



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 beneficiaries under the scheme. If it is possible, your answer may be unequivocal without quoting the application conditions. Thanks in advance.	Under the Call for Submission of Project Proposal, an eligible Applicant must meet both requirements: - is any entity, whether 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. 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 submission of project proposal, an eligible Applicant must meet both requirements: - is any entity, whether public or private organization or non-commercial organization which is established as a legal entity in the Republic of Bulgaria;





3.	Anna Grozeva 10.04.2020 Madlen Georgieva	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?	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. Under the Call for submission of project proposal, an eligible Applicant must meet both requirements: - is any entity, whether 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. 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.	13.04.2020	in Mladost region. We have 3 preparatory	Education Act, kindergartens are
4.	Madlen Georgieva	Hello, I represent 75 "Sarchitse" Kindergarten	According to the Preschool and School





		Application Guidelines whether kindergartens are eligible beneficiaries of BGENVIRONMENT-3.001 - Small Grant Scheme Circular Economy.	
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?	Under the Call for submission of project proposal, an eligible Applicant must meet both requirements: - is any entity, whether 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. 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 21.04.2020	My question is in connection to the selection of potential applicants: the organization I represent is a legal entity established to the National Agency Vocational Education and	In the Call for Submission of Project SMALL GRANT SCHEME No. 3 "Small Grant Scheme Circular Economy" under Outcome 3: "Improved Use of Resources at the





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) under this procedure?

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 any entity, whether 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.
7.	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 directly the school?	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 invitation does not restrict 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 any entity, whether 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 pre-school 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 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 any entity, whether 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 pre-school 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 Nº 3.
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	Eligible partners are any public or private entities, commercial or non-commercial, as well as non-governmental organisations





	into the territory respectively, or should it be	established as a legal person either in the
	directly the school?	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 invitation does not restrict the
		partners.