

**Interreg**



Co-funded by  
the European Union

**Greece – Italy**

# Programme & Project Implementation Manual / **Section A: Programme Overview**

Cross-Border-Cooperation Programme

Interreg VI-A 'Greece-Italy 2021-2027'

CCI 2021TC16RFCB019

Adopted by the Monitoring Committee on 25 September 2023, Version 1.0

Greece-Italy Programme is co-financed by European Union and National Funds of Member States

## List of Versions

Number of Version	Date of the version	Modified sections

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## SECTION A: PROGRAMME OVERVIEW

The first section of the PPIM provides stakeholders and project applicants with information about the Programme, specifically its management structures, priorities and specific objectives of the Programme, eligible area and official language.

### ***Programme Management Structures***

The implementation structures and procedures set out below are agreed among the Member States of the Greece - Italy cooperation area in order to ensure an effective and balanced management of the Greece - Italy Programme 2021-2027.

The relationships of the Programme bodies are based on the following overall principles:

- efficient and effective structures;
- clear definition of tasks and responsibilities;
- balance between structures on national and cross-border level;
- respect of the partnership principle as set out in Article 8 of the CPR.

The management and implementation of the Cooperation Programme Interreg VI-A Greece - Italy 2021-2027 is based on the structure applicable for a Cooperation Programme and described in **more detail in the Cooperation Programme document**.

In brief, the following bodies form the Programme management structure:

### ***The Monitoring Committee***

The **Monitoring Committee (MC)** of the INTERREG VI-A Greece-Italy 2021-2027 is set up according to the provisions of articles 28, 29 and 30 of Regulation 1059/2021. Its composition is decided by the participating Member States, taking into account that Member States shall be equally represented and complying with the partnership principle in managing, monitoring and evaluating the operations in all stages of programme implementation. It comprises representatives of the two member states on an equal basis. Representatives of the MA, NA, regional governors, mayors, NGOs may be members. The MC is co-chaired by Senior-position representatives of the Hellenic Ministry of Economy and Finance and the Italian Presidency of the Council of Ministers - Department of Cohesion Policies.

The Italian Presidency of the Council of Ministers - Department of Cohesion Policies informs the MA about the Italian nominations. The functions of the Monitoring Committee are described in Article 30 of the Regulation (EU) 1059/2021.

### ***The Managing Authority***

The **Managing Authority (MA)** of the Interreg VI-A Greece-Italy 2021-2027 Cooperation Programme is the Managing Authority of the INTERREG 2021-2027, 65, Leoforos Georgikis Scholis, 57001 Pilea, Thessaloniki, Greece - [www.interreg.gr](http://www.interreg.gr). It is under the auspices of the Hellenic Ministry of Economy and Finance, which is the National Authority on the Greek side.

The MA is responsible for the coordination of the Cooperation Programme's elaboration, its submission for approval to the EC, for the overall management of the implementation, for the drafting of the annual Reporting to the EC, the approval of implementation manuals and certain projects' modifications.

### *The National Authorities*

The NA supports the MA in the management and implementation of the Programme. The NA participates in the elaboration of the Cooperation Programme, ensures the share of the national co-financing, manages the procedure for verifications of expenditure of the Italian beneficiaries.

<b>NATIONAL AUTHORITY PER COYNTRY</b>	<b>BODY</b>	<b>ADRESS</b>	<b>WEB SITE</b>
<b>GREECE</b>	Special Secretariat for European Regional Development Fund and Cohesion Fund Programmes	Nikis 5-7 10563 Athens	<a href="http://www.minfin.gr">www.minfin.gr</a>
<b>ITALY</b>	Italian Presidency of the Council of Ministers - Department of Cohesion Policies	Largo Chigi 19, 00187 Roma	<a href="http://www.politichecoesione.governo.it">www.politichecoesione.governo.it</a>

### *The Joint Secretariat*

The **Joint Secretariat (JS)** of the INTERREG VI-A Greece-Italy 2021-2027 is in Italy and the JS Branch in Greece.

<b>Joint Secretariat, IT</b>	Lungomare Nazario Sauro, 33 70121, Bari, Italy, Tel: +390805406578, e-mail: <a href="mailto:info@greece-italy.eu">info@greece-italy.eu</a>
<b>JS Branch, GR</b>	65 Georgikis Scholis Av., Zeda Building, 2nd floor, Pylaia, 57001, Thessaloniki, Greece, Tel: +302310469600, e-mail: <a href="mailto:jts_grit@mou.gr">jts_grit@mou.gr</a>

The website of the Programme is [www.greece-italy.eu](http://www.greece-italy.eu).

The JS consists of experts from both countries. The JS is the direct link with the potential and actual beneficiaries, providing consultations on project preparation, implementation, technical and financial reporting. The JS is involved in the evaluation procedure according to the approved by the MC methodology and assists the MA, the MC, the CVA and the AA in carrying out their respective duties by collecting, checking and preparing draft decisions, payment claims, payment forecasts and the annual structured policy dialogue. The JS approves minor changes in the projects' contents during implementation (see [§1.Modifications approved by the JS](#) of PPIM).

### *The Antenna Office*

The Antenna Officer assures logistic support to the implementation of the Programme activities and shall contribute to implement the planned activities of the Communication Plan, carrying out their duties in coordination and cooperation with the MA and the JS. More specifically, the Antenna Officer is responsible for:

- Supports the Managing Authority and the JS in the implementation of the communication plan in force, acting as a “contact point” for providing information, advice and help to the project beneficiaries or project applicants and reinforces communication and information about the Programme;
- Supports the JS for the monitoring of projects at the regional level as regards Partners;
- Provides support to beneficiaries during the preparation of proposals and throughout the period of implementation of operations
- Carries out the support “desk” functions (distribution and diffusion of Applicant’s packages or other relevant material to be used for the submission of the project proposals)
- Provides organisational and operational support to the MA activities (organization of seminars, meetings, conferences).
- Organizes and/or participates in technical meetings and events of the MA/JS that take place in the Greek Regions.

<b>Antenna Office in Corfu, GR</b>	Kapodistriou 1, Corfu, Greece Tel: +30.26610.87121, e-mail: pmitsi@mou.gr
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### *The Info Contact Point*

An Info Point Officer adds value to the work of the Managing Authority and the Joint Secretariat. The Info Points aim is to promote the Programme and act as a point of territorial connection, point of communication and information and as a help desk for potential applicants/ Programme beneficiaries. More specifically, the Contact Info Point Officer is responsible for:

- To offer proximity and easy access to project operators from the area;
- To provide support to beneficiaries during the preparation of proposals and throughout the period of implementation of operations;

Provides organisational and operational support to the MA activities (organization of seminars, meetings, conferences).

There are two Info Points in Greece and three Info Points in Italy, in total five Info Points for supporting the Programme and the Beneficiaries. The addresses of the Info-points are:

<b>1. Info Point in Ioannina, GR</b>	University of Ioannina, 45110, Ioannina, Greece
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	Tel: +30.26510.07948, e-mail: pmitsi@mou.gr
<b>2. Info Point in Patras, GR</b>	University of Patras, 26504, Patras, Greece Tel: +30.2610.997899, e-mail: kkapota@mou.gr
<b>3. Info Point in Cittadella Regionale, Catanzaro, IT</b>	
<b>4. Info Point in Reggio Calabria, IT</b>	
<b>5. Info Point in Basilicata - Matera, IT</b>	

### *The Accounting Authority*

The **Special Service Certifying and Verifying Authority of Co-funded Programmes (CVA)** at the Hellenic Ministry of Economy and Finance carries out the accounting function of the Programme in accordance with Article 47 of Regulation (EU) 2021/1059.

The CVA shall be responsible for certifying statements of expenditure and applications for payment before being sent to the Commission. In this context, the CVA shall carry out the functions envisaged in article 47 of Regulation 1059/2021

According to Law 4914/2022 (Governmental Gazette 61/21-3-2022), Chapter A "For the management, control and application of developmental interventions for the programming period 2021-2027", article 14 defines the framework of the Accounting Authority's duties.

### *The Audit Authority and the list of bodies designated to carry out audits tasks (members of GoA)*

The **Audit Authority (AA)** of the CP Greece-Italy 2021-2027 is the Financial Control Committee (EDEL) - Secretariat General for Fiscal Policy (General Accounts of the State) at the Hellenic Ministry of Economy and Finance. The AA is responsible for verifying the effective functioning of the management and control system of the operational Programme and it is assisted by the **Group of Auditors (GoA)** comprised by representative appointed by the Italian State. The GoA performs verifications on the management and control systems related to the implementation of projects by Italian beneficiaries. The AA approves and executes annual plans of audits on beneficiaries and management structures and may impose financial corrections in cases of breach of EU, national procurement legislation and programme implementation rules.

### **Members of the Group of Auditors (GoA)**

<b>Authority/ designated responsible for</b>	<b>body to be carrying</b>	<b>Name of the authority</b>	<b>Head of the authority</b>
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out audit tasks in Member States		
<b>Greece</b>	General Accounting Office/ Financial Audit Committee of the Hellenic Ministry National Economy of Finance	President of the Financial Audit Committee
<b>Italy</b>	Puglia Region	Audit Authority Puglia

*The Controllers for management verifications and the list of bodies designated to carry out controls (designated controllers in Member States)*

***Designated Controllers in partner States***

Authority/ body designated to carry out control tasks in Member States	Name of the authority/ coordinating control body	Head of the Authority	Description of the control system
Greece: Managing Authority Interreg 2021- 2027, Unit C	Unit C: Management verifications' Unit	Head of Unit C	Centralised FLC system.
FLC	The FLC will be identified by the beneficiaries		Decentralized FLC system

## ***Main objectives of the Greece - Italy Programme***

The '**Interreg VI-A Cooperation Programme Greece – Italy 2021-2027**' (hereinafter Greece-Italy Programme or GR-IT) is a cross-border cooperation Programme co-financed by the European Union under the European Regional Development Fund aiming to boost cooperation actions across borders between neighbouring regions and countries.

The cross-border cooperation between Greece and Italy has formally begun in 2000. The three predecessors of the 'Interreg VI-A Greece-Italy 2021-2027' offer valuable experience that the current Programme embraces and addresses in both pertaining and emerging challenges and trends, such as transformation towards an innovation-based economy, digitization, growth and competitiveness; climate change, circular economy, green transition, multimodality; economic and social regional disparities; and enhanced governance for cooperation.

Against this background, the Greece-Italy Programme envisages enhanced cooperation in the GR-IT area towards smart economic transformation, green transition and social inclusion for reinforced SMEs, education, training and lifelong learning, health services, tourism and culture sectors, green and blue economy.

## ***Eligible area of the Programme – participating regions***

The eligible area of the Programme, as illustrated in the map below, contains 7 Prefectures on the Greek side (Evros, Kavala, Xanthi, Rodopi, Drama, Thessaloniki and Serres) and 4 Districts on the Bulgarian side (Blagoevgrad, Smolyan, Kardzhali, Haskovo), covering an area of 40.202 km<sup>2</sup> with 2,8 million inhabitants.

Cross-border cooperation between Greece and Italy has been consolidating over the years. The Programme Area has been enlarged with the addition of two (2) new Italian regions, namely Basilicata and Calabria Regions, covering eleven (11) regional units from Greece and eleven (11) provinces from Italy, covering an area of 59.950,83 km<sup>2</sup> with of 7,1 million inhabitants. More specifically, it embraces:

Three (3) Greek Regions:

- The Region of Western Greece, including the following Regional Units: Aitolioakarnania, Achaia, Ileia;
- The Region of Ionian Islands, including the following Regional Units: Zakynthos, Kerkyra, Kefalonia, Lefkada; and
- The Region of Epirus, including the following Regional Units: Arta, Thesprotia, Ioannina, Preveza;

Three (3) Italian Regions:

- The Region of Puglia, including the following Provinces: Foggia, Bari, Brindisi, Lecce, Barletta-Andria-Trani (BAT) and Taranto;
- The newly added Region of Basilicata, only the Province of Matera; and
- The newly added Region of Calabria, including the following Provinces: Catanzaro, Cosenza, Crotone and Reggio Calabria.



**Figure 1: The Eligible Programme Area**

The Programme covers the following eligible regions:

<b>TABLE 1: ELIGIBLE AREA</b>	
<b><u>NUTS regions covered by the programme</u></b>	<b>REGIONS / REGIONAL UNITS</b>
	EL54 – Epirus
	EL541 - Arta, Preveza
	EL542 – Thesprotia
	EL543 – Ioannina
	EL62 – Ionian Islands
	EL621 – Zakynthos
	EL622 – Kerkyra
	EL623 – Ithaca, Kefallinia
	EL624 – Lefkada
	EL63 – Western Greece
	EL631 – Aitolokarnania
	EL632 – Achaia
	EL633 – Ileia

<b>TABLE 1: ELIGIBLE AREA</b>	
<b><u>NUTS regions covered by the programme</u></b>	<b>REGIONS / PROVINCES</b>
	ITF4 – Puglia
	ITF43 – Taranto
	ITF44 – Brindisi
	ITF45 – Lecce
	ITF46 – Foggia
	ITF47 – Bari
	ITF48 - Barletta-Andria-Trani
	ITF52 – Matera
	ITF61 – Cosenza
	ITF62 – Crotone
	ITF63 – Catanzaro
	ITF65 - Reggio di Calabria

### ***Official language of the Programme***

The official language of the Programme is **English**. Additionally, the national languages of the participating countries can also be considered as working languages.

Deliverables produced within the projects should be in English, unless specifically oriented towards a targeted audience, where only Greek or Italian can be used.

### ***Priorities and Specific Objectives of the Programme***

The Interreg VI-A Greece - Italy Programme aims to promote integrated regional development. Through cross-border cooperation, communities located in border areas seek to promote the socioeconomic development of the border area, develop economies of scale and overcome their peripheral positioning. The Programme Strategy emphasizes on specific objectives that can contribute in bridging the gap of regional, social and economic disparities in the cross-border area and promoting sustainable development.

To meet its objectives, the Greece-Italy Programme is built on four priorities:

**Priority 1: Enhanced cooperation for a more competitive and smarter GR-IT area**

**Priority 2: Enhanced cooperation for a greener and low carbon GR-IT area**

**Priority 3: Enhanced cooperation for a more social and inclusive GR-IT area**

**Priority 4: Enhanced governance for cooperation in the GR-IT area**

A comprehensive description of the Programme's strategy and priorities, together with a socio-economic analysis of the Greece-Italy Programme area are included in the Implementing Provisions of Greece-Italy Cooperation Programme available at the programme website, which defines the programme strategy and intervention logic

for Interreg VI-A Greece-Italy Programme 2021-27 as adopted by the European Commission.

**The full Programme strategy is outlined in the Cooperation Programme document.**

**Attention:**

**Please consult at all times the Call for proposals launched and the Project Application Guidelines for the priorities and specific objectives open to submission of proposals.**

### ***Priorities in Greece - Italy cross-border area***

Within the framework of Regulation (EU) No 1058/2021 of the European parliament and of the Council of 24 June 2021 on the European Regional Development Fund and on specific provisions concerning the Investment for growth and jobs goal and for achieving and serving the overall objective, a series of specific objectives has also been selected, which constitutes the policy outline for the convergence in the area of intervention.

These specific objectives are expressed as four priorities (including the technical assistance), along with a certain number of interventions and specific objectives. Specifically:

**Priority 1: Enhanced cooperation for a more competitive and smarter GR-IT area**

**Priority 2: Enhanced cooperation for a greener and low carbon GR-IT area**

**Priority 3: Enhanced cooperation for a more social and inclusive GR-IT area**

**Priority 4: Enhanced governance for cooperation in the GR-IT area**

The following table depicts the budget allocation per priority.

Priority	Fund	EU Contribution (€)	National Contribution (€)	Total (€)
Priority 1	ERDF	14.445.016	4.815.005	19.260.021
Priority 2	ERDF	34.704.625	11.568.209	46.272.834
Priority 3	ERDF	27.149.540	9.049.847	36.199.387
Priority 4	ERDF	3.283.747	1.094.582	4.378.329
<b>Total</b>	<b>All funds</b>	<b>79.582.928</b>	<b>26.527.643</b>	<b>106.110.571</b>

**The specific objectives per Priority include:**

**Priority Axis 1: Enhanced cooperation for a more competitive and smarter GR-IT area**

- ❖ SO 1.1. Developing and enhancing research and innovation capacities and the uptake of advanced technologies
- ❖ SO 1.2. Reaping the benefits of digitisation for citizens, companies and governments
- ❖ SO 1.3. Enhancing growth and competitiveness of SMEs and job creation in SMEs

**Priority Axis 2: Enhanced cooperation for a greener and low carbon GR-IT area**

- ❖ SO 2.4. Promoting climate change adaptation and disaster risk prevention and resilience, taking into account eco-system-based approaches
- ❖ SO2.6. Promoting the transition to a circular and resource efficient economy
- ❖ SO2.7. Enhancing protection and preservation of nature, biodiversity and green infrastructure, including urban areas, and reducing all forms of pollution

**Priority Axis 3: Enhanced cooperation for a more social and inclusive GR-IT area**

- ❖ RSO4.2. Improving equal access to inclusive and quality services in education, training and lifelong learning through developing accessible infrastructure, including by fostering resilience for distance and online education and training
- ❖ RSO4.5. Ensuring equal access to health care and fostering resilience of health systems, including primary care and promoting the transition from institutional to family- and community-based care
- ❖ RSO4.6. Enhancing the role of culture and sustainable tourism in economic development, social inclusion and social innovation

**Priority Axis 4: Enhanced governance for cooperation in the GR-IT area**

- ❖ RSO6.1. Enhance the institutional capacity of public authorities
- ❖ RSO6.4. Enhance institutional capacity of public authorities and stakeholders to implement macro-regional strategies

### ***Link of the Greece-Italy Programme to the EU Macroregional Strategies***

Macro-regional strategies have become an integral part of EU regional policy. The Programme Area is covered by EU Macro-regional strategy since Both Member States participate in the European Strategy for the Adriatic and Ionian Region (EUSAIR). EUSAIR priorities were proposed as solutions for the main challenges of macro-regional importance consistent with national needs, as well as with the EU policy objectives for a greener, low-carbon and more connected Europe.

The Programme aims at strengthening its alignment with EUSAIR thematic priorities and its contribution to the flagship implementation, in coordination with the other ETC programmes of the Adriatic-Ionian area. EUSAIR priorities and flagships are incorporated horizontally in the Programme under each Priority and Specific Objective.

The level of contribution of the projects to EUSAIR flagships will be assessed upon selection criteria. The Programme shall promote actions and interventions that will enhance the level of integration and connectivity of the cross-border area with key fields of the EUSAIR ensuring full complementarity with other Interreg programmes of the Adriatic and Ionian area. Inter-programme coordination modalities (for example, joint communication events by targeted theme/policy, capitalization activities across different programs, such as with ADRION, alignment in project selection criteria and guidance towards capitalisation and EUSAIR to project applicants) can be defined within informal coordination tools between MA/JS, which will eventually be established at the EUSAIR level in 2021-2027.

The Programme will also consider participation in coordinated projects undertaken at the Mediterranean level, in particularly strategic cooperation areas.

### ***Financial arrangements on Programme level***

The Greece-Italy Programme equals to a total budget of **106.110.571,00 Euros**, including national contribution. The total support from the European Regional Development Fund (ERDF) accounts for **79.582.928,00 EUR** (75%) and the national contribution accounts for **26.527.643,00 EUR** (25%).

For the overall cooperation area, **a co-financing rate of 75%** is applied.

#### ***ERDF contribution***

All project beneficiaries participating in ERDF Programmes will be financed by ERDF.

Within one single project, the ERDF contribution for each beneficiary from both Member States is of 75% of the eligible costs of the projects.

#### ***National contribution***

The remaining budget (25%) has to be covered by national contribution, brought in by each project beneficiary. The national contribution can be covered by state contribution and/or other contribution (regional/ local/ own sources) of the project beneficiary.

Each Member State applies a different system in providing national contribution. The specific national systems shall also apply in the CP Greece-Italy 2021-2027.

### ***De-commitment of ERDF/IPA co-financing***

The European Commission demands from the Programme that each annual ERDF co-financing is spent within the three years following the budgetary commitment. This means that ERDF co-financing not claimed in time by the Certifying and Verifying Authority to the European Commission is automatically de-committed from the Programme budget and therefore lost.

The above-described principle is the so-called “n+3 rule”, where “n” represents the year in which the co-financing was committed and “+3” refers to the time (in years) during which the co-financing has to be spent.

For projects co-financed by Greece-Italy Programme, the automatic de-commitment has fundamental implications. The payment claims to the European Commission are based on the reported and certified expenditures submitted by the projects, thus they depend on projects’ financial performance. In case the European Commission de-commits ERDF co-financing and if the de-commitment cannot be covered otherwise, the ERDF co-financing of ongoing projects must be reduced.

After official information is provided from the Commission about the amount to be de-committed from Programme funds of year ‘n’ or after official request from the Monitoring Committee to reduce the ERDF co-financing for significantly delayed projects, the MA/JS calculates the amount to be de-committed from Programme and project funds and assesses the cases for which this de-commitment procedure may be suspended.



## ***State aid and “de minimis” regime***

### ***Concept of state aid***

Free movement of goods, services and people is one of the basic principles of the European Union. Therefore, the objective of the EU State Aid policy is to ensure that free competition is not distorted and trade among the Member States is not affected by public grants.

It must be clear that the notion of State aid is an objective and legal concept defined directly by the Treaty.

Article 107(1) of the Treaty defines State aid 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”

In order to check if a measure constitutes state aid, first we have to determine the entity that receives it. Only when the entity is involved in economic activity acquires the status of “undertaking”. We examine the existence of state aid ONLY in undertakings (in other words “enterprises”),

Having said that the concept of “undertaking” is wide and may include public bodies, SMEs, large companies, NGOs, associations, universities, etc., regardless of its legal status and regardless of whether it aims to make a profit or not. The classification as an undertaking for the Programme relates to the specific activity that the beneficiary performs in the project using public funding.

To be State aid, an activity performed by an undertaking needs to have the following features present all together:

- a)** there has been an intervention/measure that is imputable to the State and the financing materializes through State resources (always present in Interreg projects);
- b)** the recipient is an undertaking carrying out an economic activity in the project;
- c)** the intervention gives the recipient an advantage on a selective basis;
- d)** as a result, competition has been or may be distorted;
- e)** the intervention affects trade between Member States.

State aid is generally prohibited, unless compatible with EU rules. Thus, public support granted by the Programme must comply with State aid rules. State aid relevant activities might receive co-financing by the Programme as project activities, only in case they strictly comply with Articles 20 and 20a of the General Block Exemption Regulation (GBER)<sup>1</sup> or with the De Minimis Regulation<sup>2</sup>.

Any project beneficiary, located in EU Member States, offering goods and services to the market in the context of the proposed project is potentially considered as an undertaking, regardless of its legal status, the way it is financed and whether its aim is to make profit or not. The State Aid scheme applies to all beneficiaries located in EU Member States.

Beneficiaries located in IPA countries must not carry out any economic activity in the framework of a project under the Programme Greece - Italy 2021-2027. The beneficiaries could mitigate the State Aid relevance risk of activities considering some

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<sup>1</sup> Commission Regulation (EU) No 651/2014, as amended by Regulation (EU) No 2021/1237

<sup>2</sup> Commission Regulation (EU) No 1407/2013 of 18 December 2013 on the application of Articles 107 and 108 of the Treaty on the Functioning of the European Union to de minimis aid

possible solutions in the performance of activities: respect of public procurement rules for all activities and provision of services at market place, wide dissemination of project activities, outputs, results and deliverables to avoid any selective advantage of certain groups, open free software applications, open training sessions, etc..

### *Direct aid granted under GBER*

As part of an administrative simplification, the European Commission adopted the General Block Exemption Regulation (GBER/2023) and allows any Member State not to notify a certain number of State aid measures to the Commission as long as all criteria given in the GBER are fulfilled. It includes a block exemption for aid granted in the context of Interreg projects (GBER Article 20)<sup>3</sup>.

The aid granted by the Programme amounts to the whole ERDF funds budget of the concerned beneficiary (ies), up to a threshold of 2 million euro of total public contribution per undertaking and per project<sup>4</sup>. The maximum intensity of the GBER aid that could be granted is up to 50%. In any case the GBER rules set will be followed.

For GBER records (documentation) should be available for 10 years from the date on which the last aid was granted under the scheme.

### *Direct aid granted under De minimis*

Those beneficiaries considering applying for any external public co-financing for their project budget will receive ERDF funds from the Programme under de minimis in case of state aid activities. The de minimis aid will amount to the ERDF funds' budget of the concerned beneficiary.

De minimis could be granted by the Programme to a single undertaking that in the previous three fiscal years from the date of granting the aid<sup>5</sup> have not receive state aid from the Greek state amounting to more than 200 000 euro in total<sup>6</sup>. This threshold vary for the road freight transport sector, for the primary agriculture and for the aquaculture and fisheries sector<sup>7</sup>.

The de minimis thresholds counts per "single undertaking" in case a project beneficiary is part of a group, the entire group is therefore considered as one single undertaking and the de minimis threshold applies to the whole group.

All aid granted by Greek public funds (national, regional or local authorities, regardless if they come from domestic sources or are partly co-financed by the EU), will be considered as public aid applicable to de minimis threshold. In case beneficiaries are already recipients of de minimis, the Programme will proceed to reduction of the relevant state aid activities and the respective ERDF, so that the threshold is respected.

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<sup>3</sup> Article 20 of Regulation (EU) No 651/2014, as amended by Regulation (EU) No 2021/1237

<sup>4</sup> Threshold determined in Article 4, paragraph 1(f) of the Regulation (EU) No 651/2014, as amended by Regulation (EU) No 2021/1237 in force

<sup>5</sup> The year of the submission of the State Aid Declaration of the beneficiary counts as the last of the three years' de minimis period for granting of the aid (e.g. submission within a Call for proposals of a State-aid declaration, dated on the 3<sup>rd</sup> of April 2023 – De minimis is granted for 2021,2022 and 2023).

<sup>6</sup> De minimis aid rules as in force will be applied in regards to the amount granted and the timeframe of the aid.

<sup>7</sup> Commission Regulation (EU) No 1407/2013 of 18 December 2013 on the application of Articles 107 and 108 of the Treaty on the Functioning of the European Union to de minimis aid.

In cases of de minimis aid granted - records (documentation) regarding State aid should be available for 10 fiscal years from the date when aid was granted. If requested by the EC, these documents and any supporting documentation must be presented to the EC within 20 working days or longer if it is fixed in the request.

During the project application process, the applicants will complete a De minimis declaration referring to the de minimis amounts received in the last three fiscal years. Should the project be approved, at the contracting phase beneficiaries will be checked in the Greek national register on state aid - Sorefsis<sup>8</sup> to ensure respect of the de minimis threshold.

In addition, at the project application process, applicants are requested to identify state aid relevant activities in a specific section of the Application Form and justify their choice on the state-aid relevance. At the project assessment phase, all the projects' activities per beneficiary will be checked and evaluated for their state aid relevance. Upon project selection, the application of one of the state aid regimes (GBER or De minimis) should be chosen in the AF for the state aid relevant activities of the concerned project beneficiaries. The Programme continues to monitor activities for state aid relevance during the whole implementation of the approved projects.

### *Indirect aid (2<sup>nd</sup> level State Aid)*

Indirect state aid occurs when the final recipient of the Programme funds is not the beneficiary of the project, but a third entity carrying out economic activities. Thus, some project activities might happen to give advantages to undertakings that would not have received under normal market conditions, eg. target groups, like companies that receive free of charge services, vouchers, training, or consultancy on a certain topic. In such cases, the aid is granted to third parties who are considered final beneficiaries of aid.

This kind of indirect aid is granted under GBER Article 20a, referring to exemption for aid of limited amount in the context of Interreg Programmes. The aid granted under Article 20a of the GBER to an undertaking, target group of the project activities may not exceed the limits as in force 22.000,00 euro per undertaking per project<sup>9</sup>.

This form of State aid can be identified during the application and the assessment process but may also appear during project implementation.

In this case, the activity concerned by the risk is identified. Additional conditions setting a threshold to the aid granted to third parties could be set. If the threshold is not respected, the project beneficiary providing the support has to eliminate any State aid element.

When such advantage is provided to a third party, project beneficiaries as well as third parties bear the responsibility to comply with State aid rules and this shall be checked by the relevant institutions (i.e., controllers and national authorities).

The amount to be granted to the single third party shall be approved by the MA/JS, before the related activities take place. The conditions of the Subsidy Contract will be monitored during the project implementation in order to ensure their respect.

The MA shall ensure that all supporting documents are kept at the appropriate level for a 5-year period from 31 December of the year in which the last payment by the managing authority to the beneficiary is made (Article 82.1 CPR).

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<sup>8</sup> <https://www.sorefsis.gr/>

<sup>9</sup> Threshold determined in Article 4, paragraph 1 (f) of the Regulation (EU) No 651/2014, as amended by Regulation (EU) No 2021/1237 regarding cases falling under Article 20a

### ***Conflict of interest***

A conflict of interest arises when the impartial and objective exercise of the functions of a financial actor or other person involved in a project is compromised for reasons of family, emotional life, political or national affinity, economic interest or any other direct or indirect personal or any other shared interest with a recipient. Each beneficiary is responsible for ensuring that appropriate measures are taken to minimise any risk of conflict of interest at any stage of the project implementation (e.g. in the process of procurement of services for the project). A conflict of interest is a factor that can potentially lead to high risk of corruption. All beneficiaries should ensure that measures are taken like transparency of the decision-making process for example, so as situations leading to conflict of interest are avoided within the project<sup>10</sup>.

### ***Anti-fraud policy***

The Directive (EU) 2017/1371 defines the term "fraud", considered as any deliberate act or intentional omission related to an "act not in conformity with European Union (EU) rules (EU, State or Programme regulations) which has a potentially negative impact on the financial interests of the Union<sup>11</sup>, namely:

- The use or presentation of false, inaccurate or incomplete statements or documents resulting in the misappropriation or wrongful retention of funds from the general budget of the European Communities or budgets managed by them or on their behalf
- Non-disclosure of information in breach of a specific obligation, with the same effect
- The misuse of such funds for purposes other than those for which they were originally granted.

Conflict of interest and/or any suspicion or established case of illegal activity, fraud or corruption can be detected and stated by:

- **A project beneficiary**
- **The Audit Authority- A whistle-blower** (anonymous or not)
- **Members of the Monitoring Committee or other Programme Authorities** (Managing Authority, Certifying and Verifying Authority, National Authority and others)
- **Other authorities that perform control** from the Member states of the Programme
- **The European Commission**

In case of detection of illegal activity, fraud or corruption (conflict of interest that could potentially lead to a fraud, included), this should be reported. The procedure could be launched informing through:

- **The official website of OLAF:** [European Anti-Fraud Office \(europa.eu\)](https://ec.europa.eu/info/strategy/eu-budget/protection-eu-budget/conflict-interest_en)
- **The official website of the European Public Prosecutor's Office:** [Reporting a crime to the European Public Prosecutor's Office \(europa.eu\)](https://ec.europa.eu/info/strategy/eu-budget/protection-eu-budget/conflict-interest_en). If the national

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<sup>10</sup> Please consult the guidance on how to avoid and manage conflict of interest at [https://ec.europa.eu/info/strategy/eu-budget/protection-eu-budget/conflict-interest\\_en](https://ec.europa.eu/info/strategy/eu-budget/protection-eu-budget/conflict-interest_en)

<sup>11</sup> Irregularity committed deliberately is considered as fraud

rules provide for it, you can submit the alert directly to the Deputy European Public Prosecutor in your country.

- The **official website of the Greek European Public Prosecutor's Office:** <https://www.eppo.europa.eu/en/greece>
- The **official website of Italian European Public Prosecutor's Office:** <https://www.anticorruzione.it>
- The **National Reporting Mechanism and Authority for suspicion of fraud in Greece**, is the General Directorate of Integrity & Accountability of the National Transparency Authority, which is also responsible for the national coordination of fraud issues in Greece (Greek Authority AFCOS).
- A Complaint by Greek beneficiaries could be made via platform on the programme's website <https://aead.gr/submit-complaint>
- The **National Reporting Mechanism and Authority for suspicion of fraud in Italy**, is National Authority Anticorruption at [Whistleblowing - Modulo per la segnalazione di condotte illecite ai sensi del decreto legislativo n. 24/2023 \(anticorruzione.it\)](https://www.anticorruzione.it).
- **At the dedicated section of the website of the MA:** <https://interreg.gr/kataggelies-kata-tis-diafthoras>

If the complaint is submitted directly to the National Reporting Mechanism and Authority for suspicion of fraud, it is handled in accordance with the system applied by them.

In the event that a complaint is received directly by the MA, the MA forwards it directly to the Greek or Italian National Reporting Mechanism and Authority for suspicion of fraud for further examination/evaluation.

### *Examination of evidence of fraud*

In case an official of the MA/JS or the Certifying and Verifying Authority identifies an irregularity which is considered to be an indication of fraud, an examination of the indication of fraud is carried out, based on a procedure described in detail in the Management and Control System.

### **GPDR**

The Managing Authority holds the position of "controller" or "executing the processing" declares that:

- is aware of the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, the Hellenic Legislation - Law 4624/2019 and the relevant instructions and decisions of the Hellenic Data Protection Authority, which govern the legal execution of the Programme, and
- fully undertakes the obligations deriving from the legislation, regarding the protection and security of personal data, which may be processed and/or come to its knowledge in any way.