

# GUIDE FOR IDENTIFIED APPLICANTS TO DEVELOP AND SUBMIT FULL PROJECT PROPOSALS *(Contracting Guide)*

Programme Priority 2  
‘Integrated Development of the Cross-  
Border Region’

*(Interreg VI-A) IPA Bulgaria Türkiye Programme  
2021-2027*

DEADLINE FOR SUBMISSION OF THE FULL PROJECT PROPOSALS IN JEMS  
13<sup>th</sup> of August 2024, 17:00 EET

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## Introduction

This guide is exclusively intended for organizations that have received invitations to develop and submit full project proposals (FPP) within the framework of Programme Priority 2, ‘Integrated Development of the Cross-Border Region’. Each FPP originates from a corresponding concept note, which the Strategy Board (SB) of the Programme has identified as a project idea to compile into a list (please, see the table below). This list is annexed to the Programme’s Territorial Strategy (TS). The TS and its annexes, including the list of identified project ideas (main and reserve projects), have been approved by the Monitoring Committee (MC) of the Program under Decision No 3/07.11.2023 and have been posted on the programme's website. For additional information, please visit <https://ipa-bgtr.mrrb.bg/>.

**The identified project ideas are categorized into *main project ideas/concept notes*, ranked until the disposable call’s budget is exhausted, and *reserve project ideas/concept notes*, which fall below the disposable call’s budget. Applicants with reserve concept notes are encouraged to submit FPPs under equal conditions with the main concept notes. However, a reserve FPP may proceed to the contracting stage if a FPP from the main list is not submitted, drops out or does not meet all eligibility criteria for contracting. In this case, the respective reserve FPP proceeds to contracting stage, and it must adhere to all subsequent steps and meet all conditions to secure a contract. The order of proceeding is according to the ranking established in the list of operations, approved by the SB.**

**One project idea/concept note can be further developed in only one full project proposal!**

List of identified project ideas/concept notes whose applicants are invited to develop and submit full project proposals:

Concept note ID	Name of the project idea	Lead Partner	Total Budget
<b>Main project ideas/concept notes</b>			
BGTR0200037	"ENPORT STRANDJA - an integrated approach to the development of	Municipality of Sredets (BG)	1 000 000,00

	sustainable tourism in the cross-border region"		
BGTR0200043	THRACIA Alive: Partnership for experiential Cultural tourism from the Black Sea to Maritsa	Municipality of Uzunkopru (TR)	900 500,00
BGTR0200103	Shared Shores&Stories: Discovering the Rich Cultural Heritage&Terroir of Pomorie-Kırklareli Tourist Area	Municipality of Pomorie (BG)	999 645,00
BGTR0200042	Exploring the Past: Experimental Archaeology as a Catalyst for Tourism and Growth	Kırklareli Provincial Directorate of Culture and Tourism (TR)	948 640,00
BGTR0200086	Together We Reveal the Greatness of Nature for Sustainable Tourism Between Two Seas	Municipality of Elhovo (BG)	999 300,00
BGTR0200044	Gateway Through History: Mobility of Cross-Border Destination Exploring	Municipality of Kameno (BG)	969 000,00
BGTR0200102	To preserve biodiversity and nature for our future	Municipality of Enez (TR)	961 165,00
BGTR0200039	Cooperation for reloading tourism generation skills in the border areas of Yambol and Kırklareli	Kırklareli Chamber of Tradesmen and Craftsmen (TR)	995 000,00
BGTR0200100	Maritsa Timeless Journey	Historical museum Prof. Dr. Aleksandar Fol - Malko Tarnovo (BG)	999 534,62
BGTR0200051	Touch Your Cultural and Natural Heritage	Edirne Special Provincial Administration (TR)	995 000,00

BGTR0200094	New opportunities for sustainable tourism	Yambol Municipality (BG)	1 000 000,00
BGTR0200057	Tourism through culture - our common future	National Academy of Art – branch Burgas (BG)	999 990,00
BGTR0200046	Karnobat and Kırklareli Invest in The Future	Karnobat Municipality (BG)	989 900,00
<b>Reserve project ideas/concept notes</b>			
BGTR0200074	Introducing low-carbon tourism in the CBC area of Bulgaria and Türkiye	Kırklareli Special Provincial Administration (TR)	999 971,47
BGTR0200080	Green Smiles: Development of sustainable tourism and green initiatives in the Municipalities of Topolovgrad (Bulgaria) and Büyükkarşıran (Türkiye)	Topolovgrad Municipality (BG)	997 546,24
BGTR0200055	Development of business and tourism potential in the cross-border region	Association "Together for Svilengrad"(BG)	1 000 000,00
BGTR0200038	The New Face of Natural Heritage: Sustainable Tourism Initiatives in Cross-Border Agricultural Areas	Directorate of Trakya Agricultural Research Institute (TR)	971 888,00
BGTR0200075	Together for sustainable and inclusive economic growth	OU Naiden Gerov, Bugas (BG)	804978,95
BGTR0200087	Cross Border EcoVolt Corridor: Connecting Green Urban Spaces	Edirne Municipality (TR)	999 960,00

BGTR0200072	Sustainable Tips on Art	Drama- Puppet Theater "Ivan Dimov" (BG)	999 900,00
BGTR0200041	Cooperation for Community Oriented and REsponsible Tourism in Cross Border Area of Bulgaria and Türkiye	Municipality of Nessebar (BG)	997 640,00
BGTR0200088	Increasing attractiveness of local sites with touristic potential through improved infrastructure	Municipality of Lyubimets (BG)	993 000,00
BGTR0200056	Education, suitability, business adaptation	Secondary school "Ivan Vazov"(BG)	999 700,00
BGTR0200082	Back to the Nature in Tourism: Strengthening rural, agro and experience tourism for sustainable development in CBC region	District Governorship of Ipsala (TR)	991 129,00
BGTR0200085	EXPAND STRANDJA- a capacity progress for the interplay of cross-border cultural heritage	Vize Municipality (TR)	999 850,05
BGTR0200061	Tundzha and Enez - territories with potential	Municipality of Tundzha (BG)	982 278,00
BGTR0200110	Digitalized Cycling Tourism - Empowering CBC Region for Cycling Infrastructure as part of European Cycling Route Network	Trakya University (TR)	992 000,00

**The total budget available for contracting FPP is 13 423 529 Euro** of which 11 410 000 Euro EU financial contribution (ERDF+IPA funds) and 2 013 529 Euro national contributions from national budgets of the partnering countries.

While contributions from partners' own resources are not mandatory, applicants have the option to provide their own co-financing, which should be explicitly outlined in the project budget and will undergo verification.

The intensity support to full project proposals is 100%. However, it's important to note that the financial amount granted to contracted applicants may be subject to reduction in the case of de minimis relevance of project activities.

The concept note needs to be further elaborated in the FPP with regard to the operational aspects of the project, particularly its work plan and budget. Therefore, this Guide complements the Guide for application with concept notes, published on May, 22<sup>nd</sup> 2023 based on Decision №3 of the Strategy Board, by providing crucial specifications and additional details covering the stages from FPP development to contracting. The submission of FPPs conducted exclusively in JEMs and the application form (AF) of a concept note and the one for FPP is technically and functionally aligned.

The primary objective of this Guide is to facilitate invited applicants to develop and submit FPPs that meet programme requirements. The FPP Guide is structured into three primary sections:

**Part A** provides guidance to applicants on how to further develop their concept notes into FPPs. It emphasizes compliance with the program's contracting requirements, encompassing also the submission of supporting documents to substantiate stated or desired conditions.

**Part B** focuses on the submission and screening process of the received FPPs, outlining the steps and checks towards contracting. Received FPPs will not undergo a separate assessment. Instead, they will be screened against the contracting criteria outlined in section **2.2 Screening process of full project proposals**. FPPs originate from the identified project ideas previously approved by the Strategy Board for full development. As a result, the FPP stage is designed to avoid redundant identification and assessment, with a primary focus on evaluating whether FPPs meet programme requirements for contracting. It's important to note that the FPP screening is not a scoring (quality

assessment) process. Its outcome is expressed as either 'yes' or 'no,' indicating whether a FPP is eligible to obtain a subsidy contract.

**Part C** describes the contractual process with roles and responsibilities of all actors involved. It also includes a provisional timeline for the implementation of this process.

## 1. Part A – From concept note to full project proposal

Applicants should note that there are elements of the project proposals which cannot be altered between the concept note and FPP stages and therefore they remain unchanged. Please, refer to section **1.1. Eligibility and content elements of the concept note** that cannot be changed in the full project proposal for further information on this matter.

However, it is important to acknowledge that during the transition period from the concept note to the FPP, certain modifications to the concept notes may be necessary. This is due to the evolution of the project idea while elaborating its intervention logic (links between needs, activities, results and contribution to programme indicators), work plan and detailed budget. The programme bodies are open to considering these modifications in a positive manner, but within certain limits. The programme bodies are fully committed to ensuring the application of fundamental assessment and funding principles, such as providing fair and equal treatment to all candidates and avoiding redundant reassessment of project features in different submission stages. Therefore, applicants are strongly advised to avoid making significant changes, specifically those related to project modifications that could jeopardize the eligibility of the proposal.

### 1.1. Eligibility and content elements of the concept note that cannot be changed in the full project proposal

- Objective of the concept note
- Scope of the project activities:



- Mandatory combination of investment (works only or works and supply) and soft type of actions (e.g. services);
- Each FPP must contribute to the achievement of the targets of the mandatory indicators (RCO84+RCO116/RCR104 + RCO74), including the targets of at least one of the two pairs of ERDF indicators (RCO58/RCR64 and/or RCO77/RCR77). Please, ensure that you are familiar with Attachment 5 ‘Programme’s indicators fiches’.
- Investment component/s of the concept note – scope, location, responsible partner/s.

**If the project involves investment activities such as building new or rehabilitating existing infrastructure, these activities should be exclusively carried out on state-owned or municipal property. Only the owner of the respective property rights, or the legal body that has already acquired the management rights<sup>1</sup> for that specific property, is entitled to contract the implementation of those activities, i.e. it should be a project partner. The legal authority to manage the property must be in force for a duration that aligns with or exceeds the specified 5-year durability period, specified in Art.65 of the CPR Regulation, following the project's completion.**

**Interventions on elements of the planned infrastructure, situated at/passing through private properties, are eligible only in cases where there is no alternative technical solution and it has been regulated in accordance with the applicable national legislation, as a part of the approved documentation for construction (Working design and Building permit). In this case, a notarized declaration (including a copy of the respective property act and excerpts from the cadastral map) from the owner of the private property(ies) must be provided to ensure free access to and unhindered use of the public infrastructure for a period project implementation and at least 5 years after the completion of the project.**

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<sup>1</sup>The period of the contract which stipulates the management rights over the conveyed property should be no less than the sustainability period of the funded project, as set out in [Common Provisions Regulation \(EU\) 2021/1060](#), art. 65 (1).

- Mandatory contribution to the protection of the environment and/or provision of green and digital solutions to boost cross-border territorial potentials. Project actions must be in full accord with the DNSH principle<sup>2</sup>.
  - The implementation of the project activities should take place in the Programme area. Activities outside the Programme area can be implemented in duly justified cases.
  - Project activities of an economic nature, irrespective of their implementer, should not fall under the scope of the ineligible sectors for EU funding. These sectors are outlined in Regulation (EU) 2023/2831, Regulation(EU) 2023/2832, Directive 2003/87/EC of the European Parliament and of the Council, Annex 1 and Regulation (EU) No 1379/2013, Annex 1.
  - The budgetary parameters of the concept note, reflecting mandatory criteriaas the minimum and maximum budget of the concept note, a minimum of 70% budget share allocated to the investment component cannot be altered.
- Eligibility of project partners:
- Local/regional bodies and authorities (incl. regional structures of central public authorities and statutory bodies);
  - SMEs – stands for micro, small and medium-sized enterprises as defined in European Union law (EU recommendation 2003/361;
  - NGOs and other socio-economic partners;
  - Academic, research, training and cultural institutions
  - The Lead partner and the project partner/s responsible for the project investment/s cannot be altered.

The FPP must include at least one partner from each side of the border region.

Lead partners are required to be registered and operational within the programme area for a minimum of 3 years preceding the submission of the concept note. Project partners must also be

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<sup>2</sup> Please see the [Taxonomy Regulation](#), the [Technical guidance on the application of DNSH principle](#)) and the ‘climate resilience’ pillar of the climate proofing of infrastructure ([Technical guidance on the climate proofing of infrastructure](#)). Climate proofing is a process that integrates climate change mitigation and adaptation measures into the development of infrastructure projects. It enables European institutional and private investors to make informed decisions on projects that qualify as compatible with the Paris Agreement

registered and operational in the programme area for a minimum of 2 years before the submission of the concept notes. In cases where new partner/s become project partner/s to the FPP, this rule applies to them proportionally. Therefore, the new project partners are required to be registered and operational in the programme area for a minimum of 2 years before the submission of the respective concept note.

In instances where a local/regional/national authority structure is unable to act as a legal entity, its legally established central organisation, shall serve as the project partner, regardless of its location.

Project partners situated outside the programme area but within Bulgaria and Türkiye may be eligible, provided they bring a clear benefit to the programme area and meet all eligibility criteria. However, their involvement is considered exceptional and must be duly justified.

Project partners may participate in up to two FPPs. However, a Lead partner may participate in only one project as such and in maximum one more project as a regular project partner. When a project partner participates in two proposals it should make sure that the **targeted population differs** in each of the two projects.

All partners are directly responsible for project implementation and are prohibited from acting as intermediaries or engaging in any form of contracting among themselves.

**Not meeting all requirements outlined in this section, along with the references it makes, will result in the FPP being ineligible for funding.**

## 1.2 Developing a full project proposal

The applicants will be guided in the process of developing FPP by training/s and Q&A sessions. The purpose of this guidance is to ensure that all FPPs adhere to the rules and requirements of the programme for contracting. During the FPP screening process the necessary adjustments will be made through formal exchange of communication. The applicants may submit questions of substance in writing up to 14 calendar days before the deadline for submission of proposals on the following e-mail address: [jshaskovo@mrrb.government.bg](mailto:jshaskovo@mrrb.government.bg). The JS will reply no later than 7 calendar days before the deadline for the submission of proposals.

**It is important to note that the programme bodies cannot be held responsible for any failure on the part of the applicants to develop, submit, and ultimately secure a contract for their FPPs.**

The application process of a FPP is conducted exclusively in [JEMs](#). The application form (AF) of a concept note and the one for FPP is technically and functionally aligned. A template of application form for FPP is provided as Attachment 1. Therefore, applicants with FPP should use the **same account profile as the one when they submitted the concept note**. In case there are needs to change user settings in JEMs, please follow section 3 ‘User Management’ of the JEMs Manual, which can be found here <https://jems.interact-eu.net/manual/>.

All the information provided in the sections of the concept note in JEMs will automatically transfer to the FPP application. Therefore, applicants do not need to rewrite the entire project proposal in the FPP AF. Instead, they only need to fill in the sections of the FPP AF that were not part of the concept note application. However, since the application form for the concept note was offline (in Word format) and attached to the JEMs application, applicants must now transfer the content of the offline concept idea’s application form to the JEMs application form of the FPP. During this process, project partners can further elaborate on their project idea, consolidate their partnerships, and develop a detailed work plan in line with the recommendations, if any, provided in the notification letters sent to the applicants with the outcomes of the concept note stage.

**The summary of the project proposal (section ‘A.2 Project summary’ of the FPP form) needs to be updated to reflect any modifications made at the FPP stage.**

### **1.2.1 Section ‘Project partners’ from the application form**

The strategic concept of the partnership is introduced at concept note stage. At FPP stage, applicants are required to provide a description of the final partnership composition, partners’ roles, and the manner in which they will interact and cooperate. They should explain how the composition of the partnership is conducive to achieving the project’s objectives and results, and how the

partners' relevance addresses the identified territorial challenges. Additionally, they must specify the mechanisms through which partners will collaborate in cross-border settings.

In general, it is preferable for the partnership composition described in the concept note to remain unchanged in the FPP stage. However, in justifiable cases, a change in partners between concept note and FPP is permitted. It is crucial to note that any such change should not impact the investment activities of the project. This means that **partner/s responsible for the project investment/s cannot be altered. Neither can the Lead partner.** Modifications in the partnership are allowed for partners involved in activities that contribute to the Interreg indicators RCO84 'Pilot actions developed jointly and implemented in projects', RCO116 'Jointly developed solutions' and RCR104 'Solutions taken up or up-scaled by organisations'. In such cases, there are two options for a change in partners:

Option 1: Withdrawal of a partner whose original functions are taken over by other partner within the partnership;

Option 2: Withdrawal of a partner whose original functions are taken over by a new partner.

**Automatic withdrawal of project activities is not allowed when the partner responsible for those activities is also withdrawing from the project. In this scenario, either the new project partner assumes the responsibilities initially assigned to the withdrawn partner, or an existing partner takes on these tasks.**

**Applicants are encouraged to provide additional details and expand upon the activities outlined in the concept note, creating a comprehensive project work plan to enhance the attainment of project targets and results. If the activities outlined in the concept note do not facilitate the incorporation of environmental mitigation measures and indicators provided in Attachment 4 "Measures for monitoring and control of the environmental impact in project proposals"), applicants are required to introduce new activities to address this aspect.**

**During the guidance/screening process for FPP development, certain project activities and their associated costs may be excluded from the EU grant if they are deemed ineligible. In such cases, additional own co-financing may be considered if necessary to achieve project goals.**

If option 2 is chosen, the new partner must have the expertise and legal rights necessary to fulfil the proposed responsibilities. Additionally, it has to meet all eligibility requirements outlined in section 1.1. Eligibility and content elements of the concept note that cannot be changed in the full project proposal in this Guide. Failure to meet these requirements, along with the conditions of the current section, will result in the FPP being ineligible for funding.

At the concept note stage, project applicants were required to provide brief descriptions of the project partners. At the FPP stage, these sections must be elaborated and/or updated, regardless of the selection of option 1 or 2 or if no partner change has been initiated. How partners intend to cooperate must be updated to reflect the final composition of the partnership and to fill in the 'cooperation criteria' section in the AF.

### **1.2.2 Section 'Budget and co-financing' from the application form**

A detailed, economically justifiable, and consistent budget that aligns with the project activities is a critical component of the FPP. An ideal way of starting to develop a detailed project budget is to look at the project activities. Although the project development process requires applicants to go back and forth from goals, objectives to strategies and activities and back again, once the activities are ready it is easier to achieve a great level of budget clarity.

During the concept note stage, only an overall budget estimation of expenditures per cost category and project partner was requested, and thus the project idea's budget was partially evaluated to ensure it aligns with eligibility criteria. Therefore, the budget will undergo a thorough review

during the screening process of the FPP before it can be approved for contracting. The final approval is granted by the Monitoring Committee of the Programme.

### **Eligibility of expenditures**

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. However, changes in budget parameters between the concept note and FPP are only allowed in duly justifiable cases, provided that the following conditions are cumulatively met:

1. The maximum percentage for Budget categories (BC) 1, 2 and 3 and the minimum percentage for investment component (BC 5 and BC 6) should be respected, namely:

BC 1 Staff costs – up to 20% of the eligible costs under BC 4, BC 5 and BC 6 of the total project budget of the respective project partner;

BC 2 Office and administrative costs – up to 15 % of staff costs;

BC 3 Travel and accommodation costs – up to 15 % of the staff costs;

BC 5 and BC 6 (cumulative) – minimum 70% of the total eligible costs.

2. The programme's methodology for determining expenditures for project events using the unit costs approach should remain unchanged (please, see below);
3. The budget changes should not result in non-compliance with the minimum budget of €500,000 and the maximum budget of €1,000,000 for a project proposal.
4. 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.
5. Any potential budget change should not lead to exceeding the overall budget of the concept note.

The eligible and ineligible costs are set out in the Regulation (EU, Euratom) 2018/1046 of 18 July 2018 ([Financial Regulation](#)), the Regulation (EU) 2021/1058 of 24 June 2021 ([ERDF Regulation](#)), the CPR Regulation and the Interreg Regulation.

To ensure that project costs are considered eligible, the following criteria must be met:

1. All project costs should be budgeted rationally and based on market prices. Relevant supporting documents (listed in section **1.2.4 Additional documents supporting the full project proposals**) are requested at application stage. However, it's important to note that expenditures associated with flat rates, unit costs, and lump sums, where final costs are automatically derived or represent a fixed amount for a specific activity, are exempt from this requirement.
2. All expenditure related to activities that have not been financed from other financial instruments. Double funding is strictly prohibited. It is going to be checked during screening and contracting procedures.
3. Project costs must align with the FPP work plan, ensuring that expenditures are explicitly linked to the planned activities, deliverables, and outputs.

**The following costs are ineligible** and therefore cannot be reimbursed:

- Interest on debt
- Fines, financial penalties and expenditure on legal disputes and litigation
- Costs of gifts
- Costs related to fluctuation of foreign exchange rate
- Second hand equipment
- Purchase of land and existing buildings
- In-kind contribution (including unpaid voluntary work)
- Project expenditure split among project partners (i.e. sharing of „common costs”)
- Costs resulting from subcontracting between project partners for services, expertise, equipment and works carried out within the project.
- Charges for national financial transactions;



- Consultant fees between partners for services and work carried out within the project;
- Contracting of employees of the partner organizations as external experts, e.g. as freelancers;
- Other non-eligible expenditures according to EU and national legislation;

### **The budget approach to Simplified Cost Options (SCOs)**

It is important for all project partners to get acquainted with the Programme's approach to financial management. It refers to the application of a methodology named Simplified Cost Options (SCOs). SCOs are an EU innovative way to reimburse grants and repay assistance. Instead of reimbursing "real costs", SCOs allow the reimbursement of expenditures according to predefined methods based on process, outputs or results. SCOs allow the tracing of financed expenditures without the need to provide individual supporting documents. Furthermore, SCOs allow administrations to shift the focus from collecting and verifying financial documents to achieving policy objectives (i.e. concentrating on achieving concrete outputs and results instead of verifying actually incurred costs). As all project partners are subject to potential scrutiny of expenditures by responsible control bodies at national level (for example Court of Accounts) at any time, it is imperative to ensure compliance with national legislation requirements.

SCOs may take the form of:

- **Flat rate** – specific categories of eligible costs which are expressed as a percentage of other eligible costs;
- **Lump sums** – fixed amount for certain activity;
- **Unit Costs** – cover certain specific categories of eligible costs which are expressed in maximum amounts per unit (e.g. maximum prices of certain goods, items, etc).

### **Applicable law and public procurement**

The acquisition by means of a public contract of works, supplies or services from economic operators is subject to rules on public procurement. For the award of service, supply and work

contracts by the project partners, acting as contracting bodies, the procurement procedures shall follow:

- the provisions of Article 58 of Interreg Regulation;
- the provisions of Articles 178 and 179 (and points 36 to 41 of Chapter 3 of Annex I) of the Regulation (EU, Euratom) 2018/1046 of the European Parliament and of the Council of 18 July 2018 on the financial rules applicable to the general budget of the Union;
- National procurement rules (for the Bulgarian partners) - Public procurement act (Закон за обществените поръчки) and Government decree No. 4/2024 (Постановление на Министерски съвет ПМС №4/11.01.2024 г. за определяне правилата за разглеждане и оценяване на оферти и сключването на договорите в процедурата за избор с публична покана от бенефициенти на безвъзмездна финансова помощ от Европейските фондове при споделено управление
- Annex II ‘Public procurement’ of the Financing Agreement between Türkiye and the European Commission, as well as applicable provisions on public procurement as specified in the Project Implementation Manual (for the Turkish partners).

### **The budget template and types of costs**

The budget template of FPP consists of 7 budget categories (BC), as follows:

**BC 1 Staff costs** – these costs relate to remuneration of people involved in the management of the project implementation, such as the project team (manager, coordinator, accountant, assistant, etc.) and permanent staff of project partners engaged in soft project activities (e.g., trainings, studies, research, etc.). These costs can be reimbursed on the basis of flat rate of up to 20% of the eligible costs under BC 4, BC 5, and BC 6 from the respective partner's total project budget. Please refer to Article 39 of the [Interreg Regulation](#) for more information. The project partner has to prove that the project team has been established. The proper appointment of the project team has to be in line with the respective national legislation and is responsibility of the beneficiaries themselves.

Project partners are not required to provide documentation demonstrating that staff costs for project management purposes have been incurred and paid. However, such documentation is to be provided to relevant national control bodies (different than Programme bodies) whenever required by Turkish/national legislation. If the project has been contracted, project partners must provide an official document (e.g. order) proving that a project team has been appointed and is operational. More comprehensive information on this requirement will be provided in the Project Implementation Manual.

**Example for the calculation of staff costs:**

**Reported eligible direct costs:**

*External expertise and service costs:* 20.000 EUR

*Equipment costs:* 30.000 EUR

*Costs for infrastructure and works:* 50.000 EUR

Total: 100.000 EUR

**Eligible Staff costs = 100.000 EUR \* 20% = 20.000 EUR**

**Project partners from the Republic of Türkiye**

**Beneficiaries which are public institutions should take into account that according to the national legislation of Republic of Türkiye, they are not allowed to pay any remuneration to the project team members (project staff) that are already working as civil servants.**

**If a public institution plans to designate civil servants in project team, then 0% flat rate for BC1 must be selected.**

- **BC 2 Office and administrative costs** – All eligible types of office and administrative costs are set out in Art. 40 of the [Interreg Regulation](#). These costs will be reimbursed as a flat rate of up to 15 % of staff costs. No further justification or supporting document is needed from the project partners.

**For the public institutions from the Republic of Türkiye which must select 0% flat rate for BC1, the BC 2 is automatically calculated to 0.**

- **BC 3 Travel and accommodation costs** – This budget category covers expenses related to travel and accommodation exclusively for project staff engaged in project management and implementation. The eligible types of travel and accommodation costs are outlined in Article 41 of the [Interreg Regulation](#). These costs will be reimbursed as a flat rate of up to 15% of the staff costs. No further justification or supporting document is needed from the project partners. When using flat rate, it is not necessary for the applicants to set a detailed budget for travel and accommodation as the calculation is done automatically by JEMs.

When developing your FPP, it is important to ensure that you adhere to the following additional eligibility principles:

- The duration of the travel shall be clearly linked to the concerned event/meeting and shall not be longer than from the day before to the day after the concerned meeting, unless it is clearly justified and documented;
- The maximum accommodation costs and daily allowances must be respected, in accordance with national eligibility rules;
- Travel and accommodation expenses of external experts and service providers shall be declared under the BC 4 External expertise and services costs;
- Generally, the most economical way of transport should be used. In principle, business or first class tickets are not eligible. Furthermore, it is recommended to use environmentally friendly means of transport (e.g. train over flight, green public transport vehicles over taxi/car etc.);
- Taxi costs are eligible, e.g. for travelling to/from the airport/train station, to/from the venue of the event/hotel, in case they are well justified (e.g. the only effective travel solution if public transportation is not available);
- Car rental is eligible in exceptional cases and in justified circumstances, e.g. the location of the event is not accessible by public transport;

- Cancellation fees of travel costs are eligible in case of force majeure;
- In case travel and accommodation costs are not eligible for financing for the given project partner (e.g. no staff employed), travel costs shall not be declared on flat rate basis to the project (i.e. the eligibility of expenditure does not depend on the form of reimbursement).

**Project partners from the Republic of Türkiye**

**For the public institutions from the Republic of Türkiye which must select 0% flat rate for BC1, the following exception is made:**

**Only these partners are allowed to allocate funds in BC3 on a real cost basis up to a maximum of 3,0 % of the of the eligible costs under BC 4, BC 5, and BC 6 of the respective partner's project budget. These costs undergo verification before reimbursement and supporting documentation is needed to be provided to the relevant national control bodies in the verification process.**

- **BC 4 External expertise and services costs** – This category includes costs for expertise and services provided by entities or individuals, other than the project partners, that are directly linked to the project and are crucial for its successful implementation. The extent of external support required may vary depending on the project's specific needs and objectives. All eligible cost types are specified in Article 42 of the [Interreg Regulation](#) (Regulation (EU) 2021/1059 of the European Parliament and of the Council).

Costs associated with external expertise will be reimbursed by the Programme based on real costs supported by relevant documentation. These costs undergo verification before reimbursement.

**For event organization services, costs can be reimbursed based on either unit costs or real costs. The choice between these two options is made by the applicants.**

The unit costs are determined based on the event's duration and the number of participants. The unit costs for event organisation are as follows:

- 14,00 EURO unit cost for one-day events;
- 60,00 EURO unit cost for multi-day events;

The unit costs include the following types of expenditures:

- ✓ Rental expenses for meeting halls, training venues, conference facilities, etc.
- ✓ Rental expenses for equipment such as translation equipment, audio equipment, etc.
- ✓ Vehicle rental expenses for event participants (car, van, minibus, bus, etc.)
- ✓ Expenses for coffee breaks, refreshments, lunches and dinners for participants in the events;
- ✓ Accommodation costs;
- ✓ Expenses for purchasing consumables and materials for event participants, such as paper, files, folders, cases, CDs, as well as printing costs for invitations, agendas, presentations, etc.

#### Examples for using unit cost approach:

***\* Example for calculation of the amount for 1-day event per 20 participants:***

1 day x 20 participants = 20 units

20 units x unit costs EUR 14 = total costs EUR 280

***\* Example for calculation of the amount for 2-day event per 20 participants:***

2 days x 20 participants = 40 units

40 units x unit costs EUR 60 = total costs EUR 2 400

- **BC 5 Equipment costs** – The [Interreg Regulation](#), specifically Article 43, outlines all eligible types of equipment costs. It is essential that the equipment is directly and strictly linked to achieving the project objectives. The Programme will reimburse the costs associated with equipment purchases based on real costs supported by relevant documentation. These costs will undergo verification before reimbursement.

Market analysis for the planned supply is required. The recommended approach for conducting this analysis is for the Lead or project partner to provide a minimum of three extracts from national/EU public procurements systems of a similar supply with identical technical specifications. In instances where evidence from a national/EU procurement system is unattainable (verifiable circumstances apply), the Lead or project partner is required to present soliciting offers (along with website references) 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. Expenditures included in the project budget derived from the market analysis should reflect an average of the price offers received or an average of the extracts from national/EU public procurement systems. In order to overcome the impact of future inflation and price instability, the expenditures included in the budget based on the above market analysis could be increased with the average rate of the national inflation of the last 3 years before the application submission, but not more than 10%.

Upon exhaustion of the first two possibilities, when there is a requirement to procure highly specialized equipment (with insufficient evidence in national/EU procurement systems) from a limited pool of suppliers, and conducting market research for the equipment cost is not feasible, 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.

To ensure fair and equitable treatment of all potential bidders during the actual procurement of specialized equipment, the project partners (acting as contractors) are committed to transparent practices. To achieve this, the project partners shall publicly disclose all information exchanged during the market consultation and historical data gathering (only for highly specialized equipment) phases on their official website. This disclosed information is integral to the tender dossier, fostering openness and fairness in the procurement process.

- **BC 6 Costs for infrastructure and works** - The [Interreg Regulation](#), Article 44, specifies all eligible types of costs for infrastructure and works. It is important to note that the **purchase of land and buildings is not eligible**. The Programme will reimburse costs related to infrastructure and works based on real costs supported by relevant documentation. These costs will also undergo verification before reimbursement.

- **BC 7 Project Preparation costs (PPC)** – projects approved by the Programme’s Monitoring Committee and contracted by the MA are entitled to receive the reimbursement of the preparation costs in a form of a lump sum, except for projects that have already received financial support for project preparation from other EU funding sources. Costs related to project preparation are eligible if they are incurred after the date of 1<sup>st</sup> of January 2021.

For FPP, the PPC is capped at EUR 12,000 per project proposal. The total amount shall be included in the lead partner’s budget at the application stage. This lump sum must be distributed among all project partners in proportion to their involvement in the preparation and contracting of the proposal. It should be included in their Project Partnership Agreement, which is a mandatory document (Annex 1) attached to the FPP application.

With the first report, the lump sum for preparation costs should be added to the lead partner’s reported expenditure, and shall be verified and reimbursed to the lead partner.

**PPC is limited to the following services:**

- ✓ Consultancy and development of technical documentation (including feasibility studies, obtaining necessary permits, detailed design, technical (or working design stage drawings), etc.);
- ✓ Elaboration of the project proposal and application form, translation of documents, taxes, and other charges;
- ✓ other costs necessary for submitting a valid application form and contracting;

The Lead partner must declare the amount in the first Project Progress Report and first interim payment request.



**During the implementation of the screening process (please refer to section 2.2 Screening process of full project proposals), all project costs will be scrutinized and may be reviewed and optimized where necessary by the screening working group. This review will occur if the proposed costs are deemed ineligible, not fully aligned with the project content, not conducive to achieving project objectives and programme indicators/targets or not justified in terms of volume and prices.**

#### **VAT**

**The expenditure for VAT is eligible for operations the total cost of which is below EUR 5 000 000 (including VAT). Each project partner must take the respective national VAT legislation into consideration when budgeting project costs.**

**For Bulgarian partners:** In the implementation phase of the project the project partners should be requested to provide the necessary documentation proving the VAT requested for reimbursement is non-recoverable under national VAT legislation.

**For Turkish partners:** Turkish Beneficiaries shall make all the project expenditures with VAT included. They will also submit their requests for payment with VAT included. They will be taxpayer of the VAT in accordance with Turkish legislation. VAT Exemption Certificate shall not be provided to beneficiaries by no means. **Turkish Beneficiaries** shall make their expenditure excluding the following taxes according to Financial Framework Partnership Agreement signed between the European Commission and the Government of Türkiye, where appropriate: Stamp Tax (Damga Vergisi- DV), Special Communication Tax (Özel İletişim Vergisi-ÖİV) fees to tax administrations (harçlar), Inheritance and Transfer Tax (Veraset ve İntikal Vergisi-VİV), Motor Vehicle Tax (Motorlu Taşıtlar Vergisi-MTV). These taxes are not eligible for reimbursing under the Programme. For exemption of these taxes, tax administration offices will provide an official letter to beneficiaries.

For Special Consumption Tax (Özel Tüketim Vergisi) the beneficiaries will receive tax refund for the paid taxes upon their application to the responsible tax administration for refund, in accordance with Turkish legislation.

Customs Duties (İthalat ve Gümrük Vergisi) are not eligible for reimbursing under the Programme. Whenever customs duties arise from project activities, the beneficiary shall contact with JS Edirne office for guidance in the recovery process of it.

**No-profit principle: NOT APPLICABLE FOR NON-PROFIT ORGANISATIONS (Article 192, par. 3, c) of Regulation 2018/1046)**

The meaning of a no-profit principle is in accordance with Article 192 of Regulation 2018/1046 of the European Parliament and of the Council on the financial rules applicable to the general budget of the Union.

The compliance with the no-profit principle shall be applied as follows:

The grant amount representing the EU funds and national co-financing funds may not have the purpose or effect of producing a profit for the project partners. Profit is defined as a surplus of the grant amount received and the revenue generated by the operation over the total amount of eligible expenditures incurred by the project partner and paid by the Managing authority. If this calculation results in a profit for the project partner, the Managing authority will reduce the final amount of the grant with the profit generated.

The revenues may be but not only: cash in-flows directly paid by users for the goods or services provided by the operation, such as charges borne directly by users for the use of infrastructure, sale or rent of land or buildings, or payments for services, payment received by the project partner arising from contractual penalties as a result of a breach of contract between the partner and a sub-contractor, interests accrued on the received pre-financing payment into the bank account using for the operation, etc. For the purpose of respecting the no-profit principle and for the proper calculation of the revenues generated each project partner should keep detailed, timely, adequate and traceable information and accounts concerning the generated revenues during the implementation period of the operation. A declaration for revenues generated with the relevant

supporting documents shall be requested by each project partner at the stage of the last reporting of expenditures.

### State Aid

For project partners - SMEs

Public support provided within the programme to undertakings<sup>3</sup> will adhere to the de minimis rule. For more information, please refer to [REGULATION \(EU\) 2023/2831](#) of 13 December 2023 on the application of Articles 107 and 108 of the Treaty to de minimis aid, as well as to Attachment 2 – *FactSheet: De minimis support*.

According to [REGULATION \(EU\) 2023/2831](#), undertakings falling within the scope of the regulation will be eligible for grants under the program only if they have not received public assistance exceeding EUR 300,000 over any period of 3 years, prior to the date of grant.

The de minimis ceiling considers all aids granted by national, regional, or local authorities, irrespective of whether the resources come from domestic sources or are partially financed. Undertakings that do not meet the de minimis rule are not eligible for grants under the Programme.

For applicants falling under other categories:

All project activities will be subject to examination to ensure compliance with state aid regulations. This check of compliance is conducted on a case-by case basis, meaning that the presence or absence of activities relevant to state aid depends on the specific details of the project. For further information, please refer to Attachment 2 – *FactSheet: De minimis support*.

Activities of an economic nature are only eligible for financing under the de minimis rule. In such instances, the provisions outlined in Regulation (EU) 2023/2831 of 13 December 2023 on the application of Articles 107 and 108 of the Treaty to de minimis aid must be followed

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<sup>3</sup> The term ‘undertaking’ is in this context used in a wide sense as any entity has an activity of an economic nature and which offers goods and services on the market, regardless the legal form and the way of financing of this entity. Also, if an entity is not profit-oriented state aid rules will apply as long as it competes with companies that are profit-oriented. Therefore, not only private companies are subject to state aid rules but also public authorities or other organisations if they carry out an economic activity on the market.

Project partners registered in Türkiye should follow the applicable provisions set out in [REGULATION \(EU\) 2023/2831](#), as well as national regulations regarding State aid.

The average annual exchange rate obtained from the ECB's data is utilized in order to convert calculation of the state aid from Turkish Lira (TR) to Euro (EUR) for the purpose of calculating the aid of TR applicants during the specified financial years 2020, 2021, 2022, as follows:

- Average exchange rate for 2020 TRY to EUR – 0.124;
- Average exchange rate for 2021 TRY to EUR – 0.095;
- Average exchange rate for 2022 TRY to EUR - 0.057.

Exchange Rate Source: The source for the exchange rates is the European Central Bank (ECB) via the EuroSystem:

[https://www.ecb.europa.eu/stats/policy\\_and\\_exchange\\_rates/euro\\_reference\\_exchange\\_rates/html/eurofxref-graph-try.en.htm](https://www.ecb.europa.eu/stats/policy_and_exchange_rates/euro_reference_exchange_rates/html/eurofxref-graph-try.en.htm)

**All project partners must fill in and submit Annex 6 ‘State Aid Declaration’**

### **1.2.3 Section ‘Project description’ from the application form**

#### **C.1 Project overall objective**

Applicants are required to transfer the content from Section C.1, 'Project Overall Objective,' in their Concept Note's application form to the corresponding section in the AF of the FPP. It is essential to ensure that the narrative remains the same as it is in the concept note with slight rewording possible to ensure consistency with the FPP.

#### **C.2 Project relevance and context**

When developing FPP, project applicants must review and further refine the project relevance and context, as initially provided in the concept note stage. This should be done in accordance with the evaluators' recommendations, if any, provided in the notification letter from the concept note stage.

Applicants must ensure that the information reflects the latest state of play and is consistent with the work plan and final partnership.

Applicants are strongly advised to devote careful attention to Section C.2.7. *How does the project build on available knowledge?* of the FPP. This section is specifically related to the concept of capitalisation of results, an integral aspect of every project. Capitalisation is the process of collecting, analysing, exchanging experience, and transferring / adapting good practices gained in a specific field of regional development policy. It is a priority and a challenge for all Interreg programmes, given the extensive work already conducted in the targeted territorial, policy, and community areas.

When building a project, and implementing activities, partners should therefore consider the results and outputs already achieved by the Programme, as well as in other CBC programmes or European schemes. The aim is to benefit from past experiences and to give continuity to the cooperation efforts in the targeted territories, focusing on addressing shared challenges. This initiative aims to produce tangible outcomes, including databases, reports, booklets, etc., that will serve as valuable resources for future endeavours beyond the completion of the project.

Applicants might also consider the KEEP database<sup>4</sup>, and more broadly the EU funded regional policy projects<sup>5</sup>.

### **C.3 Project partnership**

Applicants are granted certain degree of flexibility to reconsider the proposed partnership, as outlined in their concept notes. Please, see '1.2.1 Section 'Project partners' from the application form' of this Guide for further details.

While the level of involvement of partners may differ according to their role in the project and their organizational capacities, all partners should be meaningfully involved in the project and their expertise valorized as much as possible in the design of an effective work plan.

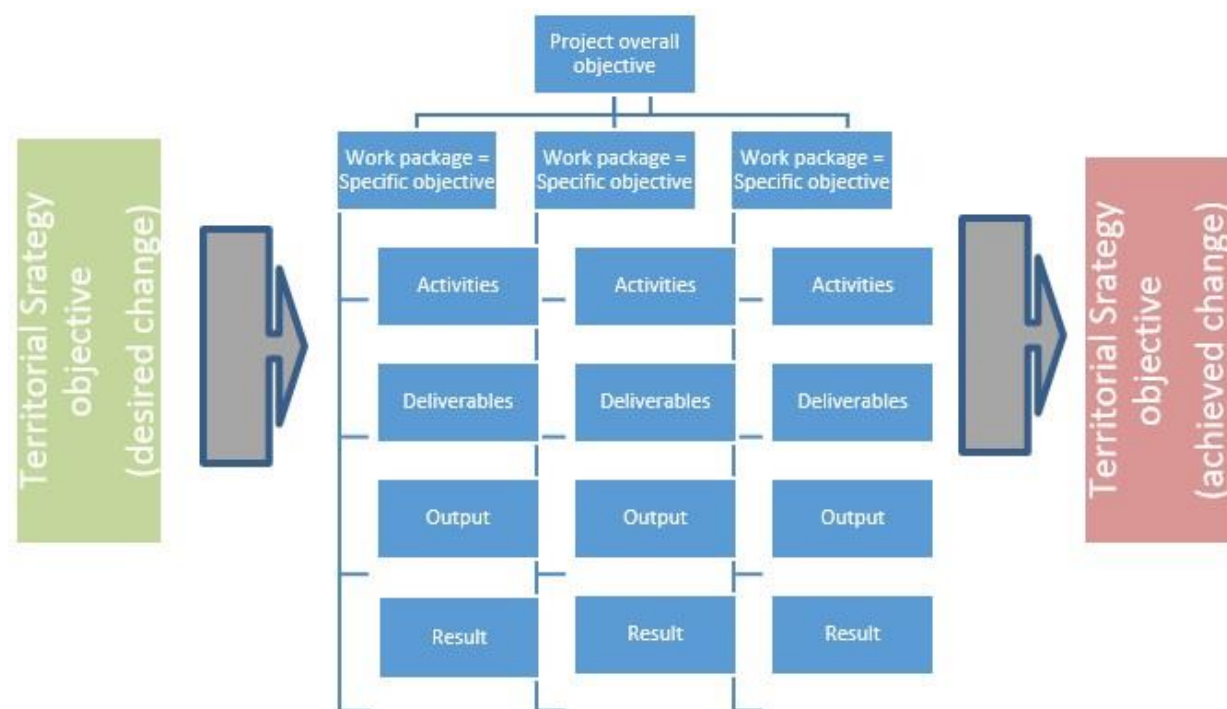
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<sup>4</sup> [https://ec.europa.eu/regional\\_policy/en/projects/](https://ec.europa.eu/regional_policy/en/projects/)

<sup>5</sup> [https://ec.europa.eu/environment/gpp/index\\_en.htm](https://ec.europa.eu/environment/gpp/index_en.htm)

**C.4. Project work plan*****C.4.1 Project intervention logic***

To prepare a good and coherent work plan, the project intervention logic must be considered. The following graphic visualizes the project's intervention logic and its connection to the Territorial Strategy.



In the above graphic, the keywords should be understood as follows:

- **Territorial Strategy objective** - > thematic area which reflects the most relevant needs and potentials of the Strategy area;
- **Project overall objective** - > what the proposal wants to change for the communities in this thematic area;
- **Project specific objective (work package)** - > specific objectives detail *what* the project is trying to achieve during its lifespan, while the work plan (structured in packages) explains *how* it is going to do that. A work package is a group of related activities for which work is estimated, scheduled, monitored, and controlled. Work packages are not predefined by the Programme. Therefore, applicants are free to structure their work packages according to specific objectives

of their projects. Normally, one specific objective is linked with one work package. Project management and communication activities are directly integrated in the work packages.

- **Project activities** - > each work package is divided into activities to achieve its corresponding project specific objective. To keep consistency with the delivery of limited outputs, please, limit the number of activities per work package. Each activity delivers one or more deliverables.
- **Project deliverables** - > physical evidence of what has been produced through an activity. Deliverables are the documentation that capture the implementation of project activities. They can be reports, studies, action plans, digital tools, training modules, permits, tender dossier, etc. Deliverables contribute to project outputs. It is recommended to limit the number of project deliverables and design them as efficiently as possible.
- **Project outputs** -> the direct products of the activities, which will contribute to the desired change. Outputs are defined on work package level. Project main outputs are those that can be captured by the Programme output indicators. Project output/s directly contribute to the achievement of the project result/s. Not every work package must have one or several main outputs (in fact, a project may have only one main output). Outputs of the project remain in use by the partners and/or target groups after completion of the project.
- **Project results** -> describe the achieved desired change the project partners aim to accomplish in their target territories by the end of the project. Project results are the societal benefit brought about by project implementation. The project result must be coherent with the project objective and quantifies the degree to which the objective will be achieved in the project timeframe.
- **Project budget** - project costs must align with the FPP work plan, ensuring that expenditures are explicitly linked to the planned activities, deliverables, and outputs.

**We recall the very important horizontal principle that shape the implementation of the Programme. It is imperative that each supported intervention includes a component contributing to the protection of the environment and biodiversity or provides green and digital solutions. Thus, the green and digital policy becomes integral part of the integrated territorial development of the cross-border region.**

**All outputs and results need to contribute to the Programme's output and result indicators that applicants have selected in their concept notes. The values of the indicators in the FPP should not be lower than those in the respective concept note. When such deviation occurs reasonable justification shall be presented.**

**The applicants are encouraged to develop FPP in a way to avoid local actions that are vaguely linked through a common topic. Stand-alone activities or investments serving local aims are not a good fit for this Programme. The emphasis is on fostering collaboration and addressing shared challenges in a cohesive and integrated manner.**

#### *C.4.2 List of investments*

Applicants need to list and describe in more details project investments that will be delivered within each work package.

**It is important to emphasize that investment activities, such as building new or rehabilitating existing infrastructure, are eligible only when conducted exclusively on state-owned or municipal property.**

**In this regard, public authorities are mandated to uphold the Green Public Procurement (GPP) principle. GPP is defined as "*a process whereby public authorities seek to procure goods, services and works with a reduced environmental impact throughout their life cycle when compared to goods, services and works with the same primary function that would otherwise be procured*"<sup>6</sup>. Additionally, investment activities must comply with the New European Bauhaus<sup>7</sup> principle which is a horizontal principle of the Programme.**

**Additionally, the investment activities must align entirely with the environmental mitigation measures and indicators provided in the Attachment 4 'Measures for**

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<sup>6</sup> [https://green-business.ec.europa.eu/green-public-procurement\\_en](https://green-business.ec.europa.eu/green-public-procurement_en)

<sup>7</sup> [https://europa.eu/new-european-bauhaus/index\\_en](https://europa.eu/new-european-bauhaus/index_en).



**monitoring and control of the environmental impact’). Project partners are mandated to integrate these measures and indicators into their FPP work plans.**

**Modifying the object of the investment as outlined in the concept note (please, refer to section 1.1. Eligibility and content elements of the concept note that cannot be changed in the full project proposal) is not allowed, as it alters the essence of the project idea and affects its assessment outcomes.**

In the context of Interreg programmes, ‘investment’ is anticipated to produce tangible and measurable outcomes, fostering positive changes within the targeted sectors or regions. This involves **investments in equipment** (defined as ‘supply’ within the framework of the current Call 1) and/or **investments in infrastructure** (defined as ‘works’ within the framework of the current Call 1).

**Ensure that your FPP includes a mandatory investment component, comprising either works only or a combination of works and supply, constituting no less than 70% of the total project eligible costs.**

**SMEs are not eligible to receive funding, as lead or project partners, under this Call to implement actions of circular economy relevance in order to demarcate this support from the Call under Programme Priority 1 ‘Environmentally-friendly cross-border region’. Legal entities other than SMEs can apply or participate as partners in integrated projects of circular economy significance.**

The investment description in your FPP should encompass a title, expected delivery period, justification (explaining the need for the investment, its cross-border relevance, who is benefiting from that investment and in what way), location of the physical investment, and investment documentation (including all technical requirements and permissions required according to respective national legislation).

Furthermore, applicants need to identify and describe in their FPP risks associated with the investment and suggest risks mitigation measures.

Additional detailed information regarding the documents that justify and support the investments in the FPP is provided below (see section **1.2.4 Additional documents supporting the full project proposals**).

#### *C.4.3 Communication objectives and target audience*

Communication is an integral part of every Interreg project and a key element for a project to achieve its objectives and changes in a target audience's awareness and behaviour. Please note that there is no specific communication work package in the Application Form. Communication activities and objectives must therefore be directly integrated in the work packages precisely to allow the communication strategy to be fully embedded in the project overall strategy.

Given the importance of communication, project partners are required to describe their communication approach in the FPP (Section C.7 of the Application Form). Applicants are strongly encouraged to reconsider their communication approaches and embrace a more open and modern mindset by leveraging the abundant digital opportunities available in the present era. It is advisable to relinquish outdated communication practices generating digital content for the project and amplifying its territorial and social visibility. Develop a communication strategy that empowers project partners to craft a compelling story showcasing European cooperation through their project. For inspiration, applicants may consider referring to the following resources:

<https://www.interact-eu.net/communication-and-visibility/communication/harmonised-branding>

### **C.5 Project results**

In this section, applicants are required to articulate the anticipated changes that their projects are expected to bring about. These changes should be directly linked with the program results indicators previously selected in the concept note. The quantification and justification of the results indicators must be elaborated further in the FPP.

### **C.6 Project time plan**

The overview table is automatically generated from thematic work packages. It displays activities (length), deliverables (delivery period), outputs (delivery period) and results (delivery period). The time plan shows only periods, not months. The length of the periods is 3 months.

### **C.7 Project management**

In addition to the activities outlined in the work plan, applicants are required to incorporate adequate provisions for project management, coordination, and internal communication. While the standardized and repetitive nature of management and coordination activities may not be explicitly indicated in the project work plan, project partners are expected to accurately plan and budget for them.

Applicants should describe how project management at both strategic and operational levels will be executed, including the establishment of management structures, delineation of responsibilities and procedures, as well as risk management strategies. Additionally, provide an explanation of how internal communication within the partnership will be organised.

Furthermore, explain how the quality of deliverables and outputs will be monitored and ensured, and indicate the responsible partner(s). If you plan to conduct any type of project evaluation, please describe its purpose and scope as well.

Applicants must detail how the project's communication objectives, as outlined in the work plan, contribute to achieving the project's main result(s). Emphasize the importance of communication, outline common tactics, channels, and tools to engage target audiences, and elucidate how the project communication coordinator will ensure the involvement and contribution of all project partners to communication efforts. One effective approach to conceptualize the project's outreach strategy and action plan is to devise a project communication plan. This plan should include a detailed outline of how information about the project's implementation and achievement of targets will be publicly disclosed, including the frequency of such disclosures. This ensures a structured and transparent communication process throughout the project's lifecycle. Additionally, it aids the MA and the NA in leveraging projects contributions to achieve programme indicators effectively.

### ***Cooperation criteria***

According to the [Interreg regulation](#) (Art. 23) “partners shall cooperate in the development and implementation of Interreg operations, as well as in the staffing or financing, or both, thereof.” Project partners from the two participating countries have to cooperate mandatory in at least both **joint development** and **joint implementation** and, additionally, one or both of the other two cooperation criteria: **joint financing** and/or **joint staffing** (as described below):

➤ **Joint Development:**

- FPP development requires close cooperation with all project partners.
- Applicants must describe this collaborative effort in the AF.

➤ **Joint Implementation:**

- All project partners actively participate in implementing the project, with clearly defined tasks and functions outlined in the AF and Partnership agreement.
- Activities must be interconnected, not merely running in parallel, and there should be regular contact between partners on both sides of the border.

➤ **Joint Staffing (optional):**

- A dedicated project team is appointed for the project.
- Team members should not have duplicate functions on either side of the border.
- Contingency measures should be planned to ensure project work continuity in case of team member absence.
- Mutual coordination and constant exchange of information among team members are crucial for successful project implementation.

➤ **Joint Financing (optional):**

- Only one contract per project is established.
- A single joint project budget is created, allocating funds based on the activities carried out by each partner.

- A unified project bank account for the EU contribution is held by the Lead partner.
- Payments from the MA are made to this account.
- The Lead partner administers and distributes funds among project partners, with all payment commitments outlined in the Partnership agreement.

### *Horizontal principles*

Horizontal principles, as outlined in Regulation (EU) No 2021/1060, are core values of importance that cut across and have relevance to all areas of the work of EU funded projects, thus reinforcing the integrity of the EU. The FPP must explicitly address these principles, supported by relevant explanation. There are three key horizontal principles:

**(1) Sustainable Development:** Aligned with the UN's Sustainable Development Goals<sup>8</sup>, the Paris Agreement and the DNSH<sup>9</sup> principle. The environmental and social dimension of sustainability should be integral to every project activity, from conception to closure. Partners are required to assess potential harmful effects on the environment, climate, or citizens' well-being, and actively promote contributions to nature-based solutions, climate mitigation, neutrality, and social solidarity (please, fill in Annex 7 for DNSH).

Another important horizontal principle of the programme is the New European Bauhaus (NEB) principle which is highly relevant and appropriate for projects envisaging infrastructural activities. NEB is an initiative that promotes a new lifestyle where sustainability matches style, thus accelerating the green transition in various sectors of the economy such as construction as well as other areas of our daily life. The aim is to provide all citizens with access to goods that are circular and less carbon-intensive, that support the regeneration of nature and protect biodiversity.

Three core inseparable values guide the New European Bauhaus:

- sustainability, from climate goals, to circularity, zero pollution, and biodiversity,

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<sup>8</sup> <https://sdgs.un.org/goals>

<sup>9</sup> EU Taxonomy Regulation, <https://eu-taxonomy.info/info/eu-taxonomy-overview> and <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX%3A52021XC0218%2801%29&amp%3Bfrom=EN>

- aesthetics, quality of experience and style, beyond functionality,
- inclusion, valorising diversity, equality for all, accessibility and affordability

Applicants need to become familiar with the NEB and ensure its application in all relevant project activities. For information, please visit [https://europa.eu/new-european-bauhaus/index\\_en](https://europa.eu/new-european-bauhaus/index_en)

**(2) Equal Opportunities and Non-Discrimination:** Ensuring fairness and non-discrimination<sup>10</sup> in all project aspects.

**(3) Equality between Men and Women:** Promoting gender equality. Projects can consult the ERNACT publication ‘Women in European Cooperation projects’<sup>11</sup> which contains recommendations on actions that project leaders, programme management and organisations involved in EU projects can take to improve the experience of women working in this field.

Applicants must define the impact of the project on each of these principles by choosing ‘neutral’, ‘negative effects’ or ‘positive effects’. Projects are not expected to have a negative effect on any of the principles. If there are some specific measures planned to make a positive contribution, then ‘positive impact’ must be chosen, and an explanation provided. An explanation must also be provided when a contribution is indicated to be ‘neutral’ or ‘negative’.

Please note that paying attention to the issues in general, or following the existing rules and regulations is considered ‘neutral’, and a positive impact would be realised only by developing and implementing things beyond the current standard procedures.

### **C.8 Long-term plans**

The programme aims to support projects that have a long-lasting effect on the cross-border region and its communities. After the closure of the project, certain requirements regarding ownership and durability of implemented productive and infrastructure investments must be met. Thus, within 5 years of the final payment to all types of project partners, each partner must not make:

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<sup>10</sup> EU Charter of Fundamental Rights, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:12012P/TXT>

<sup>11</sup> <https://www.ernact.eu/DocumentDetail.aspx?AttId=8228>

- (a) a cessation or transfer of a productive activity<sup>12</sup> outside the NUTS level 2 region in which it received support;
- (b) a change in ownership of an item of infrastructure which gives to a firm or a public body an undue advantage;
- (c) a substantial change affecting the investment's nature, objectives or implementation conditions which would result in undermining its original objectives.

**In the event of non-compliance with this rule, the Programme Authorities will request reimbursement of the grant in proportion to the period of non-compliance. Partners are required to inform the Programme Authorities of any non-compliance with this rule.**

In more practical terms, the projects' lasting impact is viewed through three perspectives:

#### *C.8.1 Ownership*

Applicants are encouraged to describe who will ensure the financial and institutional support for the outputs/deliverables developed by the project after the project has ended. Additionally, explain how these outputs/deliverables will be integrated in the work of the partner institutions.

#### *C.8.2 Durability*

The long-term durability of project outputs and results is of great importance for the programme. All projects are expected to plan and implement activities that will ensure the replication and roll-out of their outputs and results. Activities to ensure long-term effects must be inherently tied in with other project activities. In this section of the AF applicants need to describe the concrete measures (including institutional structures, financial resources, etc.) who will take during and after project implementation to ensure and/or strengthen the durability of the project outputs and results, including possible continuation of activities.

#### *C.8.3 Transferability*

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<sup>12</sup> This rule does not apply to a project partner which undergoes cessation of a productive activity due to a non-fraudulent bankruptcy.

All outputs and deliverables of supported projects must be transferable, replicable and adaptable within the Programme cooperation area enabling their use by other target groups or in different territories. The availability of raw data is fundamental, and the format of all productions should maximize their potential for reuse. An open data approach must be considered when compiling or delivering information.

Applicants are required to outline their actions to ensure that relevant groups are informed about the projects' outputs/deliverables and have the capability to utilize them.

It is important to highlight the need for the applicants to view their FPPs as tools for creating a meaningful impact in the targeted territory by capitalizing on project results. The capitalization is aimed at consolidating the capital built by Interreg projects and programmes, with the objectives of:

- Making the knowledge and results generated by projects more accessible, thus improving transfer of knowledge;
- Obtaining additional results through benchmarking and detailed content analysis, building on existing knowledge and experience;
- Promoting the re-use and/or transfer of this knowledge and these results, in order to boost performance and delivery;
- Raising awareness and improving communication of results in specific fields of regional policy

Hence, it is imperative for project partners to strategically develop their projects and yield results in a manner that ensures their effective capitalization and transferability. This approach maximizes the impact of the projects by facilitating the broader dissemination and utilization of their outcomes beyond the immediate project context.

#### **1.2.4 Additional documents supporting the full project proposals**



**As a general rule – all documents must be submitted in English. In cases where a document is translated into English from the original language, the true original copy should also be presented.**

**Valid electronic signatures are acceptable if accompanied by the respective signature certificate. The electronic signatures must pertain to the legal representative of the project partner, ensuring they are not attributed to an individual without legal affiliations with the project partner.**

The following annexes, which indicate the responsible party for completion and signature within brackets, are integral parts of the Guide:

**Annexes for mandatory completion and submission:**

Annex 1 – Project Partnership Agreement

Annex 2 – Project Partner Declaration (all project partners)

Annex 3 – Partnership and co-financing statement (all project partners)

Annex 4 - Declaration of e-mail address of the Lead Partner (only the Lead partner)

Annex 5 – SME Declaration (only SMEs)

Annex 6 – State Aid Declaration (all partners)

Annex 7 – Statement of Capacity and Compliance with the Principles for Investment (all partners foreseeing investments /works only or works and supply/)

Annex 8 – Climate proofing assessment (all partners foreseeing investments)

Annex A7 Justification for expenditures planned as a total amount under Budget category 4 (all project partners with envisaged expenditures in BC4)

**Attachments for information and consideration:**

Attachment 1 – Template of the application from

Attachment 2 – FactSheet: De minimis support

Attachment 3 - Draft Subsidy Contract (for information only)

Attachment 4 – Measures for monitoring and control of the environmental impact. Project partners are mandated to integrate these measures and indicators into their FPPs.

Attachment 5 – Programme’s indicators fiches

Attachment 6 – Complaint procedure

**Additional documents on the basis of which eligibility screening of the FPP is carried out:**

**A1. Document indicating the legal status (for Turkish partners only)**

Documentary and other evidence on the most recent legal status of all partners from Türkiye. The documents should be issued not later than 6 months prior to the submission of the FPP. In cases where the applicable document does not show the legal representative of the organization, an additional document (such as the act of appointment/nomination, order, decision, etc.) must be provided, clearly indicating the name of the person with representative authority. The document detailing the recent legal status should include information on the organization's date of establishment, place of establishment (registration), and the scope of territorial competence if applicable. If the issued document is unavailable or does not sufficiently justify all the mentioned circumstances, documents such as the official act of establishment or certificates from superior authorities (Ministries, Agencies, Regional Administration, and Inspectorates) may be provided.

**A2. Decision/Letter of Acknowledgement/Letter of Support of the Managing Authority/Municipal Council/Board of Directors of each project partner**

The required document type depends on the legal status of the project partner. Regardless, this document should indicate the consent of the decision-making body of each partner to execute the proposed project and ensure sustainability for the project results for a period of 5 years following the completion of the implementation phase.

When local governments act as project partners, this document should be issued by the respective Municipal Council.

If the official representative of the project partner also holds decision-making authority within the organization, this document must be signed by another authorized representative from the same organization.

The Bulgarian partners that are second-level budget administrators should present a Letter of Support for implementation of the project issued by the respective first level administrator. The letter should clearly state the support of the first level administrator for project development, implementation and ensuring the sustainability of the project results for five years after completion of the implementation period.

#### **A2.1 Legalized mandates of delegation from the legal representatives of partners**

Legalized mandates of delegation from the legal representatives of partners are required (if applicable), particularly when the application form, annexed declarations, or project partnership agreement are not signed by the legal representatives of the Lead Partner or project partners. If the signatures are from a deputy by rights, the document certifying the substitution by rights must be presented along with the act of nomination for the person holding the deputy position. When granting a mandate of delegation, the legal representative must present evidence that their rights for delegation are unrestricted.

#### **A3. NACE code (for SMEs only)**

Certificate issued by the responsible authority in each country, verifying the business's start date, the main economic activity according to NACE rev. 2 (clearly indicating the principal NACE activity and any complementary NACE activities).

#### **A4. Annual Financial Statement (for SMEs only)**

Annual Financial Statements for the two most recent years preceding the application, as per national legislation, must be submitted for each SME acting as project partner. In the case of linked enterprises, all the required financial statements mentioned above must be provided for each linked enterprise.

#### **A5. Annual work unit (for SMEs only)**

Certificates for annual work unit headcount for the two most recent years preceding the submission, issued by a competent authority (it is the NSI for Bulgarian partners), must be submitted for each SME acting as project partner. In the case of linked enterprises, the required certificates mentioned above must be provided for each linked enterprise. For Turkish partners this document should be prepared in accordance with the explanation provided in Part II, Headcount and Annual Work Unit, of Annex 5 (SMEs Declaration).

#### **A6. Justification for the proposed budget changes or changes in indicators value from Concept note to FPP in a free written format (if applicable)**

- Budget change: The document should be presented by each project partner, which find the need to modify certain budget costs from their original values in the concept note to the FPP. 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.
- Changes in indicators value: The values of the indicators in the FPP should not be lower than those in the respective concept note. When such deviation occurs reasonable justification shall be presented

**A7. Justification for expenditures** planned as a total amount under Budget category 4. Each project partner should provide justification for calculation of the amount in English, signed by the legal representative or the authorized person (Annex A7). This justification should contain at least:

- detailed description of the proposed activity;
- calculation of the envisaged experts' input, including number and type of experts needed, days/months of involvement and remuneration unit rate;

- detailed description of the expected outcomes from the activity, including information about any printed materials (type, number of copies, number of pages) and calculation of the price;
- any other additional information the applicant may find appropriate for justification of the proposed cost.

## **A8. Documents verifying the legality and the programme eligibility of the proposed project investments (see section C.4.2 List of investments)**

### **A8.1 Ownership act or equivalent**

Submission of the ownership act, certificate, or legal document for municipal or state-owned property, in accordance with national legislation, is required for tangible assets intended for works activities. This documentation should encompass a cadastral map of the property. If the project entails the acquisition of supplies necessitating permanent installation, it is imperative to provide an ownership act for municipal or state-owned property. This documentation should be accompanied by an excerpt from the cadastral map and the cadastral registers corresponding to the relevant property.

The provided document should demonstrate that the project partner responsible for implementing the investment activities is the rightful owner or possessor of the acquired management rights for the respective property. The legal authority to manage the property must be in force for a duration that aligns with or exceeds the specified 5-year durability period, specified in Art.65 of the CPR Regulation, following the project's completion.

Interventions on elements of the planned infrastructure, situated at/passing through private properties, are eligible only in cases where there is no alternative technical solution and it has been regulated in accordance with the applicable national legislation, as a part of the approved documentation for construction (Working design and Building permit). In this case, a notarised declaration (including a copy of the respective property act and excerpts from the cadastral map) from the owner of the private property(ies) must be provided to ensure free access to and unhindered use of the public infrastructure for a period project implementation and at least 5 years after the completion of the project.

## A8.2 Permits

- In the case of investment activities within **territories or sites with special status** (such as national parks, environmental and architectural reserves, cultural monuments, protected areas, areas included in Nature 2000, etc.), relevant documentation (permits, approvals, certificates, statements, etc.) required by the respective national applicable law should also be provided.
- Applicants must submit a copy of a letter issued by the relevant competent body clearly stating that an **Environmental Impact Assessment (EIA)** for the project investment is not necessary. Alternatively, if the competent authority confirms the need for an EIA, a copy of a positive EIA is required.
- Bulgarian partners are required to provide a copy of a letter issued by the relevant competent body, clearly stating that the project proposal aligns with the current **River Basin Management Plans and Flood Risk Management Plans**. Turkish partners, likewise, should submit a copy of a letter serving the equivalent purpose from the Ministry of Agriculture and Forestry, Directorate General of Water Management (Tarım ve Orman Bakanlığı, Su Yönetimi Genel Müdürlüğü) stating that the project proposal is eligible according to the current River Basin Management Plans and Flood Risk Management Plans and basin based management plans and documents via governorship in the provinces.
- If deemed necessary by the competent body, Bulgarian partners should also submit an **explanatory note detailing the envisaged prevention measures** for avoiding pollution of water bodies in emergency situations.
- **Building permit** validated as 'entered into force' and issued not later than two years prior to FPP submission is required for works that necessitate a building permit. It can be provided after FPP submission but no later than 45 calendar days from the receipt of the notification about the Decision of the Monitoring Committee for financing the project. Positively screened valid building permit is a precondition for contracting. Alternatively, for works exempted from the need for a building permit according to national legislation, applicants should provide a document issued by the competent authority declaring that the envisaged construction/repair works do not require the issuance of a building permit.

### *For Bulgarian partners*

The investment activities which do not require the issuance of a building permit are defined in Article 151 (1) of the Bulgarian Spatial Development Act.

**A8.3 Approved Detailed Works Design (Проект за изпълнение на строителството, включващ задължителните проектни фази ТП/РП на съответните проектни части, Proje Tasarımı)**

An approved Detailed Works Design, in case required by the relevant national legislation, must be provided. The documentation should include at least the Explanatory Notes of each of the works design parts, a detailed Bill of quantities, technical or working design stage drawings, and any other documents regarding the investment project designs that the applicant believes might contribute to a better assessment. English translation should be provided at least of the Explanatory Notes of each of the works designs parts (if applicable), Bill of Quantities, Cover sheets of technical drawings (where applicable) and any other documents related to the works designs that the applicant thinks might contribute to better assessment.

***For Bulgarian partners***

The works design (in the means of Chapter 8, section 1 from Bulgarian Spatial Law) should be elaborated according to Ordinance 4/21.05.2001 for the volume and the content of investment projects in technical or working design stage and must be developed by certified according to national legislation designers. Works designs should be stamped and signed by the certified designers of the relevant parts of the working investment designs and signed by the legal representative of the respective project partner.

The works design should be approved by the relevant authority, which should be certified with the seal of the authority placed on the investment project designs.

For Bulgarian partners the authority responsible for the approval of the investment project designs is defined in article 145 (1) from Bulgarian Spatial Law.

***For Turkish partners***

The work designs must be elaborated, taking into consideration all related national legislation in force, particularly in accordance with Law for Public Works No. 3194 (3194 sayılı İmar Kanunu), all related regulations for public works (ilgili İmar Yönetmelikleri), Regulation on Public Works for Planned Areas and (Planlı Alanlar Yönetmeliği) Regulation on Public Works for Unplanned Areas (Plansız Alanlar İmar Yönetmeliği), Building Earthquake Code (Deprem Yönetmeliği) for the content of investment projects. In addition, all design drawings should be in compliance with architectural and engineering presentation standards.

The list of existing laws and regulations, architectural and engineering drawing standards related to specific topics on planning and construction can be found in the Construction Guide of the NA (<https://cbc.ab.gov.tr/sinirotesi/50676/sinir-otesi-isbirligi-programlari-inaaat-rehberi?lang=tr>).

However, applicants are responsible for checking and implementing any amendments in the related regulations. This list is not exhaustive, and applicants must conform to both the legislation specific to their type of design and region, as well as the general legislation.

The working investment design should receive approval from the relevant authority, and this approval should be certified with the seal of the authority placed on the investment project designs.

**Please note that, according to Turkish legislation, the mayor's signature alone is not considered proper approval of work designs.** Approval should involve a comprehensive assessment by the architect/engineer/technical staff, their supervisor, and the head of the related department for construction or development in the municipality or the local government, in accordance with the relevant regulations.

***For all project partners***

**In case of investment activities which according to national legislation do not require elaboration and approval of works designs applicants are obligated to submit at least:**

- Explanatory note, describing the envisaged construction/repair works.
- Scheme and/or plan of the object/s, technical or working design stage drawings, illustrating planned interventions.
- Bill of quantity (as described below).



- Statement by a competent authority, which declares that the envisaged construction/repair works do not require approval of works designs.

Applicants may submit any other documents related to the works interventions that are considered contributing to better assessment.

The explanatory note, scheme and/or plan of the object/s, technical or working design stage drawings, illustrating planned interventions must be developed by certified according to national legislation designers. They should be stamped and signed by the certified designers and signed by the legal representative of the respective project partner.

The explanatory note and the works designs drawings must be elaborated by a certified according to national legislation designer and signed by the legal representative of the respective project partner. English translation should be provided at least of the Explanatory Note, the Bill of Quantities, Cover sheets of technical drawings and any other documents related to the works designs that the applicant thinks might contribute to better assessment.

### ***For Bulgarian partners***

The investment activities which do not require approval of working designs are defined in Article 147 (1) of the Bulgarian Spatial Development Act.

### ***For all project partners***

The detailed Bill of quantities should be presented in the form of a table, indicating at least the type of construction works, unit, estimated quantity, unit price, amount of the type of construction works, and the total amount of the Bill of quantities. Where possible, the Bill of quantities should be supported with a breakdown per investment site or per parts of the works designs. Calculations for the unit prices of the types of construction/repair works may also be presented. Applicants will also need to specify if VAT is included in the Bill of quantities or not.

The Bill of quantities may be presented in the local currency of the project partner. In this case, the table of the Bill of quantities should mandatorily include a column with the unit price in EUR for each type of construction/repair work and a column for the amount in EUR of that type of

construction/repair work. **Turkish partners should convert the local currency into EUR using the monthly exchange rate of the European Commission ([info Euro website](#)) for the month of the submission of the project proposal.**

Additionally, the Bill of quantities should be stamped and signed by the certified designers of the relevant parts of the working investment designs. Bills of quantities are presented by the applicant as scanned originals in PDF file format and English translation signed by the respective partner as a true copy, and also in an editable EXCEL file format.

**Other supporting documents, where deemed necessary (e.g. justification of project costs), may be requested at any time during the screening process.**

#### **A8.4 Supply of equipment**

- Each 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.
- A valid permit for installation, whose validity period is not expired at the time of FPP submission as per national legislation, is required. It can be provided after FPP submission but no later than 45 calendar days from the receipt of the notification about the Decision of the Monitoring Committee for financing the project. Alternatively, a statement from the competent authority confirming that the intended installation does not necessitate a permit must be provided.
- Market analysis for the planned supply is required. The recommended approach for conducting this analysis is for the Lead or project partner to provide a minimum of three extracts from national public procurements systems of a similar supply with identical technical specifications. In instances where evidence from a national procurement system

is unattainable (verifiable circumstances apply), the Lead or project partner is required to present soliciting offers (along with website references) 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. Expenditures included in the project budget derived from the market analysis should reflect an average of the price offers received or an average of the extracts from national public procurement systems. In the event that the latter documentation is dated beyond two years, project supply costs may be adjusted for inflation using the most recent available official national data. In order to overcome the impact of future inflation and price instability, the expenditures included in the budget based on the above market analysis could be increased with the average of the national inflation of the last 3 years before the application submission, but not more than 10%.

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.

For more information, please, refer to sub-section '***The budget template and types of costs***', and more specifically 'BC 6 Equipment costs'.

**The submission of a valid permit for installation (described in A8.4) and/or building permit (described in A8.3) at the application stage is optional. They can be provided after FPP submission but no later than 45 calendar days from the receipt of the notification about the Decision of the Monitoring Committee for financing the project. Positively screened valid permits are a precondition for contracting.**

## 2. Part B - Submission and screening process of full project proposals

### 2.1 Submission of Full Project Proposals in JEMs

The submission process for FPP and all accompanying documents, both mandatory and optional as outlined in section **1.2.4 Additional documents supporting the full project proposals**), occurs through JEMs. Applicants are required to transfer their concept notes to the FPP application form in their JEMs accounts, created during the application with project ideas. The deadline for submission is **13<sup>th</sup> of August 2024, 17:00 h. EET**.

All sections of the application form must be completed, and it is the applicant's responsibility to ensure compliance.

**Detailed instructions for completing and submitting the entire package of the FPP can be found here <https://jems.interact-eu.net/manual/>.**

Furthermore, all annexes and attachments attached to the AF must be submitted in English. In cases where a document is translated into English from the original language, the true original copy should also be provided. Translated versions take precedence and are the ones considered for assessment or review of the entire FPP. The attached documents may be scanned signed versions or electronically signed (acknowledged only if accompanied by the respective signature certificate and the e-signature pertains to the legal representative of the project partner).

#### **Applicants should attach in JEMs:**

Annex 1 – Project Partnership Agreement;

Annex 2 – Project Partner Declaration (all project partners)

Annex 3 – Partnership and co-financing statement (all project partners)

Annex 4 - Declaration of e-mail address of the Lead Partner (only the Lead partner)

Annex 5 – SME Declaration (only SMEs)

Annex 6 – State Aide Declaration (all partners)

Annex 7 - Statement of Capacity and Compliance with the Principles for Investment (all partners foreseeing investments /works only or works and supply/)

Annex 8 – Climate proofing assessment (partners foreseeing investments)

Annex A7 – Justification for expenditures planned as a total amount under Budget category 4 (all project partners with envisaged expenditures in BC4)

- any relevant additional documents, enabling the eligibility screening and the pre-contracting process. The list of these documents is presented in sub-section **Additional documents on the basis of which eligibility screening of the FPP is carried out** in section 1.2.4 Additional documents supporting the full project proposals.

**Applicants should be aware that automatic pre-submission checks in Jems do not guarantee that a submitted application form is complete and declared eligible. The lead partner remains responsible for checking that all eligibility criteria are met before final submission.**

## 2.2 Screening process of full project proposals

The screening of FPP is an integral part of the identification process of project proposals that most contribute to the achievement of the objectives of the Territorial Strategy. This process commences after the FPP submission deadline expires and concludes in 90 calendar days. Its primary objective is to ascertain the eligibility of submitted FPPs for contracting. For a FPP to proceed to contract approval, it must successfully meet all eligibility and contracting criteria, as detailed in this Guide.

**FPPs that do not meet eligibility and contracting conditions will not be excluded from the contracting process! Instead, they will proceed to the contracting stage once all criteria are fulfilled within the 90-day period of the screening process, provided there is still available budget. If an applicant continues to be incapable of meeting all contracting criteria within the 90-day screening period, it will be replaced by the next applicant from the ranking list.**

The entire screening is a ‘yes or no’ process without assigning scores to FPP. Therefore, it is important for the applicants to know that once they have been included in the list of identified PO5 project ideas, their project proposals will not undergo additional assessment.

The screening process involves three key actions as described below. It is the main process that guides the applicants to the contracting stage.

First, FPPs are screened against eligibility criteria to ascertain their formal readiness for contracting. Secondly, there is a project content screening, which examines strategic and operational aspects, aimed at verifying that the proposal's content demonstrates a strong intervention logic and aligns with programme specifics and targets. And lastly, members of the screening working groups will conduct on-the-spot visits to the investment sites the FPP and, if deemed necessary, undertake optional project budget optimization.

The purpose of conducting **on-the-spot visits** to all project investment sites is to verify the stated circumstances as provided by the respective project partners regarding the envisaged investments.

**Budget review and optimization** may occur if the proposed project costs are deemed ineligible, not fully aligned with the project content, not conducive to achieving project objectives and programme indicators/targets or not justified in terms of volume and prices. This review and optimization will be carried out by the screening working group.

To maintain consistency with the concept note stage, the majority of screening criteria mirror those used in the eligibility checks and assessment in stage 1. However, these criteria are slightly expanded to encompass more detailed and/or new aspects introduced in the FPP.

### 2.2.1 Administrative and eligibility screening

№	ADMINISTRATIVE CONDITIONS	YES	NO	Comments
1	Documents in original language are accompanied with their English translation. In this case, the true original copy is also presented.			

2	If the provided documents are signed with e-signature, it must pertain to the legal representative of the respective project partner, ensuring that the e-signature is not attributed to an individual without legal affiliations with the project partner. The e-signature is accompanied by the respective signature certificate.			
3	All sections of the full application are filled out in English			
4	All mandatory annexes (Annex 1 – Project Partnership Agreement; Annex 2 – Project Partner Declaration; Annex 3 – Partnership and co-financing statement; Annex 4 - Declaration of e-mail address of the Lead Partner; Annex 5 – SME Declaration; Annex 6 – State Aide Declaration; Annex 7 - Statement of Capacity and Compliance with the Principles for Investment; Annex 8 – Climate proofing assessment) are submitted and signed.			
5	Documentary and other evidence on the most recent legal status of all Turkish project partners are presented and it contains all the attributes described in p. 1.2.4 (Additional documents A1)			
6	Decision/Letter of Acknowledgement/Letter of Support of the Managing Authority/Municipal Council/Board of Directors of each project partner regarding the project development, implementation and ensuring the sustainability of the project results for five years after completion of the implementation period is provided. For the Bulgarian partners that are second-level budget administrators: letter of Support for implementation of the project, issued by the respective first level administrator is provided. (Additional documents A2)			
7	Legalized mandates of delegation from the legal representatives of partners is provided (if applicable) . (Additional documents A2.1)			
8	For SMEs only: - <b>NACE code</b> – certificate issued by the responsible authority in each country, verifying the business's			

	<p>start date, the main economic activity according to NACE rev. 2 (Additional documents A3)</p> <ul style="list-style-type: none"> <li>- <b>Annual Financial Statements</b> for the two most recent years preceding the application, as per national legislation (Additional documents A4)</li> <li>- Certificates for <b>annual work unit</b> headcount for the two most recent years preceding the submission, issued by a competent authority (Additional documents A5)</li> </ul>			
9	<p>Justification for the proposed budget changes from Concept note to FPP in a free written format (if applicable) is presented.</p> <p>Justification for the proposed changes in indicators value (if applicable) is presented.</p> <p>(Additional documents A6)</p>			
10	Justification for expenditures planned as a total amount under Budget category 4 (Additional documents A7)			
	<b><i>Investment documents</i></b>			
11	<p>Ownership act or its legal equivalent validating the municipal or state-owned status of tangible assets designated for works activities. This documentation encompasses excerpts from the cadastral map and cadastral registers of the property. If the project involves purchasing supplies requiring permanent installation, an ownership act for municipal or state-owned property and excerpts from the cadastral map and cadastral registers, if applicable, are also provided. The provided document demonstrates that the project partner responsible for implementing the investment activity is the rightful owner or possessor of the acquired management rights for the respective property for a minimum period of 5 years following the project completion. (Additional documents A8.1)</p>			
12	<p>The planned infrastructure is not situated at/ does not pass through private properties.</p> <p>OR</p>			



	<p>There are project interventions on elements of the planned infrastructure situated at/passing through private properties and a notarised declaration (including a copy of the respective property act and excerpts from the cadastral map) from the owner of the private property(ies) are provided to ensure free access to and unhindered use of the public infrastructure for the period of the project implementation and of at least 5 years after the completion of the project.</p> <p>(Additional documents A8.1)</p>			
13	<p>None of the project investment activity falls within territories or sites with special status.</p> <p>OR</p> <p>At least one of the project investment activities falls within territories or sites with special status. In this case, relevant documentation (permits, approvals, certificates, statements, etc.) required by the respective national applicable law is provided. (Additional documents A8.2)</p>			
14	<p>The applicant has provided a copy of a letter issued by the relevant competent body clearly stating that an Environmental Impact Assessment (EIA) for the project investment is not necessary. Alternatively, if the competent authority confirms the need for an EIA, a copy of a positive EIA is provided. (Additional documents A8.2)</p>			
15	<p>For Bulgarian partner: copy of a letter issued by the relevant competent body, clearly stating that the project proposal aligns with the respective River Basin Management Plans and Flood Risk Management Plans is provided. If deemed necessary by the competent body, the Bulgarian partner has also submitted an explanatory note detailing the envisaged project prevention measures for avoiding pollution of water bodies in emergency situations.</p> <p>For Turkish partner: copy of a letter serving the equivalent purpose from the Ministry of Agriculture and Forestry,</p>			

	Directorate General of Water Management (Tarım ve Orman Bakanlığı, Su Yönetimi Genel Müdürlüğü) stating that the project proposal is eligible according to the current River Basin Management Plans and Flood Risk Management Plans and basin based management plans and documents is provided. (Additional documents A8.2)			
16	<p><u>In case of works activities requiring approval of works designs:</u></p> <p>Works designs in working/technical design stage (проект за изпълнение на строителството в проектни фази ТП/ПП,, Proje Tasarımı) is submitted, regardless of whether a building permit is legally required or not.</p> <p>Works designs are stamped and signed by the certified designers of the relevant parts of the working investment designs and signed by the legal representative of the respective project partners.</p> <p>English translation is provided at least of the explanatory notes of each of the works designs parts and the cover sheets of technical drawings.</p> <p>The works designs are approved by the relevant authority that is certified with the seal of the authority placed on the investment project designs.</p> <p>OR</p> <p><u>In case of works activities that do not require approval of works designs:</u></p> <p>Statement by a competent authority, which declares that the envisaged construction/repair works do not require approval of works designs is presented.</p> <p>Explanatory note, describing the envisaged construction/repair works is presented.</p>			

	<p>Scheme and/or plan of the object/s, technical or working design stage drawings, illustrating planned interventions are presented.</p> <p>The explanatory note and the works designs drawings are elaborated by a certified according to national legislation designer. They are stamped and signed by the certified designers and signed by the legal representative of the respective project partner.</p> <p>English translation of the explanatory note and the cover sheets of technical drawings are provided.</p> <p>(Additional documents A8.3)</p>			
17	<p>Detailed Bill of quantities for each project works investment is presented.</p> <p>The Bill of quantities is stamped and signed by the certified designers of the relevant parts of the working investment designs.</p> <p>The Bill of quantities is presented as scanned originals in PDF file format and English translation signed by the respective partner as a true copy, and also in an editable EXCEL file format.</p> <p>The Bill of quantities indicates at least the type of construction works, unit, estimated quantity, unit price, amount of the type of construction works, and the total amount of the Bill of quantities.</p> <p>The Bill of quantities includes a breakdown per investment site or per parts of the works designs where applicable.</p> <p>It is specified if VAT is included in the Bill of quantities or not.</p> <p><u>In case the Bill of quantities is presented in local currency of the project partner</u></p> <p>The Bill of quantities includes a column with the unit price in EUR for each type of construction/repair work and a</p>			

	<p>column for the amount in EUR of that type of construction/repair works.</p> <p>For Turkish partners: the local currency is converted into EUR using the monthly exchange rate of the European Commission (info Euro website) for the month of the submission of the project proposal.</p> <p>(Additional documents A8.3)</p>			
18	<p>Building permit validated as 'entered into force' and issued not later than two years prior to FPP submission for working investment designs, that necessitate such, is provided. If the result of the initial screening check is 'no' this cannot be subject for contract refusal, because the applicant has an opportunity to provide valid building permit within 45 calendar days from the receipt of the notification about the Decision of the Monitoring Committee for financing the project.</p> <p>OR</p> <p>A document issued by the competent authority declaring that the envisaged construction/repair works do not require the issuance of a building permit is provided.</p> <p>(Additional documents A8.3)</p>			
19	<p>The FPP envisages supply and the relevant project partners have provided technical specification for the supplies. The detailed specifications are sufficiently clear for the identification of the desired deliverables.</p> <p><u>In case of supplies that need to be permanently installed:</u></p> <p>Detailed plans/schemes for positioning the delivered equipment, both outdoors in public spaces and indoors, are also submitted. These plans/schemes are approved by the competent authority in accordance with the national legislation, if applicable.</p>			

	<p>OR</p> <p>The FPP does not envisage supply.</p> <p>(Additional documents A8.4)</p>			
20	<p>A valid permit for installation of the purchased equipment, issued not later than two years prior to FPP submission, as applicable according to national legislation, is provided. If the result of the initial screening check is ‘no’ this cannot be subject for contract refusal, because the applicant has an opportunity to provide valid building permit within 45 calendar days from the receipt of the notification about the Decision of the Monitoring Committee for financing the project</p> <p>OR</p> <p>A statement by the competent authority, declaring that the envisaged permit for installation is not required, is provided.</p> <p>(Additional documents A8.4)</p>			
21	<p>Market analysis for the supply costs is provided. The analysis complies with the requirements outline in p. A8.4 Supply of equipment.</p> <p>OR</p> <p>In case of highly specialized equipment from a limited pool of suppliers - an historical data for concluded contracts from previous similar deliveries is provided.</p> <p>(Additional documents A8.4)</p>			
	<b>ELIGIBILITY CONDITIONS</b>			
22	<p>The duration of the FPP is between 12 months and 24 months. (AF Part A, section A.1)</p>			

23	Mandatory cooperation criteria (joint development, joint implementation, joint staffing, joint financing) are fulfilled, i.e. ‘partners shall cooperate in the development and implementation of Interreg operations, as well as in the staffing or financing, or both, thereof.’ (AF Part C, section C.7.5)			
24	Objective of the concept note is not changed in the full project proposal (AF, Part C, C.1)			
25	The project partnership consists of at least one partner from each side of the border region. (AF Part B)			
26	There are no project partners who participate in more than two project proposals that are submitted under this Call.			
27	The Lead partner does not participate as such in other full project proposals that are submitted under this Call.			
28	For Turkish project partners The Lead partner is registered and operate in the programme area for at least 3 years prior to the application with the concept note. Project partners are registered and operate in the programme area for at least 2 years prior to the application with the concept note.			
29	There is no change to the composition of partners between the concept note and the FPP. If this is the case, please skip checking criteria from 29.2 to 29.4. However, criterion 29.1 must be checked irrespective of any changes in the partnership composition. <b>Or</b> There is a change to the composition of partners between the concept note and the FPP. A project partner from concept note withdraws whose original functions are taken over either by other partner within the partnership or by a new partner. (AF Part B, part C)			
29.1	The withdrawal of project partner/s did not result in the withdrawal of project activities. (AF Part B, part C)			

29.2	The Lead partner is not changed between the concept note and the FPP. (AF Part B)			
29.3	There have been no changes to the partners responsible for implementing project investments. (AF Part B, part C)			
29.4	A change to the composition of partners contributing to Interreg indicators RCO84, RCO116 and RCR104 is suggested. If yes, new partners meet all eligibility criteria outlined in section 1.2.1 Section ‘Project partners’ from the application form. (AF Part B, part C, part D)			
30	The budget of the FPP is between EUR 500 000 and EUR 1 000 000 (AF part D)			
31	The FPP contains compulsory combination of investment (works only or works and supply) and soft type of actions (e.g. services). The investment component is minimum 70% of the project total eligible costs. (AF part D)			
32	The maximum amount (12 000 EUR) for Project preparation cost is respected. (AF part D).			
33	The budget of the FPP does not exceed the budget of the concept note. (AF part D, Annex 1.1 to the Concept note)			
34	The implementation of the full project proposal takes place in the Programme area. (AF part C)			
35	The full project proposal contains the mandatory pair/s of indicators (RCO84, RCO116, RCR104 and RCO74), including at least one of the two pairs of ERDF indicators (RCO58/RCR64 and/or RCO77/RCR77). The targets for these indicators meet or exceed the levels specified in the Concept Note or the proposed changes are justified. (AF part C, C.4, Additional documents A6)			
36	The project makes a positive or neutral contribution to the Programme’s horizontal principles: equal opportunities and			

	non-discrimination, equality between men and women, sustainable development. (AF Part C, C.7.6, whole AF)			
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## 2.2.2 Project content screening

No	Conditions for contracting related to the content of the full project proposal	Yes	No	Comment
	<b><i>Section 1 - Project Relevance with the programme</i></b>			
1	The need for the FPP is well justified and address common challenges and opportunities for the programme area (AF Part C.2.1, C.2.2)			
2	The FPP objective is compliant with the programme specific objective under Priority 2 (AF Part C.1)			
3	The FPP brings added value to the CBC area, i.e. project outputs have an impact beyond project lifetime (AF Part C.2.3, C.2.4, C.4.1)			
	<b><i>Section 2 - Partnership relevance</i></b>			
4	The partnership of the FPP contributes to the achievement of projects objectives (AF Part C.3)			
5	<b>Only for FPPs that have changed partners between the concept note and FPP stages</b> All partner organisations have proven experience and competence (incl. legal rights to act in the proposed way) in the addressed intervention field/s (AF Part B, C.3)			
6	<b>Only for FPPs that have changed partners between the concept note and FPP stages</b> The proposed partnership is balanced and reflects the addressed issue in terms of target groups, sectors, territory (AF Part B, C.3)			
7	<b>Only for FPPs that have changed partners between the concept note and FPP stages</b>			



	Partner organizations complement each other in their efforts to propose integrated solutions in the addressed intervention field/s (AF Part B, C.3)			
	<b>Section 3 - Project work plan</b>			
8	The intervention logic of the project is clear and it facilitates the achievement of the project objectives and the programme indicators. Project indicators values are realistic and contribute the values set by the Programme. (AF part C, C.4, C.5, C.6, D)			
9	The relation “project objective – specific objectives of the work packages – activities – deliverables – expenditures” is clear and justified. (AF Part C, Part D)			
10	The project work plan is realistic, consistent, and coherent. (AF Part C)			
11	The project work plan aligns with the environmental mitigation measures and indicators provided Attachment 4 ‘Measures for monitoring and control of the environmental impact’. Additionally, it includes component/s contributing to the protection of the environment and biodiversity or provides green and digital solutions (AF Part C)			
12	Time plan is realistic (AF Part C, C.6)			
	<b>Section 4 – Communication</b>			
13	Communication activities are appropriate to reach the relevant target groups and stakeholders and to contribute to the achievement of project objectives (AF Part C, C.4)			
	<b>Section 5 – Budget</b>			
14	Project costs are eligible, realistic and logically connected to project activities and prices are realistic and market based (AF Part B, Part D.2, Part E, provided additional documents)			
15	The budget is proportionate according to partners roles and responsibilities. In case of changes budget changes from Concept note to FPP, the amendments are justified. (AF Part C, Part D, D2, Part E, Additional documents A6)			
16	The Bill of quantities of each project investment (works only or works and supply) is sufficiently detailed and the cause-effect linkages between project investment and its objectives is clear.			

	(AF Part C, Additional documents A8.3)			
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During the screening process of the FPP the following procedures will be conducted:

- Procedure for budget optimization and projects' content modifications - final review of the budget of the project proposal, making revisions of unit rates, based on both the recommendations of the assessors and the good practices of the MA and NA in terms of transparent and market-oriented financial allocations. In addition, the following procedures are implemented;
- Documentary check of presence/lack of double financing – assessment of whether or not the proposed action/s has not already been financed under other EU funded Programmes;
- Check for compliance with the State Aid rules;
- Performance of on-the-spot visit for project partners with investment component – assessment of whether or not the object, subject to the proposed investment, really exists and is in a physical condition as described in the project proposal and/or has not already been developed or is currently under development.

The MA, the NA and the JS composes a Screening Working Group (SWG) to perform the screening on the contracting conditions.

If the overall outcome of the screening check contains 'No' on one or more of the contracting criteria provided above, the proposal will be returned until it meets all conditions to secure subsidy contract. The applicant needs to demonstrate it meets all the conditions in a maximum period of 90 calendar days from the start of the screening procedure. Failure to do so will result in the applicant being replaced in the ranking list, with the next applicant taking its place. The only exception is for the building permit which may be presented up to 45 calendar days from the receipt of the notification about the Decision of the Monitoring Committee for financing the project

The Monitoring Committee of the Programme decides on granting funding to those FPPs who meet all contracting conditions. Subsequently, the MA informs the Lead applicant in writing about the MC decision and the contracting process starts for those FPP proposed for funding. For FPPs not proposed for funding, the reasons are detailed in the notification. If there is disagreement with the

MC decision, upon receipt of the notification letter from the MA, the Lead partner may issue a complaint before the MA against the MC decision. The complaint procedure is attached to this Guide as Attachment 6.

The duration of the screening process is estimated to be 90 calendar days.

### 3. Part C- Contracting process

The contracting process starts with the MA notification letter, following the MC decision, and ends with signing a subsidy contract between the MA and the Lead Partner. This process is expected to take approximately one month after the MA sends the notification letter.

Before the contract is finalized, all project partners of the FPP will be required to submit updated State Aid declaration (Annex 6) for the MA/NA/SWG to conduct the most recent state aid assessment (please, see Attachment 2). In parallel to that assessment, the MA/NA/SWG will also conduct updated assessment for the lack of double funding.

After consolidating the information from the Application Form in Jems, a Subsidy Contract will be prepared and signed. This contract delineates the rights and responsibilities of the Lead Partner and the MA, outlines the main activities, and establishes general financing conditions. The Subsidy Contract is issued and signed in a paper version.

The Lead Partner is required to retain an original version of the Subsidy Contract, signed by both parties, as part of the project's audit trail. This document is registered in Jems and made accessible to all project partners, along with any applicable amendments.

All project partners will be required to submit a declaration during the contracting stage in accordance with Article 51 of Council Regulation (EU) No 2022/576 dated April 8, 2022. The Regulation explicitly prohibits the provision of direct or indirect support, including financing, financial assistance, or any other benefit under Union, Euratom, or Member State national programs and contracts, as defined in Regulation (EU, Euratom) 2018/1046, to any legal person, entity, or body established in Russia with **over 50% public** ownership or public control.

**Subsidy contracts will not be awarded to any project proposal which includes entity falling under the circumstances outlined in Article 51 of Council Regulation (EU) No 2022/576.**

Beneficiaries with a standing debt to the Programme Authorities can only sign Subsidy Contracts after they pay out all their debts.

### 3.1. Indicative timeline for application, screening and contracting of FPP

Step	Description	Indicative date of period
1	Invitation of identified applicants to develop and submit FPP	13 <sup>th</sup> of May 2024
2	Deadline for submission of FPP	13 <sup>th</sup> of August 2024
3	Screening of submitted FPP	19 <sup>th</sup> of August – 19 <sup>th</sup> of November 2024
4	(1) Funding decisions of the Monitoring committee (MC) for positively screened FPP; (2) MA contracts FPP with MC funding decisions	Up to 20 <sup>th</sup> of December 2024