



Clarifications to questions submitted under Open Call № 2 “Circular Economy and Resource Efficiency” 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	Date of receipt	QUESTION	ANSWER	Date of reply
1.	Savremenno st Foundation	13 th May 2020	<i>A municipality has a relatively small amount up to the upper limit of de minimis. Can it increase its financial opportunities for application under Call №2 "Circular Economy" under Outcome 3: "Improved use of resources at the municipal level (circular economy)" through the use of state aid?</i>	<i>The Call provides only for de minimis aid regime. The Call is not in the state aid regime.</i>	15 th May 2020
2.	Kostadin Yordanov	28 th May 2020	<i>1. Please provide a clear opinion on whether the funding under this Call of a project with a Project promoter "municipality" falls under the "minimum</i>	<i>1. Applicant organizations should distinguish between state and de minimis aid within the meaning of item 7 and item 15 of the Additional Provisions of the State Aid Act.</i>	4 th June 2020



			<p><i>aid" regime?</i></p> <p><i>My question arises from the fact that in one place in the Application Guidelines it is mentioned that: "the assistance under the procedure at the level of the Project promoter-municipality does not constitute state aid when it is related to the exercise of the municipal authority to manage household waste, generated on its territory. In cases where the grant is granted to municipalities to fulfill their powers arising from the Waste Management Act, the provision of funds constitutes a transfer between the budgets of executive authorities."</i></p> <p><i>On the other hand, again in the Application Guidelines it is written that: "Funding activities envisaged under the procedure are of an economic nature and there is an existing market for them. Therefore, all costs to the Applicant and / or his partner related to the implementation of the project proposal activities are of an economic nature and will be considered as de minimis aid."</i></p>	<p><i>According to item 19. "State aid and de minimis" from the Application Guidelines "the municipality will be considered as an enterprise carrying out economic activities only for the project activities and as such, the minimum aid rules described below will find application".</i></p> <p><i>2. No. The Call does not limit these activities to household waste only. The activities related to the identification and implementation of municipal separate collection and recycling schemes refer to waste for which national targets have been introduced.</i></p>	
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			<p>2. Do the activities related to the identification and implementation of schemes by the municipality for recycling and separate waste collection on its territory, only apply to household waste?</p> <p>3. Do the activities related to the identification and implementation of schemes by the municipality for recycling and separate waste collection on its territory, only apply to waste generated by households? Is it permissible, for example, to implement such schemes with regard to biodegradable waste generated from municipal public places (parks, riverbeds, etc.)?</p> <p>4. Is it permissible to purchase specialized equipment for collection and</p>	<p>3. No. The Call refers to waste for which national targets have been introduced. The Programme operator will not give preliminary opinions on the compliance of an application or an Applicant with the application conditions.</p> <p>4. The Call is implemented under the Regulation on de minimis aid, as according to the provisions of art. 3, para. 2, the de minimis aid shall not be used for the acquisition of road freight</p>	
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			<p><i>transportation of separately collected waste in connection with the implementation of project activities?</i></p> <p><i>5. Is it permissible to carry out construction and installation works (for example, a site to place containers for separate collection) in connection with the implementation of project activities?</i></p>	<p><i>transport vehicles, including for waste transportation.</i></p> <p><i>5. The Call does not set restrictions on the implementation of construction and installation activities in the projects. Applicants should familiarize themselves with the specific requirements related to construction and installation activities described in item 16, item 20 and item 21 of this Call.</i></p>	
3.	Valentina Koleva	1 st June 2020	<p><i>When considering the Application Guidelines for Open Call №2 "Circular Economy and Resource Efficiency", a question arose.</i></p> <p><i>One of the expected results of the Programme is "Implemented systems and equipment for recycling/ separate collection of waste".</i></p> <p><i>The indicator that measures the achievement of this objective is "Number of municipal recycling/ separate collection schemes implemented".</i></p> <p><i>Accordingly, in the evaluation criteria the</i></p>	<p><i>Subjects of evaluation are different schemes for recycling / separate waste collection on the territory of one municipality.</i></p>	2 nd June 2020



				<i>implementation of 4 recycling schemes is with the highest score. In this regard, the question is: Is it about implementing four different types of recycling / separate waste collection systems or multiplying one recycling / separate waste collection system at four points?</i>		
4.	Samokov Municipality	05 th June 2020		<p><i>1. Item 7 of the Application Guidelines "Demarcation with similar projects / Programmes" states that "The eligible activities under the Call complement the envisaged measures and activities in the National Waste Management Plan in Bulgaria for the period 2014-2020, in particular activities 4.12 and 4.16 of the Action Plan of the National Waste Generation Prevention Programme and activity (measure) 4 of the Action Plan of the Programme for improving the capacity of the waste management institutions</i></p> <p><i>The activities envisaged by the Applicants should be clearly distinguished from the envisaged measures and activities in the National Waste Management Plan for Bulgaria for the period 2014-2020, which will be implemented through other sources of funding."</i></p>	<p><i>1. Item 7 of the Application Guidelines "Demarcation with similar projects / Programmes" clarifies how this Programme relates to other existing Programmes, and in particular how it complements them: "eligible activities under the Call complement the envisaged measures and activities in the National Waste Management Plan in Bulgaria for the period 2014-2020, in particular activities 4.12 and 4.16 of the Action Plan of the National Waste Generation Prevention Programme and activity (measure) 4 of the Action Plan of the Programme for improving the capacity of the waste management institutions."</i></p> <p><i>Then the demarcation with the National Waste Management Plan for Bulgaria for the period 2014-2020 and the procedure "Implementation of</i></p>	11 th June 2020



		<p><i>Please specify whether the activities envisaged by the Applicants should be clearly distinguished from the measures and activities envisaged <u>only</u> in item 4.12 and 4.16 of the Action Plan of the National Waste Generation Prevention Programme and <u>activity (measure) 4</u> of the Action Plan of the Programme for improving the capacity of the waste management institutions or should be clearly distinguished from any measures and activities envisaged in the National Waste Management Plan for the period 2014-2020.</i></p> <p><i>2. Considering the fact that “. In order to avoid the risk of double funding, there should also be a clear distinction from projects funded under the procedure</i></p>	<p><i>demonstration projects in the field of waste management" under priority axis 2 "Waste" of the Operational Programme "Environment" 2014-2020 is clearly described, where eligible beneficiaries are also municipalities, namely: “The activities envisaged by the Applicants should be clearly distinguished from the envisaged measures and activities in the National Waste Management Plan for Bulgaria for the period 2014-2020, which will be implemented through other sources of funding. In order to avoid the risk of double funding, there should also be a clear distinction from projects funded under the procedure "Implementation of demonstration projects in the field of waste management" under priority axis 2 "Waste" of the Operational Programme "Environment" 2014-2020, where municipalities are also eligible beneficiaries.”</i></p> <p><i>2. Information about the procedure is available in EUMIS 2020.</i></p>	
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		<p><i>"Implementation of demonstration projects in the field of waste management" under priority axis 2 "Waste" of the Operational Programme "Environment" 2014-2020, where municipalities are also eligible beneficiaries", please specify where information on the projects funded under this procedure can be found.</i></p> <p><i>3. Item 16 of the Application Guidelines "Eligible costs", and in particular "Eligible direct costs" on page 21, states that this category also includes "Project audit costs". On what basis are the project audit costs determined, is their amount defined?</i></p> <p><i>4. Is the provision of a consulting service for the preparation of the project proposal an eligible cost?</i></p>	<p><i>3. The audit refers to the project management activities as an activity necessary for the successful implementation of the project. Project audit costs should be included in project management costs as part of direct project costs. According to item 16 of the Application Guidelines "Eligible costs", and in particular "Eligible direct costs", management costs must not exceed 10% of the eligible direct costs of the project.</i></p>	
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			<p>5. Please specify whether these are a total of 4 "recycling schemes" and / or schemes for "segregated waste recycling" implemented and whether for each scheme for "segregated waste recycling" in the project proposal a "recycling scheme" should also be provided for.</p> <p>6. Please specify whether these "4 recycling / segregated waste recycling schemes implemented" should be implemented on the territory of each partner or the requirement is a total of 4 for the whole project proposal.</p> <p>7. If a donor project partner is included in the project proposal, should its budget be provided from the budget of the project proposal (EUR 200 000 - 400 000)?</p>	<p>4. No. The provision of a consulting service for the preparation of a project proposal is not among the eligible costs listed under this Call.</p> <p>5. In order to receive the maximum number of points, the applicant organizations should implement a minimum of 4 schemes for separate waste collection and subsequent recycling.</p> <p>6. In order to achieve the indicators under the Call, the schemes implemented for the whole project proposal will be considered.</p> <p>7. According to item 10 "Eligible partners" of this Call, the Application form must contain a detailed description</p>	
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				<p><i>of the project and budget, as well as the role of the partners and the budget for the implementation of the partners' activities.</i></p> <p><i>When preparing the budget, Applicants should familiarize themselves with the document „Guidelines for Budget Completion under the Environment Protection and Climate Change Programme“published in the Documents for Information package of this Call.</i></p>	
5.	Kostadin Yordanov	11th June 2020	<p><i>1. Is it permissible to implement a municipal scheme for recycling of construction waste within the project?</i></p> <p><i>2. Is it possible to implement the scheme at the level of several Bulgarian partner municipalities -in the sense of creating a site to serve the three partner municipalities from Bulgaria (adjacent to each other in terms of territory) or can one site be established on the territory of each municipality?</i></p>	<p><i>1. Under this Call, recycling / separate collection schemes for the subsequent recycling of the relevant types of waste for which national targets have been introduced are eligible.</i></p> <p><i>2. This Call does not impose restrictions on the local territorial distribution and implementation of project proposals.</i></p> <p><i>As stated in item 5 “Territory of implementation of the project” activities should be carried out on the territory of the Republic of Bulgaria as well as on the territory of the Donor States</i></p>	15 th June 2020



				<p><i>(Iceland, the Principality of Liechtenstein and the Kingdom of Norway), in the case of a partnership with an organization from one of these countries(s) under the project.</i></p>	
			<p><i>3. Accordingly, is it permissible to purchase specialized equipment for construction waste recycling?</i></p>	<p><i>3. Equipment costs are eligible under this Call, in strict compliance with the requirements set out in item 16 "Eligible costs" and in particular "Eligible direct costs" (page 18 of this Call). You should keep in mind that a final opinion on the eligibility of equipment will be taken by the Selection Committee, which will have all the information on the project proposal.</i></p>	
6.	Municipality of Vratsa Kalina Georgieva	11 th June 2020	<p><i>The recycling of municipal waste is a key measure in the implementation of European and national policies for the so-called circular economy and the efficient use of waste as a resource. The Municipality of Vratsa is 100% with organized collection of household waste. Since 2012, the municipality of Vratsa has a facility for pre-treatment of mixed household waste before disposal by</i></p>	<p><i>It is permissible for the schemes to provide for separate collection of groups of waste for which national targets have been introduced.</i></p>	15 th June 2020



		<p><i>separating the useful components. The installation is located at the regional landfill for non-hazardous waste, as part of the separated municipal waste is handed over for recycling.</i></p> <p><i>The principle and organization of collection and transportation of the mixed household stream, which is separated, presupposes a higher percentage of contaminated recyclable waste. This significantly reduces the percentage of separated recyclable waste.</i></p> <p><i>The review of the data of the morphological composition of the waste for the municipality of Vratsa shows that paper, glass, plastic and metals represent about 1/3 of the composition of the mixed household waste. The analyses of the municipal waste show that the quantities of separately collected waste, for which there is a report in the municipality, are still not enough for the municipality to achieve the annual goals for recycling of the municipal waste, i.e. recycling of at least 25%, etc. of the total waste from paper, cardboard, plastics, metals and glass. In this regard, the municipality will have to make additional</i></p>		
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		<p><i>efforts to achieve the goals set.</i></p> <p><i>The collection of the "dry" mass presupposes the preservation of the quality of the resources and during transportation, reducing the possibility of additional pollution from organic matter and other waste.</i></p> <p><i>One of the measures that the Municipality of Vratsa intends to implement is the separate collection of recyclable waste from the original source, by placing containers for separate collection of the recyclable mass from the mixed household waste and recyclable waste from commercial, administrative, production and economic sites. They will again fall for separation in the Regional landfill site for non-hazardous waste installation and divided by types.</i></p> <p><i>Our goals are:</i></p> <ul style="list-style-type: none"> <i>- Improving the functioning of the system;</i> <i>- Achieving a higher percentage of the objectives under Art. 31, para. 1;</i> <i>- Facilitating the implementation of the requirements for separate collection of recyclable waste;</i> <i>- Increasing the possibilities for</i> 		
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		<p><i>monitoring the quantities of waste by types;</i></p> <ul style="list-style-type: none"> <i>- Larger share of separated recyclable waste and its transfer for reuse;</i> <i>- Less deposited waste.</i> <p><i>In connection with the above-mentioned, please clarify whether the organized system for separate collection of recyclable waste from the general household flow should be limited to waste from group 20 or the same can be combined with waste from group 15 from the same contractors?</i></p> <p><i>2. On March 6, 2014, the Separation Installation at the Regional landfill site for non-hazardous waste p.i. 12259.788.1, Shumaka locality, land of the town of Vratsa, came into operation. The same has an issued Permit for use № CT-05-611 / 01.04.2013 from the Directorate for National Construction Control / NCSD /.</i></p> <p><i>Technical parameters: built-up area of the building - 1 921.05 m²; built-up area of a shed for temporary storage of baled waste - 218.46 m².</i></p> <p><i>Annually, about 22,000 tons of waste</i></p>		
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		<p><i>from Vratsa Municipality and Mezdra Municipality enter for separation.</i></p> <p><i>The economic analysis for the period from 2014 to 2019 shows that the operation of the installation does not meet our expectations and the separation of the recyclable mass is 6.5-7% of the total household flow.</i></p> <p><i>Currently, the separation plant is depreciated and often breaks down.</i></p> <p><i>Upon inspection by specialists, Vratsa Municipality intends to improve the operation of the installation by replacing existing parts and putting into effect additional elements for the implementation of the technological process in order to increase the efficiency.</i></p> <p><i>By allocating more suitable resources, we achieve sustainability in the process and actively contribute to their useful use.</i></p> <p><i>We are increasing the share of waste that can be recycled, compared to those that are incinerated or disposed of.</i></p> <p><i>In connection with the above, please clarify whether activities for overhaul of the separation plant at the Regional landfill site for non-hazardous waste are eligible, for the implementation of which</i></p>		
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			<i>it is necessary to prepare an investment project?</i>		
7.	Kostadin Yordanov	17 th June 2020	<p><i>Hello,</i></p> <p><i>In evaluation indicator №7 "Organizational structure for the implementation of the project." the highest number of points is awarded in case "The project will be implemented entirely with own human resources".</i></p> <p><i>Please explain in particular what this means?</i></p> <p><i>For example:</i></p> <ul style="list-style-type: none"> <i>- Does the above-mentioned affect the requirement for only project employees to be included in the Project Management Team? Or of the Applicant and the Partner?</i> <i>- Given that the Project Management Team includes experts external to the Applicant / Partner, the project cannot receive the maximum number of points</i> 	<i>The criterion aims to assess the presence or absence of own (for the Project promoter and the Partner / s) human resources for management and implementation both during and after the completion of the project.</i>	18 th June 2020



			<p><i>on this indicator?</i></p> <p><i>Thank you!</i></p>		
8.	Kostadin Yordanov	18th June 2020	<p><i>Hello,</i></p> <p><i>Please clarify the completion of the Application Form in the EUMIS regarding the location of the project, provided that the project is implemented in partnership between 2 or more municipalities from Bulgaria and a partner from Norway and on the territory of all partners it is planned to implement activities on the project?</i></p> <p><i>As in section 1 " Main data" section "Place of implementation of the project", when filling in the fields "Municipality" or "Settlement", we could fill in data only for the partners - municipalities from Bulgaria.</i></p> <p><i>When filling in the data in the "Country" field, can we fill in only Bulgaria and Norway, respectively, as a location?</i></p>	<p><i>The EUMIS functionality allows more than one location to be entered for a project.</i></p> <p><i>"Main data" section, "Location" (Location of the project) field is conditionally structured on 2 levels. Applicants should choose:</i></p> <ol style="list-style-type: none"> <i>1. Level 1 - Type of location - Country / Protected area / NUTS level 1 / NUTS level 2 / District / Municipality / Settlement.</i> <i>2. Level 2 - From the drop-down menu the specific location according to the type of location already set in Level 1 should be selected.</i> <i>3. Below the drop-down menu there is an "Add" button. Through it, Applicants have the opportunity to add additional fields / drop-down menu to choose from.</i> 	19 th June 2020



			<i>Please clarify which option is the most correct to use.</i>		
9.	Iliana Georgieva	2 nd July 2020	<i>In connection with the announced Open Call № 2 BGENVIRONMENT-3.002 - "Circular Economy and Resource Efficiency" for the call for project proposals, please clarify whether a municipal enterprise, 100% owned by a municipality is an eligible partner of the same municipality.</i>	<i>The eligible partners under this Call are described in item 10. In addition, in order to be eligible, the partner must have independent legal personality.</i>	6 th July 2020
10.	Milena Stefanova	6 th July 2020	<p><i>We are sending questions on Open Call №2 "Circular Economy", EEA FM 2014-2021:</i></p> <p><i>1. Can the schemes include only separate waste collection for subsequent recycling or must they include, in addition to this activity, the realization of the recycling itself on the territory of the municipality?</i></p> <p><i>2. Will the scheme for separating paper, plastic, metal and glass from mixed household waste be interpreted as one scheme or realization of 4 schemes simultaneously?</i></p>	<p><i>1. Schemes should include recycling / separate collection for the subsequent recycling of the relevant types of waste for which national targets have been introduced.</i></p> <p><i>2. Schemes already in place are not eligible for funding under this Call.</i></p>	10 th July 2020



11.	Radoslava Kuzmanova	14 th July 2020	<p><i>DEAR LADIES AND GENTLEMEN,</i></p> <p><i>In connection with the published Call for project proposals under open Call № 2 “Circular Economy and Resource Efficiency” under Outcome 3: “Improved Use of Resources at the Municipal Level (Circular Economy)” under the Environment Protection and Climate Change Programme, please clarify the following issues:</i></p> <p><i>Question 1:</i> <i>The project proposal, which is being prepared by our municipality, envisages the establishment of a site for disposal of large-size waste. The demarcation of the site will be carried out by purchasing equipment (containers), strengthening the existing pavements (by laying concrete and, if necessary, bitumen) and building a protective fence. In this regard, please clarify whether the activities related to pavement reinforcement and installation of a protective fence are eligible for funding under this Call, insofar as they are necessary for the implementation of the project?</i></p>	<p><i>On question 1: It is not clear from the project idea presented in this way whether it contains activities eligible under this Call. You should keep in mind that a final opinion on the eligibility of certain activities will be taken by the Selection Committee, which will have all the information on the project proposal.</i></p>	16 th July 2020
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		<p><i>Question 2: According to the information in open Call No 2 "Circular Economy and Resource Efficiency" under Outcome 3: "Improved Use of Resources at the Municipal Level (Circular Economy)" under the Environment Protection and Climate Change Programme, 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." In this regard, given that the documentation indicates the grant rate only for budgetary organizations, please clarify the grant rate when part of the project costs will be borne by a private partner, commercial or non-commercial, , as well as for non-governmental</i></p>	<p><i>On question 2: According to the document "General Conditions for Grants under Programme" Environmental Protection and Climate Change" of the European Economic Area Financial Mechanism 2014-2021" (published in this Call in the Documents for information package), the maximum grant amount for projects approved for funding is as follows: Article 16. The maximum grant amount for the projects approved for funding is: 1. 100% of the total eligible costs of the project for all public organizations; 2. 90% of the total eligible costs of the project for NGOs and all other organizations.</i></p>	
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			<i>organizations established as a legal entity in the Republic of Bulgaria?</i>		
12.	Samokov Municipality	14 th July 2020	<p><i>DEAR LADIES AND GENTLEMEN,</i></p> <p><i>Please clarify the following issues in relation to the Application Guidelines under Procedure BGENVIRONMENT-3.002 - Open Call № 2 "Circular Economy and Resource Efficiency":</i></p> <p>1. Question 1: <i>Item 23.1 of the Application Guidelines "Application Form" states that "Applicant organizations should respect the restrictions of the symbols set in each field."</i></p> <p>Please confirm that in cases where the information exceeds the allowable number of characters in the EUMIS Form, it can be provided as an annex to the project proposal.</p> <p>2. Question 2: <i>According to the criteria for technical and financial evaluation</i></p>	<p><i>1. Applicant organizations shall comply with the allowable number of symbols in the application form.</i></p> <p><i>2. According to item 8 Expected results from the Application Guidelines the expected result is Improved resource management at the municipal level</i></p>	16 th July 2020



		<p><i>presented, one of the parameters for obtaining the maximum number of points of a project proposal is “The activities included in the project proposal guarantee more than a 10% share of recycled waste...”.</i></p> <p><i>Please specify whether this 10% recycled waste refers to the total project proposal or should be 10% for each partner municipality?</i></p> <p><i>3. According to the criteria for technical and financial evaluation presented, one of the parameters for obtaining the maximum number of points of a project proposal is the availability of: 4 recycling / segregated waste recycling schemes implemented”.</i></p> <p><i>Question 3:</i> <i>Please specify whether if in the city, which is a municipal centre, there is already a recycling / segregated waste collection scheme in place, the realization of such is admissible in any of the other settlements in the Municipality, where there is no scheme for separate collection / recycling of this type of</i></p>	<p><i>(circular economy)- + 10% share of recycled waste for each municipality.</i></p> <p><i>3. The Call does not place restrictions on the settlements where the recycling / separate collection schemes are to be implemented.</i></p> <p><i>3. Applicant organizations should implement new recycling / separate collection schemes for the subsequent recycling of the relevant types of waste for which national targets have been introduced. You should keep in mind that a final opinion on the evaluation of a project proposal will be taken by the Selection Committee, which will have all</i></p>	
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		<p>waste?</p> <p>Question 4: Please specify whether if the same separate collection / recycling scheme is implemented on the territory of 2 partner municipalities, 2 separate schemes will be considered?</p> <p>Question 5: Please specify whether if the project proposal provides for the implementation of 2 different schemes for separate collection of the same type of waste, which end with one scheme for its subsequent recycling, they will be considered as 2 implemented schemes?</p> <p>Question 6: Please specify whether it is permissible after pre-treatment to transfer the waste to a company (free of charge for both parties) holding a permit under Art. 35 of the Waste Management Act for their subsequent recycling and is this considered as an implemented recycling scheme?</p> <p>Question 7: Please specify whether the</p>	<p>the information on the project proposal.</p> <p>4. You should keep in mind that a final opinion on the evaluation of a project proposal will be taken by the Selection Committee, which will have all the information on the project proposal.</p> <p>5. You should keep in mind that a final opinion on the eligibility of certain activities and the evaluation of a project proposal will be taken by the Selection Committee, which will have all the information on the project proposal.</p> <p>6. The Programme operator will not provide answers for specific project proposals, according to the application conditions.</p> <p>7. The schemes for separate collection /</p>	
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			<i>schemes for separate collection / recycling are allowed to be implemented only on the territory of separate institutions (e.g. schools, community centres, etc.) in the Municipality and in this case will the target share of recycled waste of 10% be only for these institutions or for the Municipality as a whole?</i>	<i>recycling of waste should be implemented on the territory of the municipality as a whole. The applicant organization should be familiar with national waste management legislation and in particular the consideration of recycling targets.</i>	
13.	Milena Stefanova	15 th July 2020	<i>We are sending questions on Open Call No2 "Circular Economy", EEA FM 2014-2021: In the case of existing separate solid household waste collection schemes that do not work effectively (e.g. there are containers but people do not use them), will improving the operation of this scheme be considered an eligible activity? In that case, is it permissible to make a new scheme or to improve the old one so that it is actually working?</i>	<i>Under the Call, new recycling / separate waste collection schemes, for which national targets have been introduced, are eligible. You should keep in mind that a final opinion on the eligibility of the activities will be taken by the Selection Committee, which will have all the information on the project proposal.</i>	16 th July 2020
14.	Ralitsa Marinova Institute for entrepreneurship, sustainable development	16 th July 2020	<i>Dear ladies and gentlemen, I have the following inquiry under Open Call No2 "Circular Economy and Resource Efficiency", Environmental Protection and Climate Change Programme, EEA FM 2014-2021:</i>	<i>According to this Call, applicants must meet the following eligibility criteria: 18. The information, provided in the Declaration of De-minimis and State Aid (Annex D2) on the de minimis aid, received in the previous two years and the current budget year, indicates that</i>	20 th July 2020



	<p>and innovation</p>		<p><i>A municipality has received a de minimis aid for the last 3 years (2018, 2019 and 2020) amounting to exactly EUR 200,000, but wants to participate in the Call with a project starting in January 2021.</i></p> <p><i>Will their proposal be admitted to the TFE, given that after 01.01.2021 they will not have any other de minimis aid received, in addition to the project under this Call and the de minimis threshold of EUR 200 000 for 3 consecutive years will not be exceeded?</i></p>	<p><i>the applicant/partner(s) is/are entitled to receive de minimis aid that will not exceed the eligible maximum amount, according to Art. 3 of Regulation 1407/2013.</i></p> <p><i>19. The Declaration of De-minimis and State Aid (Annex D2) on the de minimis aid, received in the previous two years and the current budget year, indicates that the applicant/partner(s) and the undertakings with which they form a "single undertaking"² within the meaning of Art. 2, para. 2 of Regulation (EU) No 1407/2013 have received minimum grants for the last three budget years which do not exceed the BGN equivalent of EUR 200 000.</i></p> <p><i>In case the Applicant/Partner(s) and the undertakings with which they form a "single undertaking" within the meaning of Art. 2, para. 2 of Regulation (EU) No 1407/2013 has/have already received the maximum amount of eligible minimum aid, the project proposal is not eligible for TFE.</i></p> <p><i>In case the Applicant/Partner(s) and the undertakings with which they form a</i></p>	
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				<i>"single undertaking" within the meaning of Art. 2, para. 2 of Regulation (EU) No 1407/2013 has/have received amount of de minimis aid, which, together with the budget, foreseen under the project proposal, will exceed EUR 200,000 over a period of three budgetary years, the proposal shall not be admitted to TFE and rejected.</i>	
15.	Radoslava Kuzmanova	16 th July 2020	<p><i>Is it permissible to create a unit for project management through external assignment of management activities, according to the Public Procurement Act and the bylaws on its implementation?</i></p> <p><i>In the event of a positive answer to Question 1, is it permissible for travel expenses, in order to exchange experience with the partners from the Donor states, to be spent on trips of representatives of the Project promoter and municipal experts who are not in the unit for project management?</i></p>	<i>The project management team should be proposed in the project proposal, in accordance with the requirements of the Call. It should be described in section 9 "Team" of the Application Form, as well as Document D11 "Profile of experts" for the experts included in section 9 "Team" of the Application Form and CVs of the experts to be attached to the project proposal.</i>	20 th July 2020
16.	Milena Stefanova	30 th July 2020	<p><i>We are sending questions on Open Call No2 "Circular Economy", EEA FM 2014-2021:</i></p> <p><i>On page 35 of the Call it is written that .verified Statement of revenue and</i></p>	<i>The documents described in item 23.18 of the Call are submitted by Applicants and Partner / s regardless of the type of organization.</i>	6 th August 2020



			<p><i>expenditures and Balance Sheets for the past three financial years are presented. Please specify which organizations submit Statement of revenue and expenditures and Balance Sheets, according to the way they are included (Applicant / Partner) and the type of organization (public, private, non-governmental).</i></p>		
17.	Boris Nikolov Belogradchik Municipality	31 st July 2020	<p><i>DEAR LADIES AND GENTLEMEN, please clarify the following:</i></p> <p><i>The Municipality of Belogradchik is preparing a project proposal, which envisages the introduction of schemes for separate collection and subsequent recovery of construction waste and biodegradable waste. The waste will be collected in different parts of the municipality and will be stored temporarily on a designated site, outside the territory of the settlement. The site for temporary waste disposal will be equipped with the necessary number and volume of containers for separate collection of construction and biodegradable waste. The containers will be transported. In order to secure the temporary site both against</i></p>	<p><i>Eligible activities, incl. for construction and installation works are described in item 11 of this Call, in particular, the schemes should be for groups of waste for which national targets have been introduced.</i></p> <p><i>You should keep in mind that a final opinion on the eligibility of the activities in any project proposal will be taken by the Selection Committee.</i></p>	6 th August 2020



		<p><i>environmental pollution and against the possibility of using the site for the disposal of mixed household waste, we envisage laying of flooring, delivery and installation of a protective fence and delivery and installation of a video surveillance system. In case we do not envisage the construction and installation works described above and deliveries for separation of the temporary site for storage of separately collected construction and biodegradable waste, there is a risk of environmental pollution and compromising the project objectives.</i></p> <p><i>In this regard, please clarify whether the costs related to the construction and installation works are eligible when they meet the eligibility criteria described in item 16 "Eligible costs" and when "they are supported by an invoice, a payment order and a document certifying the actual performance of a supply, service or construction-assembly activity".</i></p>		
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18.	Svetoslav Marchev	4 th August 2020	<p>Hello.</p> <p><i>The Municipality is considering applying with a project proposal under Open Call No 2 "Circular Economy and Resource Efficiency" under Outcome 3: "Improved Use of Resources at the Municipal Level (Circular Economy)".</i></p> <p><i>On page 25 second paragraph of the Call for Proposals, it is stated that according to the case law of the Court of Justice, the assistance under the procedure at the level of the Project promoter-municipality does not constitute state aid.</i></p> <p><i>Page 26 of the Call describes that all costs to the Applicant and / or his partner related to the implementation of the project proposal activities are of an economic nature and will be considered as de minimis aid.</i></p> <p><i>De minimis aid shall not exceed the BGN equivalent of EUR 200 000 (BGN 391 166) over a period of 3 (three) consecutive budget years (two previous plus current).</i></p> <p><i>At the same time, on page 59 of the Call -</i></p>	<p><i>The quoted text on page 25 is an integral part of the full text in item 19 of the Call.</i></p> <p><i>1. As indicated on page 26 of this Call – "Funding activities envisaged under the procedure are of an economic nature and there is an existing market for them. Therefore, all costs to the Applicant and / or his partner related to the implementation of the project proposal activities are of an economic nature and will be considered as de minimis aid."</i></p> <p><i>2. As described in criterion 18 on page 59 of the Call – "If the Applicant/Partner(s) has/have already received the maximum amount of eligible de minimis aid, the project proposal is not eligible for TFE. If the Applicant/Partner(s) has/have received amount of de minimis aid, which, together with the budget, foreseen under the project proposal, will exceed EUR 200,000 over a period of three budgetary years, the proposal shall not be admitted to TFE and rejected."</i></p> <p><i>This is also evident from what is described on page 27:" in a "de minimis aid" regime, the maximum amount of</i></p>	10 th August 2020
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		<p><i>point 18, right column of the eligibility criteria it is written that if the Applicant/Partner(s) has/have already received the maximum amount of eligible de minimis aid, the project proposal is not eligible for TFE. If the Applicant/Partner(s) has/have received amount of de minimis aid, which, together with the budget, foreseen under the project proposal, will exceed EUR 200,000 over a period of three budgetary years, the proposal shall not be admitted to TFE and rejected.</i></p> <p><i>In this regard, we have the following questions:</i></p> <ol style="list-style-type: none"> <i>1. Does the support under this procedure to Applicants-municipalities represent a de minimis aid?</i> <i>2. Given that the activities envisaged for financing are of an economic nature and will be considered as de minimis aid, Is it possible for a municipality to apply with a project worth EUR 350,000, given what is described in item 18 of the eligibility criteria?</i> 	<p><i>the aid under de minimis regime, for which the undertaking applies for, together with the other de minimis aid received by him and with all entities with which it forms a single undertaking, may not exceed the BGN equivalent of EUR 200,000 over a three-year budget period (two previous plus the current year)."</i></p>	
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19.	Svilengrad Municipality	4 th August 2020	<p><i>In connection with the application of the Municipality of Svilengrad under open call №2 "Circular Economy and Resource Efficiency" we have several questions:</i></p> <p><i>1. Please specify if the appendices to the application form - Declarations from D1-D14 must be filled in only in Bulgarian for a Bulgarian Applicant or partner, and respectively whether the declarations in English are only for foreign partners?</i></p> <p><i>2. In connection with the application "B1 Detailed budget template bilingual" we inform you that in the package of application documents in the presented Annex B1 the language selection function does not work.</i></p> <p><i>3. Regarding the determined grant / which is eligible up to the amount of the de minimis aid /, which is considered to be the de minimis aid received under the project - the funds for the main activity for the implementation of schemes for separate waste collection for subsequent recycling or the other eligible activities under the project: information and publicity, information campaigns, project management, good practices, activities to increase skills and competencies, etc.</i></p>	<p><i>On the first question: In accordance with criterion 5 of the administrative criteria and eligibility criteria (p. 42), the Application form, the budget and all the declarations must be submitted in English and Bulgarian.</i></p> <p><i>On the second question: The document Annex B1 Detailed budget template bilingual.xlsx allows to be filled in both in Bulgarian and in English. Before completing the Annex, applicants should read the instructions for completing the document (worksheet "Instruction" in the document itself). The choice of language is described in item 1.</i></p> <p><i>On the third question. All eligible activities are calculated under the De minimis aid regime.</i></p>	
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20.	Miroslav Yanchev Zlatograd Municipality	4 th August 2020	<p>1. According to the evaluation criteria: The project proposal must lead to the implementation of 4 schemes for recycling / separate waste collection for subsequent recycling. It is clear from the European Commission's (2015) study (Assessment of separate collection schemes in 28 capitals) that separate collection schemes:</p> <ul style="list-style-type: none"> - door-to-door separate collection – i.e. one stream of recyclable waste is disposed of in 1 container; - door-to-door co-mingled collection of recyclables - e.g. plastic + metal in one container; - bring system; - separate collection of biodegradable waste); - civic amenity sites. <p>A combination of ECONOMIC INSTRUMENTS is applied to MUNICIPAL WASTE, which are also summarized as SCHEMES in the Study:</p> <ul style="list-style-type: none"> - PAYT Scheme (Pay-As-You-Throw) ; - flat tax or municipal tax (e.g. municipal waste tax); - a combination of the two methods / schemes. 	<p>1.1. The activities related to the identification and implementation of municipal collection and recycling schemes by the municipality refer to waste for which national targets have been introduced.</p> <p>1.2. As stated in the previous reply, separate collection and recycling schemes should refer to waste for which national targets have been introduced.</p> <p>1.3. A scheme implemented on the territory of two or more municipalities can be considered as two or more separate schemes.</p> <p>You should keep in mind that a final opinion on the evaluation of a project proposal will be taken by the Selection Committee, which will have all the information on the project proposal.</p> <p>2. Waste for which there are national targets would be considered recycled if it is clearly demonstrated that it has been recycled in the framework of the project</p>	10 th August 2020
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		<p>An <i>EXTENDED PRODUCERS RESPONSIBILITY SCHEME</i> applies as a <i>TOOL FOR WORKING WITH BUSINESS</i>. Municipal waste and producer schemes are also covered by Directive 2008/98 / EC on waste.</p> <p>This Call and the Application Guidelines require the application of four implemented schemes in order to obtain the maximum number of points. At the same time, from the answers to the questions on the procedure so far it is clear that the schemes proposed with the project proposal should not have been implemented so far in the municipality. Given the development of the waste management sector in Bulgaria, I believe that there are no municipalities in which any of these schemes have never been implemented. In this regard, I have the following questions:</p> <p>1.1. Please clarify whether in the Call and the Application Guidelines you mean the separate collection schemes or a combination of the three types of schemes mentioned above?</p> <p>1.2. Is it possible to apply 4 (four)</p>	<p>implementation.</p> <p>You should keep in mind that a final opinion on the eligibility of the activities will be taken by the Selection Committee, which will have all the information on the project proposal.</p> <p>3. The indicator is linked to a programme objective and expected outcome "Improved use of resources at the municipal level (Circular Economy)"</p> <p>3.1. Given the nature of the indicator, the data will be collected on an annual basis for each municipality, according to the terms of Ordinance 1 / 04.06.2014 on the procedure and templates for providing information on waste activities and the procedure for keeping public registers (Promulgated SG No. 51 of June 20, 2014, amended SG No. 51 of June 19, 2018, amended and supplemented SG No. 51 of June 28, 2019, amended and supplemented SG No. .30 of 31 March 2020)</p> <p>3.2. The share should be calculated for each municipality separately.</p>	
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		<p><i>schemes for 1 type of waste, e.g. paper - to meet the requirements of the Call and Application Guidelines or should be considered to apply to a larger number of recyclable waste for which national targets are set- e.g. paper, plastic, metal and glass?</i></p> <p><i>1.3. According to the answers so far under the Procedure (answer to the Municipality of Samokov on Question 7, July 14, 2020), the schemes for separate waste collection / recycling should be implemented on the TERRITORY OF THE MUNICIPALITY AS A WHOLE! Does this mean that in case one municipality + 2 (two) partners apply, ALL 4 SCHEMES SHOULD BE APPLIED ON THE ENTIRE TERRITORY OF THE THREE MUNICIPALITIES?</i></p> <p><i>2. Is a contract concluded with a person under Article 35 of the WMA considered to be a fulfillment of the requirement for waste recycling? I ask for an unequivocal answer to this question, because there is no municipality in Bulgaria that has an installation for waste recycling, but only installations for separation of municipal waste!</i></p>	<p><i>4. The Call does not impose restrictions on the use of the Applicant's / partners' own resources.</i></p> <p><i>5. As specified above in 3.2. a 10% increase in recycled waste is reported for each municipality separately.</i></p> <p><i>6. Equipment costs are eligible under this Call, in strict compliance with the requirements set out in item 16 "Eligible costs" and in particular "Eligible direct costs" (page 18 of this Call). You should keep in mind that the final opinion on the eligibility of equipment will be taken by the Selection Committee, which will have all the information on the project proposal.</i></p> <p><i>7. Eligible Applicants under this Call are the municipalities on the territory of the Republic of Bulgaria. The manner of Implementation of the activities is in the prerogatives of the applicant organization, strict observance of the de minimis rules should be considered when</i></p>	
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		<p>3. According to the Call and the Application Guidelines, the activities under the project proposal must guarantee more than + 10% share of recycled waste. The specific questions are:</p> <p>3.1. How will this share of 10% be determined - based on a comparison of the recyclable waste collected by the municipalities in the previous year (2019) - partners with the recyclable waste collected and handed over for recycling for a period of one year under the project?</p> <p>3.2. Should the share of 10% be calculated separately for each partner municipality or for the project proposal as a whole?</p> <p>4. Can available equipment and trucks be used to carry out the project?</p> <p>5. Will it be considered as implementation of the Call and Application Guidelines if the different schemes proposed are implemented on the territory of different partner</p>	<p>writing the project proposal.</p> <p>You should keep in mind that a final opinion on the eligibility of applicants and partners will be taken by the Selection Committee, which will have all the information on the project proposal. The manner of assignment and implementation of the activities under the project proposal is part of the verification of the costs during the implementation.</p>	
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		<p><i>municipalities and respectively the results, in terms of 10% share increase in recycled waste, are reported only for each individual scheme?</i></p> <p><i>6. Is the equipment of trucks with a waste weighing device an eligible cost?</i></p> <p><i>7. Item 19 of the Application Guidelines describes the hypothesis of the possibilities for a Municipal Enterprise established under Article 51, paragraph 1 of the Municipal Property Act to participate in the procedure - taking into account the requirements for de minimis. Our understanding is that in case the municipality performs the services for collection and transportation of waste through such an enterprise, possessing the respective registration document under the Waste Management Act - there are no obstacles for the respective municipality to indicate in the project documentation that it will carry out the mentioned activities through the enterprise, as the budget services do not exceed the de minimis. Please clarify this!</i></p>		
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21.	Tanya Slavova Plovdiv Municipality	6 th August 2020	<p><i>Dear ladies and gentlemen,</i></p> <p><i>In connection with published Application Guidelines under procedure “Circular Economy and Resource Efficiency” under Outcome 3: “Improved Use of Resources at the Municipal Level (Circular Economy)” under the Environment Protection and Climate Change Programme it is necessary to clarify the following:</i></p> <p><i>By its legal nature, the municipal enterprise "Chistota" is a specialized unit of the Municipality of Plovdiv for the implementation of local activities and services, namely in the case of: waste management services and maintenance of cleanliness on the territory of the Municipality of Plovdiv, according to its regulations, in connection with Article 53, item 2 of the Municipal Property Act / MPA /. Through the enterprise the Mayor fulfills his obligations for waste collection, waste removal, cleaning, etc. according to art. 19 of the Waste Management Act. The activity is carried out on behalf of the enterprise, but at the expense of the municipality. The enterprise is financed with funds provided by the Municipality of Plovdiv,</i></p>	<p><i>Eligible Applicants under this Call are the municipalities on the territory of the Republic of Bulgaria. In case the activities planned under the project proposal are economic, the funding will be considered as de minimis aid. The manner of Implementation of the activities is in the prerogatives of the applicant organization.</i></p> <p><i>You should keep in mind that a final opinion on the eligibility of applicants and partners will be taken by the Selection Committee, which will have all the information on the project proposal. The manner of assignment and implementation of the activities under the project proposal is part of the verification of the costs during the implementation.</i></p>	
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		<p><i>necessary for the implementation of activities and maintenance. Outside the Plan - the account of ME "Chistota" additional funds are provided for waste stream management, other than household and / or similar to household, mainly under contracts through the Municipality of Plovdiv and customers of the enterprise. In this part the enterprise carries out economic activity, as the revenues are transferred to the Municipality of Plovdiv.</i></p> <p><i>According to the Application Guidelines: "it is the responsibility of the mayor of the municipality to organize the management of the waste... He is the authority responsible for deciding how to organize waste management within the municipality... where the activity is related to the exercise of public powers, it is not of an economic nature".</i></p> <p><i>In view of the above, I ask for your opinion, if in the presence of such an enterprise, a municipality applies, will the funding received be considered as de minimis aid.</i></p>		
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22.	Kostadin Kostadinov	10 th August 2020	<p>1. Please clarify with regard to the documents listed in item 23 "List of documents to be submitted at the application stage" of the Conditions for application - the documents specified in points 23.3, 23.4, 23.5, 23.6, 23.7, 23.8, 23.15, 23.18, 23.19, should they also be submitted by the partner from the Donor state? If "YES", should documents from our Norwegian partner, such as Statement of revenue and expenditures and Balance Sheet, be submitted not only in the original in Norwegian but also in translation into Bulgarian?</p> <p>2. Should the documents of our Norwegian partner referred to in item 24 "Supporting documents / Documents submitted by partners from Donor States" of the Conditions of Application be submitted not only in the original but also in translation into Bulgarian?</p> <p>3. On page 36 of the Conditions of Application it is stated that "Each attached file shall be signed with electronic signature as all files shall be published in EUMIS 2020, Section 12..."</p>	<p>1. In accordance with criterion 5 of the administrative criteria and eligibility criteria (page 42), the Application form, the budget and all declarations must be submitted in English and Bulgarian.</p> <p>2. As described in item 24 (p. 36) of this Call: "IMPORTANT! The supporting documents shall be presented in Bulgarian from the side of the applicant and in English from the side of the partner from Donor States/countries other than Bulgaria."</p> <p>3. As stated in item 24, page 36. "Each attached file shall be signed with electronic signature as all files shall be published in EUMIS 2020, Section 12 "Attached Electronically Submitted Documents" from the Application Form, fields "File" and "Signature". Applicants shall number and put the name of the applied documents in Latin alphabet so that the content is understandable (for instance „1. D1_Declaration_acceptance of the terms and conditions_en") in order to facilitate the review of the documents when evaluating project proposals."</p>	
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			<p><i>Does this mean that all files attached must be signed with a qualified electronic signature of the Applicant and / or the Partner?</i></p> <p><i>Is it permissible for the declarations to be signed on paper and color scanned copies to be attached?</i></p> <p><i>Is it permissible for documents that are in a copy, such as Statement of revenue and expenditures and Balance Sheet, to be presented scanned?</i></p>	<p><i>In addition, as indicated in item 22, on page 33, the Programme Operator also allows the submission of scanned documents, but only on condition that they are also electronically signed by the Applicant.” The attachments to the application form containing signature boxes shall be attached as signed copies (i.e. either printed, signed, scanned and attached, in this case the originals being presented at the conclusion of the grant contract or signed with electronic signature and attached)¹.”</i></p> <p><i>¹ The documents must be signed with the electronic signature of the Project Promoter / Lead Partner, who through their signature assumes responsibility for the correctness of the information. Signing should be done under the “Attached Signature” scheme, which creates a new file and contains two files - the original document plus the digital signature. The new file shall be attached.</i></p>	
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