

# Frequently asked questions

## Targeted Call for Proposals

### General info

Please send your request to the following email help desk address: [js@italy-albania-montenegro.eu](mailto:js@italy-albania-montenegro.eu)

- These **FAQs** will be updated REGULARLY, depending on the questions received
- These **FAQs** will include also questions from events

We specify that, in order to manage the several questions received, some of them could be summarized, clustered or separated according to the specific items they refer to.

**This FAQs include also questions related to the first call for standard projects, which are still relevant also for the targeted call and have been adapted for the targeted call.**

### Legal notice

With these FAQs the Joint Secretariat of the Interreg IPA CBC Italy-Albania-Montenegro Programme (JS) intends to provide clarification to issues and answers to questions on the targeted call for project proposals, raised by potential applicants, in order to support them in the project development and application process.

The Managing Authority/Joint Secretariat is not legally bound by the information contained in or omitted in the manual and in the FAQs document and does not accept any liability in this respect. Only the Contractual Conditions and the relevant legal and regulatory framework which apply to the implementation of the Programme and project's Subsidy Contract are binding.

The interpretation of legal provisions of European and national rules provided in the FAQs have no legally binding value. The Managing Authority/Joint Secretariat cannot take legal responsibility for changes in the interpretation to these rules, which may occur as a result of new legislation, new national and EC guidance or new court decisions and may affect these FAQs. In case of doubts, it is therefore advisable to seek for legal advice.

The JS is committed to keeping the FAQs updated. Please feel free to give us feedback on these FAQs.

The Managing Authority/Joint Secretariat will update this document until 1 week before **the updated call's deadline**, in order to allow the full compliance of potential requests by the Programme. Questions received in the last days before closure of the call may not be answered.

Edited by the Joint Secretariat

12 April 2019

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## 1. ELIGIBILITY

### 1.1 Eligible Partners, location, time

1.1.T1 (Q) There is a limitation for certain types of partners. Is there also a reward for involving certain types of partners?

(A) No, it is not foreseen. In general, management capacities and thematic expertise of partners will be assessed.

1.1.T2 (Q) Is the chamber of architects (ordine degli architetti) an eligible partner, provided that it is a public entity?

(A) Yes, as public entity with legal personality, it is eligible.

1.1.T3 (Q) Regarding Small Scale Projects, the obligation to have 3 partners, meaning Italy (no matter if it is Puglia or Molise as a partner), Albania and Montenegro?

For Small Scale Projects, the **total number of partners must not exceed three (3) including the Lead Partner**, plus the possibility to have associated partners. Taking into account the size of projects, for Small Scale Projects the partnership composition is regulated only by article 39 of the IPA IR (EU) No 447/2014, as well as article 12 of ETC Reg. (EU) No. 1299/2013. However, please note that project activities shall lead to results and impacts **in the whole programme area**, which is going to be carefully assessed, see quality assessment criteria A1, A3 and E1.

1.1.T4 (Q) With regards to the limitation of the partners, as it mentioned in the call there is a limitation for some type of public institutions (i.e. number of proposals to be applied by *Legal entities being universities, research centers / bodies, as well as national ministries or Italian regional authorities*), but there is not mentioned anything about the private ones. Does this mean that the NGO are eligible to apply in many projects, and if yes how many?

(A) No limitation are foreseen for NGOs, but according to the assessment procedure, it will be assessed their capacity to manage and their coordination role (avoiding overlapping and creating synergies) in several quality criteria, therefore they should plan their participation strategically, in order to reach a good score.

1.1.1 (Q) Could a foundation (non profit entity) with legal headquarter outside the eligible area, and having operating headquarter established in Puglia from less than 3 months, be considered eligible? If yes, it could participate as Lead Partner?

(A) In accordance with the rules of the targeted call, non profit organizations are eligible for funding, if they satisfied the requirements listed in the Fact sheet 4.10 Eligibility Rules. In particular **they must be operational for at least 12 months before the launching of the call for proposals and have an operating headquarter, having full legal capacity, in the Programme area.**

Private lead partners shall provide a financial guarantee covering the whole EU pre-financing amount for the duration specified in the subsidy contract, once the project proposal is approved and before contracting.

The operating headquarter must have full legal capacity, i.e. it must be able to assume rights and obligations on behalf of the organisation, therefore it must be entrusted by the legal headquarter to do this.

We remind that, according to the article 44 of the IPA implementing Regulation n.447/2014, the programme authorities have to be able to fulfill their obligations in relation to management, control and audit. This means that the operating headquarter in the eligible area must operate according to the national rules of Italy, Albania or Montenegro.

#### 1.1.2 (Q) Is it possible for a group of Italian Municipalities to join a project as Temporary Association (ATS) as foreseen by Italian DPR 207/2000, art. 30?

(A) In accordance with the eligibility rules, public bodies are eligible for funding, if they satisfied the requirements as “Eligible Partners”.

In particular all bodies/institutions interested in being part of a project proposal must fulfil all the following criteria.

- **Established under the national law** of one of the Partner States participating in the Programme.
- Have their registered office or operating headquarters, **having full legal capacity**, in the Programme area.

Moreover “Where and how to send the applications”, all partners have to upload the following **Supporting documents for eligibility check**:

- a) **The registration acts** (in accordance with relevant national law) of each partner;
- b) **Statutes or articles of association/decision on establishment of each partner.**

Both public and private bodies are required to enclose their statute/legal act. Where the applicant/partner is a public body created by a law, a direct link or a copy of the said law must be provided.

#### 1.1.3 (Q) What is the maximum project duration?

(A) As far as the targeted call for proposals is concerned, the standard project implementation shall not be longer than 18 months (and 12 months for Small Scale projects). Applicants shall indicate the start and end date in the application form, taking into account the necessary time for the assessment process and contracting procedures (a period of approximately 8 months from the call closing date may be estimated). Approved operations will be offered the possibility of modifying this starting date and project duration as reported in the application form before the signature of the subsidy contract.

#### 1.1.4 (Q) When will the approved projects be able to start?

(A) Indicatively, the projects should consider being able to start within the first quarter of 2020.

#### 1.1.5 (Q) What is the minimum requirement for a partnership?

(A) The minimum eligible partnership for standard projects comprises at least one partner from each participating Country:

- at least 1 partner from each Italian Regions, 1 from Puglia Region and 1 from Molise Region (eligible territories of Italy)

- at least 1 partner from each IPA Countries (1 partner from Albania and 1 partner from Montenegro).

With regards to the small scale projects, the partnership composition is regulated in article 39 of the IPA IR (EU) No 447/2014, as well as article 12 of ETC Reg. (EU) No. 1299/2013.

#### 1.1.6 (Q) Can financing partners outside the programme area but within EU participate in a project?

(A) Partners outside the programme area but within the EU cannot participate as partners in the projects. They shall necessarily have an operating headquarter with full legal capacity in the programme area.

#### 1.1.7 (Q) Are other forms of participation within the projects possible?

(A) The other possible forms of participation within a project is as Associated partners.

The Interreg IPA CBC Italy-Albania-Montenegro Programme allows for the involvement of associated partners, i.e.: those bodies willing to be involved in a project with an observer or associated status without financially contributing to the project or financing from the programme. The associated institutions do not have to meet the partnership minimum requirements; all expenditure incurred for these bodies shall be finally borne by any of the institutions acting as project partner (i.e. financing beneficiaries) in order to be considered as eligible. The associated institutions must not act as service providers in order not to infringe public procurement rules.

The partnership must demonstrate the benefits that the involved associated partner shall bring to the project and its follow-up. Expenditure incurred for these bodies shall be limited to reimbursement to the concerned project partner of travel and accommodation costs related to their participation in project meetings.

**Associated partners** can also be located outside the Programme area.

#### 1.1.8 (Q) What requirements apply to private project partners?

(A) Non-profit Private partners can participate on condition that:

- they have been constituted from at least 1 financial year before the date of launch of the call;
- specific criteria, aimed at ensuring their financial capacity, are met.

Private partners shall upload the balance sheets of the last two accounting years, or of the last accounting year in case of organization established only in the last 12 months, issued according to national legislation.

As general rule all partners are required to:

- a. Have the ability in managing the project budget;
- b. Have the capacity in incurring expenditure in advance;
- c. Have the ability in managing the project along the project duration.

Private lead partners shall provide a financial guarantee covering the whole pre-financing amount for the duration specified in the subsidy contract, once the project proposal is approved and before contracting.

If deemed necessary by the concerned lead partner, private project partners may be requested to provide the same kind of financial guarantee too.

**1.1.9 (Q) Can a partner only dealing with project coordination, management, communication or knowledge management be involved in a project proposal?**

(A) As a general principle, lead and project partners shall have and demonstrate a strong interest in achieving the project objectives. As far as the role covered by the partners within the project is concerned, public and private entities, whose ordinary main scope of activities and whose role in the project consists mainly in project coordination, management, communication or knowledge management, cannot be considered as eligible partner/beneficiary.

**1.1.10 (Q) What requirements apply to private lead applicants?**

(A) Private lead applicants, in order to be eligible, have to demonstrate that they have stable and sufficient sources of funding to maintain their activity throughout the project implementation period and to participate in its funding. The Programme will carefully check the financial capacity of private lead applicants, for example on the two last balance sheets, which have to be submitted with the application. In case a project with a private lead partner is selected for funding, the lead partner will additionally be asked to provide, before the signature of the subsidy contract, proof that a valid financial guarantee is in force, issued by a primary financial institution (bank, insurance).

**1.1.11 (Q) How strictly do projects have to follow the initial spending plan? Are deviations permitted?**

(A) The spending plan should be calculated in a realistic way. Still, deviations are normal during the implementation. During implementation you can either report less or more expenditure than planned for a specific reporting period, as long as it is up to the total budget allocated. However, severe and continuous underspending can lead to de-commitment of funds of a project should the Programme face de-commitment itself. In particular, if a partner does not reach at least 85% of the amount planned for a specific reporting period, the Managing Authority may decide to de-commit that amount, unless the partner proves that this is not due to its own failure.

**1.1.12 (Q) NGO Eligibility.**

I work for an Italian NGO with headquarter in Rome and a legal branch in Albania. I would like to know if we can apply with the role of Lead Applicant as Italian headquarter or we can simply participate as Albanian branch. The first solution will be better for us to obtain the financial guarantee provided by the Call for Proposals.

(A) The Albanian branch of the organization could be considered an eligible partner (see above); the headquarter in Rome is not eligible because it is located outside the Programme eligible area. The Albanian branch shall be registered according to the national legislation.

**1.1.13 (Q) Is an Italian association without legal personality (i.e. productive cluster) eligible according to the targeted call for proposals?**

(A) According to the Programme, as for only Italian private no profit partners, an association without legal personality (i.e. in Italian legal system an association lacking of formal legal recognition) could be an eligible body. Anyway, non-profit organizations shall in all cases have full legal capacity to assume liabilities, obligations and rights, i.e. it must be ensured that their representatives have the capacity to undertake legal obligations on behalf of the entity and offer guarantees for the protection of the Union's financial

interests equivalent to those offered by legal persons according to art. 131 of Regulation (EU, Euratom) 966/2012.

**1.1.14 (Q) Taking into consideration an Organization with legal headquarter outside the eligible area, and local Institutes sited within the eligible area (ie. CNR or ENEA), the single Institute can be considered eligible partner?**

(A) All bodies and institutions interested in being part of a project proposal shall have their registered office or operating headquarters, having full legal capacity, within the Programme area. The meaning of "full legal capacity" is related to the fact that the headquarter must be operative (adequate equipment and staff) and it must have full capacity to be center of rights and obligations.

The meaning of sentence "to have full capacity to be center of rights and obligations" related to the operating headquarters in the eligible area is referred to the full power of the office to operate with complete autonomy from the legal office of the same organization (for instance the local office must have the power to sign all necessary contracts and agreements for project implementation).

Additionally, the programme controllers and auditors have to be in the position to check the expenditures of the operating headquarters, which shall be bound to national rules of the country, where it is located and audit trail shall be kept in this location.

**1.1.15 (Q) Is an International Organization or an International intergovernmental organization eligible?**

International organizations and international intergovernmental organizations are eligible provided that they have a headquarter with full legal capacity in the eligible area, which shall be registered and established according to the national legislation of one of the participating countries.

International organizations established according to international law may be eligible only if they accept to comply with the rules, as well as to be controlled and audited on the basis of the same audit trail provided by eligible public bodies of the participating countries.

**1.1.16 (Q) A no profit association is operational for less than 12 months. Can it be eligible as associated partner? Are private organisations (like SME) eligible as associated partners?**

(A) In compliance with the programme nature, associated partners must follow the same principles as for the project partners.

Therefore SMEs are not eligible as associated partners. As the Programme does not finance associated partners, even if established in less than 12 months or even if located outside the Programme area, non-profit organizations can be associated partners if their participation is beneficial to the project.

**1.1.17 (Q) Could Puglia Region be considered as eligible public partner, or being the Managing Authority of the Interreg IPA CBC IT-AL-ME programme, Puglia Region has to be excluded from the possibility to submit any project proposal?**

(A) EU and national rules require that there is a functional separation between bodies managing, granting and controlling how funds are spent and bodies receiving subsidies (beneficiaries/partners). Puglia Region is a public body, having specific constitutional competences for specific sectors in its territory, including those selected by the Programme. Therefore, competent departments of Puglia Regions should be involved and at the same time functional separation should be provided. To do that, Puglia Region assigned the MA

function to the Department for Economic Development, legally represented by its Director. This department and all its services and offices are not allowed to submit any project proposal or receive a grant in the Programme, while all other departments/regional structures having complete functional separation from this, may act as applicant and be selected as beneficiary of a grant (partner).

#### 1.1.18 (Q) FAQ ONLY FOR ITALIAN PARTNERS “DISTRETTI TECNOLOGICI/PRODUTTIVI”

I soggetti costituiti nella forma di “Distretti” (nelle varie loro configurazioni, Tecnologici, Produttivi, ad elevato contenuto tecnologico), di cui alla Legge della Regione Puglia del 3 agosto 2007 N. 23 ovvero all’art. 2 comma 1 lett. d) della Legge 597/1999 e del DM 593/2000, sono considerati soggetti ammissibili?

(A) Sì, tali soggetti sono ammissibili, purché siano costituiti senza finalità di lucro e forniscano in sede di presentazione della proposta progettuale una completa e dettagliata descrizione della loro capacità organizzativa e gestionale in ordine alla conduzione del progetto

## 1.2 Eligible expenditure and co- financing rate

#### 1.2.T1 (Q) Can we use 20% flat rate for staff?

(A) Yes, but remember that control and audit is going to check that the organisation has staff working on the project and that the activity is not exclusively externalised.

#### 1.2.T2 (Q) Is it possible to recover VAT for the expenditures incurred and paid during a project implementation?

(A) the VAT is recoverable if foreseen by the national rules. We remind that only VAT, which cannot be recovered, is eligible for funding

#### 1.2.T3 (Q) I would like to know whether about the IPA CBC Targeted call for project proposals whose official publication is scheduled for February 2019, there are spending limits (i.e. a percentage of the total funding requested) for eligible expenditure categories and in particular for categories 4 "external expertise and services" and 6 "infrastructure and works".

(A) The Programme does not fix spending limits for any foreseen budget line, except the case of flat rate simplification cost options. Nevertheless, be aware that the Programme funds only soft investments and doesn't fund large infrastructures or interventions.

As for to external expertise and services budget line, the national market values shall be taken into account, following the basic principle of economy, efficiency and effectiveness; moreover, the related percentage shall be fair in comparison with the partner role/activities in charge and its own competences and resources. For further details please check carefully the F.S. 1.1. and F.S. 4.10 of the Programme Manual

#### 1.2.T4 (Q) During the implementation period, is eligible to report expenditures that belongs to previous reporting periods (which for some reasons have not been included in financial report for that period but in the narrative report also for that period is already mentioned as activity occurred)?



(A) The eligibility of expenditures is detailed in the FS 4.10 of the Programme Manual. Therefore, it is possible to report eligible expenditures incurred and paid in previous reporting periods and that for some reasons have not been included in financial report for that period but only in the narrative report as activity occurred. Of course in the partner report in which these expenditures will be reported, the postponement has to be justified as deviation occurred.

**1.2.T5 (Q) In case of small scale projects, are external expertise costs eligible? In particular can the external provider be located outside the programme eligible area, e.g. in Rome?**

Lump sum is an amount, which is paid once the defined output is achieved and delivered and NOT on real cost basis. i.e. staff, travel, office, experts, equipment, infrastructures and works. Please check the defined outputs in the call. All single costs occurred in order to be able to deliver the output are compensated on a basis of a lump sum.

In order to simplify the submission procedure in eMS, you have to fill in relevant data only in the budget line "external expertise and services"

Please check the concept of lump sum at:

[https://ec.europa.eu/regional\\_policy/sources/thefunds/fin\\_inst/pdf/simpl\\_cost\\_en.pdf](https://ec.europa.eu/regional_policy/sources/thefunds/fin_inst/pdf/simpl_cost_en.pdf)

**1.2.T6 (Q) Following the public procurement rules, are there limitation on the maximum amount for a tender procedures? Is it possible to follow a public procurement procedure exceeding 300.000,00 €?**

(A) Yes, there are limitations to the amount of a tender procedures according to the threshold established in the EU regulations n. 1268/2012. In any case please carefully check factsheet 4.3 of the Programme manual on public procurement; the public procurement rules are applicable to any procurement of any project partner, public or private.

**1.2.1 (Q) Which expenditures are eligible?**

(A) Eligible expenditure is grouped in budget lines in accordance with Regulation (EU) No 481/2014:

1. Staff costs;
2. Office and administrative expenditure;
3. Travel and accommodation costs;
4. External expertise and services costs;
5. Equipment expenditure.
6. Infrastructures and works expenditures

**1.2.2 (Q) Which co-financing rate is it applied?**

(A) The IPA co-financing is up to 85% for any kind of partner.

The remaining part (i.e.: at least 15%) has to be funded via:

- a) Public national contribution obtained via specific co-financing schemes at Partner State level (such as the rotation fund in Italy) or via own funds of the public project partners;
- b) Private national contribution refers to the amount of own funds provided by private bodies.

We underline that in Albania and Montenegro a similar co-financing scheme as provided by the Italian Government has not been foreseen.

#### 1.2.3 (Q) What is the start and end date of project eligibility of expenditure?

(A) Expenditure is eligible as from the start date set in the Subsidy Contract. Planned activities shall be implemented within the indicated project start and end date.

#### 1.2.4 (Q) Are preparation costs reimbursed?

(A) The preparatory phase can be financially supported by the Programme only in case of project approval.

Approved projects which signed the subsidy contract with the managing authority can receive a lump-sum reimbursing their preparation and contracting costs according to the following principles:

- The lump sum amounts to the amount set by the call (EUR 10.000 for standard projects; EUR 5.000,00 for small scale projects);
- The lump sum covers all costs linked to the preparation and/or contracting of the project until the signature of the project start date set in the subsidy contract.

#### 1.2.5 (Q) Will shared costs be allowed?

(A) The practice of splitting cost items among project partners (i.e. sharing of common costs, i.e. same contracting procedure and expenditure document for all project partners) is not allowed. Accordingly, the budget allocated to a project partner shall fully reflect the activities actually implemented by that partner.

#### 1.2.6 (Q) Is it possible to consider as eligible cost, the expenditures related to all staff involved in an operation, regardless of the territory in which he/she works?

Only staff costs of the headquarter located within the Programme area are eligible. Derogation may be granted according to the rules on expenditures outside the Programme area, see question below.

#### 1.2.7 (Q) In case an applicant is a no-profit association that involves volunteers associates in order to carry out some activities, is it possible to report the voluntary work/service for the project? In this case, in which category of cost can it be reported and which documents should the partner attach?

Furthermore, the voluntary work/service can be considered as the contribution with own resources in order to co-finance the project?

(A) Contributions in kind are not eligible according to the Programme rules.

#### 1.2.8 (Q) Are expenditures occurred outside the Programme area eligible and what are the limitations?

(A) As a general rule, all the project activities have to be located in the Programme eligible area. In compliance with art. 44 of the IPA Implementing Regulation (Commission Implementing Regulation no. (EU) No 447/2014), a derogation to this rule may be exceptionally accepted, provided that activities carried out outside the Programme area shall:

- be for the benefit of the Programme area and essential for the implementation of the project;

- either be indicated and justified in the application form or, during project implementation, an authorization shall be requested to the JS before the activity takes place;
- be monitored by the JS, as the total amount of all activities must not exceed the limits set by the Regulation.

If the activities are for promotional, capacity building or technical assistance purposes, it is not necessary to monitor them, thus it is not necessary to flag them in eMS the system. In those cases, it is anyway advisable to contact the JS in order to clarify the nature of the activity before it takes place.

In any case, eligible partners shall have an operating headquarter with full legal capacity in the Programme area, therefore it must be possible for the Programme authorities to manage, control and audit partners expenditures according to national rules of the participating countries.

#### 1.2.9 (Q) Can the staff costs be considered co-funding? the 15% share not covered by the IPA Fund, can only be covered with the staff? Also has to be covered with cash contributions?

(A) The co-financing rate is set per partner, for the relevant total budget and not for single budget line, accordingly to the total expenses actually incurred.

Please note that also in the reporting phase, the co-financing is not calculated per budget line, but on the total. For further clarification please consider the example below:

A partner who has own co-financing is reporting for period X like this

Staff: 10 hours \* 30 EUR hourly rate = 300 EUR

Office and administration: 15% Flat rate = 45 EUR

External expert and service: Expert invoice = 100 EUR

Total: 445 EUR, of which 85% will be reimbursed to the partner (i.e. 378 EUR).

So the partner should certify 100% of the expenditures (specifically €445), to receive 85% (i.e. 378 EUR).

#### 1.2.10 (Q) Can I finance also activities started before the project start?

(A) Operations fully completed before the project start cannot be financed (art. 43 (3) IPA IR No. 447/2014 and art. 65 (6) CPR No.1303/2013). Please note that expenditures necessary to implement project activities are eligible, if paid out between project start and end dates (implementation period).

#### 1.2.11 (Q) Can the research staff of the Universities or other research Institutions (i.e. PhD students with scholarship or fellowship researchers) be considered as staff costs?

(A) It depends on the nature of the contract (i.e. employment or external expert contract), as well as on the supporting expenditures documents (i.e. pay slip or invoice). Costs arising from a contract concluded with a natural person generating invoice or equivalent documents according to national rules belong to the external expertise and services expenditure category.

#### 1.2.12 (Q) Are admissible costs for technical assistance from the award notice to the signature of subsidy contract and partnership agreement? If yes, in which WP shall they be declared? And in which period?

(A) All expenses incurred before the signature of the subsidy contract are considered as "Preparation costs", thus covered by the lumpsum.

1.2.13 (Q) Are public servants and local self-government employees allowed to be paid from the projects? We are aware that monthly salaries are excluded, but is there a possibility to pay extra hours, top ups. Additionally, if there is a need for drafting some studies, documents, expertise etc. is case there are no experts in this filed outside respective institution, is there a possibility to pay public servant/local self-government employee from beneficiary institution for providing such services?

(A) As general rule, public servants or local self-government employees are not allowed to be paid from the projects for fulfilling their institutional tasks (additionality principle). Anyway, the partner organization, according to a service order (or any administrative document/act that provides for the involvement of the employee in the specific activities of the project implementation for a fixed or flexible number of hours), is allowed to claim the related costs of the employees as staff costs. For instance an employee could be involved for administrative or for technical issues related to the project activities and the organisation can claim this as project costs.

The extra hours are eligible costs, if allowed by the national rules, too.

1.2.14 (Q) Can we sub-grant a specific project activity to an external organization linked to a partner by a specific agreement (e.g. organization member of a district, or association or others)

(A) Concerning the external expertise and service budget line, we underline that for each contracting procedure, all public procurement rules have to be applied, as described in the eligibility rules. The related expenditures documents must comply with national civil and fiscal regulations, including rules on in-house contracting. Sub-grant options are not foreseen within this Programme.

1.2.15 (Q) With regards to the FLC costs for partners with decentralized system are partners still advised to include in the project budget an adequate amount of money for expenses relating to the validation process? (up to 3% of activities).

(A) Yes, but it is advisable that an adequate and consistent % threshold for FLC should be calculated on the total budget, as this complies with the principle of proportionality. In any case, the choice between the minimum and maximum of FLC fee should be left to the free market.

## 2. APPLICATION PROCEDURE

### 2.1 How to apply

#### 2.1.T1 (Q) How many projects can be applied by each organization?

(A) please check carefully the paragraph of the call related to the “Project partners”, in which there have been included limitations only for specific partners.

#### 2.1.T2 (Q) Can an Italian university apply as single department or as single university? Can the same university or single department apply maximum for 1 project as lead and 2 projects as project partner (i.e. maximum 3) per specific objective?

(A) Yes, the maximum number refers to a specific objective. The Italian universities (like the ministries, research centres and Italian Regions) may apply as one single legal body, not as single department, as this has not a separate legal personality, also due to the fact that this bodies are identified by a single fiscal code and VAT number. The number of applications will be counted in chronological order of submission and the exceeding and latest applications will be excluded. To avoid that departments compete with each other or that a strategic project is submitted after the maximum number is reached, we recommend all these legal bodies to coordinate their applications through a person or central office.

#### 2.1.T3 (Q) Is it possible to submit both standard and small projects?

(A) Yes because they are considered as 2 separated ranking lists. Nevertheless, the same partnership cannot submit the same proposal for both twice.

#### 2.1.1 (Q) How the document attesting that the legal representative of each should look like?

(A) The declaration (ANNEX A) must be drafted in English. It must attest that the legal representative/delegated person holds the power of signature and representation. The document attesting the power of signature or delegation must be in line with the national rules of the affected partner.

Therefore it is necessary to enclose the official act (in original language) attesting the power of signature and representation of the legal representative or his/her delegated person on behalf of the organization (e.g. updated constitutive act of the organization or a Decision of the Board).

Each declaration must be accompanied by a copy of a valid identity document of the legal representative or his/her delegate (e.g.: identity card or passport).

#### 2.1.2 (Q) How many Programme priorities or specific objectives can a project address?

(A) A project proposal must focus on one Priority Axis and one of its related Specific Objectives.

#### 2.1.3 (Q) Can the project proposal be related to two different priority axes and specific objectives?

(A) No, applicant must select only one priority axis and one specific objective for a project proposal, which corresponds to the main focus, theme and objective of the project.

Links to and synergies with other topics and objectives, to which the project proposal additionally contributes to, even across different priority axes and specific objectives of the programme, may be described in the specific sections of the application form. If they provide an added value, these should be explained by the applicants in details.

#### 2.1.4 (Q) Power of Signature of the Legal Representative

Can the Accompanying Act attesting that the signatory holds the power of signature and representation, by project partners from Albania and Montenegro, be provided in original language?

(A) Yes. They can be provided in original language.

2.1.5 (Q) With reference to the balance sheets, Montenegrin NGOs says that for the Law of Montenegro they are not obligated to make a balance sheet every year. Can the partner participate even if it does not have the balance sheets of the last two years?

(A) In accordance to the requirements of the call, no derogation are allowed. If the non-profit organization is operational for less than 24 months, and anyway more than 12, it is possible to provide only one balance sheet instead of two.

2.1.6 (Q) Considering the document LP/PP Statement, should the table about the sources of contribution for co-financing (2B) be filled with the precise amount of co-financing or it is sufficient marking (with a X) the specific nature of co-financing.

(A) Yes, you have to fill in the precise amount of the co-financing rate. We remind that Each Project Partner has to ensure at least 15 % of total costs from other sources than IPA necessary for the implementation of the Operation. The sources can be own contribution and other national funding.

In order to avoid inconsistency with rounding in the eMS platform, in the table 2B, we can accept both percentages or figures. For the exact amount of 15% contribution to be declared in the Annex A Declarations, please use the automatic amount per each partner which the eMS calculates in the table of "Define a contribution".

2.1.7 (Q) the document, which proves the power of signature, is in national language. Shall we translate it in English?

(A) The translation in English is not required.

2.1.8 (Q) About the Sources of contribution for co-financing, if the source is the rotation fund (for the University of Bari), in the Annex A, this must be mentioned in the table 2b) as own contribution or other fundings

(A) Concerning Italian public partner, This must to be mentioned in the table 2b) as other funding - national Rotation fund CIPE Resolution 10/2015 . Please check also USER MANUAL of eMS on page 50.

2.1.9 (Q) what kind of documents shall be considered as "registration acts" for an Union of Municipalities located in Apulia Region. Could it be the VAT/Fiscal Code certificate provided by the relevant National Authority? What other documents shall be considered as eligible?

(A) Concerning the registration act, according to the Applicant Manual in force (Section 16.2.3 pg. 43), Italian partner has to produce the Fiscal Code certificate provided by competent Authority.

2.1.10 (Q) Sometimes statutes are available and publically accessible online in their most recent version. Can we submit only a link, to reduce no. of bytes uploaded? In which form?

(A) Yes, a link inserted in a pdf file is acceptable (e.g. The statute in its updated version is available at: www.....). Please make sure that the link works. A non-functioning link shall be considered as a missing document.

2.1.11 (Q) Referring to the SUPPORTING DOCUMENT TO PROVIDE WITH THE DECLARATIONS, in point one.. "1)The registration acts (in accordance with relevant national law) of each partner", what is intended if we are not required to register as private association of enterprises? For example we have a Fiscal Code and not registration in Chamber of Commerce as National Law.

(A) The registration act, as referred in declaration template, could be e.g. the Fiscal Code Certification or other fiscal certificates, issued by competent national Authority.

2.1.12 (Q) As the Annex A requires "Address of head office", where or how shall I report address of operating headquarter in the eligible area?

(A) Please fill in both addresses in the same cell.

2.1.13 (Q) Can the statute of project partners (public bodies) from Albania and Montenegro be provided in original language?

(A) The statute of the project partners can be provided in the original language, as well as the other supporting documents suitable for the eligibility check.

2.1.14 (Q) We are the LP of our project proposal and we are a Public Body, our Director is requested to sign electronically each document. Do you accept electronic signature for the LP statement and for the other document requested? Can we upload P7m files in the eMS platform?

(A) As the Programme is multi-national and the national e-signature protocols are not used in the other countries, e-signatures are not foreseen by the Programme. Please therefore upload scanned signed documents in pdf format.

2.1.15 (Q) For documents such as registration acts, copy of valid identity documents, is there a necessity to be verified by notary?

(A) The registration act has to be enclosed in the eMS Application Pack (registration acts are the documents or certificates issued by competent national authorities). The copy of identify documents is necessary to prove the identity of the legal representative or of his delegate. The same document does not have to be verified by notary. Applicants have to note that any documents may be checked during project implementation in the on-the-spot checks.

2.1.16 (Q) As regard the Annex A, if the undersigned is a delegated person and not the legal representative, who must be indicated in all related parts of the document?

(A) In all related parts of the document According to your specific request you have to fill in ( ), the name of the delegated person, specifying ...*as delegated representative*".

Furthermore, Declarations signed by the legal representative/delegated person must be accompanied by: i) a document attesting that he/she holds the power of signature and representation and ii) by a valid identity document (e.g. identity card, passport) copy.

2.1.17 (Q) As regards the Annex A, for what concerns the following items: main registration number, the place and the date of main registration number, Are these information mandatory also for public bodies?

(A) YES they are mandatory for all type of partner's organizations.

(Q) Furthermore, can we consider as main registration number the fiscal code of the body or also the VAT number?

(A) YES, registration numbers according to national rules.



### 3. PROJECT MANAGEMENT

3a (Q) If something goes wrong during the implementation of the project to what extent is the lead partner responsible?

(A) In general the lead partner has the overall responsibility of the project. The legal basis for this is the subsidy contract signed between the Managing Authority and the lead partner. In practice if there are e.g. financial corrections to be done for a partner, the Managing Authority would first deduct the amount from the payment to the lead partner. Afterwards the lead partner will have to recover the amount from the project partner. This recovery procedure should be agreed ex-ante between the lead partner and project partners in a written agreement e.g. a clear clause in the partnership agreement. Only if this recovery procedure is unsuccessful, the Lead Partner can request the Managing Authority to activate the subsidiary liability of the national authority of the country, in which the partner is located

#### 3.1 Project planning

3.1.T1 (Q) Can we apply only in the topics identified for the targeted call or refer to the cooperation programme in general?

(A) The topics identified for the targeted call are the outcome of a gap analysis, i.e. these have not been sufficiently tackled by the first call and thematic projects. For this reason, projects related to these topics may receive additional points and have more chance to be financed. However, applicants might apply for all other topics of the cooperation programme, except for S.O. 3.1. and only small scale projects for S.O. 1.1. Rather than a general reference to the cooperation programme, you must closely respect its objectives, expected results, outputs, type of actions.

3.1.T2 (Q) Can we foresee capitalisation actions on approved projects of the first call?

(A) Yes, synergies and capitalisation are encouraged also with projects of the first call. Please explain also how overlapping and double funding is avoided.

3.1.T3 (Q) How shall we demonstrate the link to EUSAIR?

(A) A precise contribution to single actions foreseen in the EUSAIR action plan and a contact with the pillar coordinators of the EUSAIR is necessary.

3.1.T4 (Q) How can we ensure synergies among projects and at the same time avoid overlapping?

(A) Capitalisation implies that the results/activities are complementary, i.e. that the results of a project are the starting point and that the capitalising project builds on those results. To do that, an added value shall be created. Thus, overlapping and double financing of the same activities shall be avoided, by doing something new, starting from results achieved by another project. You have to explain precisely how you intend to build on another project (synergies), at the same time doing something different (avoiding overlapping).

### 3.1.T5 (Q) Where we can find the list of operations to be capitalized?

(A) The list of operations funded by the Programme within the 1<sup>st</sup> call for proposals, is available in the Programme web portal at the following link <https://www.italy-albania-montenegro.eu/programme/closed-call-%26-notices> and <https://www.italy-albania-montenegro.eu/programme/official-docs/cooperation-programme> (including partners and project objectives)

### 3.1.T6 (Q) Which kind of Activities are covered by the small scale projects?

(A) The **Small Scale Projects** grants can use lump sum for three typologies of actions/activities i.e. outputs as follow:

1. Preparation cost
2. Workshop, seminars and conferences
3. Incoming missions & B2B meetings

Once the overall output is reached, the beneficiary is entitled to receive the lump sum. To reach an output a long list of sub-activities might be necessary, depending on the project objective (e.g. preparation of studies, scientific applications, papers, expert input, pilot tools, renting of rooms, catering, printing, phone calls etc.). as proof that the output is reached, all key deliverables and products of these sub-activities shall be included in the report.

#### 3.1.1(Q) What is the alignment between the Programme and EUSAIR?

(A) Priority Axis 1 **Strengthening the cross-border cooperation and competitiveness of SMEs**, addresses directly Pillar 1 on Blue Growth but also encompasses elements of the other three Pillars.

Priority Axis 2 **Smart management of natural and cultural heritage for the exploitation of cross border sustainable tourism and territorial attractiveness**, addresses directly Pillar 4 of the EUSAIR Action Plan, mainly in terms of support to: a) common tourist / territorial brand building; b) sustainable and accessible tourist offer; c) thematic tourist routes; d) foster natural heritage; e) upgrade of tourist products for SO2.1 and to a) foster cultural heritage, creative cross border region. for SO2.2.

Furthermore, the two SOs are aligned to the EUSAIR Cross Cutting issue “Capacity building”.

Priority Axis 3 **Environment protection, risk management and low carbon strategy** addresses directly the Pillar 3 of the EUSAIR Action Plan, with reference to its two topics :

- a) marine environment;
- b) terrestrial habitats and biodiversity, for SO3.1;

and the Pillar 2 of the EUSAIR Action Plan, with reference to its topic “Energy Networks”, as both interventions complement each other and might produce a smarter and more sustainable growth at Programme area level, for SO3.2.

Furthermore, the SOs are aligned to the EUSAIR cross cutting issue “Capacity building”.

Priority Axis 4 **Increasing cross border accessibility, promoting sustainable transport service and facilities and improving public infrastructures** is coherent with the Pillar 2 of the EUSAIR Action Plan, with reference to the following topics:

- a) “Maritime transport”;
- b) “Intermodal connections to the hinterland”.

Additionally, it is aligned to the EUSAIR Cross Cutting issue “Capacity building”.

It should be highlighted that the alignment is not comprehensive, as not all the Interreg IPA CBC Italy-Albania-Montenegro topics are present in EUSAIR, and not all EUSAIR ones are mirrored in Interreg IPA CBC Italy-Albania-Montenegro. Please consult also the CP.

Please also notice that in the quality assessment a specific criteria is dedicated to compliance with the EUSAIR. The project clearly contributes to the EUSAIR macroregional Strategy, with specific reference to its Action Plan. In case a project receives a maximum score for this criteria, a specific attention will be paid during project monitoring and a link to the EUSAIR actors will be facilitated.

### 3.1.2 (Q) What are the lead partner responsibilities?

(A) The partner designated by all beneficiaries to act as lead beneficiary (art. 13 of Regulation (EU) No 1299/2014) assumes the following responsibilities:

- a. Is responsible for the coordination of the drafting of the project application and of its submission on behalf of the entire partnership. In case clarifications are necessary during the assessment phase, the Joint Secretariat (JS) will address to it;
- b. Signs a subsidy contract on behalf of the entire partnership with the MA;
- c. Ensures arrangements with the other partners comprising provisions able to guarantee the sound financial management of the funds allocated to the project and arrangements for recovering the amounts unduly paid (a template of the subsidy contract and partnership agreement are elaborated by the Programme and downloadable from the Programme web site);
- d. Assumes the responsibility for ensuring the implementation of the entire operation; in this respect it sets the coordination structure through the appointment of key figures (e.g.: a project coordinator, a financial coordinator and a communication manager) operating for the entire partnership;
- e. Ensures that expenditure presented by all partners has been incurred in implementing the operation and corresponds to the activities agreed between all the beneficiaries, and is in accordance with the subsidy contract;
- f. Ensures that the expenditure presented by all partners has been verified by the controllers appointed by the country where the partner is located according to the specificities of the national system;
- g. Ensures that the promised outputs as in the approved application are delivered in accordance with the set timeline;
- h. Receives the reimbursed amount from the Programme on behalf of the entire partnership and transfers the due amounts to its partners as soon as possible without deducting any amount or specific charge;
- i. Guarantees the reimbursement of amounts unduly paid to the MA upon receiving a recovery order following the detection of an irregularity on behalf of the affected partner(s) (itself or project partner);

- j. Ensures that all project documentation (e.g.: progress report etc.) shall be kept available for a period of two years from 31 December following the submission of the payment request of the MA to the European Commission including the final expenditure of the completed projects or otherwise required by the specific legislation (e.g.: State Aid). The time period referred to shall be interrupted either in the case of legal proceedings or by a duly justified request of the Commission;
- k. Coordinates the communication flow towards the MA/JS with regard to the timely submission of the progress reports and requests for reimbursement;
- l. Is responsible of the communication flow between the partnership and the Programme (mainly with the JS and the MA), it is in charge of spreading communication and information received by the Programme to its project partners, including the announcements to participate to seminars organized by the Programme;
- m. Ensures prompt solutions of management problems (e.g.: change of partners, requests for revision of activities etc.).

### 3.1.3 (Q) What are the project partner responsibilities?

(A) Each project partner carries out activities planned in the approved AF within the deadline agreed at Programme and partnership level. Each project partner shall:

- a. Assume responsibility towards the lead partner of repaying the received undue amount and it assumes its responsibility in case of irregularities in the expenditure it has declared;
- b. Carry out information and communication measures for the public about the project activities;
- c. Ensure that all project documentation (e.g.: progress report etc.) shall be kept available for a period of two years from 31 December following the submission of the payment request of the MA to the European Commission including the final expenditure of the completed projects or otherwise required by the specific legislation (e.g.: State Aid). The time period referred to shall be interrupted either in the case of legal proceedings or by a duly justified request of the Commission.

Obligations of the lead partners towards the Managing Authority are laid down in the subsidy contract, while obligations of the project partners towards the lead partner are laid down in the partnership agreement respectively.

The Subsidy Contract determines the rights and responsibilities of the Lead Partner according to the lead partner principle, the conditions for the project implementation, requirements for reporting, financial controls, litigation etc.

The Partnership Agreement transfers rights and responsibilities from the Lead Partner to the project partners.

Detailed information and templates for these two legal documents shall be provided on the Interreg IPA CBC Italy-Albania-Montenegro website.

### 3.1.4 (Q) Which key elements must be taken into account while drafting the project proposal?

(A) Applicants must carefully read the Interreg IPA CBC Italy-Albania-Montenegro Programme to meet its goals and objectives as well as follow the project intervention logic in order to define project objectives and outcomes. The project intervention logic has to be coherent and has to highlight the changes the project intends to bring with regard to the present situation.

One relevant aspect related to this you should consider is whether your project proposal can contribute to at least one of the programme outputs set for each specific priority.

Moreover, you should verify to which extent your project proposal matches with the indicative actions of the identified Specific Objective as listed in the Cooperation Programme: Even if they are indicative, they give you good indications on the actions the programme intends to fund; additionally, you should ensure that your project contributes to the achievement of the expected results (different per each specific objective) and with the overall objective of the programme which is to act as a policy driver and governance innovator fostering European integration among Partner States (Albania, Italy, Montenegro), taking advantage from the rich natural, cultural and human resources surrounding the Adriatic and Ionian seas and enhancing economic, social and territorial cohesion in the Programme area.

Reference to past funded projects is highly appreciated; however the new project must provide a step ahead in order to avoid the repetition of already funded activities in particular with regard to those partners involved in approved operations also in the past. Synergies with other funds, programmes and projects is welcome, but overlapping and double funding must be avoided.

The project must lead to concrete results at the end of its life cycle and at the same time aim at a long lasting impact. Therefore it is necessary to demonstrate that project partners know already in the planning phase how project results will be used, i.e. what legacy the project will have.

The definition of the partnership is highly relevant: in particular, each partner must have a specific role, coherent with its financial allocation and able to contribute to the improvement of the sector subject of the project proposal also after the project completion.

Do not forget to carefully define the target group(s) benefitting from the activities of your project proposal.

As a general suggestion, kindly check the assessment criteria according to which your project proposal shall be appraised in order to identify potential elements of weaknesses where you have to put more efforts.

#### 3.1.5 (Q) What role should communication play in a project?

(A) Communication is about raising the awareness and informing target audiences as well as changing their attitudes and behaviour about a project and its activities. Such kind of communication plays a strategic role in successful projects. It will help projects to achieve the change they aim for with their thematic activities. When developing project communication objectives it is important to bear in mind that these have to be intrinsically linked to the developed project outputs.

#### 3.1.6 (Q) How can I find partners?

(A) You can join the “Partner search section open at Interreg IPA CBC Italy-Albania-Montenegro web portal” to search for partners and exchange on project ideas, checking partner search file published on the Programme web portal.

#### 3.1.7 (Q) Is there any recommendation on the share of the work package Management from the overall budget? Is 10% of the total budget a fair amount?

(A) The costs depend on the complexity of the project activities and partnership. For some projects 10% might be sufficient, some others might need more. The adequacy and balance will be assessed during quality assessment by JS.

### 3.1.8 (Q) What is meant by promotional materials and communication products, and what are the restrictions?

Promotional materials are branded items which are distributed to stakeholders to raise awareness on the project (e.g. pens), whereas communication products are either not distributed (e.g. roll-ups) or include content information on the project (e.g. brochures).

Promotional materials may be produced only if they are strictly necessary to project communication activities and if they clearly serve the objectives of the project communication strategy. Their cost and the quantity produced should be reasonable and justified. All promotional materials must be branded with the project logo.

The following products may be produced if required by the projects' communication activities:

- Conference folders
- Block-notes
- Pens
- Low budget shoppers
- USB sticks (only if project materials /outputs are uploaded, not empty)

Items not included in this list may be eligible only if agreed with the JS. In order to avoid rejection during project monitoring, the project should contact the JS before purchasing such items, and ask for confirmation that the relevant costs can be accepted.

Communication products, as well as publications containing information on the project and its results are not considered as promotional material and are, thus, not subject to the above restrictions.

### 3.1.9 (Q) In relation with the outputs of the project (O.T1.1, O.T1.2....) into "Implementation" WP, have these to be referred to one or more activities (A.T1.1, A.T1.2....n)? Or has each activity to be associated to one output? Or has each deliverable to be associated to one output?

*(A) **The outputs of the project** listed into the WP T will be the outcome of the activities carried out in the Implementation work package. You must explain which activities will be taken to achieve an output. Each output should be linked to a programme output indicator (please ensure that it has the same measurement unit). One or more deliverables could be linked to each activity.*

### 3.1.10 (Q) In the section called "project risk" of the application form, if after consulting all the partners (all public partner and applying for S.O 2.1) has emerged that there are no risks for the implementation of the project, Is the compilation of the related boxes compulsory? Can it be evaluated negatively to not list any risk?

(A) It is advisable to compile all section foreseen in the AF but this session is not compulsory. Please note there are different kind of risks which may be detected (internal, external etc.).

**The fact that we did not detect possible risks is a negative factor for the project evaluation?**

(A) It is up to you in this phase the evaluation on the relevant topics to take into consideration for the best submission of your own proposal.

### 3.1.11 (Q) What is the definition and understanding of each output indicator for the programme?

(A) In order to support the compilation of eMS sections related to how the project can contribute to the output indicator of the Programme, please pay attention to this table.

Priority axis	Indicator type	Indicator or key implementation step	Explanation of relevance of indicator, where appropriate
1	Output indicator	Number of enterprises receiving non-financial support (common indicator – reference to the Annex of Regulation (EU) No 1299/2013)	<p>For PA 1, in order to take the cooperation aspect into account, at least 2 enterprises per project are foreseen. Projects shall select at least one out of two programme indicators for this priority axis and explain how their activities will contribute to these.</p> <p>Project shall report on how many enterprises were involved in its activities, as final target group for these activities. Involvement can be e.g. through services provided to the enterprises, in the form of training, online support, guidance provided, promotional activities (such as participation in fairs), etc.</p>
1	Output indicator	Number of business and research institutions involved/offering non financial support	<p>For PA 1, in order to take the cooperation aspect into account, at least 2 enterprises per project are foreseen.</p> <p>Projects shall report on how many business organizations and research institutions were involved in its activities, as final target group for these activities, as well as number of organizations, which were offering non financial support to other target groups, such as to enterprises or third organisations.</p>
2	Output indicator	Number of new products, services and pilot or demonstration projects realized	<p>Projects shall select at least one out of two programme indicators for the specific objective and explain how their activities will contribute to these. For S.O. 2.1. projects shall report on how many new products, services and pilot or demonstration products were produced in its activities.</p>
2	Output indicator	Number of valorized sites.	<p>Projects shall select at least one out of two programme indicators for the specific objective and explain how they will contribute to these.</p> <p>For S.O. 2.1. projects shall report on how many cultural or natural sites have been valorized, for the benefit of the sustainable development of territories.</p>
2	Output indicator	Number of enterprises receiving non-financial support (common indicator – reference to the Annex of Regulation (EU) No 1299/2013)	<p>Projects shall select at least one out of two programme indicators for the specific objective and explain how they will contribute to these.</p> <p>For S.O. 2.2. projects shall report on how many enterprises were involved in its activities, as final target group for these activities, in at least two countries.</p>
2	Output indicator	Number of cross-border creative platforms	<p>Projects shall select at least one out of two programme indicators for the specific objective S.O. 2.2. and explain how they will contribute to these.</p> <p>Projects shall report on how many cross-border creative platforms, having a sustainable nature, were created , i.e. the</p>

			number refers to the total platforms created by all projects in this PA.
3	Output indicator	Number of new products and services, pilot and demonstration projects realized	<p><b>Not applicable for this call</b></p> <p>Projects shall select at least one out of two programme indicators for the specific objective S.O. 3.1. and explain how they will contribute to these.</p> <p>Projects shall report on how many new products, services, pilot or demonstration products were produced in its activities.</p>
3	Output indicator	Number of users involved (in pilot or demonstration projects)	Projects shall select at least one out of two programme indicators for the specific objective S.O. 3.1. and explain how they will contribute to these. Projects shall report on how many new products, services, pilot or demonstration products were produced (see above indicator 3) also directly involve at least one final user, at least for the testing/starting phase of this product.
4	Output indicator	Number of new products and services, pilot and demonstration projects realized	<p>PA 4 has two output indicators. Projects shall select at least one out of the two programme indicators for this priority axis and explain how they will contribute to this.</p> <p>Projects shall report on how many new products, services, pilot or demonstration products were produced in its activities.</p>
4	Output indicator	Number of passengers and freight benefitting of the new multimodal connections.	<p>Projects shall select at least one out of the two programme indicators for this priority axis and explain how they will contribute to this.</p> <p>This output indicator refers to number of transport operations e.g. the new multimodal routes, transport services, connections, etc. created for passengers or freight (see above indicator 4).</p>

**3.1.12 (Q) Can a pilot activity take place only in one country? Or shall all partners have the same activity in their work plan? Or shall one partner pay for this activity in all other countries?**

(A) It depends on the project: Partners have to demonstrate that activities are for a joint benefit of the programme area, even pilots implemented only in one of the countries. Shared costs are not allowed.

Each partner should contract services/supplies separately, even if for the benefit of other partners. It is of course possible, that a partner contracts services in the programme area, but outside its own country.

**3.1.13 (Q) In order to better define our Project, it's possible to know the values of the drop-down lists defined for programme output indicators and for pre-defined target groups in the WP Implementation work package?**

(A) A very conservative estimation has been made, so you have to foresee to contribute to at least one unit for each output indicator selected.

With regards to the values for pre-defined target groups, there is no definition at programme level.



3.1.14 (Q) How the "target value" box works and what intend to explain? Is it compulsory to fill in ?

(A) The target value is a quantity value to be reached for each listed deliverable, and it is compulsory to fill it in for each deliverable listed.

## **3.2 Assessment**

3.2.T1 (Q) Are the score grids, as well as the number of applications per S.O. for universities/research centres, ministries and regions, counted separately for normal and small scale projects?

(A) Yes, even though the call is one, in the eMS you will find two different calls (targeted call normal, targeted call small scale) and the score (as well as the number of applications) are separate.

3.2.T2 (Q) Does a project receive more points if it works accross specific objectives, i.e. if it contributes to different S.O.s of the programme?

(A) No. The main objective and result of the project must focus on one single S.O. of our programme and contribute to the related results and outputs indicators. The linkages to other S.O. may well be explained, but they should be functional to the main objective.

3.2.T3 (Q) Is it possible to reduce the budget during a project assessment?

(A) Yes. Based on the outcomes of the quality assessment, the JMC shall makes a funding decision, which includes often conditions. Accordingly, a negotiation phase will be opened, where the JS/MA will require the LP to optimize project planning, activities and budgets.

3.2.T4 (Q) Which kind of documents have to be considered for NGO's operational and financial soundness?

(A) In compliance with the application procedure of the call, the application package shall include for private partners, the balance sheets of the last two accounting years, or of the last accounting year in case of organization established only in the last 12 months, issued according to national legislation.

During the quality assessment each project partner will be checked according to its relevance, experience and competence in the field concerned. Check also the question 1.1.8

3.2.T5 (Q) How does the open ranking list run?

(A) The outcome of the project selection shall be an open ranking list, which is going to be valid until all funds of the programme are absorbed. This means, that in case funds become available in a specific objective, e.g. because of project savings or thematic project allocation not fully absorbed, the next project of the list is going to be financed. Two separate open ranking lists are foreseen: one for "standard" and one for "small scale projects".

3.2.1 (Q) How are the received applications assessed?

(A) The assessment of the application is coordinated by the Managing Authority and performed by the Joint Secretariat, and external experts, if specific technical knowledge is needed. Additionally, Albanian and Montenegrin National Info Points are assessing each project as well.

The Joint Monitoring Committee decided to set up a steering committee, made of representatives of the participating countries, in order to carry out an own assessment on the basis of the JS assessment, before this is submitted to the Joint Monitoring Committee for decision.

In order to ensure equal, fair and transparent approach, the project proposals are assessed according to a set of criteria previously elaborated by the Programme, approved by the Joint Monitoring Committee.

Admissibility and Eligibility check aim at verifying the respect of all formal and substantial minimum conditions of eligibility.

Only those proposals having positively passed the admissibility and eligibility checks will be subject to the assessment of their quality.

Qualitative assessment is performed according to list of criteria and is aimed at assessing their degree of fulfilment by each project proposal.

All project proposals must demonstrate sufficient operational capacity and to respect the State Aid discipline and have no fraudulent behaviors.

Overall assessment of proposals will result from summing up the assessment scores of strategic, operational and sustainability score.

### 3.2.2 (Q) Who will take the funding decisions?

(A) The funding decision is adopted by the Joint Monitoring Committee by consensus. The results of the funding decisions are communicated to the Lead Applicant on behalf of the entire partnership. The Lead Applicant shall inform its partners as soon as possible.

### 3.2.3 (Q) Should the Partnership Agreement regulate the rights and responsibilities of project partners associated organisations as well?

(A) The partnership agreement shall only include project partners. Associated organisations do not have formal obligations towards the Programme as they do not generate or request Programme funds for their activities.

### 3.2.4 (Q) Are the months of contracting phase included in the (up to) 18 Months implementation period?

(A) No, the months of contracting phase come on top of the 18 Months maximum implementation; the 18 months start from the start date set in the subsidy contract.

## 4. FINANCIAL MANAGEMENT

4a (Q) Can all partners receive preparation costs or only the lead partner?

(A) On the basis of the approved project, of the subsidy contract and upon request only the Lead Partner receives the lump sum for preparation costs. Unlike real costs, lump sums are not checked by the controllers and auditors against an expenditure documents, but on the basis of the outputs achieved (in this case the application form developed).

4b (Q) Explanation request or further info on budget related to WP Management", WP "Communication" and budget between Partners within a project proposal:

1. As regards WP Management, does exist a maximum financial limit related to the budget per partner and/or the total project budget?
2. As regards WP Communication, does exist a maximum financial limit related to the budget per partner and/or the total project budget?
3. Concerning the budget assigned for iT, AL, ME partners, are there thresholds to be complied?

(A) It is not foreseen any thresholds of budget to be complied neither for the WP M Management, as for WP C Communication; nevertheless the coherence and the fairness of each of them, will be evaluated during the assessment phase. Concerning the budget for each partner, no minimum budget per partner is required. Anyway the budget allocation shall be coherent and reasonable, as well as inspired to the cross border cooperation criteria. As a general principle, a balanced budget per partner is not lower than 10% of the total budget. Lower partner's shares should be justified

### 4.1 Verification of expenditures (FLC)

4.1.1 (Q) Is it possible to have different real cost calculation methods for staff costs within the partnership and within a partner organisation? Does the lead partner or each project partner decide which method to use?

(A) The decision on the calculation methods has to be made by each project partner depending on their needs and organisational set-up. It is possible to establish different calculation scheme for persons within an organisation. However, the selected method for each person should be kept throughout the project lifetime or at least for the complete reporting period.

4.1.2 (Q) Can we report staff costs for management of a partner organisation, which does not receive any salary?

(A) No. Only payments based on employment contracts (or equivalent employment contract) are eligible. According to the Programme rules, contributions in kind are not eligible.

4.1.3 (Q) How strictly do projects have to follow the initial spending plan? Are deviations permitted?

(A) The spending plan should be calculated in a realistic way. Still, deviations are normal during the implementation. During implementation you can either report less or more expenditure than planned, as long as the total expenditures do not exceed the total budget allocation. However, severe and continuous

underspending could lead to de-commitment of funds. In particular, not reaching 85% of the target for the specific period, may lead to de-commitment, in case the partner cannot prove that this is not due to own failure.

4.1.4 (Q) Do we have to report 100% of the time worked (also outside the project) when using the flexible hours option for part time employees?

(A) Yes, you will need to have a timesheet covering 100% of working the time including activities outside the project.

4.1.5 (Q) How does the reimbursement of the preparation costs works and are partners obliged to present any invoices to receive the funds?

(A) The reimbursement of the preparation costs is done after the signature of the subsidy contract. Partners do not need to provide any financial document to justify the actual costs as these are reimbursed on a lump sum basis, and on the basis of the developed application form.

4.1.6 (Q) As for expenses in currency other than euro, what's the rate of exchange applicable?

(A). The Euro/exchange rate applicable is the one of the month of submission to the First Level Controller (see INFOEURO currency converter)

4.1.7 (Q) During the budget preparation, for the same project partner, is it possible to choose the real cost method for staff cost budget line and at same time the flat rate method for Office and Administrative Expenditures? Or it is mandatory to choose the same method of calculation for both cost categories?

(A) It is confirmed the possibility to use O&A flat rate and real staff cost methods at the same time.

4.1.8 (Q) Concerning the office and administrative expenditures, they get calculated as 15% of the staff costs or 15% of the all amount of grant?

(A) They get calculated as 15% of the staff costs.

4.1.9 (Q) For the implementation of the project, we have planned renting land for testing, and renting a complex for installing and organizing laboratories and workshops. Does the cost of rent be included in the infrastructure expenditure or in the office and administrative expenditure?

(A) As general principles, in Office and Administrative Budget Line it's possible to allocate only expenditures that are mentioned in art. 4 EU Reg. 481/2014. <http://www.interact-eu.net/download/file/fid/5566>

Moreover purchase (and not rent) of land expenses are eligible under the conditions mentioned in the applicant manual.

4.1.10 (Q) ALERT to fill in budget data within the eMS platform in the foreseen WP of each project proposal

(A) Please note that before filling budget data (eg. budget lines for each WP), it is necessary to define periods following the procedure described at page 41 of the eMS User Manual. Otherwise the system will not allow this data entry.

4.1.11 (Q) With reference to the "Equipment" Budget line, in the Fact sheet 4.10 of the Programme manual §13.5, is stated: "..As a general principle, for all project equipment (purchased before or during the project lifetime) only depreciation costs should be allocated to the project.."

"..In case equipment is part of or fully represents an investment item which was listed (in the section of the Application Form dedicated to the description of Infrastructure and Works) and approved in the AF, the full cost of the equipment is eligible"

So, the question is the following: If in the project it is foreseen the creation of a DEMOLAB and there's no need of works or infrastructures costs (because for example the venue is offered for free from an organization, and works have been already done or are covered by other funds), while it is necessary to buy equipment to make the DEMO LAB "Ready to use" and so to realize the pilot initiative.

Or for example it is necessary to buy equipment to implement small pilots (i.e. telemedicine pilot for tourism purposes or environmental monitoring etc...)

In these case, as for equipment we have to consider only the depreciation or we can consider the full cost?

(A) On the basis of the different project ideas mentioned, if the equipment is part of an investment output as specified in the Application Form, the full cost is eligible. Anyway, any further evaluation on the eligibility of equipment (depreciation or full cost) can be done only in the assessment phase, on the basis of a complete project proposal.

We underline that "..In case equipment is part of or fully represents an investment item which was listed (in the section of the Application Form dedicated to the description of Infrastructure and Works) ..., means that when an equipment is part of or fully represents an investment item, this has to be described in the Application Form, in the WP dedicated to the Investment, and in the budget line equipment accordingly."

## 4.2 Public procurement rules

4.2.1 (Q) Do rules on competition and public procurement have to be respected?

(A) Acquisitions by means of public contracts of works, supplies or services from economic operators are subject to rules on public procurement. These rules aim at securing transparent and fair conditions for competing on the common market and have to be respected by beneficiaries.

Rules differ depending on the kind of goods and/or services to be purchased, as well as the value of the purchase and the legal status of the awarding institution. They are set at the following levels:

- EU Regulations, i.e.: all general rules mainly referred to the ERDF and IPA as far as public procurement is concerned (Chapter 3 of Title IV of Part Two of Regulation No 966/2012 and of Chapter 3 of Title II of Part Two of Delegated Regulation (EU) No 1268/2012, also PRAG may be a useful tool);
- National, regional and or/local legislation.

As general rule, the selection of the suppliers shall comply with both the relevant EU (i.e. Chapter 3 of Title IV of Part Two of Regulation No 966/2012 and of Chapter 3 of Title II of Part Two of Delegated Regulation (EU) No 1268/2012) and national public procurement law in force. The strictest procedure, i.e. the most

transparent, the most open to competition or applying the procurement principles in the strictest way, ensures that both rules are respected.

#### 4.2.2 (Q) Do public procurement rules apply also to private partners?

(A) All partners have to observe the basic principles on which the procurement rules are based and ensure the best value for money or, if appropriate, the lowest price. Please check EU rules, national rules and guidelines in this respect (if available) which may set specific/stricter rules applicable also to institutions not falling under the scope of application of the public procurement laws.

#### 4.2.3 (Q) Can we contract and pay external speakers from associated organisations?

(A) External speaker costs belong to the budget line External experts & services. Costs for travel and accommodation of associated partners are eligible.

The contracting of associated partners by the same partner is not allowed as far as it infringes public procurement rules and principles (such as of the equal treatment and transparency).

### 4.3 State Aid discipline

#### 4.3.1 (Q) What is State aid?

(A) State Aid is a fundamental principle to guarantee fair competition in the European Union. This principle is defined by a set of rules in the EU Treaty. State Aid rules may - under certain circumstances - lead to cuts of Programme co-financing to projects. In case activities have to be disciplined by the State Aid regulations, the latter apply to all partners. Applicants and project finance managers should therefore become familiar with State Aid in the context of the Interreg IPA CBC Italy-Albania-Montenegro programme.

#### 4.3.2 (Q) What is included in the concept of undertaking?

(A). It is a concept used in State Aid and it is not related to the nature of the partner (public, private or any other kind of partner). In particular, among the numerous documents, it might be useful, to check this: <http://www.interact-eu.net/download/file/fid/2957>

as well as, even if it is not an applicable legal basis, to check e.g. protocol no. 22 of the Agreement on the EEA.

<http://www.efta.int/eea/policy-areas/goods/competition-aid-procurement-ipr/~media/Documents/legal-texts/eea/the-eea-agreement/Protocols%20to%20the%20Agreement/protocol22.ashx>

### 4.4 Financial Guarantee

#### 4.4.T1 (Q) Financial bank guarantee is compulsory for no profit organizations?

(A) In compliance with the F.S. 3.3 of the Programme Manual, in case private bodies are involved as lead partners, they shall provide the MA a financial guarantee according to EU standards<sup>1</sup> for an amount corresponding to the whole EU pre-financing amount for the duration specified in the subsidy contract, as a pre-condition for the MA to sign the Subsidy Contract.

**4.4.1 (Q) Must the bank/insurance guarantee claimed to the Lead partner in case of the project approval, correspond to 20% of maximum Grant (percentage of anticipation EU)?**

(A) As stipulated in the Subsidy Contract the bank / insurance financial guarantee must cover the pre-financing amount provided to the private Lead partner, for an amount of 20% of the whole EU financing to the project (30% for small scale projects).

**4.4.2 (Q) After receiving the pre-financing, will the further payment be done after the second reporting period (on 12° month upon 18° one)? Nevertheless, I do not understand the following phrase: "the Pre-financing 20% of IPA contribution by signature of subsidy contract Offset of pre-financing in equal shares in the three reporting periods."**

(A) The pre-financing shall be compensated in equal shares with the first 3 payments due to the concerned partners according to actually incurred and validated expenditures included in the related progress reports; therefore e.g. if the pre-financing received is 90.000 EUR and the progress report is 50.000 EUR, the second tranche of funding will be:  $50.000 - (90.000/3) = 20.000$  EUR

**4.4.3 (Q) *De minimis* Self Declaration**

**In case the project has some activities which are economic/market-oriented and we have **Project Partners from Albania and Montenegro**, how should be filled in the Paragraph 5, Point n. 3 (State Aid & *De minimis* Self Declaration/In case the activities in the project are economic oriented..) of the document "Annex A"? Which are the rules applying to AL and MNE project partners with regard to the *de minimis* Regulation?**

(A) In line with the Fact sheet 4.6 of the Programme Manual related to the State Aid discipline, Project Partners must duly fill the declarations in the Section 5 of the Annex A- PP Statement.

State aid rules apply to Member States and to Albania and Montenegro as countries involved in the context of preparation for accession to the European Union (IPA Countries). The applicable rules are in Commission Regulation (EU) No 1407/2013 of 18 December 2013 on the application of Articles 107 and 108 of the Treaty on the Functioning of the European Union to *de minimis* aid.

**4.4.4 (Q) Self Declaration on State Aid**

**If we have a final beneficiary (project partner) which is a Private Body and the project activities are not economic/market-oriented, is it sufficient to provide synthetic motivations on why the project activities cannot be considered undertaking and why they don't affect trade between the participating Countries?**

(A) In this case, following the indications provided in the section 5 of the Annex A, it is sufficient to provide clear motivations why the project activities cannot be considered as undertaking ones and why they don't affect trade between Participating Countries.

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<sup>1</sup> In case of private partners located in IPA Partner States, the identified private bank or public financial institution can provide the guarantee if it offers equivalent security and characteristics as those offered by a bank or financial institution established in an EU Member State. The MA reserves the right to require a certification by a bank or financial institution legally established in EU Member State.

## 5. eMS platform

### 5.1 (Q) How can an application be submitted?

(A) Project proposals can be submitted only through the on-line system of the Interreg IPA CBC Italy-Albania-Montenegro programme (eMS). Other forms of submission shall not be accepted.

### 5.2 (Q) Who and how shall I register with the online submission system?

(A) Lead Applicants need to be registered to get an ID and password on the eMS system to be able to create and submit valid application forms on behalf of the entire partnership.

The project proposal shall:

- Be submitted by the Lead Applicant on behalf of the entire partnership;
- Be submitted using the credentials of the Lead Applicant.

The contact person of the project shall register and be responsible for the application process. As a general rule, the contact person shall use its own professional email address at the lead partner institution and not private emails, such as gmail or others.

Automatically generated email on successful submission will be sent to the email address of the contact person only.

### 5.3 (Q) With regards to the section Activities outside the programme area of the eMS system, is it compulsory to be filled in?

(A) This section must be filled in only if your project proposal foresees activities outside the Programme area. Costs must be related to those activities.

### 5.4 (Q) Uploading of attachments in eMS

(A) We kindly remind that the documents can be uploaded to the eMS in one or more files (it is suggested pdf format). However, the maximum size of EACH uploaded pdf file cannot exceed **12 MB**.

5.5 (Q) For the preparation of budget in EMS, regarding the budget line "staff cost", in Unit Type there are two cells: if in the first one I select "Part-time with a flexible number of hours", can you confirm that I may select for the second cell one of the three options (period or month or hour)? Or am I bound to select the third one?

(A) In case of "Part-time with a flexible number of hours", the unit type to be selected in the second cell is "hours".

5.6 (Q) When entering the legal status of a project partner, only the following options are allowed by the eMS platform: public/private. I kindly ask you how to identify a body governed by public law; in fact, as such, we would be entitled to receive the 15% national co-financing, which is not provided to private partners.

(A) According to EU general rules and the official documents of the Programme in force, the status of the bodies governed by public law is the same of public bodies ones; so, bodies governed by public law are identified as public bodies.



5.7 (Q) It seems the calculation rules automatically applied by the eMS are different from the calculation rules followed by Excel sheet enclosed in the Application Tool Folder of the Call. Could you clarify this difference?

(A) We would like to inform you that the file excel is only a supporting tool for the beneficiaries and not a document to be uploaded in the application pack (note that excel has a different rounding).

Therefore the only data considered correct and binding are those calculated in the eMS platform.

5.8 (Q) With regard to the preparation and closure WP, in the eMS platform – section “Define Period” seems it is not possible to fill in time linked to the project closure. It is possible to specify this period in the text description? How many months I have to consider?

(A). You are free to describe in the text description all relevant information linked to the preparation and closure of your project. Be aware that in the WP 0 you have to describe only preparation costs, whilst closure costs have to be detailed in a specific activity in WP M (Management) and allocated there accordingly. We suggest to fill in the section “DEFINE PERIOD” – Period 0 – in the cell reporting date. The preparation lumpsum shall be included in the first report and the closure lumpsum in the final report.

Anyway the scheduled time plan, reporting deadlines and periods will be fixed in the subsidy contracts of the approved projects.

#### 5.9 (Q) ROUNDING PROBLEMS IN THE eMS

During the filling of data into budget lines of a specific partner, the eMS shows a different total budget within the section “Project Budget - Partner budget - Budget For PartnerX”, the section “Partner “X Contribution Rate” and the section “Project Budget Overview”. More specifically, in the 1<sup>st</sup> section, the total budget is lower than the budget auto-generated in the 2<sup>nd</sup> and 3<sup>rd</sup> sections of eMS in term of few eurocent. In which way we can solve the problem?

(A) This is due to the rounding methodology used by the eMS platform, which leads to a difference between section manually filled in by partner and section auto-generated by the eMS system. This doesn't affect the project proposal submission procedure or its assessment.

## 6. SMALL SCALE PROJECTS

### 6.1 General issues

6.1.1. (Q) How do reporting of lump sums and payments work in practice? Can you make a couple of simulations, which would explain the process of reporting and payment?

(A) These are 3 simulations:

1) Simulation A: Italian LP plans 3 seminars, Albanian PP1 2 seminars, Montenegrin PP2, 1 seminar. In period 1 only 1 seminar for IT LP and 1 seminar for AL PP1 are concluded (first milestone). The rest is concluded at the end of the project.

#### Project total budget

Partners	Country	Seminars	Total	Preparation	Total	Total IPA	Total Nat.
LP	IT	3	51.000	5.000	56.000	47.600	8.400
PP1	AL	2	24.000		24.000	20.400	3.600
PP2	ME	1	11.000		11.000	9.350	1.650
			Total	91.000	91.000	77.350	13.650

#### Project reporting

Period 0	Period 1	Period 2	Total	Total IPA	Total Nat.
5.000	17.000	34.000	56.000	47.600	8.400
	12.000	12.000	24.000	20.400	3.600
		11.000	11.000	9.350	1.650
5.000	29.000	57.000	91.000	77.350	13.650
	1st milestone	2nd milestone			

#### Payments IPA 85%

Advance	23.205	At project signature
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1st Milestone	28.900	End of first period
2nd Milestone	25.245	End of second period
TOTAL	77.350	

2) Simulation B: Albanian LP plans 3 seminars, Montenegrin PP1 2 seminars, Italian PP2, 2 seminars. In period 1 only 1 seminar for AL LP, 1 seminar for ME PP1 and 1 seminar for IT PP2 are concluded (first milestone). The rest is concluded at the end of the project.

#### Project total budget

Simulation B		Seminars	Total	Preparation	Total	Total IPA	Total Nat.
LP	AL	3	36.000	5.000	41.000	34.850	6.150
PP1	ME	2	22.000		22.000	18.700	3.300
PP2	IT	2	34.000		34.000	28.900	5.100
			Total	97.000	97.000	82.450	14.550

#### Project reporting

Period 0	Period 1	Period 2
5.000	12.000	24.000
	11.000	11.000
	17.000	17.000
5.000	40.000	52.000
	1st milestone	2nd milestone

#### Payments IPA 85%

Advance	24.735	at project signature
1st Milestone	38.250	End of first period
2nd Milestone	19.465	End of second period
TOTAL	82.450	

3) Simulation C: Italian LP plans 1 seminar and 2 B2Bs, Albanian PP1, 1 B2B, Montenegrin PP2, 1 B2B. In period 1 only 1 seminar and 1 B2B for IT LP are concluded (first milestone). The rest is concluded at the end of the project.

#### Project total budget

Simulazione C		Seminars	B2B	Total	Preparation	Total	Total IPA	Total Nat.
LP	IT	1	2	59.000	5.000	64.000	54.400	9.600
PP1	AL	0	1	15.000		15.000	12.750	2.250
PP2	ME	0	1	11.000		11.000	9.350	1.650
			Total	Total	90.000	90.000	76.500	13.500

#### Project reporting

Period 0	Period 1	Period 2
5.000	38.000	21.000
		15.000
		11.000
5.000	38.000	47.000

#### Payments IPA 85%

Advance	22.950	at project signature
1st Milestone	36.550	End of first period
2nd Milestone	17.000	End of second period
TOTAL	76.500	

#### 6.1.2. (Q) For the small scale projects do partners have to be located in all three countries?

(A) The Article 39 of the IPA IR (EU) No 447/2014 applies to small scale projects. Please note that the JS, JSC and JMC assesses also that impacts are ensured in the whole programme area.

#### 6.1.3. (Q) Can small scale projects include both workshops and B2B?

(A) Yes, all three type of lump sums are possible, up to EUR 100.000,00

#### 6.1.4. (Q) Is one lump sum covering all events of the project?

(A) No, the single lump sum amount covers only one output (i.e. one lumpsum for one workshop) and it covers all costs incurred before, during and after the meeting. For the workshops remember that at least 40 participants for one day event must be planned and that sufficient evidence must be collected that the event was prepared, implemented and followed up on. The meeting shall reach its objective and it shall contribute to the achievement of the project objective and expected results. We recommend to collect evidence that quality of the event has been ensured and analysed, such as external experts inputs, evaluation by participants, etc.