



Clarification to questions received regarding the "Small Grant Scheme for Pilot Models for Marine Water Purification" under Outcome 2: "Marine Waters Assessment, Monitoring and Management System" of the Environment Protection and Climate Change Programme

Applicants may submit their questions to the following e-mail: eea@moew.government.bg or through the Programme's website. The questions and answers will be published on the Programme's website, part of the EEA FM Single Information Portal for Bulgaria, as well as in EUMIS 2020. Questions may be submitted not later than 21 days before the deadline for project proposals submission. The Programme Operator (PO) answers the submitted questions no later than 14 days before the deadline for project proposals submission.

The clarifications given in respect of the Call do not express an opinion on the quality of the project proposal and are obligatory for all applicants. In order to ensure equal treatment of Applicants, the PO shall not give prior opinions on the compliance of an application or an applicant with the eligibility requirements.

The answers represent the official opinion of the Programme Operator and must be taken into consideration when submitting the project proposals by the Applicants.



	Физическо/Юридическо лице подало въпроса, дата на постъпване	ВЪПРОС	ОТГОВОР
1	Vesela Nikolova; 03.01.2020	<p>1. If the project will include the acquisition of Tangible Asset, which is produced and offered on the European market exclusively and only by 1 organization (accordingly, only 1 tender can be submitted to justify the valuation of the asset in the budget), is the requirement for presenting a minimum of 2 tenders in the financial analysis of the asset planned in the relevant budget line applicable?</p>	<p>The Call for proposals does not impose a restriction on the purchase of products from the European market only, and applicants should not impose such restrictions.</p> <p>In view of the purpose of the Call, namely to fund projects implementing pilot methods and technologies for marine water purification that are innovative / demonstrative, the PO accepts, only in the case of using innovative products / Tangible Assets, that it is possible to hypothesize that they are manufactured or offered by a single manufacturer. In such cases, the project proposal should be accompanied by a tender document proving that the product / Tangible Asset is only offered by that manufacturer.</p>
		<p>2. In the case of an asset being offered from only 1 organization, should the Assessment Committee conclude that there are missing documents (no second tender) when submitting only one tender to justify the asset valued in the relevant budget line, from which the impossibility to submit a second tender would result in the project proposal not being allowed to be admitted to the TFA and rejected?</p>	<p>In case of missing documents or ascertained missing information, these will be requested from the Applicant. Failure to submit the information and documents, required by the Evaluation Committee within the specified timeframe or the submission of irregular documents, is basis for not allowing the project proposal to be admitted to the TFA and its rejection.</p>
2	Chavdar Tombashki, 11.01.2020	<p>3. On page 37 of the Application Guidelines, under item 23 "List of documents to be submitted at the application stage", sub-item 1 states that an English-language application form is attached as an</p>	<p>According to item 23. "List of documents to be submitted at the application stage", Applicants should submit an application form in English as an attachment in Section 12 of the</p>



	<p>attachment to the system? At the same time, such a template document is not attached to the Application Documents file. Is there an Application form translated in English or should each applicant develop it?</p>	<p>Application Form, signed by the person entitled to represent the applicant, or by a person authorized by him. EUMIS 2020 provides the opportunity to fill out an Application form in English, which can then be saved in .pdf format through print option.</p>
	<p>4. Document D11 Experts profiles is attached to the Application Documents file, but no information was provided on how to complete it. What experts should this document refer to?</p>	<p>The applicant should complete Document D11 "Experts profiles" for the experts included in Section 9 "Team" of the Application Form.</p>
	<p>5. Is it possible to plan the cost of legal services as external to the organization by experts who are not part of the project management team? If possible, in which budget line should they be planned?</p>	<p>The ineligible costs under the procedure are described in item 17 of the Call for Proposals. The planned external services should relate to the implementation of the project activities, which are directly aimed at achieving its objectives and results. External services should be described in Section 10 "Plan for outsourcing" of the Application Form.</p>
	<p>6. In which budget line should the mandatory costs of project audit, bank guarantee and insurance of the equipment purchased under the project be planned?</p>	<p>Audit costs are a type of service cost and should be described in item IV Costs for services, 5. Costs for services in section 5 "Budget" of the Application Form. Costs of bank guarantee and insurance costs of purchased equipment are not described in item 16 Eligible direct costs.</p>
	<p>7. What is the logic behind completing document B1 Detailed Budget? Activity 1 by assumption is Personnel Costs. How should we plan the next activities? Should activity 2 summarize all the costs of activity 2 of the Application form, regardless of the type of expenditure included in it, respectively activity 3 should summarize all the costs of activity 3, etc.? If so, should Activity 2 have the same title as Activity 2 of the project? If there is different logic, please clarify.</p>	<p>The B1 Detailed Budget document contains five worksheets as follows:</p> <ul style="list-style-type: none"> • Budget breakdown; • Indirect costs calculations; • TOTAL BUDGET; • Instruction(in Bulgarian); • Instruction (in English). <p>Applicants should familiarize themselves with the instructions for completing the document (Instructions worksheet) before completing the document. The description, for each activity, should include all costs foreseen for its implementation. In the table for each activity cost, all columns are filled in sequentially. ("Budget line" (when a cell is clicked, a drop-down menu opens</p>



			<p>and the applicant selects it), "Cost type", "Executing partner", "Unit of measure", "Quantity", "Unit price excluding VAT, BGN", "% VAT (selectable from the drop-down menu)," Value with VAT, Euro" (calculated automatically)," Value with VAT, BGN "(calculated automatically)," Grant rate "(calculated automatically)," Total Grants with VAT, Euro (calculated automatically), " Total Grant with VAT, BGN (calculated automatically)," Total amount of own contribution with VAT, Euro (calculated automatically), " Total amount of own contribution with VAT, BGN (calculated automatically)).</p> <p>The activity numbering in document B1 Detailed budget, should correspond to the numbering of the activities described in Section 7 "Implementation plan / Project activities" of the Application Form.</p> <p>Instructions for completing the budget are included in the package of information documents.</p>
		<p>8. In Part 5 "Budget" of the Application form, we should present the amount of expenses by type (i.e. personnel costs, material assets costs, etc.). Is it sufficient to submit the total amount of each type of expenditure or should we put in sub-lines for each cost? Doesn't the information duplicate the information from document B1 Detailed Budget? Please clarify.</p>	<p>In section 5 "Budget" of the Application Form, the expenditure is divided into three levels. At level 1, the costs are grouped and numbered in Roman numerals: I, II, etc. They are divided into sub-groups according to the eligible costs. These costs are numbered in Arabic numerals 1, 2, etc. and are from level 2.</p> <p>In the budget, the Applicant shall include the expenditure necessary for the implementation of the project proposal (level 3). The costs that the Applicant introduces are 1.1., 1.2., 1.3, etc. and 2.1., 2.2., 2.3. etc. By selecting the "Add" button, level 3 costs can be added.</p> <p>It is advisable to follow the following logic and consistency of textual content when formulating level 3 costs:</p> <ul style="list-style-type: none"> • Provision of brief information on the object / subject of cost (eg. Expert 1)



			<ul style="list-style-type: none"> • Indication of the activity for the implementation of which the expenditure is intended to be incurred, according to the numbering of the activities generated by the Applicant in item 7 "Implementation Plan / Project Activities" of the Application Form (eg. "Activity 1"). <p>There are no separate columns for number and unit value in section 5 "Budget" of the Application Form. This information is completed in Annex B1 Detailed Budget.</p>
		<p>9. In Part 11 Additional information needed to evaluate the project proposal from the EUMIS Application form we should describe the following information: Risk assessment, quality management plan. At the same time, the Quality Management and Risk Assessment Plan D15 is attached to the Application Documents file. Should the information be essentially identical, are there any requirements for its different presentation?</p>	<p>Applicants should complete the information required in Section 11. "Additional information required to evaluate the project proposal" on the Application Form, subject to the 5000-character limit for specific sections.</p> <p>According to item 23. "List of documents to be submitted at the application stage" Applicants should complete document D15 "Quality management and risk assessment plan" in accordance with the attached template.</p>
		<p>10. When planning an investment activity, what documents should be submitted at the application stage, since the Application Guidelines do not contain such a hypothesis? Is there a requirement for submission of technical documents / drawings, sketches, quantitative account, technical specifications of the planned deliveries /? Should property ownership documents be provided for the property where the activities should take place or consent of the property owners, if it's another person?</p>	<p>The Application Guidelines do not impose restrictions on construction work. The purpose of the procedure is to fund projects applying pilot methods and technologies for marine water purification that are innovative / demonstrative. In the case of planned investment activities, Applicants should submit documents, consistent with the idea of their project proposal, justifying the implementation of the respective activities.</p>
3	Chavdar Tombashki, 15.01. 2020	<p>11. In section 19. "State aid and de minimis" of the Application Guidelines states that: "Where funds are provided to Project Promoters pursuing an economic (commercial) activity, the support to these persons will constitute de minimis aid within the meaning of Regulation (EU) No 1407/2013. In this hypothesis, the Programme Operator will be the aid administrator and the de minimis Project Promoters involved in the commercial activity will be the beneficiaries</p>	<ul style="list-style-type: none"> - If the applicant is an SME, the amount of the grant will be awarded under the de minimis aid conditions within the meaning of Regulation (EU) No 1407/2013; - The total amount of the grant for this legal entity should be accounted for as de minimis aid; - Depending on which hypothesis the Applicant falls



	<p>of the <i>de minimis aid</i>". In this regard, please clarify the following:</p> <ul style="list-style-type: none"> - Please confirm the hypothesis that if the Applicant is an SME, the amount of the grant will be awarded under the <i>de minimis</i> conditions, regardless of the conceptual proposal?; - In case the support constitutes minimum aid within the meaning of the abovementioned Regulation, should the total grant amount be accounted as such aid?; - If the Applicant is an SME, in section 1 of the project proposal, should he determine by himself that the project is eligible for <i>de minimis</i> on the question "The project is subject to <i>de minimis aid regime</i>"? 	<p>under in point 19 of the Application Guidelines, he or she should indicate in Section 1 the "General data " of the Application form whether or not the project is eligible for minimum aid.</p>
	<p>12. In section 4. "Financial Information - Dimension Codes" of the project proposal in the EUMIS, answers are entered. Should the answers given be changed or should the section not be filled in?</p>	<p>Section 4. "Financial Information - codes dimension" is not completed by applicants.</p>
	<p>13. In section 5. Budget, if the Applicant is an SME, what amounts should be planned in the Grant and Co-Funding (CF) columns Please confirm whether the own contribution of the applicant should be included in the CF column and the total amount of European plus national co-financing in the Grant column?</p>	<p>According to item 15 "Grant Intensity and Cash Flows" the Grant amount of may be up to 100% of the total eligible costs for public organizations or up to 90% of the total eligible costs for NGOs and private organizations.</p> <p>When completing section 5 "Budget" of the Application Form, Applicants should tick the percentage box at the end of the relevant budget line from level 2, and then manually to indicate the percentage ratio, in accordance with item 15 "Grant Intensity and Cash Flows" of the Application Guidelines and the type of their organization.</p>
	<p>14. Please confirm whether in section 5 "Budget" we should record the costs by type and in Annex 1 should we record the costs, regardless of their type, according to the activity for which they are planned?? For example, if we plan to purchase TA in activity 2, should the amount of this asset be recorded in section 5 of the project proposal, section II "TA expenditure", and in Annex 1 should we describe it for activity 2?</p>	<p>Section 5 "Budget" of the Application Form is structured by type of expenditure. Annex B1 "Detailed Budget "is structured by activity and by cost type.</p> <p>Applicants, when preparing the project proposal, should first fill in the budget in the attached excel file B1 "Detailed budget" and then section 5 "Budget" of the Application Form in EUMIS 2020 for each budget line (Expenditures for staff, Travel expenses,</p>



			<p><i>Tangible assets costs, Intangible assets costs, Service costs, Material costs, Indirect costs and Contingencies) for the Project Promoter and for each partner separately.</i></p> <p><i>Applicants should familiarize themselves with the Budget Development Instruction annexed to the Information Documents package of this Call.</i></p>
		<p>15. Please clarify for which groups of costs, other than overhead, can indirect costs under the Programme be used?</p>	<p>Item 16 "Eligible costs" of the Application Guidelines and item 8 of the Budget Development Instruction annexed to the Information Documents package to this Call state that:</p> <p><i>"Indirect costs are all eligible costs that cannot be identified by the Project Promoter and/or the project partner as being directly attributed to the project but which can be identified and justified by its accounting system as being incurred in direct relationship with the eligible direct costs attributed to the project. They may not include any eligible direct costs. Indirect costs of the project shall represent a fair apportionment of the overall overheads of the Project Promoter or the project partner. Project promoters and project partners may identify their indirect costs according to one of the following methods:</i></p> <ul style="list-style-type: none"> • <i>based on actual indirect costs for those Project Promoters and project partners that have an analytical accounting system to identify their indirect costs</i> • <i>a flat rate of up to 25% of total direct eligible costs, excluding direct eligible costs for subcontracting and the costs of resources made available by third parties which are not used on the premises of the Project Promoter or project partner; In applying this method, the calculation of the rate shall be made on the basis of a fair and verifiable methodology or a method that is customary in the case of state funding of schemes for similar projects and Beneficiaries;</i> • <i>a flat rate of up to 15% of direct eligible staff costs without there being a requirement for the Programme Operator to</i>



			<p><i>perform a calculation to determine the applicable rate;</i></p> <ul style="list-style-type: none"> <i>In case the Project Promoter or the project partner is an international organization or agency, indirect costs may be determined in accordance with the rules on indirect costs applied in these organizations in accordance with specific provisions of the Programme Agreement.</i> <p><i>The method of calculation of indirect costs and their maximum value shall be described in the budget of the project financing contract. The method for calculating indirect costs of the project partner shall be specified in the partnership agreement."</i></p> <p>Applicants should familiarize themselves with the "Information Documents" package of this Call.</p>
		<p><i>16. Please clarify if in Section VII. INDIRECT COSTS from section 5 "Budget" of the project proposal, we should only choose the type and amount of indirect costs that we are planning? Should we then add a line in which to describe what the costs are planned for?</i></p>	<p><i>The choice of type and amount of indirect costs should be described in Level 3 expenditure under VII "Indirect costs" in section 5 "Budget" of the Application Form. By selecting the "Add" button at level 3 below the appropriate indirect eligible cost type described at the level 2 selected by the Applicant. Depending on the type of indirect cost chosen, the Applicant should complete one or more Level 3 lines.</i></p>
		<p><i>17. Should the budget values include VAT?</i></p>	<p><i>According to item 16 of the Guidelines, non- refundable VAT is eligible expenditure under this Call. In this case, the figures in the budget should be VAT included.</i></p> <p><i>According to item 17 of the application guidelines, refundable VAT is an ineligible expenditure under this Call. In this case, the figures in the budget should be non-VAT included.</i></p> <p><i>Applicants should familiarize themselves with the information provided on page 3 of the Budget Development Instruction annexed to the Information Documents package of this Call.</i></p> <p><i>Applicants should bear in mind that in Section 1 "General data" of the Application Form they should indicate in the "VAT eligible cost</i></p>



			<i>of the project" field the correct option for them.</i>
		<i>18. In section 8 "Project proposal indicators", should we leave a value of 0 in the Baseline Value field? Should we record the planned indicator level in the Target Value field?</i>	<i>The baseline value of the indicators should be consistent with the baseline value for each indicator described in the table in section 8 of the Call for Proposals. The target value should comply with the specific project proposal and with the table in item 8 of the Call for Proposals.</i>
		<i>19. In section 10 Plan for outsourcing, when choosing a Council of Ministers Decree as an applicable regulatory act, there are 2 options as a type of procedure - selection by "public call" and "selection without conducting a procedure (guidance of PO)". Please clarify if there is guidance from PO and where can we find it?</i>	<i>The PO's (Programme Operator) instructions relate to costs below specified thresholds requiring the use of a specific procedure. The instructions will be provided to the Project Promoters at the stage of contracting.</i>
		<i>20. Should each expenditure be justified in the financial justification? How to justify fuel costs, bank guarantee costs?</i>	<i>All costs necessary for the implementation of the project should be described in section 5 "Budget" of the Application Form and Document B1 "Detailed Budget". All costs described in section 5 'Budget' of the Application Form and Document B1 'Detailed Budget' should be justified in the financial justification.</i> <i>Fuel costs can be justified by describing, for each activity that includes fuel costs, the distance to be travelled and the unit price of fuel. Bank guarantee costs are not among those described in item 16 "Eligible direct costs".</i>
		<i>21. Please confirm that when planning project audit expenditures, interim reports should cover project activities and a cost audit should only be performed for the final report.</i>	<i>These Application Guidelines are in accordance with Article 8. 2 "General principles on eligibility of expenditures" under the EEA FM Implementation Regulation.</i> <i>The audit of the project activities covers the actual implementation of the activities, including the costs incurred for the implementation of the activities.</i>
		<i>22. Where should the Project Proposal describe the Contribution to the objectives of the EEA Financial Mechanism: "Contributing to reducing economic and social disparities in the European Economic Area" and "Strengthening bilateral relations between Bulgaria and Donor States"</i>	<i>Contribution to the objectives of the EEA Financial Mechanism should be described in Section 1 "General Data" of the Application Form, field "Objective (s) of the project proposal", after a description of the objectives of the project proposal. In the event that the project proposal contributes to "Strengthening bilateral</i>



		<p>and to the overall objective of the Programme: "Improved environmental status in ecosystems and reduced effects of pollution and other human activities"?</p>	<p>relations between Bulgaria and Donor States" this should be described in p. 11 Additional information, needed for the assessment of the project proposal – Bilateral relations (up to 5000 symbols)</p>
		<p>23. Is it acceptable for a project management team to be assigned to civil contracts for the duration of the project?</p>	<p>The Application Guidelines do not limit the type of contract to which members of the project management team are assigned. Applicants consider that the financial statement should provide clear information on how the cost is formed.</p> <p>Applicants should familiarize themselves with the information provided in the Budget Development Instruction annexed to the Information Documents package of this Call.</p>
		<p>24. In document D15 "Management Plan", item 2. "Project Risk Register", you have set a "work package" column. Please clarify what information should be included here?</p>	<p>In the Work Package column, Applicants should describe the types of activities associated with the specific risk.</p>
		<p>25. Can all documents to be submitted be signed and stamped by the person representing the applicant organization, scanned and uploaded in pdf format? Should the project proposal generated in the EUMIS be printed, signed and enclosed? Should the project proposal in the UMIS be in any way signed by electronic signature or only submitted throughout the system through the organization's profile?</p>	<p>The project proposal in the EUMIS should be signed through QES.</p> <p>Applicants should familiarize themselves with the EUMIS E-Application Module User's Guide document, available in the information documents of this Call.</p>