

Requests for clarification/amendment of the Guide for Applicants (GfA) for Flagship projects (FSP) - Organizations / entities established in Romania

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1	ADETIM - Agentia de Dezvoltare Economico-Sociala a judetului Timis, Delia Frantiu	Chapter 1, 1.5 State Aid	<p>The assessment of state aid incidence is part of the assessment process of project in the eligibility verification phase.</p> <p>In this case, ADETIM considers that is not correct and natural that the beneficiary has to assume its own responsibility that "the activities proposed by the project does not fall under state aid" before any assessments made by competent bodies / authorities.</p> <p>It is not clearly stated in the Guide for Applicants who are actually relevant authorities in establishing and assessing state aid and in their opinion these authorities should be involved in assessing state support since the phase of elaborating the concept note, so that the project can then be further developed safely on eligibility and especially in legal conditions.</p>	<p>According to the guide, after having checked how the project responds to the Programme' recommendations to avoid state aid, by filling in the state-aid incidence self-assessment grid, the beneficiary will give a statement regarding this matter. Therefore, this is a knowingly made statement, and first of all it is an instrument for the respective applicant to see whether it fits in the Call's requirements.</p> <p>The assessment of a project proposal, from the point of view of state-aid incidence, will be carried out by dedicated external assessors. This assessment cannot be performed in the Concept Note phase, due to lack of sufficiently detailed information.</p> <p>The Competition Council is a public institution having a certain role in the legislative aspects regarding the state aid, but without projects' assessment prerogatives.</p> <p>However, in case of a suspicion, the EC has the final decision. The Programme can only deliver its grounded opinion.</p> <p>Finally, it is very important for the potential beneficiary to:</p> <ul style="list-style-type: none"> - Read carefully the Programme's recommendations on state aid; - Apply them; - Keep them during the implementation period. <p>We mention, also, that an authority cannot be involved in the elaboration of a project proposal, considering that this belongs to the potential beneficiary, and it would violate the principles of competition, transparency, equal treatment and non-discrimination, and immediately attract suspicion of conflict of interests. As we all should be aware, there are legal provisions strictly forbidding it.</p>
2		Chapter 1, 1.2.2 Programme' indicators	<p>ADETIM considers that the project indicators are insufficient and uncorrelated with programme indicators and specific objectives and therefore further narrow the possibility of identifying activities funded by this programme.</p> <p>It is an important chapter, because an application can not be submitted if an output indicator proposed in the project cannot be found in the Programme' s pre-defined list of indicators. Unfortunately, the output indicators chosen in the Programme don' t sufficiently cover the activities described in Fact sheets and, on the other hand are not correlated with the result indicators or with the specific objectives.</p>	<p>Please be advised that the GfA is listing the Programme' indicators.</p> <p>The output indicators related to operations that are to receive contributions, the result indicators relevant for each investment priority, the specific objectives, indicative activities, etc. are the result of a long and laborious process that took place in the programming phase. The Cooperation Programme was approved by the European Commission in December 2015, this being an element specifically included in the relevant EC Decision. Therefore, any such change of the Programme would need to <u>be approved by the EC</u>. At this moment, changing of the Programme is not welcomed, nor justified.</p> <p>Nonetheless, projects must subscribe to these indicators, which must be fulfilled through the activities developed by the respective projects.</p> <p>You are right that if you can not identify and choose an indicator from the predefined list of the Programme, the application can not be submitted. All your comments operated directly in the draft GfA regarding the Programme's indicators, their number / lp, their name, their quantification, their relevance in relation to indicative activities or with a specific priority and/or the objectives were duly read. However, please be advised that these indicators were defined, quantified and approved in the Cooperation Programme, after a careful analysis of the needs identified in the eligible area, in the programming phase. Any application that is submitted under a call shall meet the requirements and the needs of the Programme, in terms of eligible activities / indicators / objectives.</p>
3		Chapter 1, 1.6 Revenue Generating Projects	<p>In this case, isn't the financing considered State Aid? Because there is an economic advantage, otherwise we could not talk about profit.</p>	<p>State aid and Revenue generating projects are two different concepts. A project could be generating revenue without falling under State Aid incidence, as can fall under the State Aid incidence even if it does not generate revenue.</p> <p>Revenue generating projects can be financed under this call for proposals.</p> <p>Distinction must be made between revenue and net revenue, and between net revenue and profit as well.</p>
4			<p>What's the point of mentioning the net revenues in the AF, but not in the project budget (as such revenues are ineligible)?</p>	<p>Net revenue is not eligible, and has to be identified in order to be deducted from the total eligible cost. The eMS budget template allows the listing of the net revenues. However, a distinction must be made between revenue and net revenue, and also between net revenue and profit. If the revenue level is lower than the operational costs, there is no net revenue for that project.</p>
5			<p>Since the cost-benefit analysis is required at the partner level where their budgets include costs for infrastructure works, according to the Guide of Applicants, the CBA is to be done only for the FS, and not for DAIW too....according to relevant national legislation GD 28 / 2008</p>	<p>Please consider that this cross-border cooperation programme sets requirements for the eligible area and potential beneficiaries as a whole. It is a rule established at Programme level.</p> <p>The cost-benefit analysis (Annex VII.6) is required, regardless if there is a new or already existing infrastructure object, or of the amount of the investment.</p> <p>Also, this ACB is not limited solely to the infrastructure item.</p>

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6	ADETIM - Agentia de Dezvoltare Economico-Sociala a judetului Timis, Delia Frantiu	Chapter.2 Rules of the Call for Proposals, 2.1 Description of the Call	According to mandatory annexes table (page 40), the feasibility studies and cost-benefit analysis are not mentioned as mandatory documents to be submitted in the CN phase. In addition, the CBA is part only of the FS, according to GD 28/2008, so it is not necessary to mention it separately.	Please be advised that this is a cross-border cooperation programme, so that the GfA describes the rules of the Programme, not those deriving from the Romanian national legislation only. These documents do not appear as mandatory in the CN phase, as this phase was designed for allowing the elaboration of necessary documents for submission of FA, including the FS and/or the CBA.	
7			At 2.1, point 3, is not clear when the implementation period begins.	The starting date of the implementation period will be clearly mentioned in the Partnership Agreements and in the subsidy contracts that are to be concluded. As stated in the Partnership Agreement, a project may begin on the 2nd day after the receipt of the notification on the project selection or the 2nd day after the subsidy contract is signed by the last party, or on an interim date between the two above (date of receipt of notification or signature of the subsidy contract). The option will be made during the pre-contracting period.	
8			At point 8 of 2.1, as regards to project applicants and their associated partners, the correlation with indicative lists of applicants mentioned in the Fact Sheets, is to be verified.	The GfA mentions the eligible categories of applicants, while the Fact Sheets present in detail for each investment priority, indicative lists of operations and/or eligible applicants.	
9			It is mentioned that the lead applicant is a public body, could it be a public equivalent body, governed by public law, too?	Under this call for proposals, a specific request for the Lead Applicant is to be a public body. Regarding all Project Applicants and Associated Partners, if it is the case, they have to be entities falling into one of the following categories: a. Public bodies b. Public equivalent bodies, governed by public law.	
10			Are the travel and accommodation costs of Associated Partners eligible? (page 26)	To be eligible, the costs must comply with a series of conditions, as described in the GfA (chapt.2.2.1.3), and Annex III. Programme rules eligibility of expenditures. Being that the Associated Partners shall not receive financing (they do not have a budget for the project) and will not bear direct responsibility for the preparation and management of the project activities, nor will they enter into any contractual relationship with the Managing Authority / National Authority, their own expenses are not eligible.	
11			2.2.1.2. Eligibility of actions (operations)	My opinion is that, at this sub-chapter, the indicative actions should be described in exactly the same manner as they are mentioned in the Fact Sheets, for each priority referred to in this Guide.	The indicative activities are mentioned in the dedicated Fact -Sheet for each priority investment, while in the GfA, only the specific eligibility conditions for this Call are listed. The approach is to provide an integrated, coherent but user-friendly material, and not to repeat the same information in two different sections of the same package.
12				In point 1, it is stated that maximum score will only be given to projects strongly supported through support letters. What is meant, more exactly, by "support"? How is this support quantified/evaluated/emphasized?	Strategic projects must demonstrate a major impact in the proposed area of intervention. Also, the projects must be relevant for the Programme objectives and indicators, and have to be able to generate added value in the area/region/community in which they are implemented. Applicants may submit letters of support from individuals/institutions/authorities that have expertise and public recognition of the relevant domain. It is up to external assessors who evaluate applications submitted on an investment priority, to offer points based on the quality of documents submitted by the applicant.
13				In point 2, the strategies are, usually, public documents. Should we obtain letters from all institutions elaborating strategies relevant for the project? For example, who is going to issue the letter regarding the Partnership Agreement with EU?	The investment priorities related to this Call have specific and clearly defined fields. It is obvious that the strategies that will be referred to and which are relevant for the project proposal must be related to these priorities, namely transport, culture, health, etc.
14				In point 3, although a broad impact is considered, it is recommended, however, a total number of 3 partners. It seems to me that the recommendation is inconsistent with the requirements on partnership and impact.	The number of project partners allowed is 8, with the possibility of co-opting a maximum of 4 associate partners, too. The previous experience has shown that a very wide partnership, involving a great number of entities is quite difficult to manage. Please note that the Call requires the Lead Applicant system for all projects. Thus, all the related tasks and
15				Related to the fact that applicants must prove that he owns the land / building / infrastructure element or the contract of concession / administration is valid for at least 10 years from the date of project implementation completion, why this 10 years period, when the results are to be kept only for five years after the completion / final payment? (Pag.29)	Please, take into consideration the calendar of the Call for proposals. Starting with the submission of the CN, until the financial closure of the project, a period of up to 4 years may pass. Therefore, combined with the mandatory 5 years of sustainability after the completion of the project, we consider 10 years as a minimum period for any concession/administration viable contract, which ensures the implementation and sustainability of the project. Please see that mostly in case of strategic projects, the sense of ownership at local/regional level is important. The sustainability of these projects must be ensured on long-term, even beyond the ex-post monitoring time-frame.

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16	ADETIM - Agentia de Dezvoltare Economico-Sociala a judetului Timis, Delia Frantiu	2.2.1.3 Eligibility of costs/expenditure	What is the payment deadline for preparation costs? The "date of the submission of the Concept Note" or "no later than 60 days after the CN approval"? (page 31)	Please see the clear provisions listed within the GfA, 2.2.1.3 Eligibility of costs/expenditure: preparation costs should be incurred by the time of submission of the CN, and paid out within maximum 60 days after notification of CN selection.
17			The Programme requires evidence of market research in case of procurement above EUR 2,500.00, this limit seems very low. Details on "market research" are necessary, the lowest, the highest or the average price is to be considered? Are internet offers acceptable, too? How many offers should be presented for a product/service/work? It is not clear whether a market research is needed for all acquisitions exceeding 2,500.00 EURO or only for the relevant, listed-ones (page 31).	An appropriate justification of the estimated costs are a mandatory request for a project to receive funding from any EU programme. This requirement is not related to public procurement, but the quality and maturity of the project proposal. However, please note that the documents submitted by the applicants do not imply complete procurement / tender files, but evidence documenting the market price (research). The supporting documents that can be submitted are financial offers for equipment / services / works similar to those proposed to be acquired under the project, obtained directly from suppliers or found on the internet and could justify the budgeted expenditure within the project for the goods / services / works in question. Documents are required for qualitative assessment of the project budget, when aspects of proposed costs, their efficiency and proportionality with the proposed indicators are evaluated, etc.
18			As an exception from the rule - the expenses are eligible for activities implemented within the eligible area, refers to activities and payments outside the eligible area, except for investments costs? Or does the exception apply to investments, too? An explanation is needed, for it is not very clearly explained.	The exception relates to costs for activities that take place outside the eligible area of the programme, and is very clearly presented. As stated in the note of this chapter, investments placed outside of the programme area are not eligible.
19		2.2.2 Specific eligibility criteria for eligible costs/expenditure	Nothing can be understood regarding costs distribution on phases. In addition, infrastructure and work costs are missing (page 32).	As the title of the (sub)chapters mentions, the specifics of the Call are presented there. Service costs were divided for the two phases, CN and FA, as relevant for exemplification. The CN phase is dedicated to elaboration of all necessary documents for submitting the application in the 2nd phase. In the CN phase, costs regarding execution of works are not eligible, but only those necessary for obtaining approvals/permits required for works. Please check the table summarising the distinction between cost categories eligible for the two phases of the present Call, on page 39 of the GfA, for full picture on eligible cost categories per phase. Also, please see the Programme rules on eligibility of expenditure Priority Axis 1 - 6 and the General Matrix of Cost, annexed to the GfA.
20		2.2.2.1 Concept Note	It is not very clear what is considered here costs related to the development of Concept Notes or in connection with CN and FA. For example, I don't see why consultancy on public procurement and meetings with speakers are mentioned at this point.	There have been given some examples, which, obviously, are not mandatory. Each applicant plans and substantiates its costs necessary for the smooth implementation of the project.
21		2.2.2.2 Full Application	Where are infrastructure and work-related costs? The distinction between the categories of eligible costs, for the two phases of this Call, CN and FA, is not very clear.	The table on page 39 of the GfA shows the categories of expenditures that are eligible in the two phases. For example, in the CN phase, equipment related expenditures are not eligible, while in the FA phase preparation costs are not eligible. The GfA itself presents only the specific of the call. The general rules on the eligibility of all expenditure categories are listed in Annex III. Programme rules eligibility of Expenditure.
22		3.2 List of mandatory annexes to the Concept Note / Full Application	As regards Annex VII.3, I think it should be submitted in the CN phase, and only after a preliminary evaluation and confirmation, the process of drafting and submitting the FA shall continue. Documents deemed to be acceptable for market analysis, should be detailed.	The document you are referring to (State Aid self-assessment form, Annex VII.3) shall be submitted only for the FA phase. Please observe the Annex IV. State aid information and Annex VIII.4 State Aid assessment grid, where you can find relevant information.
23	Asociatia Heidenroslein Baia Mare, Payer Maria Magdalena	Eligibility of the applicants	Taking into consideration that the Association doesn't have the Social headquarters in a eligible perimeter, thus not fulfilling the partner requirements in RO-HU projects, the Association requests consideration regarding changes to the eligibility criteria, as follows: The associations and foundations as custodians act as structures without legal entity status in order to become eligible.	A part of the eligibility requirements regarding the applicants has been established within the programming phase. The exception of the geographical area, where the applicants' headquarter is situated, it is mentioned in the Cooperation Programme, and it refers to the public entities with legal competences to implement operations in the Programme's area.

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24	Sebastian Munich	Number of the projects.	It mentioned the maximum number of projects that will be selected for financing under the call for strategic projects - 12 and a maximum number of projects to be financed in each investment priorities. Please mention if the number firmly established in nature or whether it is indicative.	Please revisit chapter 2.1. Description of the Call of the Guide for Applicants. The maximum number of projects that can be financed under this Call for Proposals is 13, and within the Ip 6/c the indicative number of projects is 3.
25		Ip 6/c	In the case of projects related to Ip 6 / c: on art. 3 of Regulation No. 1301/2013, please mention if the ceiling of 5,000,000 euros includes the costs of the necessary documentation for accessing financing / execution (technical expertise, field studies, technical-economic documentation, technical project, technical assistance and site inspector, legal shares, opinions etc.) or refer only to the cost of restoration / reinstatement. Also, please indicate if: - Providing objective (with fixed assets and inventory objects like furniture indoor / urban, electronics and IT, art objects, etc.); - The arrangement of traditional handicraft workshops (like blacksmith, mill, bakery, etc.) outside the heritage objective targeted by the project (possibly protected area under it); - Actions of promotion and visibility of the project; - Organizing events (conferences, seminars, courses, wine tastings and food preparations local / traditional etc.) according to the project; - Other specific activities may benefit from additional financial allocation, besides the ceiling of 5,000,000 euros.	Please consult the following document posted on BRECO website: http://brecoadea.ro/attachments/article/118/E.%20EC_Small-scale%20infrastructure.pdf . According to the opinion of the Commission, an infrastructural investment is considered to be small-scale if its total costs does not exceed 5 mil./10 mil. euros. Therefore, the total investment costs (technical draft, Feasibility Study, site supervision, permits, equipment, compulsory expenditures etc. - all costs that are included in the general estimate of costs necessary for the investment, part of the Feasibility Study/DAIW) will not exceed 5 mil./10 mil. euros. Other costs related to complementary activities (strategy development, organizing events, traditional workshops outside the objective, advertising, etc.) can be also stipulated in the project budget.
26		Ip 6/c	Please state whether in the Ip 6/c the reinstatement activities of a historical monument activities may include accommodation and meals / other recreational activities (ex.: arranging restaurants / cafes / wineries, such as wellness facilities - spa, sauna, etc.).	The proposed project activities and costs have to be directly related to the priority specific objectives and contribute to the achievement of the Programme indicators. The facilities which you are referring to generate revenues/profit and are not directly related to the specific objective/activities of the Ip 6/c, such as conserving, protecting, promoting and developing cultural and natural heritage. Also, please keep in mind that the direct or even indirect state aid related activities are not eligible.
27		Supporting justifying documents	At the annexes required to be submitted along with the "concept note" it is mentioned that the "Supporting justifying documents for the estimated budgeted costs involving procurements higher than 2500 euro net". Please mention what concerns these justifying documents.	An appropriate justification of the estimated costs it is a mandatory request in order to receive funding from an EU Programme. This request is not related to the public procurement, but the quality and maturity of the project proposal. In any case, please take into consideration that the documents submitted by the Applicants do not imply complete procurement/tender files but the evidence of documenting the market price (research). The supporting documents that can be submitted are financial offers for equipment/services similar with the ones proposed in the project, obtained directly from the suppliers or found on the internet and which are able to justify the budgeted costs of the project for those goods/services, works in question. The documents are required for the qualitative assessment of the project, when aspects such as proposed project costs, their efficiency and proportionality are evaluated.
28		Preparation costs	Please consider the possibility of accepting PTH development costs as eligible even considering that service contracts - making PTH -are completed before applying for project financing in Phase I - Concept Note. This request is based on high complexity projects aimed at restoring / reinstatement of historical monuments, and the long periods required to obtain permits from the Ministry of Culture; elaborating the technical and execution details respectively the start of procedures for obtaining the necessary approvals for execution before the start of project implementation can significantly contribute to framing the terms imposed by the program and reduce the risks of delay, the more so as, in historical monuments case, archaeological finds may delay substantial completion of the project.	The CN phase (phase 1) is precisely dedicated to the elaboration of the documentation necessary for the submission of the project proposal (phase 2). If a certain documentation has been elaborated before the submission of the CN, those costs are considered <i>preparation costs</i> . The eligibility requirements for these costs are described in the GfA, both, in chapter 2.2.2.1. of the Concept Note and Annex III. Programme rules on eligibility of expenditures. Please note that these expenditures: should have been incurred until the date of submission of the CN; have to be paid in no later than 60 days after the notification letter that the CN has been selected; the elaborated documentation should not be older than a year, etc.

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1	Körös-vidéki Vízügyi Igazgatóság	2.2.1.1 Eligibility of applicants	According to the call for proposals an investment previously implemented may be continued further as well. On the other hand, according to the call for proposals of 2.2.1.1 section, point 6 provides that „the applicants must demonstrate that they have not received financing support from public funds in the past 5 years before the deadline for submitting the applications under this Call for proposals for the same operation / project in terms of objectives, activities and results.” Based on the above, what do you think we can apply the next content? We gained support for creation of a Showing House in period of 2007-2013. Museum educational development was realised in it. Because of the scarcity of resources the earlier development was not comprehensive. There is a demand for further development of the Showing House, which would be part of a bigger complex system in regard to both nature and cultural heritage protection.	The information received is not very clear. Please note that, in case of the submission of an application, each partner must sign a statement on his/hers own responsibility declaring that he/she did not receive before a financial support for the <u>same</u> project, in terms of objectives, activities and results. For projects involving infrastructure, these provisions are related to the same infrastructural object. Also, chapter 2.2.1.2 <i>Eligibility of actions (operations)</i> of the GfA states that infrastructural investments (works) started before the submission (even if not completed) are not eligible.
2		Eligibility of applicants, page 24	The public bodies have been named among the beneficiaries on page 24th of the call for proposals, but the water directorates do not even now figure on among potential beneficiaries within 6c fact sheet. The Water Directorates have assets which part of the natural and cultural heritage. Development and protections of these have an effect on the whole programme area harmonized with other institutions development.	The lists of applicants included in the Factsheets are indicative. Please see chapter 2.2.1.1 <i>Eligibility of applicants</i> of the GfA, where the types of applicants who are eligible for this Call for proposals are listed.
3	Csongrád County Healthcare Service Center Hódmezővásárhely - Makó Gyurisné Pethő Zsuzsanna, EVP programigazgató	General comment to all documents	We noticed that Open Sans fonts are used throughout different templates and other documents. Unfortunately, Open Sans fonts are not pre-installed on Windows, therefore PCs will replace them automatically with random available fonts which might be extremely difficult to read and less experienced Microsoft users will not even be aware of this. As a result, the documents submitted will use a wide variety of fonts which will hinder the evaluation. We suggest using only a widely available, pre-installed font, such as Calibri, Verdana or Arial.	The Open Sans font is recommended for use by Interact in the Interreg Branding Manual. It can be downloaded from the following address: https://www.fontsquirrel.com/fonts/open-sans . The Visual Identity Manual of the Programme (VIM), approved by the Monitoring Committee, also sets this font.
4		2.2.1.2 Eligibility of actions (operations) [Page 30]:	"The project idea should be acknowledged and/or supported by the relevant authorities on national / regional / county level, key professionals and the targeted local communities! Maximum score will only be given to strongly supported projects." Please specify who qualify for 'key professionals'.	Strategic projects must demonstrate a major impact in the proposed area of intervention. Also, the projects must be relevant for the Programme objectives and indicators, and be able to generate added value in the area/region/community in which they are implemented. Therefore, the Programme also recommends that projects proposed to be considered as priorities/strategically by communities/target groups. For example, whether the Programme should seek to support the arts, in case of a strategic project in the field of theater and film, a <i>key professional</i> , whose opinion would be relevant, is a famous movie international awards.
5		2.2.1.3 Eligibility of costs/expenditure [Page 35]:	"The Interreg V-A Romania-Hungary Programme requires the evidence of market research in case of procurement above EUR 2,500.00 net equivalent (without VAT) [...] relevant only for the following costs categories: External expertise and services costs, Equipment expenditures and Infrastructure and works costs." The provision of evidence of market research for all external expertise and services costs, equipment expenditures and infrastructure and works costs in case of a complex project (such as an Ip9/a project) is a heavy burden to bear, especially if this is a requirement for both phases of the application. Please note that projects aiming at the improvement of health-care services may contain an extremely wide variety of external expertise and equipment expenditures, while there are only a limited number of possible suppliers. In case Applicants contact one supplier, that will result in an obvious advantage for that company. In case Applicants have to attach two or more offers for each equipment and external service, that will basically equal with more procurement procedures. Moreover, Applicants will have to perform these procedures twice (in the Concept Note and Full Application phase as well). We suggest requesting evidence of market research for external expertise and service contracts and equipment in case of procurement which exceed the thresholds above which public procurement rules apply and do so only in the Full Application phase. Market research for infrastructure and works costs should be omitted, as such market research can be only provided based on a fully elaborated technical documentation and the costs for such offers are high.	The submitted supporting documents can be of any nature, provided that they are relevant. Thus, the recent similar contracts, estimations of costs, financial offers (even if they are printed from web pages of possible providers/executants) are acceptable, as long as they are relevant. The purpose of this approach is to ensure a proper documentation of the estimated costs, in order to avoid later major deviations from the initial work & financial plan. Such deviations would have a major impact on the projects and programme cash flows. Also, properly documenting the estimated costs contributes to a sound financial management on project and implicitly on programme levels. However, please be advised that the justification of costs must be ensured for the estimated budgets on each of the phases, when applying for financing. Thus, the estimated costs for the Concept Note budget will be justified and properly documented within the CN application, while the budget for the Full Application will only be described, documented and justified when applying in the second phase. By that time, a feasibility study should already be elaborated, as well as other necessary documents.
6		2.2.2.1 Concept Note [Page 36]:	"Staff, office and administrative, and equipment related costs are not eligible under preparation costs". Please consider the eligibility of staff costs as a Preparation cost (as long as travel and accommodation are eligible).	Regarding the eligibility of the preparation costs, the selected categories reflect needs that might occur and are directly determined by the preparation of the Concept Notes. In terms of staff, please see that this call is launched for strategic projects, and the applicants are expected to have the necessary institutional and financial capacity to prepare the Concept Notes. Nevertheless, please be informed that these rules are subject to agreement between the two Member States.

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7	Csongrád County Healthcare Service Center Hódmezővásárhely - Makó Gyurisné Pethő Zsuzsanna, EVP programigazgató	2.2.2.1 Concept Note [Page 36]:	"Expenditure on external expertise and services cannot be split among the project beneficiaries, i.e. common/shared costs are not allowed." The exclusion of shared costs for external expertise goes against the requirement of joint development.	Based on previous programmes experiences, shared costs are not considered a suitable option. Precedents show that the system is not efficient, it provides only for an artificial split of funds/expenditure among partners and it generates significant delays in the reimbursement of costs, as it involves implementation of a mixed methodology of division, verifications, validation and payment.
8		3.2 List of mandatory annexes to the Concept Note / Full Application [Pages 46, 47]	„Total project estimated budget (see Annex VI.4)” shall be submitted only in the Concept Note phase. Based on our understanding, the Feasibility Study is the only document which can contain all detailed activities and costs of the project. It is also mentioned [see Page 55], that "Also, the estimated budget for your intervention in the FA should suffer modification of maximum + / - 10% as opposed to your estimations within the CN, and up to the limit set by Programme". How can be that performed if the budget will not be updated in the Full Application phase?	The estimated total budget of the project is a simple form that allows a general estimation of the costs necessary to implement the project, starting with the CN phase. The Programme needs this information in order to select the best CN, considering also the estimated total budgets for implementing the projects, compared to the total available at each Ip level. The CN and FA budgets, divided as work packages, are part of the applications forms of the 2 phases. This explains the maximum allowed deviation of +/- 10%. Deviations higher than this level would make it impossible to finance all project ideas selected in the CN phase, provided of course their eligibility and feasibility of minimum acceptable standards for the Programme. It is also the reason why the Programme requests documentation/ justification for estimated costs higher than 2,500 euros, and highly recommends to have grounded estimates for full project budget estimates as well. This way, the Programme is seeking to prevent overestimating or underestimating of certain expenses. Regarding the Feasibility Study, it will be related to the infrastructural object, where the case. The partner planning the respective works intervention will have to ensure the elaboration of the study. However, there are other categories of costs that need to be taken into consideration and properly estimated.
9			"The job descriptions for all positions included in the proposed management team OR the Terms of references, in case the management is externalized" shall be submitted in both the Concept Note and Full Application phase. Job descriptions for all positions included in the proposed management team OR the Terms of references should be submitted only in Full Application phase, following the full elaboration of the Feasibility Study, especially when taking into consideration the fact that [see Page 56] "the maturity of the project proposal is assessed exclusively in the full application phase".	People who provide project management may be different in the two phases (CN and FA), depending on the complexity and specificity of the activity. Flagship Projects are projects of significant complexity and the capacity of the partners is of high importance in the efficient and sustainable management of the projects; therefore, the Programme strongly recommends avoiding the externalization of the project management. Moreover, maximum score will be granted only to applications ensuring the management staff. In terms of eligibility, both options are allowed, as long as the double financing is avoided. Regarding the elaboration of the feasibility study, this activity is eligible within the CN phase, and the FS shall be submitted within the FA package, in order to allow the assessment of the project's maturity in the second phase.
10			"Supporting justifying documents for the estimated budgeted costs involving procurements higher than 2,500 euro net; These documents are relevant only for the following costs categories: External expertise and services costs, Equipment expenditures and Infrastructure and works costs." As already mentioned, we suggest requesting evidence of market research for external expertise and service contracts and equipment in case of procurements which exceed the thresholds above which public procurement rules apply and do so only in the Full Application phase. Market research for infrastructure and works costs should be omitted, as such market research can be only provided based on a fully elaborated technical documentation and the costs for such offers are high. Also take into consideration the fact that [see Page 56] "the maturity of the project proposal is assessed exclusively in the full application phase".	Please kindly see our reply above, no.5
11		Comments on Total project estimated budget template	It is obvious that the Total project estimated budget template is only a first draft and the JS will further elaborate on it, as the actual version does not comply with the information required by the CN and FA application form e.g.: it completely lacks breakdown on Work Packages, periods, total (per project) budget on different costs, etc. Moreover, it would be very difficult to handle such a table as completing it (esp. for a complex project such as a flagship project) and adding short descriptions of costs would result in a huge and loose table. Please consider using the Budget template for the HU-RO 2007-2013 Programme as a starting point for the elaboration of a budget template.	Please kindly see our reply above, no.8
12		Comments on Feasibility Study template	In our view, the Feasibility Study template is incomplete and unelaborated, therefore it is difficult to make any comments on it. Basically it is only a rough sketch of a feasibility study; neither the structure, nor the requested content of the chapters is specified. Please consider using the Feasibility Study template for the HU-RO 2007-2013 Programme as a starting point for the elaboration of a feasibility study template.	The proposed form of the FS is seeking to gather and provide relevant and equivalent information both from Romanian and Hungarian potential applicants in what concerns new infrastructure investments. For your kind information, in Romania, the FS requirements are stipulated into a Governmental Decision, whilst in Hungary, the situation is different, as there is no such FS legally binding format. The Interreg V-A Romania-Hungary Programme requires this minimum format, which may contain any additional information you consider to be relevant, besides the mandatory information. However, please consider that, under our Programme, the Feasibility Study is mandatory for any newly built infrastructure.