



### 3rd set of Frequently Asked Questions (FAQs) (No. 12 – 20)

**Introductory note: Questions submitted by potential applicants have been generalized, where applicable.**

**12a) According to the Project Manual, page 8, the Lead Beneficiary "lays down the arrangement for its relations with its beneficiaries in a project partnership agreement comprising, inter alia, provisions guaranteeing the sound financial management, including the arrangements for recovery of amounts unduly paid". Is the "project partnership agreement" draft file available?**

The "project partnership agreement" will be available before the approval-announcement of the successful projects. Project applicants should take note of the following:

The Partnership Agreement provides the framework for an efficient project implementation and aims at guaranteeing the project's compliance with the Cooperation Programme.

While the Lead Partner is responsible for ensuring the implementation of the entire project towards the MA, each Project Partner is responsible for ensuring the implementation of its part of the project.

By clearly defining and raising awareness on project responsibilities and procedures for each project partner and within the project as a whole, the Partnership Agreement should make it easier to implement territorial cooperation projects and minimize the risks involved in carrying them out. A general description is provided in par.2.4.4 of the Project Implementation Manual.

**12b) According to the Project Manual, page 8, "in case the LB does not succeed in securing repayment from the concerned project beneficiary or if the managing authority does not succeed in securing repayment from the LB, Article 27 of the ETC Regulation (EU) No 1299/2013 applies". According to this Article, "If the lead beneficiary does not succeed in securing repayment from other beneficiaries or if the managing authority does not succeed in securing repayment from the lead or sole beneficiary, the Member State or third country on whose territory the beneficiary concerned is located or, in the case of an EGTC, is registered shall reimburse the managing authority any amounts unduly paid to that beneficiary. The managing authority shall be responsible for reimbursing the amounts concerned to the general budget of the Union, in accordance with the apportionment of liabilities among the participating Member States as laid down in the cooperation programme".**

**Does this mean that in case of unduly paid amounts that cannot be repaid (for any reason), it will be a responsibility of the Member State or third country to do so? Which processes will be followed in this case?**

The Lead Beneficiary or the Partner Country of the liable project beneficiary will suffer the loss of the EU contribution, which corresponds to the irregularity.

Read Chapter 7 of the project manual. ``DE-COMMITMENT OF FUNDS ON PROJECT LEVEL``

**13) In the Call it is mentioned that: Each potential project beneficiary cannot participate in more than three (3) proposals in this Call. Additionally, each potential project beneficiary cannot participate as Lead Beneficiary in more than one (1) proposal per Priority Axis.**

**Is there any limit of participating of each project beneficiary per Specific Objective? If there are not any limits, can one project beneficiary participate in three (3) different proposals that are within the same Specific Objective?**

The call restriction is: each potential project beneficiary cannot participate in more than three (3) proposals in this Call. Additionally, each potential project beneficiary cannot participate as Lead Beneficiary in more than one (1) proposal per Priority Axis. In other words; Yes, a project beneficiary may exhaust this limitation, by participating in 3 proposals within the same objective.

**14a) Does Specific Objective 1.1 “Create employment opportunities for educated graduates by exploiting comparative advantages of the cross border area, preferably with the use of innovative tools and practices” correspond to existing SMEs as well? If yes, are export oriented activities in line with the Programme’s priorities?**

The Programme document is providing all necessary information. Section 1 of the Programme includes information about the Strategy and the Intervention logic and financial issues while in section 2 the document provides information regarding the expected results, indicative actions supported, potential beneficiaries etc.

Furthermore, eligible project beneficiaries under 1.1 S.O. are described in paragraphs 3 and 7 of the Call and paragraph 1.3.2 of the Project Implementation Manual.

**14b) Does the 20% budget threshold apply also for National authorities based outside the eligible areas? i.e. Can a Ministry (National Authority) based in Athens be a partner in a project only under the condition that its activities will not exceed 20% of the total project budget?**

The JS/MA cannot comment on the eligibility of specific beneficiaries and on their status as potential partners.

Entities registered outside the eligible area are generally subject to the 20% budget restriction (par. 7.1 of the Call). Exceptions may be granted (i.e. if a potential partner outside the eligible area has the mandate to cover with its activities the entire country or the Programme Area). This will be determined during the assessment of the proposals. Nonetheless, the capacity building of local actors of the eligible area is one key goal of the Programme.

**14c) Do documents set in points 9&10 (p. 15-16 of the Call) have to be submitted only in the case where the (Overall) Lead Beneficiary is a partner from the former Yugoslav Republic of Macedonia? Or, is it the case, that if a partner from Greece is appointed as the Lead Beneficiary (and bears the overall responsibility according to the Lead Partner Principle), IPA partners have also to appoint a Lead Beneficiary as well (for the part of the project taking place in their country) and thus submit the documents set in points 9&10 (p. 15-16 of the Call)?**

Documents set in points 9&10 of the Call have to be submitted only in the case where the Lead Beneficiary of the project is an IPA partner.

**15) In the Call, page 11, it reads that beneficiaries located outside the eligible area within the 2 countries are eligible under certain conditions.**

**We would like to ask you if the following two organizations can be considered as located within the programme eligible area:**

- **The Centre for Renewable Energy Sources and Saving (CRES): CRES is the Greek national body for issues pertaining to renewable energy and energy efficiency and therefore has a panhellenic reach.**
- **The Cluster of Bioenergy & Environment of Western Macedonia (CluBE): CluBE is a regional entity based in Kozani that aims at fostering green entrepreneurship and economy in the Region of W. Macedonia by facilitating the cooperation among its members, which include public authorities, universities, research organizations, biomass producers and suppliers etc. Its members are based all over the region of W. Macedonia, including the regional unit of Florina.**

The JS/MA cannot comment on the eligibility of specific beneficiaries and on their status as potential partners.

Entities registered outside the eligible area are generally subject to the 20% budget restriction (par. 7.1 of the Call). Exceptions may be granted (i.e. If a potential partner outside the eligible area has the mandate to cover with its activities the entire country or the Programme Area). This will be determined during the assessment of the proposals. Nonetheless, the capacity building of local actors of the eligible Area is one key goal of the Programme.

**16) One of the indicative actions to be supported under Specific Objective 2.1. “Upgrade public infrastructure to improve road travel time, safe border crossing and promote energy efficiency towards green transport” is: “Improving energy efficiency of public buildings and infrastructure“. Does this mean that there can be interventions to public buildings and infrastructure NOT related to green / sustainable transport? Is it also eligible to propose for green or bioclimatic interventions on road surface that may contribute to energy efficiency in buildings and infrastructure?**

The list of the indicative actions under specific objectives is not exhaustive. In general all projects must contribute to the target and expected results of the programme (even those that choose to implement actions described as indicative in the Programme document). All project applications must prove their relevance with the Programme's objectives and propose actions that will contribute towards the expected results.

**17) Please provide us more detail information and explanations regarding point 2.2.4.1- Staff Costs of Programme Manual and the payment of the staff members employed by/in the beneficiary organization.**

**Can in the Project Budget line-Staff Costs be costs for engaging civil servants from the beneficiary organization working on the implementation of the project activities as additional work (as project coordinator, financial manager and technical assistant) other than the daily activities carried out if the project was not undertaken?**

**What option (20% flat rate or real cost basis) for calculating staff costs is eligible for the aforementioned situation if available?**

The management team of the project can include public servants if the National legislation of the two participating countries allows this. In such a case an official decision by the public body, which approves the overtime work, is required by the Programme.

We remind that this Call for proposals is subject to the signing of the Ministerial Decision on Management and Control System (for Greek beneficiaries).

For the calculation of the staff cost both options are available. Please pay attention to paragraph 2.2.4.1 of the Project Implementation Manual.

**18) "Project proposals must include at least one beneficiary from the core eligible Programme area of each country" (Section 7.1 of the Call). Which are the core eligible areas?**

The core eligible areas are shown in the Table below;

REGIONS/ NUTS I	NUTS II	NUTSIII
Greece	Region of Western Macedonia	Regional Unit of Florina (former Prefecture)
	Region of Central Macedonia	Regional Unit of Pella (former Prefecture)
		Regional Unit of Kilkis (former Prefecture)
		Regional Unit of Serres (former Prefecture)
		Regional Unit of Thessaloniki (former Prefecture)
The former Yugoslav Republic of Macedonia		Region of Pelagonia
		Region of Vardar
		Region of Southeast
		Region of Southwest

**19a) The Center for Education and Rehabilitation for the Blind (C.E.R.B) is a Legal Entity of Public Law, supervised by the Ministry of Public Health and Social Solidarity (Welfare). C.E.R.B's headquarters are located in Athens and our subsidiary is located in Thessaloniki since 1947 (it merged with the organization of Athens in 2011). Do we qualify to participate as Lead Beneficiary since our subsidiary is not a separate legal entity?**

The MA/JTS cannot comment on the legal status or eligibility of a potential applicant. The eligibility of partners will be part of the project assessment. It is the applicant's sole responsibility to determine its own status and eligibility to apply for funding.

**19b) For the needs of the Program can we appoint a dedicated Financial Manager and a dedicated Project Manager that are external associates of the organization under the supervision of a permanent employee of the CERB which is responsible for the projects?**

The Project Manager must always be staff of the LB organisation (Project Manual, page 8). The Financial Manager can be either an external expert or the same person (staff) who is the Project Manager.

**20a) In the Specific Objective 2.1, does the implementation of interventions to improve energy efficiency in public buildings relate to the whole cross border area or only the borders' buildings? Also, does it concern all kind of public buildings or only those related exclusively with the transportation sector? (and how can exactly this one be proved?)**

According to the Call, interventions under this S.O. will contribute to the improvement of energy efficiency of public buildings of the whole cross- border area and may concern all kind of public buildings.

**20b) The premises of the Centre for Renewable Energy Sources and Saving (CRES) are in Athens but officially has a national activity. The premises of the Cluster Bioenergy and Environment of Western Macedonia are in Kozani but has partners throughout the region of Western Macedonia. The question is whether these two entities can be included in the regular budget or in the 20% of non-eligible regions but within the eligible country entities?**

See the answer on Question 15a.