

QUESTIONS and ANSWERS

Received during and after Project implementation training on 25.04.2017 in Edirne

Concerning implementation of projects under the First Call of Interreg IPA CBC Bulgaria – Turkey Programme

No	Question	Answer proposed by JS
1	<p>CB005.1.22.063</p> <p>1) How is it the process for a Bulgarian partner to control the expenditures? Should original documents be submitted to the lead partner?</p> <p>2) Can we change the technical specification in equipment procurement (computer, camera etc.) which is written in the application form?</p> <p>3) Which way can we follow in order to attach the cost regarding the project preparation costs?</p> <p>4) How can we make expenses for such as visa, transportation, project meeting before of the signing the procurement plan?</p>	<p>1) The expenditure is controlled separately by both countries with the first level control system (FLC). All of the documents should be uploaded under the related budget lines of the dossier in Beneficiary Portal by the beneficiary. Originals of the documents must be kept in the relevant dossiers of project beneficiary.</p> <p>2) Firstly, you should not forget total amount of the budget can't be changed Unsubstantial modifications of the project which will not affect the project's objectives and outputs and will not jeopardize the successful completion of the project should be transmitted via written prior notification to the JS. After the changes are implemented, the LP should clearly describe and justify each change in the Project progress report and attach the necessary supporting documentation. The changes will be considered as "accepted" and the costs related to those changes can be validated only in case the respective PPR is approved by the JS. Regarding the technical specifications It is advised to examine Project Implementation Manual 7. Financial Management of the project Section 7.6. Eligibility of expenditure. For example, if the technical specification for the purchase of the product is insufficient, the product may be delivered at a lower price. And this can cause problems for long time use of the product. This risk can be identified and a technical specification change request can be made. In this case, please contact with the Joint Secretariat. It is also advised to review the Annex 14.2 Practical advices in public procurement.</p> <p>3) The starting date for the eligibility of expenditure for project preparation for the Bulgarian partners is the starting date of the programme period, namely January 1, 2014. For the partners from Turkey the starting date for the</p>

		<p>eligibility of expenditure for project preparation is the day after the date of submission of the Programme to EC (September 22, 2014). The cost of project preparation shall be determined in the first payment request of the relevant project partner; (Initial reporting period) as requested in the Project Implementation Manual (Page 69).</p> <p>4) For Turkish partners, After the “KDV İstisna Sertifikası” (VAT Exemption Certificate) have been received it can be started for making expenses. None of expenditure with VAT is acceptable and eligible. The visa and travel costs must be indicated in the "Expenses that will not be procured" section of the Procurement Plan if they are not subject to the Tender process. Expenses can be started if VAT exemption certificate is obtained according to the submitted cash flow plan. If the expenditure is related to the procurement process, approval of the Procurement Plan is expected to be made.</p>
2	<p>CB005.1.12.087</p> <p>1) Have to we request the guarantee for performance in local competitive bidding (tender for procurement)?</p> <p>2) Have to we request the letter of bank guarantee in local competitive bidding (tender for procurement)?</p> <p>3) Have to we invite all of the tenderer for opening meeting for tender?</p> <p>4) Is there any minimum or maximum duration for the deadline to delivery for equipment?</p>	<p>1) It is necessary to examine the question accordance with Project Implementation Guideline March 2017 4.2. Type of contracts, The local open tender procedure (procurement and construction) The following items are required for the acceptance of the procured goods.</p> <ul style="list-style-type: none"> • Interim / final acceptance protocol; • Guarantee document, • Invoice, • Certificate of Origin (if any), • Visual evidence (photography), <p>As seen above, according to the Project Implementation Guide, the guarantee document is one of the supporting documents and should be supplied from the tenderers.</p> <p>2) It is necessary to examine the question accordance with Project Implementation Guideline March 2017 9. Monitoring and Audit of the Project 9.2. On the spot visits, resources for verifying, the monitoring contain serial</p>

		<p>numbers of the products concerned, guarantee card, presentation criteria, technical specifications, supply contract, supplier contract, Photos are reviewed. Therefore, the guarantee certificate of the goods is sufficient. A letter of guarantee is not required.</p> <p>3) It is necessary to examine the question accordance with Project Implementation Guideline March 2017 Headlines of III. Tender opening session, Tender opening session: Limited to the participation of firms offering tender. If the tender opening session is to be held according to the tender, the tenderers for the session must be called.</p> <p>4) There is no time limit. Additional contracts can be made with the subcontractor.</p>
3	<p>CB005.1.21.128</p> <p>How can we upload the procurement plan in the system (Beneficiary Portal(</p>	<p>A file can be uploaded to the system by following the steps below in accordance with the PIM March 2017 Annex 15 Beneficiary Portal.</p> <p>Step by Step guide:</p> <ol style="list-style-type: none"> 1. Select submenu File System. A File manager opens. 2. Select a folder or create a new folder. 3. Upload a file and send the message.
4	<p>CB005.1.11.006</p> <p>How can we keep records for accounting?</p>	<p>In general, all primary accounting documents must meet the mandatory requirements of the relevant legislation. Some of the things to pay attention to while keeping accounting records are:</p> <p>All the primary accounting documents should possess the obligatory requisites according to the respective national legislation.</p> <p>The primary accounting documents (especially invoices), issued to the PPs should include the text “Expenditure is under project №/ code of project/or project name/..... Interreg –IPA CBC Programme Bulgaria-Turkey”.</p> <p>All expenditures have to be backed up with supporting documents depending on the kind of expenditure.</p>

5	<p>1) It is possible to make changes in technical specifications?</p> <p>2) Can we make market search again before tender?</p>	<p>1) The question is answered in Question 1.</p> <p>2) If the question refers to the price survey to be made before the tender, the price survey is valid for all procurement procedures and additionally, the tender must be made during the preparation period.</p>
6	<p>CB005.1.21.072</p> <p>Staff costs can't exceed %10 of the total budget. In the case of decreasing of the BL3, BL4, BL5 (direct costs), should the the approved expenses of staff decrease in harmony with the direct costs? In this case, does the beneficiary pay the different amount between initial and final budget to staff?</p>	<p>According to the Guidelines for Applicants, staff costs are paid by the Management Authority to the beneficiary at a fixed rate of no more than 15% of the direct costs in "soft" projects. The fixed rate for "investment" projects should not exceed 10% of direct costs. Maximum amount for budget item 1 "personnel expenses" = (budget item 3 + budget item 4 + budget item 5) * 10/100. According to this equation, If BL3, BL4, BL5 spending decreases, staff expenditure decreases.</p> <p>The difference between the first amount and the last amount is the responsibility of the beneficiary. The beneficiary has to act according to approved budget.</p>
7	<p>CB005.1.22.134</p> <p>In the annex of PIM, there are 3 documents for the simplified tender dossier. Are these documents enough for tender under 20 000 euro?</p>	<p>A set of standard documents covering every step of the procedure is submitted in accordance with PIM March 2017 to provide comparability and control over the implementation of PRAG tender rules. It is necessary for all Beneficiaries to use these annexes in order to simplify and consolidate the tender dossiers under the program. The annexes to the procedures and the practical guide (PRAG) should be followed by the beneficiaries.</p> <p>The thresholds for the procurement procedures are located on page 16 of the thresholds for PIM's procurement procedures. Accordingly, the limit for a single tender is 20,000 euros. Service and construction procedures must be implemented using simplified tender documents (PRAG Annexes B80 and DS1).</p>
8	<p>CB005.1.23.020</p> <p>You declared that single offer is enough for tender under 20 000 euro. However, FLCs request 3 offers in offer</p>	<p>It is stated that the single offer is sufficient for the tender under 20 000 euros, and it is stated that it is more appropriate to receive 3 offers in coherence with the competitiveness principle. It is recommended for that getting more</p>

	dossier. This situation creates confusion. What should we do for this request of FLCs?	offers comparing to a single offer is just a recommendation that is not an obligatory rule.
9	<p>CB005.1.12.135</p> <p>1) What are the supporting documents for certificate of origin?</p> <p>2) What is the scope of the procurement plan? Should we indicate the expenses regarding staff, office, and expert In the procurement plan?</p> <p>3) If there's a saving in any budget line can we shift this amount to another budget line.</p>	<p>1) Firstly, It is necessary to examine the question accordance with Project Implementation Guideline March 2017 4.1. Basic rules, Origin of goods section (page 12). As a document certificate of origin or "Türk Malı Belgesi"(Turkish Property Certificate) is accepted. If it is not subject to the rules of origin, the Contracting Authority must clearly state this in the Contract Notice or single tender-instructions for tenderers. The certificate of origin must be approved by the institution concerned. (Chambers of Commerce etc.)</p> <p>2) It is necessary to examine the question accordance with Project Implementation Guideline March 2017 3. Initial Activities and Project Setting Up, 3.3. Procurement plan (page 8). Additionally, There is Annex 2 Project Procurement Plan in the PIM March 2017 Annexes. Procurement plan should encompass all the expenditures.</p> <p>3) The answer is given in question 1 section 4 and question 12.</p>
10	<p>CB005.1.21.075</p> <p>1) In this period, Will FLCs not control the expenses for personnel included their Social security payments, salary, and tax?</p> <p>2) Some FLCs approve the single offer for single tender, some FLCs don't. In this period, will the discrepancies between of the FLCs disappear?</p>	<p>1) The FLCs are responsible for checking the appropriateness of the declarations declared between their duties and ensuring that the expenditures are in accordance with the rules of the CBC Program and the European Union legislation and national accounting standards. Therefore, all personnel related payments, Social Security payments, tax payments, and salary payments will be checked by FLCs. It can also find more detailed information on 2014-2020 FLC Guidelines. http://www.ipa-cbc-007.eu/sites/ipacbc-bgmk105.gateway.bg/files/flc_guidelines_2014-2020.pdf</p> <p>2) It is necessary to examine the question accordance with Project Implementation Guideline March 2017, 4. Public Procurement, 4.3. Procurement procedures, Single Tender (page 17). The number of invitations in single bidding tender - preferably at least 1, more than one. The program</p>

		rules should be observed, not the discrepancies between FLCs. If an application is found outside the program rules, you can contact the Joint Secretariat for your objections. The Appeal Statement (Annex 7) (if available) can be presented when payment is requested. In case of receiving an appeal declaration against the FLC validation certificate from a project partner together with the request for payment - the processing of the request for payment is stopped until the problem is clarified.
11	If there is mistake during FLC control, How it is the process for correction?	If you detect an error in the FLC control, preferably contact the OS by e-mail. In the event of an objection, the Appeal Form (Annex 7) may be submitted with the supporting documents for payment. In case of receiving an appeal declaration against the FLC validation certificate from a project partner together with the request for payment - the processing of the request for payment is stopped until the problem is clarified.
12	CB005.1.11.005 If there is remaining money after render process under the budget lines, it is the possible transfer this money to another budget lines? If it is possible to use remaining money How can we do this change?	Yes it can be transferred and it is possible to use remaining money. It is necessary to examine the question accordance with Project Implementation Guideline March 2017 8. Modification of Subsidy Contact, 8.3.2. Budget reallocation between budget lines (page 73). Budget reallocation between budget lines of more than 20% of the smaller budget line is not allowed. The budget of the respective partner cannot be changed and the major issues of the operation should not be affected. The modification enters into force after the written approval of the MA.
13	CB005.1.21.112 In generally the expenses for the project are realized in Euro. Is it necessary to write the info-exchange rate in the documents for expenses?	The invoice report will be filled in via Beneficiary Portal. When the expenditure made by the system selects the type and date of the expenditure, the system automatically makes an info-exchange account. No further calculation is required for the invoices acquired in euro.
14	CB005.1.12.25 1) There is vehicle purchase in the project. The estimated cost of the vehicle is 24 000 euros. Is the 30 day period before the bidding expected? Should it be published on the institution and its secretariat internet site?	1) In accordance with Project Implementation Manual for March 2017, The threshold for procurement in accordance with the Thresholds section of vehicles over 24 000 euros applies to the competitive bargaining procedure in accordance with the equation <€ 100,000> € 20,000. According to the competitive negotiation procedure, the period of submission of proposals - at

	<p>2) There may be some problems about resource transfer in the public institutions. Istanbul Forestry Directorate proposed that they collect all of the resources coming from EU in a bank joint account and spend from this joint account. Is it possible?</p> <p>3) Is the proforma invoice as evidence about spending money? So, firstly take proforma invoice as regard to spend money, after the first controls, later are it the possible that request for resource transfer?</p> <p>4) Can we have an opportunity for getting these presentations which shown during training?</p> <p>5) Will every beneficiary not request to control separately?</p> <p>6) Please, can you inform us the subject about employ personnel? For example is it possible that to working on different jobs in different institutions or companies at the same time as part time?</p>	<p>least 30 days after the invitations are sent. The announcement, contract notice, and tender file are published on the website of the Program and the Contracting Authority.</p> <p>2) It should be acted according to the approved application form. If the related activity is located in the budget of the partner, it must be spent by that partner. Financial Identification Form (FIF) has to be attached to the Request for payment. In addition, the quality of the bank account number and the bank identification code (such as BIC or SWIFT) must be indicated on the Financial Identification Form. The submitted bank account number is valid for making expenditures.</p> <p>3) For payments to be made by the management authority, beneficiary expenses must follow the steps regarding the payment request for the payment section. Proforma invoices are not among the proof documents to prove a payment has been made.</p> <p>4) Presentations will be shared with you via our website.</p> <p>5) The Lead Partner may request the Controller for 6 month / 3 month periods to verify the expenses incurred.</p> <p>6) There is a ready-made text on personnel employment issues. You can request this text from Edirne OS via e-mail. The working conditions should comply with the Program rules and the Turkish National Legislation.</p>
15	<p>CB005.1.22.166</p> <p>According to section BL4 in the budget, it is planned to have different contracts for 4 different experts to work on the project. There is the amount of budget for every expert. Total budget price exceeds 20.000 euro. Every expert will get 1 item service fee after they submit</p>	<p>The purchase must be made according to PRAG rules. It is unacceptable to divide contracts for similar services, procurement, and construction work. Similar services, procurement, and construction work should be contracted within a single contract. For the expertise in the BL4 item of the planned work, it is not possible to artificially divide the works</p>

	<p>relevant expert report related to their different departments in different times. In this case, it is necessary to take the different offer for every expert or realize one tender for all expertise in the scope of one budget line? In that point, it is important that service name named under expertise, but it another important point this services will hold different times during the project period. In this case, In what way should realize tender?</p>	
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