

**Interreg**



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**IPA** Greece – Albania

# Frequently Asked Questions: Stage B

## 1<sup>st</sup> Call for Project Proposals

Cross-Border-Cooperation Programme

Interreg VI-A IPA ‘Greece-Albania 2021-2027’

CCI 2021TC16IPCB010

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## **1. Submission of Application Form (AF)/Annexes of Applicants package/Documents**

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### **Q 1.1 After completing the Application Form on MIS, is it necessary to extract the final AF in PDF, sign & stamp it and upload it on MIS before the submission?**

It is NOT necessary. The application form will only be submitted electronically via MIS by the LB. The supporting documents should be prepared and signed according to the instructions of the ToR.

### **Q 1.2 What date should we enter in MIS as a start date?**

Please note that projects should be concluded within a maximum period of twenty-four (24) months after the signing of the Subsidy Contract (SC) between the Managing Authority and the Lead Beneficiary. As 'Start date' in the AF you can declare two or three months following the closure date of the Call (07/04/2025). In case your project is approved for funding, there will be adjustment of the start and end date upon contracting, if needed. In any case, the project duration must not exceed 24 months.

### **Q 1.3 MIS/ AF/ Additional information/ question 30:**

**Please clarify the meaning of each of the available options: Direct payment/ Indirect payment – Funding / Indirect Payment – Special Account.**

Please note that this field is not required at this stage. It will be compulsory in case of approval.

It concerns ONLY the Greek partners and refers to the way the payments are executed, selecting the appropriate value from the available list. More particular:

**Direct payment:** The payment by the Accountable Entity / Project Officer is made by paying the corresponding amount via e-PDE directly to the contractor's bank account.

**Indirect payment - Grant:** The indirect payment - grant shall be made by the Accountable Entity / Project Officer by transferring a credit to the specific blocked bank account of the beneficiary. The release of the funds for making the final payments (payment of suppliers, transfer of credits directly to the beneficiary) shall be made in accordance with the respective institutional framework applicable in each case.

**Indirect Payment - Special Account:** the payment without an accountable entity is made by transferring credit to a Special bank Account (it concerns Special Accounts for Research Funds of eg. Universities, Regional Health Authorities,..)

In case "other kind or combination of payments" is selected, analytical description per each Greek partner has to be provided in the comments.

### **Q 1.4 Can we differentiate the budget from Stage A?**

The total project budget of the proposals to be submitted in Stage B cannot deviate from the one submitted and approved during Stage A - unless differently is recommended in notification letters of Stage A. The budget per work package/ deliverable of a partner can be updated without changing the overall project budget.

**Q 1.5 Can we differentiate the partnership from Stage A? Can we change activities?**

In the context of the present 1st call for project proposals - STAGE B, only the partnership schemes of the relevant proposals that have been positively evaluated as approved are invited to participate in Stage B.

In Stage B, you cannot modify the Physical Content (main activities) described in Concept Note.

**Q 1.6 Do we have to select the same Specific Objective or can we change it in Stage B?**

Project applicants are invited to submit in Stage B their detailed proposals **under one (1) of the Specific Objectives as submitted in Stage A.**

**Q 1.7 During Stage B, is it possible to modify the target values for the output indicators of a proposal to be submitted?**

Yes, it's possible to change the value of the indicators. However, you need to consult Annex 10: Programme Output & Result Indicators for the definition of each indicator, the method of calculation, what is excluded and the correlations with other indicators. The coherence of indicators is part of the evaluation procedure at STAGE B, based on relevant Project Selection Criteria, as analyzed in Annex 15 –Selection Criteria.

**Q 1.8 Activities: Regarding the paragraph 7.3 in the Call, what is meant by "project for Stage B must remain consistent with activities approved in Stage A"? For instance, can I remove a works activity and reallocate the budget to other soft actions or equipment, without introducing new activities, in the framework of existing ones?**

In general, removing/changing activities could be a significant modification of the project activities proposed at Stage A. The decision whether the works activities are minor or less significant for the core activities of the project, as proposed in Stage A and concluding in removing/changing them in Stage B is upon each Beneficiary and the partnership scheme. In any case, the main activities cannot be changed, unless it was recommended in the Stage A notification letters.

**Q 1.9 At art. 7.3 of the Call, it is stated that “adjustments to the budget for individual work packages or deliverables are permitted as long as the overall budget remains unchanged”. Is it possible also, to change the amount of budget categories (e.g. staff, equipment, infrastructure etc.) without changing the project amount?**

Overall, the total project budget, the partnership scheme and the main activities of the project must not change. The coherence of all these is part of the evaluation procedure at STAGE B, based on relevant Project Selection Criteria, as analyzed in Annex 15 –Selection Criteria.

**Q 1.10 “IPA beneficiaries”, where indicated in the call for proposal/application package, concern only partners from Albania;**

Where reference is made to IPA beneficiaries, this refers only to partners from Albania.

**Q 1.11 In case that for the financial sustainability of the proposed project, the beneficiaries decide to charge the end-users a minimum fee (that will barely cover the operational costs and in any case beneficiaries will not have a profit) for the use of the infrastructure, are there any additional documents that are required to be attached to the proposal on the MIS?**

At this stage of the submission, you have to clearly justify, in section 9.1 of the Application Form, the need to impose a minimum fee to the end-users. In case of approval, a cost-benefit analysis should be prepared and uploaded.

**Q 1.12 Can we reduce the proposal's budget based to updated market prices?**

According to the par. 7.3 of the Call:

“The total project budget and the project activities for Stage B submissions must remain consistent with the budget and activities approved in Stage A, unless otherwise specified in the Stage A notification letters. However, adjustments to the budget for individual work packages or deliverables are permitted as long as the overall budget remains unchanged.”

#### **Annex 1-Partnership declaration.**

**Q 1.13 Do all organizations have to sign and stamp on one page or can each partner sign on a different page? Does the date of signature have to be the same for all partners?**

The Partnership declaration in Annex 1 may be signed by each PB on a separate page by hand (in that case stamped as well), or by electronic signature. Attention: Each PB can sign on a separate page, but the file should be a single one uploaded on MIS.

Documents must be signed no later than the call deadline. Signing on the same day is recommended, but signing on a different day is acceptable. Documents may be signed electronically or manually.

#### **Annex 6-Maturity sheet**

**Q 1.14 When the budget amount of a Deliverable is 30.000 exactly including VAT, the Maturity Sheet must be filled in;**

When the budget amount is 30.000 including VAT, it is not necessary to fill in the relevant file.

**Q 1.15 As far as external expertise & services are concerned, the corresponding procedures regarding budget justification should not be described; There is no available field in the template.**

The table Budget Justification refers only to infrastructure & equipment. The budget justification of external expertise and services must be provided in Annex 3. Justification of budget accompanied by the respective documentation attached (offers, market research, contracts e.t.c.) in AF.

**Q 1.16 Please clarify if the deliverables should be grouped in the table per tender procedure.**

The Project Maturity Sheet should be filled in, in case of equipment, infrastructure and external expertise & services with a budget above 30.000€ (excl. VAT). The scope of this document is to demonstrate the maturity of the tenders that are to be conducted as part of the project. The deliverables should be grouped in the table per tender procedure.

**Q 1.17 The document A6.Project Maturity Sheet should be provided/submitted by ALL PPs: If a project does not include “infrastructure”, should all partners fill in again the A6. Project Maturity Sheet? Is it accepted to insert “not applicable” to the tables and sign-stamp it? If the response in the above question is “yes”, should the partners reproduce the tables for all WPs, writing “not applicable” to each of them?**

The Project Maturity Sheet should be filled in, in case of equipment, infrastructure and external expertise & services with a budget above 30.000€ (excl. VAT) and not only in case of infrastructure.

Moreover, in cases of deliverables that do not meet the above conditions, those deliverables are not described in Annex 6.

If none of the beneficiary's deliverables exceeds the above-mentioned threshold, Annex 6 shall be submitted electronically via the MIS system and shall include:

- the project information (acronym, MIS code, and beneficiary’s name),
- the statement: "There are no deliverables with a budget exceeding the limits for completing this document", and
- the seal/signature of the Legal Representative of the Beneficiary.

**Q 1.18 Is it required to submit a Procurement Plan or the Maturity Sheet is replacing it?**

According to PPMI (p. 69), the procurement plan will be drafted and sent along with the Subsidy Contract (xls. Template provided). Further instructions will be given to the approved projects during the technical meetings prior to contracting.

**Q 1.19 Maturity sheet: which section of the table provided in the template should be completed for external expertise? Moreover, is it necessary to attach a bill of quantities of market research for external expertise and services related to professional services and/or consultancy and/or professional collaboration?**

**Concerning “Bill of Quantities and Costs For equipment” is it ok to attach market research with the price of equipment needed?**

For external expertise you should complete Section I. Tender Documents, and describe there the existing documents (tender announcement, budget documentation, specifications, technical reports e.t.c.) and Section V: CONTRACTING/ IMPLEMENTATION PROCEDURES if required. If supporting documents on budget estimations are available, you should attach them, too. For more information check also Q1.15

Market research is an accepted type of budget justification for equipment.

## **Annex 7-Feasibility Study**

**Q 1.20** As far as ‘Project Feasibility Study’ is concerned, *“The Lead Applicant shall submit a ‘Project Feasibility Study’, if preparation of a feasibility study is required by national legislation and therefore the relevant guidelines shall be followed. In all other cases, the feasibility study should take into account the following: .....”*. What do you mean by “in all other cases”? Is it required for all project proposals? Is it submitted only in English? Or can it be submitted in the national language?

If the Feasibility study is required by national legislation, you should follow the guidelines of the specific national legislation applicable to your organization. In this case, you should attach the official documents in the national language.

If the feasibility study is not required by national law, you should follow the guidelines in Annex 7 - Project Feasibility Study and submit an overall Feasibility study at a project level. Each partnership follows its format based on the guidelines provided, in order to better document in English and analyze the operational problem and its effective resolution.

Annex 7 is mandatory to be submitted for every project and must be signed and stamped by the legal representative of the Lead Beneficiary.

**Q 1.21** If a partner has included works in its budget and will prepare a feasibility study for works according to its national law, does the LB need to prepare the feasibility study according to the guidelines of Annex 7? In detail, is it enough that a project beneficiary submits its feasibility study related to works, in order not to present the project feasibility study according to Annex 7?

In case a feasibility study already exists for each beneficiary in the partnership, according to the respective national legislation, it is not needed to submit a joint Annex 7.

**Q 1.22** Is there a minimum number of pages expected for the Feasibility Study?

No, there is not. However, you need to be cautious about including all the appropriate information as described in the Call and the relevant Annex 7.

## **Annex 8: Climate endurance Validation Report.**

**Q 1.23** As far as ‘Climate Endurance Validation Report’ is concerned, is it submitted only in English? Or can it be submitted in the national language?

The 'Climate Endurance Validation Report' for LB/B should be submitted by partners that implement investments in infrastructure with an expected lifecycle of at least 5 years. Every partner involved in infrastructure works should complete the report of Annex 8- Climate Endurance Validation Report, following the format provided, sign, stamp and attach on MIS in English Language.

**Q 1.24 Is the Climate Endurance Validation Report (A.8) required for projects that do not include infrastructure works?**

If your project proposal does not include infrastructure works, meaning the budget category "Infrastructure and Works" has no amount, a statement of the LB regarding the non-obligation to submit A.8 should be submitted in the relevant document category in the MIS system.

**Q 1.25 For the Climate Endurance Report , is there a specific form provided by the interreg programme for the CO2 calculation or is it up to each partner to do the calculation?**

No, there is no specific form provided concerning the CO2 calculation. However, the structure of Annex 8 regarding the contents and the information that must be provided in each section/chapter must be strictly followed.

**Q 1.26 Also, every partner has infrastructure to be implemented, the CO2 emissions are to be calculated for each partner separately , or it is one calculation for the whole project?**

**I'm asking the above because, separately each partner's intervention is lower than 20.000tn but in total the whole project exceeds the 20.000tn.**

Annex 8 is completed per partner and per infrastructure project. CO2 emissions are calculated and assessed as for the need of mitigating measures, independently and are not aggregated at the project level.

## **Annex 9 - Compatibility with SEA**

**Q 1.27 Is the SEA Compliance Form required for all project proposals?**

All project proposals are required to submit Annex 9-SEA Compliance, to declare the compliance of the principles of DNSH objectives. It should be filled in, signed, stamped and attached to MIS by the legal representative of the Lead Beneficiary. The LB should indicate the respective mitigating measures in relation to the environmental impact of the project's activities.

**Q 1.28 Is it necessary for a communication strategy to be developed for the partnership as a whole?**

For the purposes of this call for proposals of the Greece - Albania Programme, it is not necessary to prepare and submit a separate document on the communication strategy in STAGE B. The relevant criterion "B2a) Is the communication strategy of the project efficient and well-structured to reach the relevant target groups and stakeholders?" is evaluated exclusively based on what is indicated in the field Additional Information/B.4.1 of AF. However, during implementation and according to the Publicity Guide (p. 15) each partnership needs to have a project communication strategy, defining a specific mix of tools and actions.



**Q 1.29 Is there any template for the Declaration of the non-distribution of profits?**

No, there is no such template. You need to submit a declaration of your own on the letterhead of the organization, signed and stamped by the Legal Representative. In case the relevant information is included in the Organisation's Statute, a separate statement does not need to be attached.

## Utilities section/8.1. Project Bodies Information

**Q 1.30 Please clarify the documents that have to be submitted by each of the following: “Public Bodies”, “Bodies governed by public law” and “Bodies governed by private law/ NGOs” providing evidence for the beneficiary’s competence and administrative capacity.**

Each Project Beneficiary must submit specific documents, as described in Annex 16 - Guidelines for applying in MIS 2021-2027 (p.49), when creating MIS profile for getting MIS Body code to prove its eligibility and administrative and financial capacity. The partnership scheme and the administration and financial capacity of the Project Beneficiaries are part of the evaluation procedure at STAGE B, based on relevant Project Selection Criteria, as analyzed in Annex 15 –Selection Criteria.

All partners of the proposed project, the Lead Beneficiary and each Project Beneficiary **must attach in MENU "Utilities" section/8.1. Project Bodies Information of the MIS** the legal documents that prove the administrative and financial capability, the authority/competency of the beneficiaries for the implementation of the activities of the specific Project, the regulatory framework for the designation of the body responsible for the operation and maintenance of the Project, the existence and operation of a Branch (if applicable)

All the necessary documents can be in the native language of the Beneficiary.

Additionally, the organization chart can be drawn by you, signed and stamped. Through the above documents it is demonstrated that the participating Beneficiary has the competence/ capacity/ experience etc. to participate in an administrative level at the project but also has experience in the thematic area of the project.

The legal documents that prove the **administrative capacity, the authority/competency of the beneficiaries** for the implementation of the activities of the specific Project, per category of organization (public, public equivalent, private) are the following:

<b>Administrative capacity/ Organizational structure &amp; procedures / evidence for the Beneficiary’s competence</b>	<b>Public bodies</b>	<b>Bodies governed by public law</b>	<b>Private - Bodies governed by private law - non-profit organizations</b>
-Statute including all modifications (for the past 2 years)	x	x	x
-Official document indicating the composition of the administrative/managerial or supervisory board	x	x	x
-Official document indicating the supervision by national, regional or local authorities, or other bodies governed by public law (if applicable)	-	x	x
-Declaration for the non-distribution of profits	-	x	x
-Official organigramme	x	x	x
-Official document certified by a public administration authority, providing that the organisation operates for at least one year before the launch of the specific call for proposals	-	x	x

**Q 1.31 a) Please clarify what documents should be submitted concerning the financial capacity of an organization?**

<b>Administrative capacity/ Organizational structure &amp; procedures / evidence for the Beneficiary's competence</b>	<b>Public bodies</b>	<b>Bodies governed by public law</b>	<b>Private - Bodies governed by private law - non-profit organizations</b>
--Official document indicating the sources of the body's revenues and the body's financial state during the last three years preceding the submission of the project proposal	-	-	x

For financial capacity, an Official document must be attached indicating the sources of the body's revenues and the body's financial state during the last three years, in case the body operates for at least 3 years. Otherwise, respectively two or one year preceding the presentation of the project proposal.

**Q 1.31 b) Please clarify the documents that have to be submitted by each of the following: "Public Bodies", "Bodies governed by public law" and "Bodies governed by private law/ NGOs" for the designation of the body responsible for the operation and maintenance of the project?**

<b>Regulatory framework for the designation of the body responsible for the operation and maintenance of the project</b>	<b>Public bodies</b>	<b>Bodies governed by public law</b>	<b>Private - Bodies governed by private law - non-profit organizations</b>
<b>ONLY in cases of infrastructure &amp; investments, according to the responsibility</b>			
-Supporting documents for the relevant responsibility of PB based on legislative framework, regulatory decisions, statutes etc.	x	x	x
	<u>or</u>	<u>or</u>	<u>or</u>
-In case the responsible body is different from the PB, along with the above documents, there must be attached on MIS PBs Body Account the relevant decision of the responsible body or declaration of the Legal representative that is in their knowledge and agree to undertake the responsibility for the operation and maintenance of the specific project.	x	x	x

**Q 1.32 In the case of bodies governed by public law and private-NGOs, that participate with a branch that is located in the eligible area, what documents they must attach?**

Documents providing evidence for the existence/operation of branch	Public bodies	Bodies governed by public law	Private - Bodies governed by private law - non-profit organizations
-(FOR BRANCH ONLY) Official document for the establishment/registration of a branch issued by the competent Public Authority (e.g. Tax Service of the respective country)	N/A	X	X
-(FOR BRANCH ONLY) Copy of the rental contract, submitted to and validated by the respective Public Authority (e.g. Tax Service of the respective country)	N/A	Submit at least one proving the 1 year operation before the launch of the specific call	Submit at least one proving the 1 year operation before the launch of the specific call
-(FOR BRANCH ONLY) Payroll sheet, validated by the competent Public Authority (e.g. Ministry of Labor)	N/A		
-(FOR BRANCH ONLY) Operational costs bills (e.g. electricity, telephone etc.)	N/A		
-(FOR BRANCH ONLY) Operating regulation, approved by the competent administrative body of the organisation	N/A		

In this case, they must attach an official document for the establishment/registration of a branch issued by a competent Public Authority and at least one from the above to prove the 1 year operation before the launch of the specific call.

**Q 1.33 When should the documents for section 8.1 be issued?**

The documents uploaded in section 8.1 should be in their latest version. There is no time restriction, as long as the documents are in a valid state.

**Q 1.34 In case of participation in a project proposal of an organization/university/NGO located outside the eligible area, we would like to know what kind of information we should provide to give evidence of the added value that we bring to the project. Is it sufficient if this information is explained in the Application Form or do you expect something else?**

In case of participation in a project proposal of an organization/university/other body located outside the eligible area, **justification of the added value of relevant PB for the specific project must be attached in MIS AF as a supporting document.**

It is up to each beneficiary to demonstrate the added value and benefits for the programme cooperation area in relation to its expertise and the activities it will carry out. Such evidence should be clear in the Application Form, in which each Beneficiary needs to explain - as the Beneficiary deems necessary - why the Beneficiary's expertise cannot be found among the

Beneficiaries in the eligible area of the Programme. Indicative documentation is displayed below:

<b>Documents providing evidence for the added value and expertise of organisations* located outside the eligible area</b>	<b>Public bodies</b>	<b>Bodies governed by public law</b>	<b>Private - Bodies governed by private law - non-profit organizations</b>
Any relevant documentation that demonstrates that the partner's involvement in the project adds value and expertise to its implementation and benefits the Programme area (e.g. Certificates, Contracts, legal acts etc)	X	X	X

Organizations that have a local or regional branch office, as well as central government bodies with a national-wide competence, are not subject to this obligation.

Overall, if a Beneficiary is found to be ineligible during the evaluation, then the entire proposal is rejected. Each applicant participates in a Project proposal on its own account. In any case, the eligibility check of a potential Beneficiary is part of the evaluation procedure at STAGE B/ PHASE B3 of evaluation, based on the Project Selection Criteria.

**Q 1.35 In case of missing documents on the Body's MIS Attachments on 8.1, will the JS/MA request their upload after the approval of Stage B, without rejecting the Project (permitted errors)?**

The eligibility of the partnership scheme and the administration and financial capacity of the Project Beneficiaries are part of the evaluation procedure at STAGE B, based on relevant Project Selection Criteria, as analyzed in Annex 15 –Selection Criteria. Regarding proposal completeness and eligibility check, please note that it is an on-off procedure with the performance of check on administrative compliance, eligibility requirements under the Call for proposals and compliance with horizontal policies. (Implementation Manual).

**Q 1.36 Is there any grading regarding the financial data of the organisation during the three last years?**

In Annex 15, and specifically in criterion B1c, it is examined and evaluated whether the managerial and operational capacity of the partners (beneficiaries) is adequate for the successful implementation of the assigned project activities. In this aspect, criterion B.1.c focuses on and scores the beneficiaries ability from a technical point of view (financial, human resources, premises, etc.).

**Q 1.37 What documents are needed to prove evidence for the beneficiary's competence?**

The required documents to prove evidence for the beneficiary's competence are provided in Annex16 - Guidelines for applying in MIS 2021-2027 (§A. Documentation of the nature, type, legal form, page 49).

**Q 1.38 Do we need to submit official decisions of the Partner organizations to participate?  
E.g. decision of the Municipal Council?**

Such a decision is not required to be submitted at this stage. There is an obligation before the signing of the subsidy contract to submit the Decision of the designated bodies of each project beneficiary (e.g. Board of Directors, Municipal Board, Director, Service Manager, etc.) accepting to implement the project as it was approved by MC.

For more detailed information please consult the Programme and Project Implementation Manual/SECTION C: PROJECT IMPLEMENTATION/iii. Subsidy Contract signature and the accompanying documents.

## 2. Eligibility of Expenditure & Financing

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**Q 2.1 The project covers 85% of the budget, and partners from Albania must contribute the remaining 15%. Is this correct? If yes, does the 15% contribution need to be a financial contribution, or can in-kind contributions be counted?**

The EU contribution rate is 80%. Beneficiaries shall ensure the needed own contribution (public and/or private, if applicable). The 20% contribution is a financial contribution.

Regarding the national funding (20%), all the public institutions in Albania need to plan their co-financing for the projects they are participating in their budget. SASPAC will support public institutions with pre-financing (of national contribution) only in duly justified cases when other means of financing are not available. Regarding the non-profit organizations, no public support is available, so they need to finance all the eligible costs through their budget.

**Q 2.2 Is an open call always required in the procurement/tender process, or can "closed" calls (inviting specific subjects directly) be considered in certain cases? If so, what are the rules and criteria for this approach?**

For all beneficiaries, the respective public procurement procedures should be followed. Specifically, for Albanian beneficiaries, PRUG Rules must be applied regarding the tendering procedures.

**Q 2.3 For a partner from Albania, during the implementation, is there a procurement threshold below which strict procedures like tendering or open calls are not required? If so, are there any additional steps (e.g., authorizations or MEMOs) needed?**

For Albanian beneficiaries, PRUG Rules must be applied regarding the tendering procedures.

**Q 2.4 Can amounts be reallocated between budget lines during implementation without changing the overall budget? For example, if costs for activity X exceed predictions, but savings are made in another activity, can the difference be compensated within the same budget or working package? Or can reallocation also occur between working packages?**

Please consult the Programme & Project Implementation Manual and the particular Project modification chapter (p.73-86).

**Q 2.5 Do the financial spending justification documents always require a contract, invoice, and bank payment, or are there more flexible options? For example, are the following permitted as justification docs:**

- Payment without an invoice if the supplier is an individual (with a service contract)? So, payment through the bank as per service contract (net to other tax predicted)?
- Payment with an invoice but without a contract?
- Cash payments (with invoice)?

Specific guidelines concerning the implementation project phase will be communicated to the project beneficiaries of the approved projects.

**Q 2.6 If changes are needed in the budget during project implementation, can the contract between JS and the partner/beneficiaries be amended? If so, can the amendment include an increase in the support budget from JS, or is it limited to the originally contracted amount, or less?**

Please consult the Programme & Project Implementation Manual and particular Project modification chapter (p.73-86). Specific guidelines will be communicated to the project beneficiaries of the approved projects.

**Q 2.7 Can the budget between beneficiaries be changed during the implementation without changing the overall project budget? If yes, who decides and what is the procedure for making these changes?**

Please consult the Programme & Project Implementation Manual and the particular Project modification chapter (p.73-86). Specific guidelines will be communicated to the project beneficiaries of the approved projects.

**Q 2.8 Can the contract be extended if there are delays? What is the procedure for requesting an extension?**

Please consult the Programme & Project Implementation Manual and the particular Project modification chapter (p.73-86). Specific guidelines will be communicated to the project beneficiaries of the approved projects

**Q 2.9 The purchase of a vehicle (mobile mental health unit) will be made from the equipment expense category. Maintenance - safety costs are eligible and if so, can they be charged with the purchase of the vehicle or must be budgeted to external expertise & services as an equipment maintenance service ?.."**

Maintenance – safety costs are not an eligible cost but an obligation of the entity that will procure and purchase the equipment to cover the respective expenses.

**Q 2.10 Staff Costs & Office and administrative costs**

**Is it possible for some beneficiaries to have zero staff costs and therefore in this case the office and administration costs must be zero?**

Yes, some beneficiaries can have zero staff costs. In this case, there may be office and administration costs, but only as real costs.

**Q 2.11 Is it possible to assign a company e.g. for project management?**

Yes, it is possible to assign a company to manage the project following the respective public procurement procedures.

**Q 2.12 Regarding the Civic Society Organisations (e.g. a Civic Company), are the members (partners) of the company considered as staff or as external experts?**

Staff Costs can be financed for individuals who are either permanent staff of the organization or hired based on open recruitment procedures as non-permanent staff.

Generally, the partners of the company cannot fall under the Staff category, unless otherwise stated in National Law and/or in the company's operating statute.

Additionally, expenses for external experts are also eligible, provided that the relevant assignment is made following the corresponding procedures. Partners of a company generally cannot be employed as external experts within their organization for reasons of transparency and conflict of interest.



Finally, answers to such focused questions are expected to be provided after projects approval and during the info days for the implementation of the Projects.

**Q 2.13 We need clarifications on how municipalities and other public bodies declare staff costs, as they can not hire external personnel, at least within the timeframe of the projects (ASEP procedures take forever).**

Regarding the Greek beneficiaries, Annex 18 (Ministerial Decision 45820/17-03-2023) applies, which defines the eligibility rules for each category of expenses. More specifically Article 14, case 2b concerns the eligibility of Staff Costs for public sector entities.

**Q 2.14 With reference to the JoBC file in the budget check section there are budget constraints limits where the staff cost of the partners at the project and partner level is calculated max 20%, so if you exceed this percentage the cell becomes red.**

We have chosen a mixed system of staff calculation cost (flat rate and real cost) but we cannot find in any section of the call that the level of staff cost in the budget should be at project level and partner level (real cost) max 20%, on the contrary in the call are clearly indicated the following budget rules:

**7.12** The management costs of each project beneficiary should not exceed 10% of its total budget. For the Lead Beneficiary this percentage shall be limited to 15% of its budget.

**7.13** Communication' costs cannot exceed 15% of the total project budget, without limits at beneficiary level.

**7.16** The Office and Administration costs cannot exceed 4% of the total beneficiary's budget in both reimbursement options.

**The question is: do we have to respect the 20% limit of staff cost at project level or can we exceed this percentage considering that we also have included a real cost calculation method?**

It is necessary to respect the 20% limit of staff cost at beneficiary level when the flat rate option is chosen. In any case, there is no limit on Staff budget category when the real cost option is applied. It is reminded that if the simplified cost options or the real cost option is selected by a project beneficiary, it not possible to be modified, either during its implementation or upon its completion.

**Q 2.15 In case the office and admin cost or travel was not calculated at stage A as a whole number, e.g. it was 2.78% (for office or 13,2% (for travel) can we change it in stage B? Even if it means that the total budget will be increased? If not, how can we fill in the Job file?**

The total budget of the project proposal should remain the same as submitted in Stage A. The total budget cannot be increased, though you can proceed to internal reallocation of amounts within the partner's budget. Adjustments to the budget for individual work packages or deliverables are permitted as long as the overall project budget remains unchanged. In order to fill in the JoB file, at flat rate options a whole number as a percentage should be indicated. No decimals are allowed.

**Q 2.16 Could you confirm whether there will be a verification cost for the Greek and Albanian partners? Also, is the verification cost eligible for both Greece and Albania?**

A centralised system is applied in regard to the verification of expenditures made by the PBs of the approved projects in the Greece-Albania programme for both countries. No verification costs need to be included in the AF.

**Q 2.17 Is the VAT cost for the expenditures eligible? Or are expenditures calculated without VAT?**

For Greek Beneficiaries, VAT is eligible for all projects and for all categories of Beneficiaries, since the maximum budget of a project proposal in the 1st Call is 1.500.000,00 € (incl. EU & National Funds).

For Albanian Beneficiaries, zero-rate VAT treatment is provided by the Albanian National Authority (SASPAC), following a specific procedure to be completed by the beneficiaries. Therefore, the budgets of the approved actions by Albanian beneficiaries should not contain VAT costs.

**Q 2.18 Are the preparation costs eligible? What is the limitation? Does the limitation apply on a Beneficiary or at a Project level? Will they be calculated on Real Cost or on Simplified Cost bases?**

Costs within the budget lines “staff costs, travel and accommodation costs and external expertise and services”, which have been incurred for the preparation of the project, are eligible for funding if they do not exceed the amount of €30.000 at the project level and should be calculated on Real Cost basis.

**Q 2.19 What is required to document preparation costs in case of assigning a proposal to external expert?**

For such external expertise services, the process of public contract award must be followed according to the applicable legislation. Therefore, a signed contract, an Award Decision, etc. could be considered as a commitment decision.

**Q 2.20 Do preparation costs need to be declared in a separate Work Package or in a specific Deliverable? Can invoices for preparation costs be issued after the project is approved?**

The provision for the preparation costs is set out in the Programme & Project Implementation Manual (p.58).

**Preparation cost must be included in the Application Form/Stage B in the Deliverable 1X1 “Preparation Activities”** (where X is the number of beneficiary).

The services or activities must be implemented and there must be at least a commitment decision for them between 1st of January 2021 and the date of submission of the Application Form. The related invoices and payments could be issued and made after the project is approved. The payments for preparation costs should be included preferably in the first request for verification.

### **Q 2.21 Is it possible to create additional budget lines?**

No, Project budgets must be structured according to the following predefined six (6) budget lines:

- 1) Staff costs
- 2) Office and administrative expenditure
- 3) Travel and accommodation costs
- 4) External expertise and services costs
- 5) Equipment expenditure
- 6) Infrastructure and works

### **Q 2.22 Is it possible for a Project Beneficiary to choose different methods of cost calculation for staff costs, for office and administration costs and for travel and accommodation?**

Each project partner must select a method of cost calculation (flat rate basis or real cost basis) for staff costs, office & administration costs and travel & accommodation. Different methods may be chosen.

SCOs declared in AF shall not be modified either during its implementation or upon completion.

### **Q 2.23 What is the difference between 'Equipment' and 'Infrastructure & Works' budget lines?**

The budget line 'Equipment costs' refers to expenditure for the financing of equipment purchased, rented or leased by a partner, necessary to achieve the objectives of the project. The budget line 'Infrastructure & Works costs' refers to expenditure for the financing of infrastructure and construction works related to investments in infrastructure that do not fall into the scope of other budget lines.

### **Q 2.24 Advance Payments: Is there an opportunity for advance payments to partners? If so, what percentage of the beneficiary's budget is the upper limit for an advance payment and what are the specific requirements for obtaining such payments?**

All categories of Beneficiaries in the Greek territory are entitled to receive financing (incl. the national contribution) from the Public Investment Programme (PIP) after the signature of the Subsidy Contract and the Partnership Agreement. All eligible costs of activities/projects incurred during the implementation phase of the project will be financed by the Public Investment Programme (PIP).

The Beneficiaries from Albania are entitled to request pre-financing to be used for the approved project only. The maximum amount of pre-financing that can be requested by a beneficiary is up to 25% of its EU contribution to the project budget, as presented in the operation approved by the MC (25% X 80% of the total beneficiary's budget).

**Q 2.25 Can we change the cost calculation in STAGE B? For example, if a partner has stated at Phase A that the cost calculation for travel and accommodation costs was flat rate, could the partner change it at Stage B and state that the cost calculation for the travel and accommodation costs is real cost?**

Yes you can. It is reminded that if the simplified cost options or the real cost option is selected by a project beneficiary, it is not possible to be modified, either during its implementation or upon its completion.

**Q 2.26 In the "Brief summary of project budget" of Concept Note we have indicated in the Cost Category column "consumables and laboratory reagents" costs, but in the JoBF this cost category is not present in the budget lines. Where can we enter these costs?**

Consumables are eligible, given that they are necessary for the implementation of the project and are duly justified. These costs should be budgeted and reported under the Budget line 'Equipment'.

**Q 2.27 In Work Package 1 for Management, project technical meetings have been defined as separate deliverable. Does their budget fall within the 10% limitation (15% for lead partner) applicable to work package 1?**

Only the preparation costs are not calculated in the above percentage limits.

### 3. Project Development

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**Q 3.1 Can a programmatic agreement be signed between the beneficiary/partner of the proposed project and another entity whose sole purpose is to carry out the tender process for services/supplies (specifically between the Hunting Federation of Epirus, beneficiary/partner of the proposed project, and the Region of Epirus, with the sole purpose the latter to carry out the necessary tender procedures through ESIDIS)?**

The case of assuming responsibility for the implementation of a Project instead of the owner of the project, by another body, is provided for in Article 8, point 3 of the YPASVD of INTERREG Programmes 2021-2027 (Government Gazette 3281/Issue B'/17.05.2023), as follows: "In the cases of actions for which the responsibility for the implementation of the action is assumed by another entity as beneficiary instead of the project owner based on a programming agreement, following article 44 of Law 4412/2016, as it applies each time, the eligible costs are paid for the act by the project owner or by the beneficiary, depending on what is specified in the programming contract,...". Furthermore, the YPASVD lists in detail (points a to h) the conditions that must be met in order the relevant Programming Agreement and the costs derived from it to be eligible.

In addition, article 44 of Law 4412/2016 states that:

"Article 44. Technical competence of contracting authorities in **public works contracts and studies**

1. The contracting authorities who judge that they do not have technical competence or their technical competence is incomplete, may in particular:

- a) enter into programming agreement, within the meaning of paragraph 6 of Article 12, for concluding, supervising and **overseeing a public procurement for work or study**,
- b) conclude contracts for the provision of technical services within the meaning of article 52 and
- c) be supported by the EKAA of par. 1a of article 41 in the context of its exercise of ancillary purchasing activities.

3. The contracting authority is responsible to the project owner for the proper performance of its duties and to third parties it is jointly and severally liable with the project owner. If the programming agreement does not specify otherwise, it represents the project owner in court and out of court against third parties during the exercise of its duties until the end of the contract. The ruling bodies are determined by the programming agreement."

**Therefore, from the above it is clear that the conclusion of Programming Agreements is allowed only in cases in which conditions of Article 44 of Law 4412/2016 are met and exclusively for the services described in paragraph 1a of Article 44.**

More specifically, the following should apply cumulatively:

- a) documented non-existence or inadequate existence of Technical Competency of a Contracting Authority/ potential Beneficiary,
- b) assumption of responsibility by another body, exclusively for the services referred to in Article 44 par.1, i.e. "for concluding, supervising and overseeing a public procurement for work or study", and not for the provision of other services.

In any case, the body that assumes responsibility can not, be a contractor for part or the whole of the works or studies.

The potential Beneficiary should document, during the submission of the proposal in Stage B, the need to conclude a Programming Agreement in the context of the above.

Exceptionally, a Programming Agreement can be signed after the MC approval decision only in exceptional justified cases. For that, please consult the Programme & Project Implementation Manual (PPIM/ § Other modifications/ b) Modifications related to special cases of take over).

As a conclusion, programming agreements are allowed with the above-mentioned requirements only for works and other related scientific services and NOT for supplies.

### **Q 3.2 What should the time-span of projects be?**

The maximum duration of a Project should be 24 months. There is no minimum limit. In any case, the time plan of the Project is part of the evaluation procedure at STAGE B.

### **Q 3.3 In case there are no actions outside the Programme area, should WP6 be left blank?**

In such case the Project may have three (3) thematic Work Packages (WP 3,4,5), if required, additional to the obligatory WP1 - Project Management & Coordination and WP2 – Project Communication & Dissemination. WP6 will not be used at all.

### **Q 3.4 Is it mandatory for the Project proposal to contribute to all Programme Output Indicators for the relevant Specific Objective?**

Each Project is asked to select those indicators that will fit best to the particular planned results and outputs of the Project within the framework of the selected Specific Objective. Therefore, a Project applicant can apply a Project proposal only under one Specific Objective and select only the most suitable respective indicators (see Programme Output & Result Indicators Guide).

#### 4. MIS/ Other issues

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##### Q 4.1 Mandatory Field in MIS: Is the “Project Description to be Published” field in the MIS system mandatory for completion?

This field is in MIS AF/ Section A and it is mandatory to be completed.

##### Q 4.2 How do I issue a new MIS Body Code? How do I update an existing MIS Body Code?

A **Body Code** serves as a unique identifier for an institution, organization, or other entities that are beneficiaries of a project. This code helps distinguish between different organizations or institutions within the system, ensuring each entity has a unique reference for project tracking, funding allocation, or resource management.

To issue a new MIS Body Code, you need to send us the excel file, by selecting the link below according to your country of origin:

##### **For Greek organisations:**

[https://www.ops.gr/Ergorama/fileUploads/ypostiriksi/kodikopoiisi/purinas/entipo\\_foreis.xls](https://www.ops.gr/Ergorama/fileUploads/ypostiriksi/kodikopoiisi/purinas/entipo_foreis.xls)

##### **For Albanian organisations:**

[https://www.ops.gr/Ergorama/fileUploads/ypostiriksi/kodikopoiisi/purinas/ORGANIZATIION\\_INFORMATION\\_FORM.xls](https://www.ops.gr/Ergorama/fileUploads/ypostiriksi/kodikopoiisi/purinas/ORGANIZATIION_INFORMATION_FORM.xls)

**In any case, for detailed information, please consult Annex 16: Guidelines for applying in MIS 2021-2027 and the Programme’s website for relevant news.**

##### Q 4.3 Do we also have to fill in section D of the AF on the MIS? Or is it automatically filled in by using the button “import from excel”?

No, it is not automatically filled in. You need to complete MIS AF/ Section D related to the budget by using the xls. sheet ‘AF Tables’ of A3: Justification of Budget.

##### Q 4.4 Given that the Application Form opened in MIS during the 1st stage of submission remains the same and the full proposal will be developed into this, please clarify if the work package "concept note" should be now deleted in order to have only the analytical information of the particular work packages (1 to 5). If not, how we should deal with the numbering of work packages and the budget that will include both concept note and work packages.

In Annex 16 - Guidelines for applying in MIS 2021/2027 **page 30** the procedure for submitting a Funding Application for Lead Partners of projects that have successfully passed the first phase of the evaluation of a concept note is described. The user selects the Edit option to complete the AF to be submitted in the context of the second phase of the call. The selection of the Edit action leads to the detail electronic form of the project AF with the fields filled in from phase A and **with the possibility of editing them.**

All data concerning the previous phase is now irrelevant and should be edited/deleted. For more information about the work packages see **page 39.**

#### **Q 4.5 Is the MIS platform fed with all the Work Packages descriptions as in the excel file?**

In the section budget of the MIS you should fill in all the WP and Deliverables. These should be the same as declared in the A3: JoB. We also indicate, that the WP1 should be dedicated to the management costs, WP2 for publicity and communication activities, WP3-WP5 are the technical WPs, WP6 only for the activities outside the eligible area. The max number of deliverables per WP is five.

#### **Q 4.6 - I accessed my account and I can't see the project for phase b submission.**

The AF can be edited by the author of the phase A application form or the user with submission role.

#### **Q 4.7 We would like to clarify the following issues.**

- **How can we overcome an alteration in a Name of an institution from Stage A to Stage B?**
- **How can we correct a spelling mistake in the Name of an institution on MIS?**

Cases of a clerical/spelling error in the name of a participating organization in partnership: One of the beneficiaries of the approved partnership has changed its title/name and:

- The beneficiary is registered in MIS:  
Please fill in the following Excel files selecting UPDATE and filling in column (1) the Body code of the beneficiary.
- The Beneficiary has not been registered in MIS:  
Please register the organization with the correct title/name filling in the following excel files selecting NEW and leaving the column (1) empty.

For Greek organizations:

[https://www.ops.gr/Ergorama/fileUploads/ypostiriksi/kodikopoiisi/purinas/entipo\\_foreis.xls](https://www.ops.gr/Ergorama/fileUploads/ypostiriksi/kodikopoiisi/purinas/entipo_foreis.xls)

For Albanian organizations:

[https://www.ops.gr/Ergorama/fileUploads/ypostiriksi/kodikopoiisi/purinas/ORGANIZATION\\_INFORMATION\\_FORM.xls](https://www.ops.gr/Ergorama/fileUploads/ypostiriksi/kodikopoiisi/purinas/ORGANIZATION_INFORMATION_FORM.xls)

If the contact details and/or Legal Representative of your organization have changed, then you need to update MIS Body Code 8.1/ Project Body Information. Please note that changes to the members of the partnership are not allowed at this stage. In any case, for detailed information, please consult Annex 16: Guidelines for applying in MIS 2021-2027 and the Programme's website for relevant news.

#### **Q 4.8 If the MIS account 2021/2027 is not required for project partners, is it still necessary to upload the legal documents? If so, where should these documents be uploaded? Additionally, could you please specify which "legal documents" are needed, considering the different types of partners (private, public, etc.)?**

Each Project Beneficiary must submit specific documents, as described in Annex 16 - Guidelines for applying in MIS 2021-2027 (p.45), when creating MIS profile for getting MIS Body code to prove its eligibility and administrative and financial capacity. The partnership scheme and the administration and financial capacity of the Project Beneficiaries are part of



the evaluation procedure at STAGE B, based on relevant Project Selection Criteria, as analyzed in Annex 15 –Selection Criteria.

All partners of the proposed project, the Lead Beneficiary and each Project Beneficiary **must attach in MENU "Utilities" section/8.1. Project Bodies Information of the MIS** the legal documents that prove the administrative and financial capability, the authority/competency of the beneficiaries for the implementation of the activities of the specific Project, the regulatory framework for the designation of the body responsible for the operation and maintenance of the Project, the existence and operation of a Branch (if applicable)

Each Project Beneficiary (not just the Lead Beneficiary) must attach as follows:

- **If they have an 2014/2020 MIS Body code** they update the Beneficiary's information in the MIS 2021-2027 and attach the legal documents,
- **If they don't have an 2014/2020 MIS Body code** they need to activate one and then attach the legal documents.

As for the legal documents, consult the relevant answer in the section Utilities section/8.1. Project Bodies Information of the present FAQ document.