



**Republic of Serbia**  
**MINISTRY OF FINANCE**

**Department for Contracting and Financing of EU Funded Programmes (CFCU)**

**Belgrade, 30 December 2024**

**CONTRACTING AUTHORITY'S CLARIFICATIONS**

**1st Call for Proposals for the CBC Programme Serbia – Bosnia and Herzegovina under the Instrument of Pre-Accession Assistance (IPA III), allocations 2022 and 2024**

**EuropeAid/183157/IH/ACT/Multi**

<b>No.</b>	<b>Question</b>	<b>Answer</b>
1.	<p>Dear Sir/Madam,</p> <p>I am contacting you on behalf of the NGO "Regional Education and Information Centre for Sustainable Development in South-East Europe Sarajevo - REIC" and I have a query regarding the eligibility of our organization under Specific Objective 1.2 "To increase the employability of specific groups" in the context of the 1st Call for Proposals under the Cross-border Cooperation Programme Serbia-Bosnia and Herzegovina 2021-2027 IPA III.</p> <p>We are interested in knowing whether we, as an NGO whose mission and name aim at education, can apply under this specific objective, considering that "Education and training organisations and institutions" are mentioned as eligible applicants in the call for proposals.</p>	<p>In line with the Guidelines for applicants (GfA), <b>Section 2.2.4 Further information about concept notes</b>, "<i>to ensure equal treatment of applicants, the contracting authority cannot give a prior opinion on the eligibility of lead applicants, co-applicants, affiliated entity(ies), an action or specific activities</i>".</p> <p>For detailed eligibility requirements, please refer you to <b>Section 2.1.1. Eligibility of applicants (i.e., lead applicant and co-applicant(s))</b> of the Guidelines for Applicants:</p> <p><b>“Lead applicant</b></p> <p>(1) In order to be eligible for a grant, the lead applicant must:</p> <ul style="list-style-type: none"><li>• be a legal person, <b>and</b></li><li>• be non-profit-making, <b>and</b></li><li>• be effectively established in either the Republic of Serbia or Bosnia and Herzegovina, <b>and</b></li></ul>

		<ul style="list-style-type: none"> <li>• be directly responsible for the preparation and management of the action with the co-applicant(s) and affiliated entity(ies), not acting as an intermediary, <b>and</b></li> <li>• be one of the following institutions or organisations: ....</li> </ul> <p><b>Under Specific objective 1.2. To increase the employability of specific groups</b></p> <ul style="list-style-type: none"> <li>▪ Local and regional authorities</li> <li>▪ Employment services</li> <li>▪ Regional development organisations</li> <li>▪ <u>Education and training organisations and institutions</u></li> </ul> <p>....</p> <p>Co-applicants must satisfy the eligibility criteria as applicable to the lead applicant himself.”</p> <p>The admissibility of these institutions and organization should be demonstrated through their establishment decision, statutes, or relevant legislation to confirm that they are registered for activities in the relevant filed, or that their official acts specify that these organizations operate in one or more of these fields.</p>
2.	<p>Dear all,</p> <p>We are addressing you with the questions related to the propositions of the first published Call for Proposals under the CBC BiH-Serbia 2021-2027 Program, and we kindly ask you to answer us as soon as possible.</p> <p>a) In the case that a body/institution/organization was founded by the public bodies and is non-profit, whose staff is not financed from the public budget and treasury, but from the development projects it implements, can the salaries of the staff of this body/institution/organization be paid from the project budget?</p>	<p>a) In line with the Guidelines for applicants (GfA), <b>Section 2.2.4 Further information about concept notes</b>, “<i>to ensure equal treatment of applicants, the contracting authority cannot give a prior opinion on the eligibility of lead applicants, co-applicants, affiliated entity(ies), an action or specific activities</i>”.</p> <p>For detailed eligibility requirements, please refer you to <b>Section 2.1.5. Eligibility of costs: costs that can be included, sub-section <u>Eligible direct costs</u></b> of the Guidelines for Applicants:</p> <p>“<b>Salary costs of the personnel of national, regional or local administrations, as well as those of other publicly owned or controlled institutions or enterprises</b>, may be eligible to the extent that they relate to the cost of activities</p>

	<p>Namely, from the section indicated in the Guidelines for grant applicants of the Call (page 23), it is not clear what is meant by "eligible" in this case:  “Salary costs of the personnel of national, regional or local administrations, as well as those of other publicly owned or controlled institutions or enterprises, may be eligible to the extent that they relate to the cost of activities which the relevant public authority would not carry out if the action or operation were not undertaken.”</p> <p>b) Under the specific objective 1.1 of the call “To enhance youth activism and youth socio-economic participation”, are the small grants for start-up companies (for financing equipment and office furniture) eligible for funding, as well as co-financing the internship programs for the new employees?</p>	<p>which the relevant public authority would not carry out if the action or operation were not undertaken.  <b>These personnel shall not receive for the engagement in the project activities any other remuneration other than their standard, regular salaries in their respective institutions.</b>  <b>The total sum of the salaries of these personnel shall not exceed total amount of co-financing provided by the applicant, co-applicant(s) and affiliated entity(-ies)....</b></p> <p><u>Please note that this does not apply to professional staff recruited by the national, regional or local administrations, as well as other publicly owned or controlled institutions or enterprises, for the sole purpose of managing the project resulting from the grant award.</u></p> <p>b) In line with the Guidelines for grant applicants <b>Section 2.1.4. Eligible actions: actions for which an application may be made</b>, please note the following:  <u>“Financial support to third parties</u>  Applicants may not propose financial support to third parties.”</p> <p>This means that <b>sub-granting</b>, including providing small grants to start-up companies and co-financing the internship programs for the new employees, <b>is not allowed under this Call for Proposals.</b></p> <p>For more information about the indicative types of activities that may be financed under this Call for Proposals, please refer to Guidelines for grant applicants, Section 2.1.4. Eligible actions: actions for which an application may be made, <u>Types of activity.</u></p>
3.	<p>Dear Sir/Madam,</p> <p>In reference to the published IPA III call for cross-border cooperation projects between the Republic of Serbia and Bosnia and Herzegovina, I have noted in the call guidelines that it is clearly stated that the project concept should be submitted using the Annex A form.</p>	<p>The Annex A: Grant application form is published together the Guidelines for Applicants and other annexes on the following websites:</p> <ul style="list-style-type: none"> <li>- CFCU: <a href="http://www.cfcu.gov.rs/tender.php?id=782">http://www.cfcu.gov.rs/tender.php?id=782</a></li> <li>- The F&amp;T portal: <a href="https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/opportunities/aspect-details/183157PROSPECTSEN?isExactMatch=true">https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/opportunities/aspect-details/183157PROSPECTSEN?isExactMatch=true</a></li> </ul>

	<p>However, after reviewing your official website and other available sources, I was unable to locate the mentioned form.</p> <p>I kindly ask you to provide information on where I can find the Annex A form or, if possible, to send it to me via email.</p> <p>If any additional information or documentation is required for this request, I remain at your disposal.</p>	<p><a href="https://www.ipa.gov.me/status=31094501,31094502&amp;order=DESC&amp;pageNumber=1&amp;pageSize=50&amp;sortBy=startDate">e&amp;status=31094501,31094502&amp;order=DESC&amp;pageNumber=1&amp;pageSize=50&amp;sortBy=startDate</a></p> <p>- Programme's official website: <a href="https://srbbih.org/en/1st-call-for-proposals-within-the-ipa-cross-border-cooperation-programme-serbia-bosnia-and-herzegovina-2021-2027-has-been-launched/">https://srbbih.org/en/1st-call-for-proposals-within-the-ipa-cross-border-cooperation-programme-serbia-bosnia-and-herzegovina-2021-2027-has-been-launched/</a></p> <p>The Annex A can be found in the folder <b>Documents to be completed</b>, under the name <b>2_Annex A_application form.doc</b>.</p>
4.	<p>To whom it may concern,</p> <p>Questions regarding the 1st Call for Proposals within SER-BIH CBC Programme:</p> <p>Is it acceptable within the Action to award small grants to third parties, for example, a cash prize for the best startup ideas delegated from young people?</p>	<p>Please refer to the answer 2 b).</p>
5.	<p>Poštovani,</p> <p>Za vas imam pitanje u vezi poziva 1st Call for Proposals under Cross-border Cooperation Programme Serbia- Bosnia and Herzegovina 2021-2027 IPA III. Ja sam zaposlena na Fakultetu za hotelijestvo i turizam u Vrnjačkoj Banji, pa me zanima da li bi mogli da budemo LEAD insticija na ovom pozivu, zbog toga što ne pripadamo lokacijama koje su navedene u pozivu. Tematika projekta bi bila u okviru Zlatiborskog okruga.</p> <p><i>Unofficial translation</i></p> <p><i>Dear,</i></p> <p><i>I have a question regarding the 1st Call for Proposals under the Cross-border Cooperation Programme Serbia-Bosnia</i></p>	<p>In line with the Guidelines for applicants, <b>Section 2.2.4 Further information about concept notes</b>, “to ensure equal treatment of applicants, the contracting authority cannot give a prior opinion on the eligibility of lead applicants, co-applicants, affiliated entity(ies), an action or specific activities”.</p> <p>According to <b>Section 2.1.1. Eligibility of applicants (i.e., lead applicant and co-applicant(s))</b> of the Guidelines for Applicants:</p> <p><b>“Lead applicant</b></p> <p>(1) In order to be eligible for a grant, the lead applicant must:</p> <ul style="list-style-type: none"> <li>• be a legal person, <b>and</b></li> <li>• be non-profit-making, <b>and</b></li> <li>• be effectively established in either the Republic of Serbia or Bosnia and Herzegovina, <b>and</b></li> </ul>

	<p><i>and Herzegovina 2021-2027 IPA III. I am employed at the Faculty of Hospitality and Tourism in Vrnjačka Banja, and I would like to know if we could be the Lead Institution under this call, considering that our institution is not located within the eligible locations specified in the call. The project theme would be within the Zlatibor District.</i></p>	<p>....</p> <p><b>Co-applicant(s)</b></p> <p><b>The applicant must act with at least one co-applicant as specified hereafter.</b></p> <p><b>If the applicant is established in the Republic of Serbia, at least one co-applicant must be established in Bosnia and Herzegovina, and vice versa.</b></p> <p><b>At least two legal entities in the partnership, one per participating country, being the lead applicant or the co-applicant, must be public institutions that are effectively established and/or have territorial competence for the programme eligible area.</b></p> <p>...</p> <p>Co-applicants must satisfy the eligibility criteria as applicable to the lead applicant himself.”</p> <p>In line with the above, the lead applicant may be located outside the programme eligible area, if it ensures that at least two co-applicants in partnership (one from Serbia and one from Bosnia and Herzegovina) are public institutions that are effectively established and/or have territorial competence for the programme eligible area.</p>
6.	<p>Poštovani,</p> <p>Imamo dva pitanja u vezi aktuelnog SRB-BIH IPA poziva:</p> <p>a) Revizija treba da bude jedna za ceo projekat u obe zemlje ili svaka zemlja radi za sebe (2 ukupno)?</p> <p>b) Da li se mala laka infrastruktura kao što su uređenje obala, markacije i putokazi smatraju radovima prema ovom predlogu EU? Generalno ne bi bilo loše da vidimo šta se sve smatra pod lakom infrastrukturom da bismo znali koje radove možemo da predvidimo.</p>	<p>a) In line with the Guidelines for applicants, <b>Section 2.1.5. Eligibility of costs: costs that can be included:</b></p> <p><u>Eligible direct costs</u></p> <p>“Applicants are reminded that in contracts where the EU grant exceeds €100,000 they <u>must include in the budget the cost of an audit or expenditure verification</u> carried out by an independent auditor before submitting the final financial report of the action. All grant contract requiring such an audit or expenditure verification will have the Annex G VII referred in the list of annexes.”</p>

<p><i>Unofficial translation</i></p> <p><i>Dear,</i></p> <p><i>We have two questions regarding the current SRB-BIH IPA Call for proposals:</i></p> <p><i>a) Should the audit be conducted as a single audit for the entire project in both countries, or should each country conduct its own audit (resulting in two separate audits)?</i></p>	<p>In line with the <b>Annex G_2 general conditions</b> (<i>ANNEX II General conditions applicable to European Union-financed grant contracts for external actions</i>) of the Guidelines for applicants:</p> <p><b><u>“Expenditure verification report</u></b></p> <p>15.7. The coordinator must provide an expenditure verification report for:</p> <p>a) any request for further pre-financing payment in case of grants of more than EUR 5 000 000;</p> <p>b) <u>any final report in the case of a grant of more than EUR 100 000.</u></p> <p>The expenditure verification report shall conform to the model in Annex VII and shall be produced by an auditor approved or chosen by the contracting authority. The auditor shall meet the requirements set out in the terms of reference for expenditure verification in Annex VII.</p> <p>The auditor shall examine whether the costs declared by the beneficiary(ies) and the revenue of the action are real, accurately recorded and eligible under this contract. The expenditure verification report shall cover all expenditure not covered by any previous expenditure verification report.”</p> <p>In the <b>Annex G_7_1_expenditure verification</b> (<i>TERMS OF REFERENCE FOR AN EXPENDITURE VERIFICATION OF A GRANT CONTRACT EXTERNAL ACTION OF THE EUROPEAN UNION</i>) of the Guidelines for applicants is stated:</p> <p><b>“ 1 Introduction</b></p> <p>The present document and the Annexes listed in Section 8 are the terms of reference (‘ToR’) <u>on which the Coordinator (The term “Coordinator” refers to the Beneficiary identified as the Coordinator in the Special Conditions) agrees to engage ‘the Expenditure Verifier’ to perform a verification of reported expenditure.</u></p> <p>.....</p> <p>These ToR will become an integral part <u>of the contract concluded between the Coordinator and the Expenditure Verifier.</u>”</p>
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	<p>b) <i>Is small-scale infrastructure, such as shoreline improvements, markings, and signposts, considered as works under this call for proposals? In general, it would be helpful to clarify what qualifies as light infrastructure so we can determine which works we can plan.</i></p>	<p>In line with the above, the expenditure verification report must cover all project costs incurred by all beneficiaries. Therefore, a single audit should be conducted for the entire project and not separate audit for each country.</p> <p>b) In line with the Guidelines for applicants, <b>Section 2.2.4 Further information about concept notes</b>, “to ensure equal treatment of applicants, the contracting authority cannot give a prior opinion on the eligibility of lead applicants, co-applicants, affiliated entity(ies), an action or specific activities”.</p>
<p>7.</p>	<p>Dear Contracting authority,</p> <p>Please clarify whether registration in PADOR and EuropeAID ID number is required, is it a condition for applying for grants? It is said that Legal Entity file number can be presented N/A if there is no such number. For Lead partner and Copartners, will the application be rejected if we do not present this number (Europe AID ID)in the application?</p>	<p>In line with <b>Section 2.2.5. Full applications</b> of the Guidelines for applicants:</p> <p><i>“With the full application the lead applicant also has to submit completed PADOR registration form or organisation data (Annex F) for the lead applicant, each co-applicant (if any) and each affiliated entity (if any).”</i></p> <p>In line with the above, submission of PADOR registration form or organization data (Annex F) is not mandatory during the submission of the Concept Note.</p> <p>In line with the applicable PRAG version (as of 24 June 2022) PADOR is mandatory for Calls for Proposals in direct management. Since this Call for Proposals is launched in indirect management, document <b>Organization data (Annex F in the List of Annexes in Documents to be completed)</b> may be submitted <u>if impossible to register in PADOR.</u></p> <p>Please also see footnote no.5 of the Grant application form:</p> <p>Europe Aid ID</p> <p>“To be inserted if the organisation is registered in PADOR (Potential Applicant Data On-Line Registration)”.</p> <p>If organisation is not registered in PADOR, EuropeAid ID number is not required. In that case, the completed Annex</p>

		<p>F- Organisation data form should be submitted with the Full application form.</p> <p>In line with the <i>Section 2.2.5 Full applications</i> of the Guidelines for applicants:</p> <p>“Please note that the following documents should be submitted together with PADOR registration form or organisation data (Annex F) and the full application:</p> <p>....</p> <p>2. Legal entity form (see Annex D of these guidelines) duly completed and signed by each of the applicants (i.e. by the lead applicant and by each co-applicant, if any), accompanied by the justifying documents requested there. <u>If the applicants have already signed a contract with the contracting authority, instead of the legal entity form and supporting documents, the legal entity number may be provided, unless a change in legal status occurred in the meantime.</u>”</p> <p>Please also see footnote no.6 of the Grant application form:</p> <p>“If a lead applicant has already signed a contract with the European Commission and/or has been informed of the legal entity file number. If not, write ‘N/A’.”</p>
8.	<p>Poštovani,</p> <p>Vezano za slanje Concept Note za 1. javni poziv IPA III CBC SRB-BiH, molimo Vas za nekoliko pojašnjenja:</p> <p>a) Da li se kod slanja Concept Note i Deklaracija Lead partnera uvezuje zajedno ili ide u odvojenu kovertu kao kod pune aplikacije?</p> <p>b) Nije nam jasan "Legal entity file number"? Ako je u nekom projektu naša organizacija bila Lead partner, znači li to da je imala ugovor sa Evropskom komisijom?</p> <p>c) Takođe, za planiranje budžeta a obzirom da ćemo u projektnom prijedlogu imati radove, molimo za</p>	<p>a) In accordance with Section <b>2.2.2 Where and how to send concept notes</b> of the Guidelines for applicants:</p> <p>“<u>The concept note and declaration by the lead applicant (to be found in Part A Section 3 of the grant application form) must be submitted in one original and 3 copies in A4 size, each bound.</u> Hand-written concept notes will not be accepted.</p> <p>An electronic version of the concept note must also be submitted. A CD-Rom or a USB stick with the concept note in electronic format will be included, along with the paper version, in a sealed envelope as described below.”</p> <p>b) In line with the <i>Section 2.2.5 Full applications</i> of the Guidelines for applicants:</p>



<p>odgovor da li se limit od 50.000 € odnosi i na nabavku opreme i ujedno i na njeno instaliranje? Da li je sve obuhvaćeno u tom iznosu?</p> <p><i>Unofficial translation</i></p> <p><i>Dear,</i></p> <p><i>Regarding the submission of the Concept Note for the 1st public call of IPA III CBC SRB-BiH, we kindly ask for clarification on the following:</i></p> <p><i>a) When submitting the Concept Note and the Lead Partner's Declaration, should they be bound together, or should they be placed in separate envelopes, as is the case with the full application??</i></p> <p><i>b) Legal entity file number is not clear to us. If our organization was a Lead Partner in some project, does this imply that we had a contract with the European Commission?</i></p> <p><i>c) Additionally, for the budget planning purposes, and considering that our project proposal will include works, could you please clarify whether the €50,000 limit also applies to the procurement of equipment and its installation? Does this amount cover all related costs?</i></p>	<p>“Please note that the following documents should be submitted together with PADOR registration form or organisation data (Annex F) and the full application: ....</p> <p>2. Legal entity form (see Annex D of these guidelines) duly completed and signed by each of the applicants (i.e. by the lead applicant and by each co-applicant, if any), accompanied by the justifying documents requested there. If the applicants <u>have already signed a contract with the contracting authority, instead of the legal entity form and supporting documents, the legal entity number may be provided, unless a change in legal status occurred in the meantime.</u>”</p> <p>c) Please note that the limit of 50,000.00 EUR for works and procurement of equipment and its installation is not defined in the Guidelines for applicants.</p> <p>For the eligibility of costs, please refer to <b>Section 2.1.5 Eligibility of costs: costs that can be included</b> of the Guidelines for applicants.</p>
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