



Clarifications to questions submitted under "Small Grant Scheme Circular Economy" under Outcome 3: "Improved Use of Resources at the Municipal Level (Circular Economy)" under the Environment Protection and Climate Change Programme of EEA Financial Mechanism

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.





	Natural persons/Legal entity submitted the question, date of receipt	QUESTION	ANSWER
1.	Detelina Ivanova 07.04.2020	Hello. Please confirm that municipalities, as public institutions and registered as legal entities in Bulgaria, are NOT eligible Project Promoters under the scheme. If it is possible, your answer may be unequivocal without quoting the application conditions. Thanks in advance.	Under the Call for proposals, an eligible Applicant must meet both requirements: - is a public or private organization or noncommercial organization which is established as a legal entity in the Republic of Bulgaria;
			- its main activity is in the education sector, as defined in the Pre-school and School Education Act.
			Municipalities do not fall within the eligibility applicants criteria because their main activity is not in the education sector, as defined in the Pre-school and School Education Act.
2.	Savremennost Foundation 10.04.2020	Is the Institution "Regional Department of Education - Sofia Region" an eligible Applicant for a project proposal under this scheme?	Under the Call for proposals, an eligible Applicant must meet both requirements: - is a public or private organization or noncommercial organization which is established as a legal entity in the Republic of Bulgaria;
			- its main activity is in the education sector, as defined in the Pre-school and





			School Education Act. As per item 8 Expected Results of the Call, eligible Applicants are kindergartens and schools.
3.	Anna Grozeva 10.04.2020	The Application Guidelines indicate that an eligible applicant under the procedure is any public or private and non-commercial organization that is established as a legal entity in Bulgaria, whose main activity is in the education sector, as defined in the Preschool and School Education Act. Our question is: Is a municipality an eligible Applicant under the procedure?	Under the Call for proposals, an eligible Applicant must meet both requirements: - is a public or private organization or noncommercial organization which is established as a legal entity in the Republic of Bulgaria; - its main activity is in the education sector, as defined in the Pre-school and School Education Act. Municipalities do not fall within the eligibility Applicants criteria because their main activity is not in the education sector, as defined in the Pre-school and School Education Act.





4.	Madlen Georgieva 13.04.2020	Hello, I represent 75 "Sarchitse" Kindergarten in Mladost region. We have 3 preparatory groups. It is not clear for us from the Application Guidelines whether kindergartens are eligible Project Promoters under BGENVIRONMENT-3.001 - Small Grant Scheme Circular Economy.	According to the Pre-school and School Education Act, kindergartens are institutions in the system of pre-school and school education in which children are educated in accordance with the state educational standard for pre-school education. Kindergartens are eligible Applicants under this Call.
5.	Savremennost Foundation 14.04.2020	We would like to ask the following questions: 1. The first is related to the eligibility of the Applicant organization under the Small Grant Scheme Circular Economy. Are municipalities eligible Applicants for a project proposal under this scheme? 2. The second is the following: What type of costs are defined as an own contribution? Is there any guidance on this?	On question 1 Under the Call for proposals, an eligible Applicant must meet both requirements: - is a public or private organization or noncommercial organization which is established as a legal entity in the Republic of Bulgaria;
			- its main activity is in the education sector, as defined in the Pre-school and School Education Act. Municipalities do not fall within the eligibility Applicants criteria because their main activity is not in the education sector, as defined in the Pre-school and School Education Act.





			On question 2: The Applicant's own contribution is calculated for each single expenditure included in the project budget. This is also evident from the functionality of the EUMIS, Section 5 "Budget" of the Application Form where each expenditure introduced by the Applicant is divided into a grant, own resources and Total Value / Amount.
			When filling in section 5 "Budget", Applicants should tick the percentage box at the end of the relevant budget line of Level 2 (expenditure numbered in Arabic numerals 1, 2, etc.) and then manually indicate the percentage, in accordance with item 15 "Grant Intensity and Cash Flow" of the Application Guidelines and the type of their organization.
			When filling in Appendix B1 Detailed Budget, in the table "Budget breakdown" the fields "Total amount of own contribution, including VAT, Euro and" Total amount of own contribution including VAT, BGN, are calculated automatically.
6.	Tsvetelina Hubenova	My question is in connection to the selection of potential Applicants: the organization	In the Call for submission of project





		,
21.04.2020	represent is a legal entity established to the	proposals SMALL GRANT SCHEME No. 3
	National Agency Vocational Education and	"Small Grant Scheme Circular Economy "
	Training of the Ministry of Education,	under Outcome 3:
	according to Art. 12, items 1, 2 and 6	"Improved Use of Resources at the
	respectively with Art. 49a, para. 1 of the	Municipal Level (Circular Economy)" under
	Vocational Education and Training Act.	the Environment Protection and Climate
	Can we be the Lead Organization (Applicant)	Change Programme, eligible Applicants
	under this procedure?	are defined as follows:
		Under this Call, an eligible Applicant
		("Project promoter") is any entity, whether
		public or private and non-commercial
		organisation established as a legal entity
		in the Republic of Bulgaria whose main
		activity is in the education sector, as
		defined in the Pre-school and School
		Education Act.
		According to the requirements of the Small
		Grant Scheme, an eligible Applicant must
		meet both requirements:
		·
		- is a public or private organization or non-
		commercial organization which is
		established as a legal entity in the Republic
		of Bulgaria;
		- its main activity is in the education
		sector, as defined in the Pre-school and





		School Education Act.
		According to this Act, the education sector which it regulates is the system of preschool and school education. It is clear from the question asked that the organization concerned is the holder of a license to carry out and certify vocational training with the acquisition of a degree of vocational qualification or to provide information and vocational guidance. The organization is also registered to implement Framework Programmes with the Ministry of Education, also in the field of vocational training. From the above-mentioned it is clear that the organization has a main business activity regulated by the Vocational Education and Training Act and not in the pre-school and school education sector as regulated by the Pre-school and School Education Act. Therefore, it does not meet the requirements set out in Small Grant Scheme Nº 3 on the main activity and in particular the education sector in which it is carried out.
7.	My second question is connected to the	Eligible partners are any public or private
	selection of a partner organization? Can the	entities, commercial or non-commercial,





		partner be a district / municipality and the schools that fall into the territory respectively, or should it be the school directly?	as well as non-governmental organisations established as a legal person either in the Republic of Bulgaria or the Donor States, other Beneficiary states, or a country outside the European Economic Area that has a common border with the Republic of Bulgaria, or any international organisation or body or agency thereof, actively involved in, and effectively contributing to the implementation of the project, and effectively contribute to it. The Call does not set restrictive conditions for the partners
8.	E. Todorova 23.04.2020	My question is in connection to the selection of potential Applicants: Are HIGHER EDUCATION INSTITUTIONS AND THEIR BRANCHES ELIGIBLE to APPLY?	According to the requirements of the Small Grant Scheme, an eligible Applicant must meet both requirements: - is a public or private organization or noncommercial organization which is established as a legal entity in the Republic of Bulgaria; - its main activity is in the education sector, as defined in the Pre-school and School Education Act. According to this act, the education sector which it regulates, is the system of preschool and school education.





			The main activity of Higher education institutions is regulated by the Higher Education Act, and is not in the sector of pre-school and school education, as it is regulated in the Pre-school and School Education Act. Therefore, they do not meet the requirements set out in Small Grant Scheme No. 3 on the main activity and in particular the education sector in which it is carried out.
9.	Tsvetelina Hubenova 26.04.2020	My question is in connection to the selection of potential Applicants: the organization I represent is a legal entity established to the National Agency for Vocational Education and Training of the Ministry of Education, according to Art. 12, items 1, 2 and 6 respectively with Art. 49a, para. 1 of the Vocational Education and Training Act. Can we be the Lead Organization (Applicant) inder this procedure?	In the Call for submission of project proposals SMALL GRANT SCHEME No. 3 "Small Grant Scheme Circular Economy" under Outcome 3: "Improved Use of Resources at the Municipal Level (Circular Economy)" under the Environment Protection and Climate Change Programme eligible Applicants are defined as follows: Under this Call, an eligible Applicant ("Project promoter") is any entity, whether public or private and non-commercial organisation established as a legal entity in the Republic of Bulgaria whose main activity is in the education sector, as defined in the Pre-school and School Education Act. According to the requirements of the Small





Grant Scheme, an eligible Applicant must meet both requirements:
- is a public or private organization or non- commercial organization which is established as a legal entity in the Republic of Bulgaria;
- its main activity is in the education sector, as defined in the Pre-school and School Education Act.
According to this Act, the education sector which it regulates is the system of preschool and school education.
It is clear from the question asked that the organization concerned is the holder of a
license to carry out and certify vocational training with the acquisition of a degree of
vocational qualification or to provide information and vocational guidance. The
organization is also registered to
implement Framework Programmes with the Ministry of Education, also in the field
of vocational training.
From the above it is clear that the organization has a main business activity
regulated by the Vocational Education and
Training Act and not in the pre-school and





			school education sector as regulated by the Pre-school and School Education Act. Therefore, it does not meet the requirements set out in Small Grant Scheme № 3 on the main activity and in particular the education sector in which it is carried out.
10.		My second question is connected to the selection of a partner organization? Can the partner be a district / municipality and the schools that fall into the territory respectively, or should it be the school directly?	Eligible partners are any public or private entities, commercial or non-commercial, as well as non-governmental organisations established as a legal person either in the Republic of Bulgaria or the Donor States, other Beneficiary states, or a country outside the European Economic Area that has a common border with the Republic of Bulgaria, or any international organisation or body or agency thereof, actively involved in, and effectively contributing to the implementation of the project, and effectively contribute to it. The Call does not set restrictive conditions for the partners and the municipalities fall within the scope of the eligible partners.
11.	Todor Stoyanov 04.05.2020	I have a few questions about applying for the "Small Grant Scheme Circular Economy": 1. Can institutes from the Bulgarian Academy of Sciences apply?	On questions 1,2,3 and 4 - According to the Call for proposals, eligible Applicants must meet the following requirements: - is a public or private organization or non-





		2. Can Universities apply? 3. Can EOODs apply? 4. Can NGOs apply?	commercial organization which is established as a legal entity in the Republic of Bulgaria; - its main activity is in the education sector, as defined in the Pre-school and School Education Act. As per item 8 Expected Results of the Call, eligible Applicants are kindergartens and schools.
12.	Yanka Aleksandrova Savremennost Foundation 13.05.2020	Are fees for experts who train trainers an eligible cost? Are the fees of trained teachers who teach students - theory and practice, as well as of leaders of working student groups and / or other activities, events related to the topic of the project proposal an eligible cost?	The listed costs are eligible in case the requirements specified in item 16 Eligible costs of this Call and the requirements in the Guidelines for budget completion under the Environment Protection and Climate Change Programme, attached to the "Documents for information" package to this Call, are met.
13.	Vesela Nikolova 19.05.2020	Ladies and gentlemen, representing the Programme Operator, In connection with the published Call for proposals: "Small Grant Scheme Circular Economy" under Outcome 3: "Improved Use of Resources at the Municipal Level (Circular)	On question 1. "Whose financial capacity is assessed under criterion number 3 of group I "Capacity of the applicant and the partner/s" from the TFA: the financial capacity of the Applicant, the financial capacity of the Partners or the total financial capacity of the Applicant and the Project Partners?"





Economy)" under the Environment Protection and Climate Change Programme, funded under the EEA Financial Mechanism 2014-2021 I have the following questions:

As stated in the Call for proposals, when carrying out a technical and financial assessment of the respective proposal, criterion number 3 of group I "Capacity of the applicant and its partner/s" states that, I quote: "The applicant has described that he/she has the necessary financial resources to carry out the project activities and the financial capacity is evaluated according to:

- Attached Balance Sheet and Statement of revenue and expenditures for the last three completed financial years ending from the date of publication of this invitation - for the Bulgarian partners.... "

In this connection, the following two questions arise, specifically for the assessment under the above-mentioned criterion, namely:

1. Whose financial capacity is assessed under criterion number 3 of group I "Capacity of the applicant and the partner/s" from the TFA: the financial capacity of the Applicant, the financial capacity of the Partners or the total financial capacity of the Applicant and the Project Partners?

When applying, the object of assessment is the total capacity of both the Applicant and the Partner/s.

On question 2. "Exactly which financial indicators from the Balance Sheets and Statement of revenue and expenditures presented by the Applicant and the Bulgarian partner for the last three completed financial years are subject to assessment of the financial capacities according to the above-mentioned criterion? What does the methodology for assessing the financial capacity include and how will the Selection Committee calculate whether or not the Applicant / Partner has the financial capacity?"

As an object of assessment, the presented Statement of revenue and expenditures and Balance Sheet provide information on the financial condition, results of operations and cash flows in the respective structure. Through the information available in them changes in the financial result, changes in cash flows and equity can be traced and allows for comparative analysis of a previous reporting period





			with and subsequent or conset and
		2. Exactly which financial indicators from the Balance Sheets and Statement of revenue and expenditures presented by the Applicant and the Bulgarian partner for the last three completed financial years are subject to assessment of the financial capacities according to the abovementioned criterion? What does the methodology for assessing the financial capacity include and how will the Selection Committee calculate whether or not the Applicant / Partner has the financial capacity?	with each subsequent or current period.
		Thank you in advance for your time in answering the questions.	
14.	Maria Burulyanova 29.05.2020	In connection with the procedure "Small Grant Scheme Circular Economy" under Outcome 3, is a vocational high school opened in 2018 an eligible Applicant? If yes, in this case for which years the Statement of revenue and expenditures and Balance should be? On page 34 of the Guidelines, you indicate the years - 2019, 2018, 2017, and on page 44 you indicate the years - 2018, 2017, 2016?	According to the terms of the Call for Proposals under SMALL GRANT SCHEME No. 3 "Small Grant Scheme Circular Economy" under Outcome 3: "Improved Use of Resources at the Municipal Level (Circular Economy)" under the Environment Protection and Climate Change Programme, an eligible Applicant ("Project promoter") is any entity, whether public or private and non-commercial organisation established as a legal entity in the Republic of Bulgaria whose main activity is in the education sector, as defined in the Pre-school and School





			Education Act. Vocational high schools are a form of vocational training. By virtue of Art. 1, para. 2 of the Pre-school and School Education Act, the same shall also apply to the school professional education and training, unless otherwise provided by the special law. As can be seen from Art. 74 of the same Act, according to the preparation school education is general, profiled and vocational. Therefore, vocational high schools also operate in the education sector, as regulated by the Pre-school and School Education Act, and are eligible Applicants under the Small Grant Scheme №3. Regarding the requirement for submission of Statement of revenue and expenditures and Balance Sheet, you must adhere to the general rule that they refer to the last three completed financial years, which to date are 2018, 2017 and 2016.
15.	Vera Petkantchin 05.05.2020	Hello, I would like to ask a question in connection with "Small Grant Scheme Circular Economy" under Outcome 3: "Improved Use of Resources at the Municipal Level (Circular Economy)" under the Environment Protection and Climate Change	Under the Call for proposals, an eligible Applicant must meet both requirements: - is a public or private organization or noncommercial organization which is established as a legal entity in the Republic of Bulgaria;





Programme, financed under the EEA Financial Mechanism. In the Application Guidelines, it is mentioned that eligible Applicants must meet two conditions:

- to be a public or private organization or non-commercial organization which is established as a legal entity in the Republic of Bulgaria;
- their main activity should be in the education sector, as defined in the Pre-school and School Education Act.

Our organization Junior Achievement Bulgaria is registered as a public benefit foundation and for over 20 years we have been working to support the educational system with a large network of schools across the country, introducing innovative educational programmes in entrepreneurship, financial literacy and career skills, i.e. our main activity is in the education sector, as you can see on our website (www.jabulgaria.org) and is reflected in our mission and statute, as well as in our classification by NACE.BG-2008. We certainly meet the first condition, but I will ask for more clarification and confirmation as to whether we are an eligible candidate with regard to the second condition - which specific definitions in the Pre-school and School Education Act are taken into account?

- its main activity is in the education sector, as defined in the Pre-school and School Education Act.

As per item 8 Expected Results of the Call, eligible Applicants are kindergartens and schools.





6. Ivan Ivanov	1 le sus aliaible Auglieurt au deuthe sus	On questions №1 and 2: According to the
08.06.2020	1. Is an eligible Applicant under the measure an organization, a registered legal entity, in the	Call for proposals, eligible Applicants must
	Commercial Register as an "Association" for	meet the following requirements:
	private benefit?	- is a public or private organization or non-
		commercial organization which is
		established as a legal entity in the Republic
	2. The main economic activity of the association	of Bulgaria;
	by NACE code is "Non-profit activity", respectively, does this correspond to the first	- its main activity is in the education
	question in any way and does it mean that the	sector, as defined in the Pre-school and
	association is an eligible Applicant?	School Education Act.
		As per item 8 Expected Results of the Call,
		eligible Applicants are kindergartens and
		schools.
		36776673.
	3. The activity of the association is in the field of	
	European projects, the Erasmus + programme,	3. In order to ensure equal treatment of
	the work with young people, including those	Applicants, the Programme operator shall
	coming from the field of school institutions.	not give prior opinions on the compliance
	Collecting, maintaining and disseminating information on existing opportunities and	of an application or an Applicant with the
	prospects for young people to develop their skills	eligibility requirements.
	and qualifications in an EU area; Assistance in	
	organizing meetings aimed at raising the	
	awareness and interest of young people in EU	
	programmes directly affecting them; Sending	
	young people to participate in various EU	
	projects; Preparation of projects related to the	

education and training of young people in the EU;





		Maintaining cooperative relationships with educational institutions; Establishing and maintaining international contacts, attracting prominent foreign experts in the implementation of projects. Organizing exchanges of young people in order to increase their information capacity. Does all this classify the association as an eligible	
17.	Ilko Yordanov 08.06.2020	1. In item 9. Eligible Applicants/Project promoters general features, which determine the eligibility of Applicants / Project promoters are given: "any entity, whether public or private and noncommercial organisation established as a legal entity in the Republic of Bulgaria whose main activity is in the education sector, as defined in the Pre-school and School Education Act". Could you define the term "education sector". In the Pre-school and School Education Act the term "non-commercial organization" is not used. Would you give examples of non-commercial organizations that would be considered eligible Applicants / Project promoters.	On questions №1 and 2: According to the Call for proposals, eligible Applicants must meet the following requirements: - is a public or private organization or noncommercial organization which is established as a legal entity in the Republic of Bulgaria; - its main activity is in the education sector, as defined in the Pre-school and School Education Act. As per item 8 Expected Results of the Call, eligible Applicants are kindergartens and schools.
		2. In answer №2 of the "Questions and Answers" section an answer to a question asked by Savremennost Foundationon 10.04.2020 was given, according to which: "As per item 8 Expected Results of the Call, eligible Applicants are kindergartens and schools". The same text	



appears in a response to the question of Mr. Todor Stoyanov, asked on 04.05.2020. This leaves the impression that NGOs are not eligible Applicants. Please clarify whether the quoted text means that ONLY kindergartens and schools are eligible Applicants. Aren't support centres for personal development or the boards eligible Applicants, if the latter are registered as NGOs, if their main activity is in the education field?

- 3. On page 9, an indicator is marked: "Number of schools providing awareness raising and education activities.". Please clarify whether this indicator does not include other educational institutions kindergartens and support centres for personal development.
- 4. The issue of the table for technical and financial evaluation of project proposals in the Call for proposals is similar. The table on pages 54-55 under item 6 provides for the award of points ONLY for schools. Moreover, in case of non-fulfillment of any of the criteria under item 6 of the table, the Selection committee proposes the project proposal for rejection. Does this mean that, for example, in the case of a project with a leading organization a kindergarten, in order not to be disqualified under item 6, it must also conduct campaigns in schools and if they are conducted not in the appropriate number of

3. As per item 8 Expected Results of the Call, eligible Applicants are kindergartens and schools.

4. In the case of an Applicant a kindergarten, the same may conduct educational programs in accordance with Ordinance №13 from September 21st 2016, as the number of campaigns is similar to those described for schools.





		schools but in kindergartens or in support centres for personal development, the project will be proposed for rejection? 5. In general, how should the term "educational institutions (schools)" used 8 times in the Call for	5. The term educational institutions (schools) includes not only schools but also
		Proposals be interpreted, as including other educational institutions or referring ONLY to schools?	kindergartens.
18.	Maria Burulyanova 09.06.2020	In connection with the open procedure "Small Grant Scheme Circular Economy" could you explain the development of an educational campaign programme indicator, what should be implied, what does it include, are there mandatory details that should be included in the program, as it does not appear in the official list of indicators under the programme?	In the Application Guidelines, there is no indicator for the development of an educational campaign programme. The indicators under the current Small Grant Scheme are given in item 8 Expected results of the Application Guidelines. The developed programmes for educational campaigns should meet the requirements set in Regulation No 13 of 21.09.2016 on the civil, health, environmental and intercultural education, issued by the Minister of Education and Science.
19.	NEO Bulgaria Association 11.06.2020	1. Are non-governmental organizations in private benefit eligible to participate in the Programme as a lead partner? In this case, our field of activity, according to the Statute, is ecology and education.	1. According to the Call for proposals, eligible Applicants must meet the following requirements: - is a public or private organization or noncommercial organization which is established as a legal entity in the Republic of Bulgaria;





		- its main activity is in the education sector, as defined in the Pre-school and School Education Act. As per item 8 Expected Results of the Call, eligible Applicants are kindergartens and schools.
	2. Are we eligible to participate in the Programme if the lead partner is a high school and we are a second partner?	2. Each eligible Applicant can have as a partner public or private entities, commercial or non-commercial, as well as non-governmental organisations established as a legal person either in the Republic of Bulgaria or the Donor States, other Beneficiary states, or a country outside the European Economic Area that has a common border with the Republic of Bulgaria, or any international organisation or body or agency thereof, actively involved in, and effectively contributing to the implementation of the project, and effectively contribute to it, as stated in item 10 of this Call under this Small Grant Scheme. You should keep in mind that a final opinion on the eligibility of an Applicant / Partner will be taken by the Selection Committee, which will have all the





			information on the project proposal.
20.	Anelia Fernandez 11.06.2020	Is it permissible for two private schools whose owners are related parties to apply in partnership?	This Call for proposals does not place a limit on the link between an Applicant and a project partner, provided that the maximum amount of de minimis aid (the BGN equivalent of EUR 200 00), which a "single undertaking", within the meaning of Art. 2 (2) of Regulation (EU) No. 1407/2013, may receive for a period of three budget years, is not exceeded.
21.	Nevena Dobreva 18.06.2020	Hello! I would like to ask two questions: 1/ In the evaluation criteria III Relevance and justification for obtaining the maximum number of points it is written: The applicant has provided for at least 6 (six) different awareness rising campaigns and has developed at least 6 (six) different educational programmes on circular economy and recycling in at least 6 different schools. Should these six different schools be partners of the Applicant at the application stage (or should they simply be listed)?	1. The project proposal must establish the commitment of each of the schools involved.





		2 / Please clarify whether we need to develop "educational programmes for educational campaigns" or educational programmes in the sense of school programmes. Neither the Pre-school and School Education Act, nor Ordinance 13/2016 of the Ministry of Education and Science gives a definition or mentions an "educational programme". Thank you for your time!	2. Educational programmes within the meaning and the context of Ordinance № 13 of 21.09.2016 of the Ministry of Education and Science are meant.
22.	Aksakovo Municipality Neli Petrova 19.06.2020	Hello! Our question is about the eligibility as Applicants of the Support Centres for Personal Development SCPD. According to Article 2, paragraph 3 of the Pre-school and School Education Act, they are institutions in the system of preschool and school education. SCPDs are financed from the municipal budgets, but have a separate Bulstat. Are SCPDs eligible Applicants under this procedure? Thank you!	Under the Call for proposals, an eligible Applicant must meet both requirements: - is a public or private organization or noncommercial organization which is established as a legal entity in the Republic of Bulgaria; - its main activity is in the education sector, as defined in the Pre-school and School Education Act. As per item 8 Expected Results of the Call, eligible Applicants are kindergartens and schools.





23. Ilko Yordanov 21.06. 2020

Hello, dear colleagues,

First of all, I would like to thank you for answering the 5 questions I asked in my letter of 8 June 2020. I would like to address the following three questions in this letter:

1. Why in some of the answers published in the document " Clarifications to questions submitted under "Small Grant Scheme Circular Economy" under Outcome 3: "Improved Use of Resources at the Municipal Level (Circular Economy)" under the Environment Protection and Climate Change Programme of EEA Financial Mechanism" the full text of my inquiry is not published, or at least the part in which it is clear that I am addressing the representatives of the body with due respect and a request for specific answers, I quote: "Hello, dear colleagues, Thank you in advance for your attention and specific answers to the following 5 questions." I consider that the non-publication of this appeal is a sign of unequal treatment of my inquiry with other inquiries in which these forms of appeal are included as part of the questions e.g. the statement of question 13 by Mrs. Vessela Nikolova from 19.05.2020.

It is in connection with my request for a SPECIFIC answer that I would like to ask the following two questions, for which I will be grateful for SPECIFIC answers:

2. In 9. Eligible Applicants / Project promoters

1. The Programme operator shall provide clarifications only in respect of the Call, which do not express an opinion on the quality of the project proposal and are obligatory for all applicants.

2. The eligible Applicants under this Call (schools and kindergartens) are regulated





general characteristics are given, which determine the eligibility of Applicants/ Project promoters as follows: "any entity, whether public or private and non-commercial organisation established as a legal entity in the Republic of Bulgaria whose main activity is in the education sector, as defined in the Pre-school and School Education Act."

The Pre-school and School Education Act does not use the term "non- commercial organization". Could you give SPECIFIC examples of non-commercial organizations that would be considered eligible Applicants/ Project promoters, which the operator declares to be eligible Applicants in item 9 of the Call.

. 3. How does the programme operator define the term "education sector" in item 9?

Thank you in advance for the SPECIFIC explanations you have made!

in the Pre-school and School Education Act.

The Programme operator shall not give prior opinions on the compliance of an application or an applicant with the eligibility requirements.

3. Item 9 describes the eligible Applicants. The term "education sector" is defined by reference to the Pre-school and School Education Act. Therefore, the Applicant's main activity must be in the field of pre-school or school education.