

Frequently Asked Questions: 1st Call for Project Proposals

Cross-border Cooperation Programme
Interreg (VI-A) IPA CBC
“Greece - North Macedonia 2021-2027”

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1. Budget – Eligibility of Expenditure & Financing

Q 1.1. *Which are the minimum and maximum budget limitations of a proposed project?*

A. 1.1. A Project Proposal should have a minimum budget of 700.000 € and a maximum budget of 1.500.000 €.

Q 1.2. *Which is the minimum budget limitation of a single beneficiary to participate in a project proposal?*

A. 1.2. A Beneficiary may participate in a Project Proposal with the minimum budget of 120.000 €.

Q 1.3. *We represent a small nonprofit organization with limited financial resources. In case of the approval of the project proposal in which we will participate, are we entitled to receive a pre financing and up to which amount?*

A. 1.3. All types of Beneficiaries are entitled to receive a pre financing after signing the Subsidy Contract and the Partnership Agreement.

The Beneficiaries from Greece will receive pre financing from the Public Investment Programme.

The Beneficiaries from North Macedonia may receive pre financing from the Ministry of Local Self Government up to 25% of their budget.

Q 1.4. *We represent a small nonprofit organization with limited financial resources. In case of the approval of the project proposal in which we will participate, are we obliged to cover the national co financing from our own budget? If not, who will be responsible to cover the national co financing?*

A. 1.4. All types of Beneficiaries are entitled to receive the national co financing, during the Project Implementation and after signing the Subsidy Contract and the Partnership Agreement.

The Beneficiaries from Greece will receive the national co financing from the Public Investment Programme.

The Beneficiaries from North Macedonia will receive the national co financing from the Ministry of Local Self

Government, according to the progress of the Project Implementation.

Q 1.5. *Are the preparation costs eligible? What is the limitation? Does the limitation apply on Beneficiary or on a Project level? They will be calculated on Real Cost or on Simplified Cost bases?*

A. 1.5. Costs within the budget lines "staff costs, travel and accommodation costs and external expertise and services", which have been incurred for the preparation of the project, are eligible for funding if they do not exceed the amount of €30.000 at project level and should be calculated on Real Cost basis.

Q.1.6. *Do preparation costs need to be declared in a separate Work Package or in a specific Deliverable? Can invoices for preparation costs be issued after the project is approved?*

A.1.6. The provision for the preparation costs are set out in the Programme & Project Implementation Manual. Preparation cost must be included in the Application Form/Stage B in the Deliverable 1X1 "Preparation Activities" (where X is the number of the beneficiary).

The services or activities must be implemented and there must be at least a commitment decision for them between 1st of January 2021 and the date of submission of the Application Form. The related invoices and payments could be issued and made after the project is approved. The payments for preparation costs should be included preferably in the first request for verification.

Q 1.7. *Does the State Aid legal framework apply for Interreg Projects? If yes, what will be the consequences if a specific activity of a Project Partner will be considered as State Aid?*

A. 1.7. The State Aid legal framework applies only for the Beneficiaries located in Greece. In case a specific project activity will be evaluated as State Aid, this specific Beneficiary's public finance will be reduced accordingly.

The State Aid evaluation procedure does not affect in any case the Beneficiaries from North Macedonia.

Q 1.8. *What is project expenses eligibility period?*

A. 1.8. The expenses eligibility period starts at January 1st, 2021, and after the signature of the Subsidy Contract. Projects' activities which have started being implemented before the signing of the Subsidy Contract, and in any case after 1/1/2021, should not have been concluded before the application for funding at the present Call for Project Proposals.

The last date for the expense's eligibility period is December 31st, 2029.

Q. 1.9 *What is the difference between 'Equipment' and 'Infrastructure & Works' budget lines?*

A. 1.9 The budget line 'Equipment costs' refers to expenditure for the financing of equipment purchased, rented or leased by a partner, necessary to achieve objectives of the project.

The budget line 'Infrastructure & Works costs' refers to expenditure for the financing of infrastructure and construction works related to investments in infrastructure that do not fall into the scope of other budget lines.

Q. 1.10 *Is it possible to create additional budget lines?*

A. 1.10. No, Project budgets must be structured according to the following predefined six (6) budget lines:

- 1) Staff costs
- 2) Office and administrative expenditure
- 3) Travel and accommodation costs
- 4) External expertise and services costs
- 5) Equipment expenditure
- 6) Infrastructure and works

At STAGE A, for the Submission of Concept Note on MIS, there is an additional Budget Line 'Cost based on Concept Note', which you need to select ONLY ON MIS Application Form. This is required solely for technical reasons at STAGE A and applicants should fill in the total budget of the

proposed project in this Budget Line. For more information, please consult MIS Guides.

Q.1.11 *Is VAT an eligible expense?*

A.1.11 VAT is eligible expense for all projects with budget under 5.000.000€ for all types of beneficiaries.

Q. 1.12 *Are there any limitations regarding the distribution of budget among the Work Packages?*

A.1.12 Specific budget limits are defined in the Terms of Reference of the 1st Call for Project Proposals and in Programme & Project Implementation Manual/ Section B: Project Development and must be respected by all Project Beneficiaries.

Q.1.13. *Are there any travel, accommodation and DSA rates per country that need to be taken into consideration when developing the project budget?*

A. 1.13. These rates are defined by the national law in each country participating in the Greece - North Macedonia Programme and may vary according to the legal status of each Project partner.

Q. 1.14 *In the approved programming document, there is a breakdown of the budget of all specific objectives into intervention categories. Will this breakdown be respected in this call?*

A. 1.14 The breakdown of the budget will be respected. Minor amendments and adjustments may occur.

Q. 1.15 *An institution located outside the eligible area can participate under conditions. Can it include deliverables of "equipment" and "infrastructure" in its budget? Or no equipment and no infrastructure can take place outside the eligible area?*

A. 1.15 Regarding the "infrastructure" please check page 6 of the ToR and the Programme & Project Implementation Manual page 53 "Infrastructure located outside the Programme area, even if it is directly related to the project

either for the development or for implementation, shall not be eligible".

"Equipment" may be considered as eligible if it will be used in favor of the programme's area.

Q. 1.16 *Which will be the documentation needed in this call for the justification of the land and/or buildings property (in the 2nd phase)?*

A. 1.16 During the 2nd Stage and taking into consideration the input of the project proposals Concept Notes, further instruction will be provided.

Q. 1.17 *According to page 53 of the P&PM "Purchase of land (over 10% of total eligible cost) is not eligible". What is the exact meaning and how this rule applies on the project level?*

A. 1.17. According to article 64 para 1 (b) of EU Regulation 1060/2021 ARE NOT ELIGIBLE *"the purchase of land for an amount exceeding 10 % of the total eligible expenditure for the operation concerned; for derelict sites and for those formerly in industrial use which comprise buildings, that limit shall be increased to 15 %; for financial instruments, those percentages shall apply to the programme contribution paid to the final recipient or, in case of guarantees, to the amount of the underlying loan"*

Meaning that the cost for land purchase is eligible if this cost does not exceed the 10% of the eligible TOTAL PROJECT'S COST.

2. Eligibility of Beneficiaries

Q 2.1. *Who can be considered as eligible and therefor may participate in a project proposal?*

A. 2.1. The following categories of Beneficiaries may be considered as eligible:

- national, regional or local public bodies
- bodies governed by public law (as defined in Article 2(4) of Directive 2014/24/EU)
- non-profit bodies governed by private law,
- international organizations
- European Grouping of Territorial Cooperation (EGTC).

Q 2.2. *Under which conditions an EGTC may be considered as eligible?*

A. 2.2. An Eligible EGTC must be governed by the law of one of the participating countries where the EGTC has its registered office. EGTC located outside the Programme area and not registered in one of the Partner states participating in the cross-border Programme is not eligible for funding. An EGTC cannot be a sole beneficiary of a project proposal.

Q 2.3. *Under which conditions an International Organization may participate in this Call for Proposals?*

A. 2.3. International Organizations, registered under the national law of the Partner States of the Programme, can be considered as eligible if they fulfil the criteria foreseen for the nonprofit bodies governed by private law. International Organizations operating under international law are not eligible.

Q 2.4. *We are representing a nonprofit organization, oriented to environmental issues. Are we eligible to participate in this Call for Proposals?*

A. 2.4. The Potential Beneficiaries, before participating in a Project Proposal, should check if they are eligible to participate in the Call. To check should take into consideration the categories of the eligible partners as described in the Call and the legal form of the Potential Beneficiary (e.g. statute, establishment act, tax registration documents and other legal operating documents). In any case, the Potential Beneficiary holds the full responsibility of the decision to participate in a Project Proposal as the eligibility check is a part of the evaluation procedure and will be done by the MA / JS. In case of a non-eligibility during the evaluation procedure, the Project Proposal will be rejected.

Q 2.5 *Which is the level of eligibility for universities?*

A.2.5. Universities may participate in Greece-North Macedonia Programme at University level.

Q. 2.6. *Are Organizations/ Bodies located outside Greece-North Macedonia eligible area, that do not fall in first and/or b in second category of chapter 5, page 10, of ToR, eligible for participating in a project proposal?*

A. 2.6. Organizations/ Bodies that are located outside the Programme area and wish to participate as Beneficiaries should demonstrate that they fall into the third case (see ToR, chapter 5, page 10), i.e., their participation adds value and expertise to the implementation of the Project and benefits the Programme cooperation area, meet the requirement that 'in principle, all activities of a project should take place within the Programme area'.

Each applicant participates in a Project proposal on its own account. In any case, the eligibility check of a potential Beneficiary is part of the evaluation procedure.

At STAGE A Beneficiaries are asked to declare their eligibility and provide relevant information via Concept Note. The eligibility check of a potential partner is part of the evaluation procedure. It will take place during STAGE B/ PHASE B3 of evaluation, based on the Project Selection Criteria.

Q. 2.7. ONLY FOR GREEK BENEFICIARIES - *Can Municipalities, Universities and other bodies conclude Programming Agreements (προγραμματικές συμβάσεις) in Greece-North Macedonia Programme?*

A. 2.7. The case of assuming responsibility for the implementation of a Project instead of the owner of the project, by another body, is provided for in Article 8, point 3 of the YPASVD of INTERREG Programmes 2021-2027 (Government Gazette 3281/Issue B'/17.05.2023), as follows:

"In the cases of actions for which the responsibility for the implementation of the action is assumed by another entity as beneficiary instead of the project owner on the basis of a programming agreement, in accordance with article 44 of Law 4412/2016, as it applies each time, the eligible costs are paid for the act by the project owner or by the beneficiary, depending on what is specified in the programming contract,...".

Furthermore, the YPASVD lists in detail (points a to h) the conditions that must be met in order the relevant Programming Agreement and the costs derived from it to be eligible.

In addition, article 44 of Law 4412/2016 states that:

"Article 44. Technical competence of contracting authorities in public works contracts and studies

1. The contracting authorities who judge that they do not have technical competence, or their technical competence is incomplete, may in particular:

a) enter into programming agreement, within the meaning of paragraph 6 of Article 12, for concluding, supervising, and overseeing a public procurement for work or study,

b) conclude contracts for the provision of technical services within the meaning of article 52

and

c) be supported by the EKAA of par. 1a of article 41 in the context of its exercise of ancillary purchasing activities.

3. The contracting authority is responsible to the project owner for the proper performance of its duties and to third parties it is jointly and severally liable with the project owner. If the programming agreement does not specify otherwise, it represents the project owner in court and out of court against third parties during the exercise of its duties until the end of the contract. The ruling bodies are determined by the programming agreement."

Therefore, from the above it is clear that the conclusion of Programming Agreements is allowed only in cases in which conditions of Article 44 of Law 4412/2016 are met and exclusively for the services described in paragraph 1a of Article 44.

More specifically, the following should apply cumulatively:

- a) documented non-existence or inadequate existence of Technical Competency of a Contracting Authority/potential Beneficiary,
- b) assumption of responsibility by another body, exclusively for the services referred to in Article 44 par.1, i.e. "for concluding, supervising and overseeing a public procurement for work or study", and not for the provision of other services.

The potential Beneficiary should document, during the submission of the proposal in Stage B, the need to conclude a Programming Agreement in the context of the above.

In Project Selection Criteria for the evaluation of project proposals for funding are included criteria concerning the ability of the potential Beneficiaries to respond to the implementation of the projects, in which case the above approach should be taken into account during the process of submitting the proposals that will include Programming Agreements.

Q. 2.8. *Can an NGO with relatively low balance sheets participate in the Greece-North Macedonia Programme as Beneficiary?*

A. 2.8. Each Project Beneficiary must submit specific documents to prove its eligibility and administrative and financial capacity. The partnership scheme and the administration and financial capacity of the Project Beneficiaries are part of the evaluation procedure at STAGE B.

Q. 2.9 *Are there any specific criteria, in order to appoint a Lead Beneficiary?*

A. 2.9. Lead Beneficiary will be designated by all partners participating in a project to ensure implementation of the entire project (carry out the tasks laid down in Article 26 of Interreg Regulation) and will sign a Subsidy Contract with the Managing Authority.

The Lead Partner must be located in one of the Greece-North Macedonia Partner States:

- be a legal entity.
- hold a dedicated bank account for the project.
- be legally able to transfer funds to foreign countries.
- have a technical and financial capacity and competency to manage the proposed common project.

3. Project Development – Rejection of Proposals

Q 3.1. *What is the limitation for a Beneficiary to participate in project proposals? Does this limitation apply for a specific category of Beneficiary e.g. Lead Beneficiary or Beneficiary?*

A. 3.1. A potential Beneficiary may participate up to five (5) Project Proposals in total for this Call. The above limit applies to all types of Beneficiaries, Lead Beneficiary or Project Beneficiary.

Q 3.2. *Does the limitation for a beneficiary to participate in five (5) project proposals apply on Priority of Specific Objective base?*

A. 3.2. The limitation of maximum five (5) participations apply at Call level – not at the Priority of Specific Objective level.

Q 3.3. *If we will participate in more than five (5) project proposals, which will be the consequences? Will all the project proposals in which we will participate be rejected?*

A. 3.3. In case a potential Beneficiary will participate in more than five (5) proposals, not all the Project Proposals will be rejected. The first five (5) Project Proposals submitted via MIS will be assessed, the other will be rejected before the evaluation.

Q 3.4. *What is the crucial criterion for the rejection in case of participation in more than five Project Proposals?*

A. 3.4. In case of supernumerary Project Proposal's participations, the time of each Project Proposal submission via MIS is the judge. The first five (5) Project Proposals submitted via MIS will be assessed, the other will be rejected before the evaluation.

Q 3.5. *In case our Project Proposal, after the evaluation procedure, will be rejected for financing, is there a legal administrative complaint procedure to submit our complaints?*

A.3.5. During the Evaluation Procedure an administrative "Complaint Procedure" is foreseen:

- After the completion of the Stage A' / Concept Note Evaluation
- After the completion of the Stage B' - Phase B1 & B2 / Administrative & Quality Assessment
- After the completion of Stage B' – Phase B3 / Eligibility & State Aid check

Q.3.6. *Do we have to select only one Specific Objective or can we submit a proposal in more than one?*

A.3.6. Project applicants are invited to submit their Project application under one of the Specific Objectives of the Programme. The Project objectives and the proposed activities shall be clear and in-line with the Programme Priorities and both shall have an impact on the Greece-North Macedonia area. Each Project is asked to select those indicators that will fit best to the particular planned results and outputs of the Project. Therefore, a Project applicant can apply a Project proposal only under one Specific Objective.

Q.3.7. *Are the submitted project proposals evaluated per Priority or per Specific Objective?*

A. 3.7. The submitted project proposals are evaluated and ranked per Specific Objective. Beneficiaries may submit more than one project proposal at the same Specific Objective. In this case, in which the same organization is participating in more than one project proposal, the proposals are competitive.

Q.3.8. *Is it eligible as a capitalization action to widely implement already co-funded tools demonstrating added value and transfer potential?*

A. 3.8. Capitalization is welcome. However, there must be no double-financing.

Q. 3.9. *Are SME's/ Profit-making Organizations eligible?*

A.3.9. SMEs/ Profit-making Organizations are not eligible for direct financial support in this Call. They can only benefit from guidance and other type of support and consultancy throughout cooperation schemes with research institutions.

Q. 3.10. *Is it mandatory the Project proposal to contribute to all Programme Output Indicators for the relevant Specific Objective?*

A. 3.10. Project applicants are invited to submit their Project application under one of the Specific Objectives of the Programme. The Project objectives and the proposed activities shall be clear and in-line with the Programme Priorities and both shall have an impact on the Greece-North Macedonia area. Each Project is asked to select those indicators that will fit best to the planned results and outputs of the Project. Therefore, a Project applicant can apply a Project proposal only under one Specific Objective and select only the best suitable indicators (see Programme Output & Result Indicators Guide). In any case, each Project is treated as a whole and shall be evaluated as such.

Q. 3.11. *Is there a minimum or maximum requirement for the number of output and result indicators a project must have? Are there expected target numbers for each project?*

A. 3.11. There are no maximum or minimum requirements for the number of the selected indicators that a project proposal must have.

However, the output and result indicators selected and analyzed by the potential beneficiaries are crucial for the successful assessment of the project proposal and in particular:

During the evaluation of the Stage A – see Concept Note Evaluation Grid, criterion 11, and during the evaluation of the Stage B – see Quality Assessment Phase B2, part A2 criterion (a) & (b)

There are not expected target numbers for each project, however the output and result indicators selected and analyzed by the potential beneficiaries are crucial for the successful assessment of the project proposal and in particular:

During the evaluation of the Stage A – see Concept Note Evaluation Grid, criterion 11, and during the evaluation of the Stage B – see Quality Assessment Phase B2, part A2 criterion (a) & (b)

4. Other

Q.4.1 *Is there any limitation of words or characters in the Concept Note Document?*

A.4.1 As far as the length of the Concept Note is concerned, there is no word or character limit on the length of the Concept Note. Nevertheless, in general, all parts in the Concept Note must be answered concise and comprehensive.

Q. 4.2. *Should all beneficiaries be registered in MIS?*

A. 4.2. For the submission of the Concept Note, only the Lead Beneficiary is necessary to be registered in the MIS. However, for the submission of the Application Form – at the STAGE B' of the procedure – all the Beneficiaries should be registered in the MIS. We strongly recommend, all Potential Beneficiaries to be registered in the MIS from the beginning of the procedure.

Q. 4.3. *The proposal is prepared by all beneficiaries and is submitted by the Lead Beneficiary. Should it be signed only by the lead beneficiary?*

A. 4.3. The project proposal should be signed only by the legal representative of the Lead Beneficiary

Q. 4.4. *What is the preferred number of beneficiaries? Is the participation of local or central governmental bodies compulsory or highly recommended?*

A. 4.4. The minimum number of participants in a project proposal is (2) – one of each partner country – and the maximum number of participants in a project proposal is five (5). The number and the type of participants within this limits depends of the scope of the project, the activities proposed for financing and the authorization of the participating organizations and will be evaluated during the evaluation procedure.