**Q & A, Call for Concept Notes – Integrated Territorial Strategy for development of the Romania – Bulgaria region as of the date of 27.03.2025**

| **No.****Question** | **Answer** |
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| **ELIGIBILITY OF APPLICANTS & PARTNERSHIP** |
|  | Regarding SO2, M2.3:  Supporting local businesses, entrepreneurship and job creation including the circularity of tourism services, having in mind that SMEs are not eligible under this call, this means that we can submit a project where we can budget a minimis scheme, in which we SMEs can apply for grants? | According to the Guidelines for Concept Notes (call 1), SMEs are not eligible to submit concept notes or to apply as partners under the current call.Only eligible entities will be considered for funding under the current call (see 2.2. of the Guidelines).A call dedicated for SMEs will be launched at a later stage under the Interreg VI-A Ro-Bg Programme. |
|  | Please clarify if a partnership can submit one project for SO1 and SO2, considering the fact that one partner wants to apply under SO1 and the other one idea is under SO2 or we should find a consensus for only one specific objective?In how many project concepts an organization can participate as a project partner? | No limitations are established in the Guidelines for the number of Concept Notes that an applicant or a partnership can submit.However, the application must also comply with the conditions of the envisaged financing source (Interreg VI Ro-Bg or other sources). The Guidelines for Concept Notes does not prevent the applicants to plan investments from multiple SO. Still, any project idea should be jointly developed and both partners should contribute to the objectives of the project.  |
|  | I am interested in the territorial scope of the program and whether we, as a primary school in Plovdiv, can apply for the project, respectively for Priority 2 A greener region (PO2)? | The current call for Concept Notes is open to applicants who are registered and/or functioning in the ITS geographical area.In line with the Integrated Territorial Strategy (ITS) and with Annex 3 of the Guidelines for Concept Notes (List of Local Administrative Units within the Ro-Bg ITS area), Plovdiv is not part of the selected territory for the ITS. |
|  | Are **universities** eligible for this call? The headquarters of the University is in a historical building | Eligible applicants are national, regional and local public bodies, institutions, administrations, agencies, including the bodies governed by public law (which fall under the definition of Article 2(1) of Directive 2014/24/EU on public procurement), county/district councils, local councils/ municipalities, etc., , Chambers of Commerce and Regional Development Agencies functioning in the ITS area and registered in accordance to national law, registered and/or functioning in the ITS area, active in the field of cycling, tourism, culture. Public universities in Romania are public institutions with legal personality. From this perspective, a public university functioning in the ITS area is eligible under this call. The characteristics of the buildings of the university are not relevant in terms of eligibility of the applicant.  |
|  | NGOs have to be registred in the ITS teritory? Or is enough to have activities in the ITS teritory? | All eligible applicants have to be registered and/or functioning in the ITS area, according to provision 2.2 Eligible applications and applicants under ITS. Please note that during the assessment, partners may be requested to submit additional information or to indicate legal acts in support of their declared compliance with the requirements in Annex 3. Additional information will be required under the form of a written document, containing explanations, under the signature of the applicant, in the scope of the assessment. |
|  | Is there any chance to have the harbour's administration as partner in the project to install signaling or bike racks or cycling lanes within the port? | All partners must comply with the rules on eligible applicants. Depending on the legal status of the harbour administration, this entity could be considered for partnering in the project, especially if it has activity in the ITS area. However, please also consider that the installation of different equipment could be done in a location even if the owner of the location is not a partner in the project (e.g. the owner gives its legal agreement to partners, to install equipment and to maintain it in the location for at least 5 years after the project closure). So, if it is about installing equipment, you may consider various options. If the projects envisages building cycling lanes, the owner of a real property right should be partner in the project.  |
|  | Related to the size of the partnership, we know it is recommended that the partnership is formed of max. four (4) organizations in compliance with the conditions of the envisaged financing source.Does this number include associated partners as well? | The partnership recommended size refers to lead partner and partners, not to associated partners.  |
|  | In how many project concepts an organization can participate as a project partner? | No limitations are established in the Guidelines for the number of Concept Notes that an applicant or a partnership can submit. |
| **ELIGIBILITY OF ACTIVITIES** |
|  | Our municipality is applying to the MRDPW Bulgaria for a concept for ITI with 2 projects "Construction of a pedestrian bicycle route with infrastructure for tourist attractions Evrovelo6". It mainly envisages the placement of markings and information signs along a 20 km long route and the construction of infrastructure for tourist attractions. We plan to apply under your advertisement for the same route, but now with the construction of an additional bicycle lane with a length of 6 km. on the same road after additional installation of the guardrail and installation of photovoltaic lighting. This is a clear demarcation of the site for implementation. Our question is whether this is admissible for funding from the program. The second site is the construction of a site for the use of the site "Roman Tomb Mausoleum" village of Babovo, which is a UNESCO site and is located in close proximity to the official route of the "Evrovelo6". We plan to carry out the construction in two stages.The first stage includes the construction of infrastructure related to the protection and exhibition of archaeological immovable cultural values;• Ensuring an accessible environment - approach to the site, information boards, signposts, etc.;• Construction of new infrastructure - electricity supply, cabling, water supply, sewage, alley network, roads, etc.;This is the subject of national financing, and for the second stage, the very deconservation of the tomb and the construction of a visitor center, we plan to apply under your program. With this clear demarcation, our question is whether this is admissible for financing under your program. | In order to be eligible for financing under ITS in line with the Guidelines for Concept Notes, you must fulfil the criteria detailed in section 2.1. and 2.2 of the Guidelines. The Guidelines encourage projects with clear synergies and complementarities with other initiatives. Therefore, with the condition that your project idea meet all requirements set out in the Guidelines, as well as the budget limits, you are encouraged to apply. |
|  | Following the conversations we had during the meetings for to the current Interreg VI-A Romania-Bulgaria program (Priority 4: Integrated Region) and the already opened Call for project ideas for 5.2 (Promoting integrated and inclusive social, economic and environmental local development, culture, natural heritage, sustainable tourism and security in non-urban areas), we would like to ask for your opinion and advice about the possible applying a Concept Note regarding our project for the "Black Sea Route" tourist route.As we are aware, the Strategy Board decided to accept and support the development of the following directions as adjacent routes to the EuroVelo6 infrastructure:- Silistra - Dobrich - Durankulak;- Silistra - Dobrich - Balchik.During the meetings we had proposed the "Black Sea Route" tourist route (which is connecting Constanta, Varna, Burgas and Istanbul) as a meaningful continuation of the EuroVelo6 with the idea of connecting the city of Constanta in Romania with Balchik in Bulgaria. In this way, the directions to Constanta, Durankulak and Balchik would be connected, and bicycle tourists traveling to these points would have a logical continuation of their route, regardless of whether they were heading north or south. We truly believe that the section of the "Black Sea Route" tourist route between Constanta and Balchik as a connection of these two parts of EuroVelo6 can provide a one-of-a-kind experience for tourists and would boost the bicycle tourism on both sides of the border and along the sea coast.We have already made several meetings regarding the "Black Sea Route" with representatives of Balchik, Kavarna and Constanta municipalities and we have their support. The initiative has been also supported by the Bulgarian Ministry of Tourism, Ministry of Agriculture and Food, Ministry of Youth and Sports, Ministry of Transport, i.e. our government has interest in its development.The European cycling federation and European Ramblers association also support the initiative as they proposed it to be a continuation of EuroVelo6 and the E-3 path as a beginning of its development.In regard to the above I'm sending to you again the presentation and description of our initiative with a request to give us your advice about:- is a similar connection between Constanta and Balchik, in particular using the "Black Sea Route" concept, eligible for application for funding under the current call?- how relevant to the program such a concept note would be considered? | Please refer to the approved Integrated Territorial Strategy and its Annexes for details on the EuroVelo6 main and secondary routes, eligible for funding under the ITS and the Call for Concept Notes. Part of the Black Sea Route is eligible under the ITS and the Guidelines for Concept Notes. The connection between Constanta and Balchik is also part of the ITS territory. However, please consider the budget limitations stated in the Guidelines, compared to the activities and investments that are envisaged.  |
|  | We are working on a concept note for the development of an integrated infrastructure project which will include both the development of the cycling routes in the municipality and the creation of a tourist infrastructure for recreation and rest - parking for caravans with all amenities to guarantee a pleasant stay of the visitors in the municipality.The parking infrastructure will be built on land, owned by the municipality. Still, the future management - maintenance, cleaning, security, etc. is outside the scope of the municipality's activities, so we intend to award it to a concessionaire under the Concession Act of the Republic of Bulgaria. We would like to ask if such a use of the infrastructure meets the requirements of the procedure. We expect a substantial increase in the number of visitors to the municipality due to the new parking for caravans, thus the local businesses will observe a substantial rise in customers (one of the goals of the program). In the same time, the management of the infrastructure will be performed by a company specialising in such activities, thus ensuring high quality of service and optimal maintenance of the infrastructure.Any income from the operation/concessional management of the infrastructure will be reinvested in the construction/rehabilitation of the remaining technical infrastructure (roads, parks, tourism trails) in the surrounding area to improve the life of the citizens of the municipality.  | The construction of camping sites falls under Measure 2.1 of the ITS, ”Development of touristic infrastructure and cultural assets”. The parking for caravans, in the proximity of tourist attractions falls under the specified measure. Considering the indicative types of actions financed under the current Call for Concept Notes under the Integrated Territorial Strategy, actions for which the partners do not act as economic operators and for which there are no considerations to assume that the competition will be distorted, the Concept Notes **shall not be subject to state aid rules**, where the state aid is defined as *any aid granted by a Member State or through State resources in any form whatsoever which distorts or threatens to distort competition by favouring certain undertakings or the production of certain goods […], in so far as it affects trade between Member States* (Article 107(1) of the Treaty).Please pay attention to the project idea activities which could be most susceptible to be subject of state aid provisions, for example:* aid to operators: operators who make use of the infrastructure to provide services to end-users receive an advantage if the use of the infrastructure provides them with an economic benefit that they would not have obtained under normal market conditions; or
* aid to end-user: if the operator of an infrastructure has received State aid or if its resources constitute State resources it is in a position to grant an advantage to the users of the infrastructure (if they are undertakings) unless the infrastructure is made available to the users on market terms; etc.

Thus, in case of the examples above mentioned, an economic advantage to the operator/end-user can in particular be excluded if the concession to operate the infrastructure (or parts of it)/the fees for use of the infrastructure is assigned for a positive price/have been set through a tender that meets all the relevant conditions (the tender procedure has to be competitive, transparent, sufficiently well-publicized, non-discriminatory, unconditional (to allow all interested and qualified bidders to participate in the process), using and complying with the national laws on public procurement of the country on whose territory the partner which organizes the procedure is located. |
|  | If a municipality develops a caravan parking as part of the tourism infrastructure, could we award it's management to a concessionaire under the Concession Act of the Republic of Bulgaria? Any income from the operation/concessional management of the infrastructure will be reinvested in the construction/rehabilitation of the remaining technical infrastructure (roads, parks, tourism trails) in the surrounding area to improve the life of the citizens of the municipality. | Please see the answer from above.  |
|  | Is it eligible under the call, the project partners to participate with an infrastructural project, which investment part do not include construction/modernization of cycle infrastructure? I mean is it eligible the investment part of the project to include only construction/modernization of cultural and touristic objects on the territory of the both partners? | The project concept must include a combination of investment actions (e.g., cycling network infrastructure and/or facilities) and soft-type actions (e.g., services).If your project idea aligns with **SO2**, project partners are eligible to participate with an infrastructure project, even if the investment component does not involve the construction or modernization of cycling infrastructure but it does focus on the construction or modernization of cultural and tourist sites within the territories of both partners. Still, in order to increase the chances of your project to obtain higher scoring during assessment, you may consider adding some support facilities and/or safety features for cycling tourists, within your site or along the roads leading to it. |
|  | Is it eligible under the call, an investment only in a part of the cycle infrastructure which is a part of local route - for example reconstruction of appr. 1 km. road, but not a whole length of the local route? Also, is there some limits regarding the constructional works on the local cycle infrastructure? I mean, is it possible to plan construction of road and established of cycle route or the investment need to be only in cycle route and excludes reconstruction works on the road, which is a part of the cycle local route? | The length of the newly built / significantly upgraded cycling routes or lanes will be included in the Concept Note and will be taken in consideration for the overall assessment of the project idea, in accordance with the evaluation criteria. This call is not dedicated to building roads. As a general rule, reconstruction works of the road infrastructure are not eligible under the present call for Concept Notes.Still, the call allows punctual interventions such as “ensuring road safety for the sections overlapping the EuroVelo Route, in view of complying with standards related to traffic signaling systems and/or additional development of infrastructure dedicated to cyclists and pedestrians, such as tunnels, bypasses, bridges, overpasses and walkways and protected cycling paths.”From another perspective, project activities which may not be eligible under this call or, in general, under the Interreg VI-A Romania-Bulgaria Programme, may be still included into the project, if financed from the partners’ own contribution or from other sources.Finally, please also consider the budgetary limits for the submitted Concept Notes. |
|  | Is the construction of a dispensary eligible for this call? | Any investments must respond to the specific objectives of the ITS, namely the development of the EuroVelo6 route and/or supporting tourism activities and connected industries. The health sector is not targeted by the current call.  |
|  | Can a feasibility study for a new dedicated cycling-pedestrian bridge over Danube could be financed? It definitely could not be build within the frame of the program, but a project could pave the way for the final construction. | The project ideas must contain investment(s). If the project you are planning to submit respects this requirement, then any other activities (like drafting a feasibility study) that are in line with the proposed investments can be included. However, a project focused only on drafting a feasibility study will not be considered under the present call.  |
|  | Does planning infrastructure (feasibility study on EV6 for example) could be funded if the project does not include the actual  building of the infrastructure (due to the lack of finance). In short can we apply for planning 100km but building only 10km (random number example)? | See the answer above. Still, you may consider the possibility of proposing a project idea for planning AND building the 10 km of cycling route or path, while the rest will be addressed in complementarity, under other projects, from other sources of financing.  |
|  | Please tell what you mean measures for road safety | The Guidelines for Concept Notes mentions the following measures for road safety (with priority for EuroVelo 6 route): complying with standards related to traffic signalling systems and/or additional development of infrastructure dedicated to cyclists and pedestrians, such as tunnels, bypasses, bridges, overpasses walkways and protected cycling paths. Safe cycling involves limited interaction with motorized traffic, with other cyclists and pedestrians.However, the applicants can determine what are the most relevant and efficient safety features that have to be installed on the supported infrastructure, in line with the budget and following the numerous guidelines and best practice examples of the EuroVelo, as well as complying with the national legislation on this topic.Several sources of information is available here: * Cycling Design Principles - <https://www.iurc.eu/wp-content/uploads/2024/04/Cycling-Design-Best-Practices-Report.pdf>,
* EuroVelo Development Guide - <https://pro.eurovelo.com/download/document/EuroVelo-Development-Guide_Final.pdf>,
* EuroVelo European Certification Standard - [https://eurovelo.com/download/document/ECS-Manual-2021\_online.pdf?\_gl=1\*8ynph0\*\_gcl\_au\*NTU1NzAzOTQxLjE3MzkyNzE1NzE](https://eurovelo.com/download/document/ECS-Manual-2021_online.pdf?_gl=1*8ynph0*_gcl_au*NTU1NzAzOTQxLjE3MzkyNzE1NzE).
* Guide Romanian Cycling Infrastructure - <https://www.mdlpa.ro/uploads/articole/attachments/642fe22085d91361687322.pdf>

National legislation on road safety should be also considered. |
|  | Is it mandatory to build a number of km of bike roads in a hard project? | There is no minimum limit of km of bike roads to be build. From the perspective of the assessment criteria, projects are encouraged to demonstrate their contribution to the cycling infrastructure (a maximum of 20 points are assigned to the criterion Effective Support for Cycling Tourism). Project ideas to be financed from Interreg VI A Romania-Bulgaria must contain the mandatory pair/s of indicators including at least one of the two pairs of ERDF indicators (investment indicators), namely RCO58 Dedicated cycling infrastructure supported and RCO77 Number of cultural and tourism sites supported. See the Guidelines for Concept Notes for further details.  |
|  | You mentioned at some point “pathways” to natural, cultural heritage locations etc. Can you please elaborate on what you mean by “pathways” from the perspective of the needed infrastructure and the modality of access (by foot, by bicycle, etc).  | From the perspective of the assessment criteria, projects are encouraged to demonstrate their contribution to the cycling infrastructure (20 points are assigned to the criterion Effective Support for Cycling Tourism). Pathways usually refers to pedestrian pathways. In the context of the present call for concept notes, pathways may refer to both pedestrian and cycling. Pathways for pedestrians or cycling paths for cyclists are encouraged to complement main investments in cycling infrastructure or touristic or cultural objectives, to increase their accessibility and to encourage tourism activities.  |
|  | Is there financing for green energy within this call? | Green energy is not the main focus of the current call. However, if investments in alternative sources of energy have a clear and necessary connection to the main investments of the project ideas, such activities can be included, with the condition of respecting the budgetary constraints.  |
|  | Following our review of the Guidelines for Concept Notes, we require some clarifications regarding the types of touristic infrastructure that may be modernized, rehabilitated, or restored under Specific Objective 2, Measure 2.1 – Developing Touristic Infrastructure and Cultural Assets.In this context, could you please confirm whether zoos, cinemas, and stadiums, which are publicly owned, are eligible for support under this measure?We would greatly appreciate your guidance on this matter and look forward to your response. | The current call for concept notes encourages applicants to identify which touristic attractions or cultural points are more likely to contribute to the overall specific objectives of the ITS. The examples you provided could be eligible, with the condition of meeting the specific requirements of Interreg VI A Romania-Bulgaria or of any other sources of financing that the applicant considers.  |
|  | Regarding the open call for concept notes under ITS, please give your justification on the following questions:1. Is it eligible under the call, the project partners to participate with an infrastructural project, which investment part do not include construction/modernization of cycle infrastructure? I mean is it eligible the investment part of the project to include only construction/modernization of cultural and touristic objects on the territory of the both partners?2. Is it eligible under the call, an investment only in a part of the cycle infrastructure which is a part of local route - for example reconstruction of appr. 1 km. road, but not a whole length of the local route? Also, is there some limits regarding the constructional works on the local cycle infrastructure? I mean, is it possible to plan construction of road and established of cycle route or the investment need to be only in cycle route and excludes reconstruction works on the road, which is a part of the cycle local route? | 1. Project ideas to be financed from Interreg VI A Romania-Bulgaria must contain the mandatory pair/s of indicators including at least one of the two pairs of ERDF indicators (investment indicators), namely RCO58 Dedicated cycling infrastructure supported and RCO77 Number of cultural and tourism sites supported. Therefore, projects that plan to invest in cultural and touristic objectives are eligible, with the condition of respecting the integrated approach and all other requirements. However, from the perspective of the assessment criteria, projects are encouraged to demonstrate their contribution to the cycling infrastructure (20 points are assigned to the criterion Effective Support for Cycling Tourism).
2. No minimum number of km of cycling route to be built or modernized has been established. However, please consider the assessment criteria when designing your project ideas. The cycle route must meet criteria of safety and must be separated from the road. The investment should only focus on the cycling infrastructure, not on the road infrastructure.
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|  | From the state road (EUROVELO corridor 6) there are deviations to 8-10 settlements, which are located in a beautiful canyon by a river at a distance of between 5-7 kilometers. The tourist assets are located along the river itself - caves (60 pcs.), medieval and ancient cities 4 pcs., other historical and natural assets.We cannot make an investment in the NATURA zone, and we do not have such a desire for environmental reasons.The idea is to create a bicycle route along a dirt agricultural road. The settlements will be used as entry and exit points. (Everyone will be able to rent a bicycle from these places) The trip will be carried out by bicycles and/or electric bicycles, and everyone will be able to choose what and how much to see and stay (personal tourism). (The settlements have one/two/three hotels)The project initiative will provide for regular maintenance.The investment in the state road route will be expressed in marking and signs.The investment in the route on agricultural roads will be expressed in: alignment, cleaning, several bridges, stairs to attractive places and caves.According to the guidelines, the idea is well synchronized with:Measure 1.2. Improving bicycle connectivity with tourist attractions and transport centers under specific objective 1 Development of sustainable mobility, mainly bicycle infrastructure and related facilities.Is the investment in creating such a route an acceptable investment in your opinion?Regarding the Romanian partner. He owns many tourist assets, but the main one he wants to improve is the "Zoo"! In our opinion, this communicates well with:Measure 2.1. Development of tourist infrastructure and cultural values.The question is what to do with the busy "road connections" in large cities that have no alternative?? Marking and signs are provided for specific sections. We have an idea for a direct connection from the main road to the Zoo and other assets that will be created. This section is planned to be about 4-5 kilometers. This is currently a street road in poor condition.The question? This section is by definition only a bicycle path or it could be a city street,... but used mainly for bicycles.. | Measure 1.2. Enhancing cycling connectivity to tourist attractions and transport hubs includes tentative actions such as creating accessible cycling routes and pathways leading to touristic attractions located in the proximity of EuroVelo6 route.We understand that your project idea focuses on creating cycling routes leading to touristic attractions, with limited investments in the cycling routes given the local environmental constraints (Natura site). From this perspective, your project idea fits within SO 1. We also understand that the project partner is focused on modernizing an existing touristic attraction, which falls under SO2. Also, our understanding is that you are planning to connect this touristic attraction to the main route either by a cycling route, or by road. Please keep in mind that Measure 2.1. does not include road rehabilitation activities. If you aim to connect the new or modernized touristic infrastructure to the EuroVelo6 route and if you aim to do it by rehabilitating the road infrastructure, please look for alternative sources of financing that might support such actions and which would complement to the envisaged interventions. Alternatively, you may consider a different cycling route or signalling/markings on other streets/roads.For busy road connections, please note that the “safety first” principle should apply, i.e. there should be an effort to segregate the cars circulation from cyclists and pedestrians. Therefore, solutions like detours or building distinct pedestrians/cycling paths or cycling roads should be envisaged together with other measures for traffic calming and signaling. Please consult the sources of information indicated above, at question 18.Moreover, please ensure compliance with the budgetary limits, an integrated territorial approach and that your project demonstrates a cross-border dimension.  |
|  | We want to create an interactive attraction in an underground space (cave/s obtained from limestone mining). The supplies will be hologram devices, attraction lights, animated animals/creatures/people. To create the necessary effect, we will provide many large artistic decorations from studopor. Some of these galleries are privately owned, others are state-owned. We have no questions about the admissibility of expenses for state-owned galleries. We have a question about private-owned galleries.The private company (producer of rock materials) is ready to provide these spaces for an unlimited time for use by a municipality or region.**There are three questions:**1. If no construction investment is made and the applicant is a region/municipality – will this be considered an eligible expense for Bulgaria?2. Can you give an opinion that a limited construction investment is permissible in view of the indefinite ownership by the region/municipality and the predominance of “moving elements” - specific supplies?3. In one of the caves we can create an underground bicycle route with a length of about 1.5 kilometers. If the answer to question 2 is YES, can the cost of an underground bicycle route be allocated to Specific Objective 1 “Development of sustainable mobility, mainly of bicycle infrastructure and related facilities”?**Explanation**The planned investments are in the immediate vicinity of the Eurovelo Corridor 6 route - (about 500 meters), and are concentrated in the largest Bulgarian-Romanian contact point - Basarbovski Rock Monastery. | Undertakings (entities engaged in an economic activity regardless of their legal status and the way they are financed - as defined by the Court of Justice) are not accepted under the present Call for Concept Notes. Public funds used for privately owned touristic attractions fall under the state aid rules irrespective of their classification as investments or other type of expenditures. In this respect, please bear in mind that under the current call for Concept Notes for projects to be financed under Interreg VI-A Romania-Bulgaria Programme **no state aid is granted**, any activities fulfilling state aid criteria cannot be financed. In order to be accepted for financing, the project beneficiary must prove the ownership of the land, investment site or infrastructure that will benefit from funding. Please take into consideration the provisions of the guidelines: “*In case of a project envisaging investment activities, applicants(s) have the right of property and/or use over the land and/or construction (building or item of infrastructure) subject to the project's intervention. If the partner(s) hold/s only the right of use, such right should be secured for at least 5 years after the completion of the operation; if the owner of the land and/or construction (building or item of infrastructure) is different from the applicant(s), the owner should have given it’s written agreement for the applicant(s) to perform the investment on/in the relevant land and/or construction (building or item of infrastructure). Exceptionally, for building velo routes or paths, applicants are allowed not to demonstrate the ownership the entirety of the concerned land/item of infrastructure if they commit to obtain the necessary legal right through the expropriation for causes of public utility or through other means allowed by law*”.Moreover, if aiming to obtain financing from the Interreg VI-A Romania-Bulgaria Programme, the following rule applies: “***for Bulgarian partners, the investment activities should be carried out on public property (both public and private domain of the state/municipality)***.”Please consider also that the definition of “investment” includes equipment procurement, infrastructure development and construction works. So, in some cases, even equipment may be considered an investment, if it reaches certain values or requires installation.Our view is that a project which would involve even a limited investment into a private property or an arrangement which raises strong issues of interpretation as to the nature of the intervention should be avoided because it will be ineligible under the Interreg VI-A Romania-Bulgaria Programme. |
|  | I further clarify the issues surrounding “private ownership” of caves.The case is as follows:We have an active concession for the extraction of construction material. Taking the excavated material, the company creates caves. Then it moves to another place and again extracts rock material and creates caves again. However, they remain within the global parcel of an active concession. In reality, they are not needed by the company, but formally, however, state property acts cannot yet be created.**According to the State Property Act (SPA)**According to Art. 2, para. 2 of the SPA, state property is all properties that the state acquires by virtue of law or after the expiration of a concession agreement.We declare again. We have no problem with the concessionaire, we are looking for a fair legal solution that satisfies the MA!! We can sign an agreement for joint use. In practice, the state has the right to ask the concessionaire to give consent to use the abandoned galleries for other purposes (tourism, research, etc.).Since the concessionaire does not own the underground spaces, they automatically become state property after the use is terminated.In practice, the MA authority can accept this,.. and as future categorical state property. | Please see the answer from above. Please note that the requirement for Bulgarian partners to invest exclusively on public property was not imposed by MA, but by the Bulgarian National Authority and it is based on Bulgarian law. Any interpretation of the Bulgarian State Property Act on whether the caves are public or private property should be provided by the competent Bulgarian authorities. At the same time, please consider the rules on state aid and that, under this call, no activities which may result in state aid will be financed.  |
|  | As part of the **Danube Meets Black Sea Project**, we have some questions regarding the **eligibility of specific infrastructure elements** under the **Interreg VI-A Programme** and would appreciate your guidance.Our project includes the development of:* **Two bicycle-friendly campsites** (one in RO & one in BG)
* **Three bungalows** as additional accommodation options
* **Two bicycle repair and service stations**
* **Stationary charging infrastructure for e-bikes and sheltered bicycle storage**

**Our Questions on Eligibility:**1. **Campsites & Bungalows:**
	* Can **campsites and bungalows** be funded under the Interreg VI-A Programme if they are **managed by an NGO under a cost-recovery model**?
	* If not: What **legal structure** would be required to ensure compliance (e.g., public tendering for leasing to an external entity)?
2. **Repair Stations & Sheltered Bicycle Storage:**
	* Are **buildings/infrastructure** needed for **repair services, bicycle shelters, and charging infrastructure** eligible for funding?
	* Are there any restrictions regarding **ownership or operational use** of such facilities?

To ensure our project fully **complies with EU funding regulations**, we are attaching a **copy of the Project Notes** for your review. We would appreciate your feedback on whether this structure aligns with the programme's eligibility criteria and if any adjustments are needed. | * 1. The construction of campsites and bungalows falls under Measure 2.1 of the ITS, ”Development of touristic infrastructure and cultural assets”.

The entity who owns the land on which campsites and bungalows will be built is very important, from the perspective of the current Call for Concept Notes.For eligibility purposes, the partners must prove *the right of property and/or use over the land and/or construction (building or item of infrastructure) subject to the project's intervention*. In terms of the private management of the campsite and bungalows, state aid rules must be fully respected. In this respect, please bear in mind that under the current call for Concept Notes for projects to be financed under Interreg VI-A Romania-Bulgaria Programme **no state aid is granted**, any activities fulfilling state aid criteria cannot be financed.The current Call for Concept Notes under the Integrated Territorial Strategy does not finance actions for which the partners act as economic operators and/or for which the competition would be distorted. Activities proposed thorugh the Concept Notes cannot benefit from state aid, where the state aid is defined as any aid granted by a Member State or through State resources in any form whatsoever which distorts or threatens to distort competition by favouring certain undertakings or the production of certain goods […], in so far as it affects trade between Member States (Article 107(1) of the Treaty).Please pay attention to the project idea activities which could be most susceptible to be subject of state aid provisions, for example:- aid to operators: operators who make use of the infrastructure to provide services to end-users receive an advantage if the use of the infrastructure provides them with an economic benefit that they would not have obtained under normal market conditions; or- aid to end-user: if the operator of an infrastructure has received State aid or if its resources constitute State resources it is in a position to grant an advantage to the users of the infrastructure (if they are undertakings) unless the infrastructure is made available to the users on market terms; etc.Thus, in case of the examples above mentioned, an economic advantage to the operator/end-user can in particular be excluded if the concession to operate the infrastructure (or parts of it)/the fees for use of the infrastructure is assigned for a positive price/have been set through a tender that meets all the relevant conditions (the tender procedure has to be competitive, transparent, sufficiently well-publicized, non-discriminatory, unconditional (to allow all interested and qualified bidders to participate in the process), using and complying with the national laws on public procurement of the country on whose territory the partner which organizes the procedure is located.A concession contract should be signed between the public and the private entities.* 1. For restrictions on ownership or operational use, see the answer provided under point 1.

Repair stations and sheltered bicycle storage could be included in the project idea, as cycling facilities for the infrastructure. Please check the compliance of such activities with the budgetary limitations. The same restriction on ownership and state aid rules apply to repair stations and sheltered bicycle storage as for other investments.The Q&A support mechanism is not designed to provide full eligibility check of concept notes, but to respond to specific questions derived from the documents of the Call for Concept Notes. The full Concept Notes will be checked and assessed during the formal procedure of project evaluation.  |
|  | Question submitted in Romanian:*Se permite amenajare pista pe asfalt/drum  existent? Doar marcaje și spații servicii? Sau o pistă veche doar marcare și modernizare..spații servicii și dotări pe traseu?*Translation:Is it allowed to build a cycling path on an existing asphalt/road? Only markings and service areas? Or an old track only marking and modernization...service areas and facilities on the route? | The Guidelines for Concept Notes specify, under Measure 1.1., the following indicative types of actions:* Development of new or modernized cycling infrastructure (cycling lanes and paths), with a focus on safety measures, first aid and service points, and signalling. This may also address connected infrastructure (including new, reconstruction or modernization of relevant road sections) which may be also considered, in duly justified cases (for interventions that specifically address certain road segments dedicated to cycling) and in line with the list of operations.
* Measures for road safety (with priority for EuroVelo 6 route): complying with standards related to traffic signalling systems and/or additional development of infrastructure dedicated to cyclists and pedestrians, such as tunnels, bypasses, bridges, overpasses walkways and protected cycling paths.

From the perspective of the assessment criteria, projects are encouraged to demonstrate their contribution to the cycling infrastructure (20 points are assigned to the criterion Effective Support for Cycling Tourism – the project leads to newly built / significantly upgraded cycling routes or lanes and/or to the creation or installation of support facilities and/or safety features). Depending on the current state of the cycling route, the applicant can plan modernization works and/or safety improvement measures or other types of endowments. The cycling route must meet criteria of safety and must be separated from the road. Safe cycling involves limited interaction with motorized traffic, with other cyclists and pedestrians.However, the applicants can determine what are the most relevant and efficient safety features that have to be installed on the supported infrastructure, in line with the budget and following the numerous guidelines and best practice examples of the EuroVelo, as well as complying with the national legislation on this topic. |
| **SPECIFIC OBJECTIVES** |
|  | It is possible to submit one project with contains investments activities from SO1 and SO2? For example, 2 millions for cycle tourism infrastructure and 1 million for renovation of churches.  | The Guidelines for Concept Notes does not prevent the applicants to plan investments from multiple SO. Moreover, applicants are encouraged to design project ideas with an integrated character, combining activities from multiple SOs. Please keep in mind that the project idea must meet all conditions detailed in the Guidelines.  |
|  | In Section 1/1.3, in the table detailing the indicative financial allocation available for the present call, there are 2 different total amounts corresponding, each, to a SO: 22.500.000 euro for SO1, and 33.750.000 euro for SO2.Given this tiebreaker, of different total budgets corresponding to different SOs, please clarify if one concept note must respond to/address only one ITS specific Objective: SO1, or SO2?, or can respond to two SOs in one single concept note?For example, our concept note will regard the **development of a modernized cycling lane** (being addressed by SO1) and also will **develop a camping site near a natural landmark** (being addressed by SO2). If the case might be that each of these two types of interventions can not be framed under 1 single concept note, we will submit two different concept note: one, addressing SO1, and one addressing SO2, but your clarification upon this issue is important in order for us to not wronglt interpret the Guidelines,In conclusion, please clarify **if we can cover/include both above mentioned interventions** (addressed according to the Guidelines under two different SOs), in one single concept note, **or each intervention addressing a Specific Objective, must be framed under one single concept note?** | A Concept Note is expected to contribute or respond to one or several of the specific objectives within the available budget threshold. The Guidelines for Concept Notes does not prevent the applicants to plan investments from multiple SOs. Moreover, applicants are encouraged to design project ideas with an integrated character, combining activities from multiple SOs. Please keep in mind that the project idea must meet all conditions detailed in the Guidelines.In the described situation is important to make sure that the proposed actions under the 2 objectives fall within the maximum budget limit of 6.000.000 euro. |
|  | Following the logic from questions 9 and 10 from Q&A table (updated 30.01) and respective Answers provided, please have in mind that:*"A Concept Note is expected to contribute or respond to one or several of the specific objectives within the available budget threshold.**The Guidelines for Concept Notes does not prevent the applicants to plan investments from multiple SOS. Moreover, applicants are encouraged to design project ideas with an integrated character, combining activities from multiple SOs."*Given this explanation, potential applicants are still unaware of how to proceed. Furthermore, in Annex 1 Concept Note, section III.1. DESCRIPTION OF THE PROPOSAL, part Contribution to ITS Specific Objective (where the selection is made by a predefined drop-down menu), clearly in a logical manner there is only 1 option to be selected. There is no technical way to indicated 2 SOs whatsoever. Also, what seems to be the optimal description solution when a given project envisaged multiple Measures in different SOs. In order to achieve integrated character, how to combine activities from multiple SOs, when in Annex 1 can be included 1 (one) Specific objective (from drop-down).Once again, please clarify if we can cover/indude both interventions (addressed according to the Guidelines under two different SOs), in one single concept note, or each intervention addressing a Specific Objective, must be framed under one single concept note, making sure to be within Guideline budget limits?The provided clarifications to those questions 9 and 10 in our opinion are limited and does not highlight any practical use when developing Concept notes. | The Concept Note template may be modified by the applicant by multiplying the related section as many times as needed. Applicants will thus be able to cover both Specific Objectives, if necessary, in a single project idea/Concept Note. |
|  | During the Info day held on 4th February 2025 it was stated that when talking about infrastructure, it doesn't mean only physical infrastructure but also **intangible infrastructure like** - e.g. data management, IPR, software, human resources development and others - which must contribute to enhance the performance of the physical infrastructure.My question is - is it eligible to submit a concept note for the development of an intangible infrastructure **only** (without any hard measures like construction, reconstruction, renovation of physical facilities, creation of new ones, etc.)? | If the project idea is sought to be financed under Interreg VI-A Romania-Bulgaria, it must meet the requirements of contributing to the following output indicators (as mentioned in the Guidelines for Concept Notes): RCO58 Dedicated cycling infrastructure supported and/or RCO77 Number of cultural and tourism sites supported, together with RCO87 Organizations cooperating across borders.If the project idea does not contribute to the IP indicators it will not be considered for funding by the Programme/included in the list of projects proposed for funding under Interreg VI-A Romania - Bulgaria Programme.Thus, from the perspective of the contribution to the program indicators, the investments envisaged by the applicant must either contribute to the cycling infrastructure or to cultural and tourism sites. For further clarifications, please also consult the Methodological descriptions of Interreg VI-A RO-BG indicators SO 5.2., available at <https://interregviarobg.eu/assets/2024/01/guidance-on-monitoring-programme-indicators-annex-5-so-52.pdf>.It is not so clear how the intangible infrastructure would contribute to the IP indicators, but we do not exclude completely the idea of having a project for developing intangible infrastructure (exclusively, or part of a larger project idea). Still, you need to consider that such an infrastructure should demonstrate also its relation to the territory and how it benefits to the ITS area. If submitted, the project idea will be assessed against the rules of the call.If the project idea is to be financed from other sources, please ensure compliance with their respective requirements in terms of investments. |
| **BUDGET** |
|  | Could you please provide a full list of eligible expenditures for the projects to be submitted under the Concept notes call? | A list of eligible expenditure is not available for the call for concept notes, as this call is available for concept notes that could be financed from different financing sources. Regarding the concept notes that could be financed under the Interreg VI-A Ro-Bg Programme, an applicant guide along with a list of eligible expenditure will be available for selected concept notes. At this stage, it is only necessary to provide an estimated budget of the project idea. However, in order to have an idea of the types of expenditure that may be eligible under the Interreg VI-A Ro-Bg Programme, you may consult Regulation EU 2021/1059 (Interreg Regulation) which presents the categories of eligible expenditure in articles 37 to 44. Equally, you may consult the [Project Implementation Manual](https://interregviarobg.eu/assets/2024/01/pim-interreg-vi-a-romania-bulgaria.pdf) for details about how rules on the eligible expenditure are implemented (see notably pages 32-35). Finally, you may consult the Programme website for examples of eligible expenditure categories from the previous calls for projects under the Programme (<https://interregviarobg.eu/en/calls-for-proposals>). |
|  | Can you please clarify what types of expenditures are eligible under the CALL FOR CONCEPT NOTES UNDER THE INTEGRATED TERRITORIAL STRATEGY FOR THE ROMANIA-BULGARIA CROSS-BORDER AREA? Moreover, will those budget categories be calculated as real and/ or flat rate costs? | Please see the answer above.Interreg VI-A Romania-Bulgaria Programme uses for the calls launched simplified cost options and real costs, as follows:* + Project preparation (Lump sum for project preparation of 14,000 (total value) and real costs, if the case)
	+ Staff costs - flat rate up to 20% of **direct eligible costs other than staff costs (**External expertise and services costs; Equipment and Infrastructure and works)
	+ Travel & Accommodation - flat rate up to 15% of eligible direct staff costs
	+ Office & administrative costs - flat rate up to 15% of eligible direct staff costs
	+ Project closure lump sum (Lump sum for project closure of 6,500 Euro total value)
	+ Real costs for: External expertise and services costs; Equipment and Infrastructure and works.
 |
|  | We're currently assessing the possibility of applying to the current call under ITS and we were wondering if you can clarify for us the matter of the maximal budget for operations.Context: the guidelines and the methodology for assessment, both documents currently available on the interreg VI website, mention different figures: the guidelines briefly mention a range of 300.000 - 6.000.000 euros while the second document offers a range of 300.000 - 3.500.000 detailed between hard and soft operations. | The methodology for assessment of the ITS is a document drafted by the Interreg VI-A Ro-Bg Programme bodies and it presents the general criteria for assessing the ITS, not individual project ideas. The proposed budget for the submitted concept notes should be within the 300,000 to 6,000,000 Euros limits, as it is written in the guidelines.  |
|  | Can you provide an exact example on how to present the budget breakdown on co-financing and own contribution? | Total budget = ERDF funding + national co-financing + own contribution.For Interreg VI-A Romania – Bulgaria Programme the percentages of financial sources for each partner are the following: 80% ERDF, 18% State Budget co-financing and 2% own contribution. |
|  | As part of our preparation for submitting a project proposal under the Interreg VI-A Romania-Bulgaria Programme, we kindly ask for clarification regarding the **financing conditions** and **payment modalities** in case a project is approved.In particular, we would appreciate information on the following points:1. **Is any pre-financing granted** upon project approval?
2. **What percentage of the total budget** would be disbursed as pre-financing (e.g., 10%, 20%, etc.)?
3. **What reimbursement or reporting mechanism** is foreseen during implementation?(e.g., milestone-based reimbursements, periodic reporting and payments based on supporting documents, etc.)

These details are crucial for our financial planning, especially regarding **interim financing** from banks and the ability of project partners – in particular the participating **NGOs** – to manage cash flow during the implementation period. | The “Concept Note Process” constitutes the initial phase in implementing the RO-BG Integrated Territorial Strategy (ITS). Its objective is to develop a comprehensive portfolio of project ideas, from which the most relevant to the Interreg VI-A Romania-Bulgaria Programme will be invited to submit full applications.The full applications submitted by the selected applicants will comply with the specific requirements (including pre-financing and reimbursement mechanisms and rules) of the sources of funding identified by the applicant, i.e. Interreg VI-A Romania-Bulgaria or other European or national sources of funding. In the case of Interreg VI-A Romania Bulgaria, please consult the Project Implementation Manual, available here: <https://interregviarobg.eu/en/project-implementation-manual> For Interreg VI-A Romania – Bulgaria Programme the percentages of financial sources for each partner are the following: 80% ERDF, 18% State Budget co-financing and 2% own contribution.In principle, for Romanian partners the Managing Authority may offer advance up to 70% from the state budget co-financing and for Bulgarian partners the National Authority may offer maximum 80% from the state budget co-financing. |
| **ASSESSMENT CRITERIA** |
|  | 1. Does the distance from a project location to EuroVelo 6 is calculated in a straight line from the specific location of the project to EuroVelo6?2. If a project has included  multiple locations at different distances from EuroVelo, how are the points granted calculated upon evaluation? | 1. The distance between the main intervention of the project and the EuroVelo6 will be calculated based on maps, on the existing road infrastructure, and on the GPS coordinates that the applicant will provide in the Concept Note.
2. The distance that will be assessed under the ”Proximity to the EuroVelo6 route” criteria is the distance from the main intervention of the project to the EuroVelo6 route (see Table 3. ITS prioritization criteria). In accordance with the Guidelines, ”the main intervention of the project defines its most important output which may be an investment but also an activity. If compared to other interventions of the project, the main intervention will be defined by applying the following criteria, in this order: budget, number of people benefiting from that output, duration of the activity. If all activities cannot be not related to a certain location, then the place of the main intervention will be the headquarters of the lead partner”.
 |
|  | In accordance to the Criteria "Proximity to the EuroVelo6 route", different points are granted, to different distances: for eg. 20 points if the main intervention is located on the course of the EuroVelo6 route, and 10 points are granted if the main intervention is located within 10-20 km distance from the course of the EuroVelo6 route.Based on this example, and having in mind that each project partner will develop interventions, please clarify what would be the points granted in the following situation:-LP`s main intervention will be located on the course of the EuroVelo6 routeand-PP1`s main intervention will located within 10-20 km distance from the course of the EuroVelo6 routeThe same goes for the **second criteria "Effective support for cycling tourism": please clarify what would be the points granted in the following situation:**-LP will target over 30 km of cycling routes to be endowed with support facilities and substantial safety featuresand-PP1 will target 12 km of cycling routes to be endowed with some support facilitiesThe chances of having the same geographical proximity to the EuroVelo6 route or the same necessities of endowment, for both project partners (or 3 partners), is low, and in this context, it is important for the beneficiaries to understand how the points will be granted, specifically for these 2 criteria (above mentioned) | The distance that will be assessed under the ”Proximity to the EuroVelo6 route” criteria is the distance from the main intervention of the project to the EuroVelo6 route (see Table 3. ITS prioritization criteria). In accordance with the Guidelines, page 28, ”the main intervention of the project defines its most important output which may be an investment but also an activity. If compared to other interventions of the project, the main intervention will be defined by applying the following criteria, in this order: budget, number of people benefiting from that output, duration of the activity. If all activities cannot be related to a certain location, then the place of the main intervention will be the headquarters of the lead partner”.So, if the main intervention of the project is located on the course of the EuroVelo6 route, the project idea could get the maximum scoring for the criterion "Proximity to the EuroVelo6 route". For the criterion ”Effective support to cycling tourism”, the distance of the cycling routes created/significantly upgraded within the project will be calculated as a cumulative result of all project partners. The same cumulative approach will be used to assess the endowments, on condition that partners ensure an equivalent level of endowment. Please take into consideration:* on one side, to describe how your project satisfies the conditions to consider a cycling route or lane as being “significantly upgraded”, as explained in section 2.4, point 4 of the Guidelines and
* on the other side, to describe how your project satisfies the cumulative or alternative conditions concerning the endowments and the length of cycling routes or lanes, as the case may be.

Based on the description of the project intervention, the highest possible scoring will be awarded, depending on the respect of conditions described within the criterion. If the project will deliver over 30 km of **newly built or substantially upgraded** cycling routes or lanes, endowed with support facilities **and** substantial safety features, the project idea could obtain the maximum scoring for the criterion "Effective support for cycling tourism". |
|  | For the second criteria Table 3 ITS project ideas prioritization criteria, "Effective support for cycling tourism": please clarify what would be the points granted in the following situation:-LP will target over 30 km of cycling routes to be endowed with support facilities and substantial safety features and - PP1 will target 12 km of cycling routes to be endowed with some support facilities | Please see the answer above.  |
|  | Please provide an accurate and objective clarification on the following prioritization criterion: *Effective support for cycling tourism – the project leads to newly built / significantly upgraded cycling routes or lanes and/or to the creation or installation of support facilities and/or safety features, as follows:**Excellent (20 p) = over 30 km of cycling routes or lanes, endowed with support facilities AND substantial safety features*1. What is meant by “the project leads to” – is it implied that the project has to envisage cycling infrastructure such as cycle lanes/paths leading to an acknowledged by ITS velo route (such as Dunav Ultra)?
2. Can you explain in detail the formulation *“and/or to the creation or installation of support facilities and/or safety features”*, in particular the and/or part in the following example: A project idea with location directly on the official EV6 envisages installation of bike boxes (repair and charging stations), markings for cyclists, signs with EV6 route directions and sightseeing spots, etc., but does not envisage building of or rehabilitation of existing bike lanes or paths. Does it qualify for the maximum points?
3. Can you provide an exact definition of “cycling route” as understood under the prioritization criteria?
4. What exactly is meant by “AND substantial safety features” – can you please provide an indicative list and/or example?
 | 1. The project is expected to create new cycling infrastructure or to significantly upgrade existing cycling infrastructure – lanes/paths and connected infrastructure, thus contributing to the development of the EuroVelo6 route.
2. A project should lead to newly built / significantly upgraded cycling routes or lanes and/or the implementation of support facilities and / or safety features, as follows:
* 20 points = over 30 km of cycling routes or lanes, endowed with support facilities AND substantial safety features
* 15 points = between 15 and 30 km of cycling routes or lanes, endowed with support facilities and/or safety features
* 10 points = between 10 and15 km of cycling routes or lanes endowed with some support facilities and/or safety features OR support facilities and/or safety features installed on more than 30 km of roads or existing cycling routes or lanes
* 5 points = between 0.5 and 5 km of cycling routes or lanes OR some support facilities and/or safety features installed or created on existing cycling routes or lanes
* 0 points = N/A or the information is not available.

In order to consider a cycling route or lane as “significantly upgraded”, it has to meet at least six out of the ten practical characteristics, inspired by Cycling Design Best Practices (2023), available at https://www.iurc.eu/wp-content/uploads/2024/04/Cycling-Design-Best-Practices-Report.pdf.1. From the perspective of indicators, as well as from the perspective of the assessment criteria, the definition is embedded in the EuroVelo network. More precisely, in line with the Methodological descriptions of Interreg VI-A RO-BG indicators SO 5.2., available at <https://interregviarobg.eu/assets/2024/01/guidance-on-monitoring-programme-indicators-annex-5-so-52.pdf> the dedicated cycling infrastructure includes cycling facilities separated from roads for vehicular traffic or other parts of the same road by structural means (kerbs, barriers), cycling streets, cycling tunnels, etc. For cycling infrastructure with separated one-way lanes (ex: on each side of a road), the length is measured as lane length.
2. Measures for road safety may include: complying with standards related to traffic signalling systems and/or additional development of infrastructure dedicated to cyclists and pedestrians, such as tunnels, bypasses, bridges, overpasses walkways and protected cycling paths. The applicants can propose other features, in line with current EuroVelo standards or guidelines.
 |
|  | How for example will be taken decision which is the main territory, when a project includes measures at 60 km in Romania and 100 km in Bulgaria, and it will connect the end points of Eurovelo6 route - Constanta, Durankulak and Balchik? It connects the end points, but it is still not located along the length of the Eurovelo6 route? How the points will be calculated? | The assessment criteria ”Proximity to the EuroVelo6 route” will be applied to the main investment in the project, which is determined by the applicant, by applying the following criteria, in this order: budget, number of people benefiting from that output, duration of the activity There could be just one “main investment” in the project, which will be determined by the above-mentioned criteria (the investment with the biggest budget). If your project involves a cycling route which is considered as “main investment” and if it connects directly to the EuroVelo6, then the maximum number of points will be awarded. This is the most advantageous situation. Awarding 20 points is justified by the fact that the main investment has a direct link to EuroVelo 6, so, the proximity is fully ensured. If, in a hypothetical case, the main investment would have been situated at 15 km from the EuroVelo 6 (e.g. a high value investment in a cultural heritage site), independently of where any other smaller investment from that project would be situated, for this criterion the project would receive 10 points. |
|  | When measuring the “*Proximity to the EuroVelo6 route*” prioritization criteria, does *“course of the EuroVelo6 route*” include the buffer area (study area), or only the official linear EV 6 route? Example: If a potential applicant is located within the buffer area (as shown in the map below), but further than 20 km from the official line of the EV6, does it get 20 or 0 points? | The proximity will be assessed against the EuroVelo6 route. If the main intervention is located further than 20 km distance from the course of the EuroVelo6 route, within the eligible ITS area, the assessment will result in awarding 5 points. Please consult here the map with the buffer areas: <https://www.google.com/maps/d/u/0/viewer?mid=1VLo4-T-hl9S0wnShGFTRakYKgM-t-pQ&ll=44.24752546612556%2C24.63814105273439&z=9>.  |
|  | What is the starting point from which the "three-six-nine" months for project readiness are counted: from the submission of a concept note or from the approval of a concept note and opening for launch in Jems. *"Excellent (15 points) = All necessary permits and approvals have been obtained; the detailed project plan and technical design have been completed; a project management structure with clearly defined roles and responsibilities has been established; feasibility studies have been completed; the project is ready to start within three months.**Good (10 points) = The project is well prepared with most key elements complete: most necessary permits and approvals have been obtained; project planning and technical design are in an advanced stage; there is a defined project management structure with clarity for most roles and responsibilities; feasibility studies completed; ready to start within six months.**Medium (5 points) = The project is sufficiently prepared, but some key elements are still in the process of implementation: some necessary permits and approvals have been obtained; project planning and technical design are underway; initial project management structure has been defined; preliminary feasibility studies; ready to start within nine months.* | The starting point will be considered the deadline for the submission of the Concept Notes.The applicants are encouraged to include any details that provide estimates on the technical documentation. |
|  | Regarding the "Project Maturity" scoring criterion, at what point is analyzed the existence of the documentation necessary to start the project? If the beneficiaries do not have all the technical documentation at the time of submitting the Annex 1 Concept Note, but they estimate that the documentation will be complete by the time the financing contract is signed and they will be able to start the project within 3 months of signing the financing contract, will the project receive the maximum score of 15 points on this criterion? | Please see the answer above.  |
| **LETTER OF COMMITMENT** |
|  | With respect to Annex 3 Letter of Commitment under call 1 for concept notes under the Integrated Territorial Strategy for the Romania-Bulgaria cross-border area: The Letter of Commitment should be signed by each partner in the project or only by the lead partner? (the form within the guide solely indicates the lead partner) | According to the format, the Letter of Commitment should be signed by the lead partner. |
| **PROJECT DURATION** |
|  | Are there any limits for the project duration, apart from not exceeding year 2029? | There are not yet formal duration limits set for this call, except that projects do not have to extend beyond 30 June 2029. Still, we recommend applicants to keep their implementation calendar optimized, depending on the types of activities envisaged through their project and to indicate a clear number of months. For example, for the Interreg VI A Romania-Bulgaria Programme, you may refer to the following indicative (not mandatory, but recommended) time limits for implementation: 36 months for hard projects (involving significant volume of investment activities) and 18 months for soft projects (without large investment activities). .  |
|  | In the guide, the maximum eligible duration for a project is not mentioned. Can you please specify this? Thank you for the swift response! | See the answer above. |
| **EUROVELO 6 ROUTE** |
|  | Can you clarify the eligible Euro velo 6 route on the territory of Constanta county-Dobrich region? | Please consult the map available on the Interreg VI A Romania-Bulgaria website: <https://interregviarobg.eu/en/eurovelo6>By clicking on the map, you will access a more detailed map.The map is also available at this link:<https://www.google.com/maps/d/u/0/viewer?mid=1VLo4-T-hl9S0wnShGFTRakYKgM-t-pQ&ll=44.24752546612556%2C24.63814105273439&z=9> As decided by the Strategy Board, the exact delineation of the EuroVelo 6 route is defined in one of the annexes to the Strategy Board (annex 3 - https://interregviarobg.eu/sti1). The EuroVelo6 route is marked with red on the map. You may estimate the distance from your planned investment to the EuroVelo6 by computing that distance on the existing road infrastructure from your investment to the closest section of EuroVelo 6 route, as marked with red on those maps.The territory of Constanta county and Dobrich region is almost entirely included in the ITS area and, therefore, eligible. |
|  | Can you please clarify the exact route of Eurovelo 6, as we see that the assessment of projects also depends on the proximity of the intervention site to the route. A map is given in the guidelines on page 7. Does this mean that all points located on the red line are considered to be located on Eurovelo 6?On the other hand, again in the guidelines, on page 19, another map is given in which Eurovelo 6 is not marked in the same way as the mentioned above. Can you provide a relevant map which will avoid misunderstanding.  | See the answer above. If the main investment of your project is located on the red line (EuroVelo6 route), the project will receive the maximum number of points under the proximity criterion. Still, if your main investment is located further away from the route, the distance to the rout has to be assessed and the points will be awarded according to the assessment grid thresholds. |
|  | In regard to the Proximity to the Eurovelo6 criteria: what is considered as Eurovelo route for the Interreg program - are the connections between Silistra-Dobrich-Balchik and Silistra-Dobrich-General Toshevo-Durankulak considered as such? Should be the tourist route "Black Sea route" connecting the end points of Eurovelo6 Constanta, Durankulak and Balchik considered as eligible for the Interreg? | Please refer to the approved Integrated Territorial Strategy and its Annexes for details on the EuroVelo6 main and secondary routes, eligible for funding under the ITS and the Call for Concept Notes. You may also consult this map (<https://www.google.com/maps/d/u/0/viewer?mid=1VLo4-T-hl9S0wnShGFTRakYKgM-t-pQ&ll=44.24752546612556%2C24.63814105273439&z=9>). Part of the Black Sea Route is eligible under the ITS and the Guidelines for Concept Notes. The connection between Constanta and Balchik is also part of the ITS territory. However, please consider the budget limitations stated in the Guidelines, compared to the activities and investments that are envisaged. |
|  | Please provide a working link to the “improved versions of the EuroVelo 6 route based on the Danube Cycle Plans project”, as all links provided in the ITS and its annexes lead to an inoperative website. An official map would be perfect.  | The map is available at <https://www.google.com/maps/d/u/0/viewer?mid=1VLo4-T-hl9S0wnShGFTRakYKgM-t-pQ&ll=44.24752546612556%2C24.63814105273439&z=9>. |
| **INDICATORS** |
|  | Regarding RCR77, please clarify the following issue: "visitors" are counted only the ones that are accessing the project site, by paid ticket. If a project has, in theory, as main intervention, a natural landmark, so no tickets are applied, how can we report the number of visitors if only the ones with tickets are counted? | Please refer to the Methodological descriptions of Interreg VI-A Ro-BG indicators – SO 5.2 available at <https://interregviarobg.eu/assets/2024/01/guidance-on-monitoring-programme-indicators-annex-5-so-52.pdf> for guidance on indicators and how to measure them. The payed tickets were imagined as the most effective and reliable manner of counting visitors. Other methods could be accepted, if they provide a reliable, accurate and trusted method to count visitors. According to the 2021-2027 PERFORMANCE MONITORING AND EVALUATION UNDER THE ERDF/CF AND JTF ANNEXES – PART A – The indicator RCR 77 does not cover natural sites for which an accurate estimation of number of visitors is not feasible.Therefore, the Interreg VI-A Romania-Bulgaria Programme and the Strategy Board could accept the monitoring of visitors of a natural site, even if not they do not access the site based on a payed ticket, provided that several conditions are met:* The natural site is classified as a tourist site;
* The applicant provides a reliable, accurate and trusted method of counting visitors (e.g. by installing dedicated monitoring equipment)
* The applicant takes responsibility for reporting visitors, allowing also methods of control.
 |
|  | In the indicators of the call, we have the phrases infrastructure / sites SUPPORTED. What activities would be considered "supporting" infrastructure and sites, can you please give particular examples? In terms of "cycling facilities", what particular facilities could be included, can you please give examples? | Please refer to the Methodological descriptions of Interreg VI-A Ro-BG indicators – SO 5.2 available at <https://interregviarobg.eu/assets/2024/01/guidance-on-monitoring-programme-indicators-annex-5-so-52.pdf> for guidance on indicators and how to measure them.In terms of cycling facilities for the infrastructure, please consult the existing numerous guidelines and best practice examples of the EuroVelo.One source of information is available here: <https://www.iurc.eu/wp-content/uploads/2024/04/Cycling-Design-Best-Practices-Report.pdf>Please also consider national legislation and regulations.  |
| **OTHER** |
|  | Is it ok to create a bicycle lane along an existing road**by compacting the land** on the right and left sides of the respective road and be awarded points for the number of km of bicycle lane created? | In line with the Integrated Territorial Strategy, the present call for Concept Notes envisages the creation of high-quality bicycles lanes, in order to respond to the needs in the ITS region (*i.e.* poor bicycle infrastructure).Moreover, the Guidelines include references to Cycling Design Best Practices (2023), available at <https://www.iurc.eu/wp-content/uploads/2024/04/Cycling-Design-Best-Practices-Report.pdf>.The construction of bike lanes along an existing road should comply with the national regulations and authorization conditions. We advise you to address the competent authorities in advance, to check for conditions. |
|  | Letter on the strategic importance of restoring and developing the railway line Tulcea–Constanța–Medgidia–Kardam. | The letter reveals an important local need, but it falls outside of the scope of the present Guidelines for Concept Notes. |
|  | NGOs are non-profit and usually lack own financial resources for large projects. How can NGOs secure funding to actively contribute to regional development? Are there specific funding mechanisms that support NGOs in implementing such projects?What is the required co-financing percentage for an NGO? | NGOs are eligible to participate as applicants under the present call, including as partners. The co-financing percentages are established in the Applicant Guides of the programs you are considering for the financing of the project idea. In general, for the Interreg VI-A Romania-Bulgaria Programme, the partner’s own contribution is 2%.If an NGO cannot implement infrastructure related activities, it could participate with soft measures in a larger project. |
|  | What documents are necessary to build a number of km s of bike road? Is it necessary to have approval from police or other local authorities? | The investment works on bicycle infrastructure are subject to the laws and regulations of the state and/or region. Please consult with the relevant authorities in your region, to gain a better understanding on the efforts required for planning such an investment.From the perspective of the current call, the maturity of the project idea will be assessed, in accordance with the Guidelines for Concept Notes. There are no documents requested at this stage, however in case the project is selected under the Interreg VI-A Ro-Bg Programme, documents may be requested at the moment of submitting the full application. |
|  | **Subject:** Inclusion of Project Proposal for Constanța Region – EV6 Interreg ProgramDear Sir/Madam,In the context of the upcoming meeting on [date], I would like to submit a project proposal for the Constanța region to be included in the Interreg program for EuroVelo 6. I kindly request that this proposal be added to the official project list.**Project Proposal:****Title:** Improvement of Cycling Infrastructure along EuroVelo 6 in the Constanța Region**Objective:** Expansion and modernization of cycling paths, along with the development of supporting infrastructure (e.g., rest areas, signage, secure parking facilities).**Measures:*** Upgrading existing sections of the EV6 to enhance safety and attractiveness for cycling tourism
* Establishing bicycle service points and charging stations for e-bikes
* Optimizing connections to other transport modes (e.g., railway stations, ferries)
* Promoting cross-border cooperation with Bulgaria to ensure uniform route quality

As the meeting time is limited, I will not be making a presentation but remain available for any further questions.Thank you for your support. I look forward to your feedback. | Please submit the project idea under the format of the Concept Note, accompanied by the Letter of Commitment, as required by the Guidelines for Concept Notes.  |
|  | With the submission deadline for project ideas approaching quickly, what is the maximum response time for answering questions by CIVITA? | The clarification questions differ in complexity and coverage. Thus, the questions are addressed depending on the date they have been received, and the time needed to provide answers depends on the content of the question. Also, an additional layer of checks and approval is applied to the provided answers, by the programme authorities. Please submit your questions with at least 5 working days before the deadline. Any other question received after this term may not receive the answer in due time (considering the necessary time for analysing, drafting replies, consulting within Programme structures or the Strategy Board, number of questions). |
|  | 1. In section III.1. DESCRIPTION OF THE PROPOSAL/ Contribution to indicators  - are applicants allowed to add more than 3 pairs of indicators by placing additional boxes in the application form and2. Respectively in sections III.4. OUTPUTS and III.5.  RESULTS can there be added more sections for all above mentioned indicators? | Yes, applicants will be allowed to add and fill in as many selection boxes as needed in order to cover all indicators, outputs and results, by multiplying the related section. |
|  | Question submitted in Romanian:*1-Va rog sa ne comunicati care sunt in aceasta etapa documentele obligatoriu de transmis si semnat electronic pentru finantare in cadrul programului INTEREG VI ROMANIA BULGARIA cu termen 4 aprilie 2025.**ConceptNote Anexa 1 si**Letter of comitment Anex 3.**Mai sunt si alte documente necesare !**2 Putem transmite si alte documente atasate cum ar fi o scurta descriere de proiect sau alte documente pe care le consideram utile.**3- se accepta si modernizare/semnalizarea unora vechi pentru crestere standard si securitate turisti**4- Pentru piste noi unde exista deja soseaua asfaltata si latimea ei permite  sunt acceptate  doar marcaj si semnalizare pista de biciclete  fiind drumuri de legatura intre localitati sau centura existenta**5-Exista precizata scris undeva cofinantarea minima ce trebuie asigurata.Si cat este procentual.*Translation:1-Please let us know which documents are mandatory to be sent and signed electronically at this stage for financing under the INTEREG VI ROMANIA BULGARIA program with a deadline of April 4, 2025.ConceptNote Annex 1 andLetter of commitment Annex 3.There are other necessary documents!2 We can also send other attached documents such as a short project description or other documents that we consider useful.3- Modernization/signaling of some old ones is also accepted for standard increase and tourist security4- For new tracks where there is already an asphalt road and its width allows, only marking and signaling of the bicycle path are accepted, being connecting roads between localities or the existing belt5-Is there a written statement somewhere of the minimum co-financing that must be ensured. And what is the percentage. | 1. According to the Guidelines for Concept Notes, the documents - Concept Note (Annex 1) and Letter of Commitment (Annex 2) will be sent via e-mail, as electronically signed pdf. files to the following e-mail address: conceptnotesITS@gmail.com.
2. The Concept Note should be a brief document; each section imposes clear limitation on the number of words to be inserted. If the provided information is not considered clear, the evaluators will contact the applicants requesting additional information. Therefore, no additional Annexes or documents must be sent at this initial stage.
3. Depending on the current state of the cycling route, the applicant can plan modernization works and/or safety improvement measures or other types of endowments. The length of dedicated cycling infrastructure newly built or significantly upgraded by projects supported is important from the perspective of indicators. If the project idea is sought to be financed under Interreg VI-A Romania-Bulgaria, it must meet the requirements of contributing to the following output indicators (as mentioned in the Guidelines for Concept Notes): RCO58 Dedicated cycling infrastructure supported and/or RCO77 Number of cultural and tourism sites supported, together with RCO87 Organizations cooperating across borders. from the perspective of the contribution to the program indicators, the investments envisaged by the applicant must either contribute to the cycling infrastructure or to cultural and tourism sites. For further clarifications, please also consult the Methodological descriptions of Interreg VI-A RO-BG indicators SO 5.2., available at <https://interregviarobg.eu/assets/2024/01/guidance-on-monitoring-programme-indicators-annex-5-so-52.pdf>.
4. The cycling route must meet criteria of safety and must be separated from the road. Safe cycling involves limited interaction with motorized traffic, with other cyclists and pedestrians. The applicants can determine what are the most relevant and efficient safety features that have to be installed on the supported infrastructure, in line with the budget and following the numerous guidelines and best practice examples of the EuroVelo, as well as complying with the national legislation on this topic.
5. On the issue of co-financing, please consider the following:
* the “Concept Note Process” constitutes the initial phase in implementing the RO-BG Integrated Territorial Strategy (ITS). Its objective is to develop a comprehensive portfolio of project ideas, from which the most relevant to the Interreg VI-A Romania-Bulgaria Programme will be invited to submit full applications.

the full applications submitted by the selected applicants will comply with the specific requirements (including co-financing) of the sources of funding identified by the applicant, i.e. Interreg VI-A Romania-Bulgaria or other European or national sources of funding. In the case of Interreg VI-A Romania Bulgaria, please consult the Project Implementation Manual, available here: <https://interregviarobg.eu/en/project-implementation-manual>. In general, for the Interreg VI-A Romania-Bulgaria Programme, the partner’s own contribution is 2%. |