

**Comments received in the framework of public consultations on
the Guidelines for Applicants package for the Open Call for investment project proposal (19.04.2023-19.05.2023)
PRIORITY 1. GREENER BORDER REGION**

| NO | NAME / INSTITUTION | COMMENT | ANSWER |
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| 1 | BULGARIAN ASSOCIATION OF EUROPEAN PROGRAM CONSULTANTS (BAEPC) 18.05.2023 | In regards to the condition <i>“be NGO/non-profit making organizations with registration into sphere of ecology, environmental and biodiversity protection, education and other activities, relevant to the specific objective for enhancing protection and preservation of nature, biodiversity, and green infrastructure, including in urban areas, and reducing all forms of pollution, dated no later than two years before current call”</i> we propose to extend the requirement to branches of NGOs registered in the eligible territory of the program, reducing the registration period from 2 to 1 year. The reasons for this proposal are that newly registered organizations will also be given the opportunity to participate in the program in order to gain experience and expand the opportunities for partnership and cooperation. In order to ensure good project management, organizations that have been registered less than 2 years ago could not participate in the project as a Lead partner/only as partner. | The rationale behind the 2-year experience as condition for project participation steps upon the need for Priority 1.Greener border region to identify project that contribute the most to the development/rehabilitation of green infrastructure and to the achievement of all indicators. Supporting newly registered organizations to accumulate experience of their interest is not an objective/indicator of the P1. From a general perspective, it is a very good consideration, but the need to assist the institutional growth of new organizations goes beyond the scope and objectives of Interreg where territorial cohesion plays central role. The branched of the NGO are not separate legal entities and they are not in compliance with the eligibility criteria set in p.2.5.1 even if they are located in the eligible border area. |
| 2 | | In regards to the condition <i>“The project candidates can apply with only one project proposal as a Lead partner or as a Project partner”</i> we suggest that this condition should apply only to the lead partner. The program priority and the policy objective require in some projects to involve structures of the state administration at the local level or structures of the local administration without which a given project | The requirement for implementation of the infrastructure projects is that the project partners are owners of municipal or state-owned real estate or have the relevant management rights. On the one hand, with the determined investment of 500,000 to 1,000,000 euros per project, the development of green infrastructure is allowed in the urbanized areas of the territorial scope of one and/or several municipalities in the cross-border region. On the other hand, the coordination of investment |

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| | could not be implemented, therefore these structures should be able to participate in more than one project proposal as a partner/not as lead partner. | projects with other institutions that do not have management rights is carried out in accordance with special laws and it is not necessary to be involved in project partnership. With a view to concentrating the investment and achieving an optimal territorial effect and improving the quality of the urban environment, the requirement is set that one partner can apply with one project. |
| 3 | We propose to reduce the minimum grant to 300 000 Euro in order to allow the chance to fund more project proposals. Roughly speaking, with a budget of nearly 4.5 million euros, a maximum of 5-7 project proposals will be financed at these thresholds. If the minimum grant is reduced to EUR 300,000, more than 10 projects could actually be funded. | Funding more project proposals is not a purpose of any Interreg programme. What matters is the degree of contribution of each proposal to the objective of the Priority 1. Greener border region and the Programme. The project budget range is set in a way to guarantee the achievement of P1's indicator related to development/rehabilitation of green infrastructure. Minimal budget of 500 000 EUR had been set up in order to ensure investment with clear tangible impact and effect. |
| 4 | In regards to the condition <i>“Investment activities for development of “green” infrastructure in rural, forest and other non-urban areas will not be supported.”</i> to be specified, since the concept of "rural areas" according to the generally accepted interpretation of the Bulgarian language ("селски райони") also includes urbanized territories. According to the currently set definition, it appears that urbanized areas in rural areas are not eligible for interventions under this call and are automatically excluded from the sample eligible activities related to <i>„Investments in developing urban and peri-urban green areas, including improving connections between green spaces“</i> . | The term of “rural” in this case meant geographical area that is located outside urban and peri-urban areas (towns, cities and villages) and not the term used for the statistical purposes. The definitions for urban peri-urban areas are provided in following links https://inspire.ec.europa.eu/codelist/SupplementaryRegulationValue/7_1_4_4_UrbanArea https://inspire.ec.europa.eu/codelist/SupplementaryRegulationValue/7_1_4_7_PeriUrbanAreas |