38.11 "Collection of non-hazardous waste" IS explicitly listed</b> as an eligible main economic activity under the Division "E WATER SUPPLY, SEWERAGE, WASTE MANAGEMENT AND REMEDIATION ACTIVITIES".</li> </ul> </li> </ul> <p>Based on the eligibility criteria, <b>your company is an eligible candidate only if NACE code 38.11 "Collection of non-hazardous waste" is officially registered as your main economic activity.</b> If your current <i>main economic</i></p>

		<p><i>activity</i> is 46.87, your company would <b>not be considered eligible</b> for this call for proposals as it does not meet the specific NACE code requirement.</p> <p><b>Regarding the need to undertake a procedure for adding code 38.11 to your license:</b></p> <ul style="list-style-type: none"> <li>• The guidelines clearly state that the "<b>main economic activity</b>" must be one of the listed NACE codes.</li> <li>• To prove your main economic activity, applicants are required to submit "<b>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, issued in the original language from the respective authority, and English translation signed / signed with qualified electronic signature by respective organization as true copy.</b>".</li> <li>• Therefore, if 38.11 is currently only a part of your activities and not your <b>officially registered main NACE code</b>, then <b>yes, you would need to undertake a procedure to change your primary registered NACE code to 38.11</b> to meet this specific eligibility criterion. Without this formal change, even if you perform activities under 38.11, if it's not your designated "main economic activity," you would not be eligible. The procedure for such a change would depend on your national legislation, which is outside the scope of the provided sources.</li> </ul> <p>The information regarding eligible NACE codes for economic activity can be found in <b>Section 2.1 "Eligibility of SMEs and entrepreneurs"</b> of the "Guidelines for Applicants".</p> <p>More specifically, this information is detailed as <b>criterion 4)</b> under this section. This criterion describes the required main economic activities according to the Statistical Classification of Economic Activities in the European Community (NACE rev.2.1). The list of eligible</p>
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		divisions/classes <b>begins on Page 19 and continues on Page 20</b> of the document.
16	<p><b>Received on 15 July 2025 via e-mail:</b></p> <p>We are in communication with a company from Bulgaria to create a partnership relationship for the current call, so we want to make sure if any of the activities from the list can be candidates from R. Bulgaria?</p> <p>Код основна дейност</p> <ul style="list-style-type: none"> <li>- 5914 – прожектиране на филм</li> <li>- 5630 – дейност на питейни заведения</li> <li>- 6820 – даване под наем на собствени недвижими имоти</li> <li>- 0113 – отглеждане на зеленчуци</li> <li>- 4941 – транспортна дейност – товарен автомобилен транспорт</li> <li>- 8020 – дейности в областта на техн. с/ми за сигурност</li> <li>- Сдружение за култура – НПО – 9499 – дейност на други организации с нестопанска цел.</li> <li>- Спортен клуб – НПО</li> </ul>	Please refer to the answer for question 15
17	<p><b>Received on 25 July 2025 via e-mail:</b></p> <p>Hello, Can I get information whether the activity under code 46.33 - Wholesale of dairy products, eggs and edible oils and fats is acceptable for application.</p>	<p>The information regarding eligible NACE codes for economic activity can be found in Section 2.1 "Eligibility of SMEs and entrepreneurs" of the "Guidelines for Applicants".</p> <p>More specifically, this information is detailed as criterion 4) under this section. This criterion describes the required main economic activities according to the Statistical Classification of Economic Activities in the European Community (NACE rev.2.1). The list of eligible divisions/classes begins on Page 19 and continues on Page 20 of the document.</p>
18	<p><b>Received on 28 July 2025 via e-mail:</b></p> <p>Regarding the published OPEN CALL FOR PROJECT PROPOSALS for SME's (<a href="https://ipa-bgmk.mrrb.bg/en/node/249">https://ipa-bgmk.mrrb.bg/en/node/249</a>) under Priority3 -</p>	A partner company that has reported a negative financial result (loss in the Profit/Loss Accounts) in the previous three fiscal years cannot apply for this call for proposals because financial stability is a key eligibility criterion. Applicants must demonstrate sufficient financial capacity to ensure proper project implementation, provide co-financing where required, and sustain

	<p>Integrated Development of the Border Region with the specific objective (SO) 1:</p> <p>"Increase the competitiveness of the local economy and improve the business environment"</p> <p>I have a question regarding the financial aspect of the partners.</p> <p>Can a partner company that has a negative financial result (Loss in the Profit/Loss Accounts)</p> <p>in the previous 3 fiscal years apply for this call of proposals?</p>	<p>project results after completion. A consistent negative financial performance indicates a higher financial risk, which does not meet the program's requirements.</p> <p>However, please note that this is not an official opinion. The final assessment of the financial capacity of applicants and partners is determined by the Assessment Working Group (AWG) during the evaluation process</p>
19	<p><b>Received on 29 July 2025 via e-mail:</b></p> <p>Regarding the call Interreg CBC BG- MK for SME's and the supporting documents concerning investment activities, specifically B6.6. Approved Detailed Works Design, part B, does all supply activities related to equipment need to present Technological production line scheme(s)/plan(s) and Explanatory note on the technical solutions planned (pg 45 of GfA)?</p>	<p>The technological production line plans and the accompanying explanatory note detailing the planned technical solutions are part of the mandatory investment documentation.</p>
20	<p><b>Received on 30 July 2025 via e-mail:</b></p> <p>Regarding the call Interreg CBC BG- MK for SME's and budget category 7, since is lump sum, does it need to be justified through actual incurred costs? If so, during which period should the costs be incurred – from the date the call was published until the application submission?</p>	<p>In order to be eligible for reimbursement, the project preparation expenditures must indeed be incurred and fully documented before or on the date of submission of the project proposal. All supporting documents, such as invoices, acceptance protocols, and lists, must be issued within this period and kept for audit purposes. The lump sum of EUR 12,000 must be included in the lead partner's budget at the application stage and, if the project is approved for financing by the Monitoring Committee and a Subsidy Contract is concluded with the Managing Authority, it will be reimbursed in the form of a lump sum and reported by the lead partner in the first partner report during the implementation stage.</p>