

**Interreg**



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**Greece – Italy**

# Programme & Project Implementation Manual / **Section B: Project Development & Submission**

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

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## **SECTION B: PROJECT DEVELOPMENT AND SUBMISSION**

This section of the manual provides stakeholders and project applicants with guidelines on the development of their project ideas into a structured and comprehensive project proposal that takes into account the Programme priorities and the needs of the cross-border region in reference.

**Attention: All information related to the projects' submission procedures, the development of a project idea/proposal, the submission of the Application form on the MIS and the evaluation procedure are provided in the Applicants' Package of each Call for proposals.**

### ***Project generation***

The conception of a project starts with the project idea further developed to achieve specific objectives visualized in project outputs and results. The suitable partnership for the activities to be implemented within the specific time should be chosen, as well as the needed resources for these activities.

Thus, the main stages of project development include the following:

- defining the objectives, results and project outputs;
- building the partnership;
- constructing the work plan/activities;
- setting up realistic budget and timeframe.
- ensuring the sustainability of results

Information days and workshops related to the Programme' s priorities and specific objectives may be organized with the launching of the different Calls for proposals, in order to inform potential applicants on the specific Programme needs. This support is to encourage the generation of high quality projects with a clear cross-border focus, high quality partnerships and with appropriate transferable outputs/outcomes.

The active contribution of applicants and relevant stakeholders is encouraged for the generation of projects. Beneficiaries with previous experience in the subject matter of the project, as well as previous cooperation experience can add value to the development of a sound project and make synergies happen with previously implemented interventions.

A conceptually effective project should also contain sound financial planning that will carry the project through to implementation. To this end, the financial capacity of beneficiaries is important for successful project generation.

Importantly, the Programme strives towards generating projects with a deep and widespread impact in the area along with a commitment to contribute to the implementation of National and Regional Programmes of the partnering countries, as well as to wider strategies in the area (where applicable - EU Strategy for the Adriatic-Ionian Region (EUSAIR)). It is essential that projects demonstrate a clear need for cross-border support and that the problem tackled has a clear cross-border impact.

### ***Project intervention logic***

The focus of the projects first and foremost should be the delivery of outputs and results, rather than implementation of project activities.

Projects have to draft and follow a clear intervention logic that derives from tackling particular territorial challenge or need and through the planned activities seeks a particular change in the thematic field and in the involved regions. This result-oriented approach of the project should be in coherence with the Programme's intervention logic, particularly with the outputs and the results expected under the targeted by the application specific objective.

The applicants should demonstrate through the intervention logic that it:

- targets one single Programme's specific objective;
- contributes to the respective Programme result and result indicator;
- links in a logic sequence the project activities and outputs to the specific objective targeted.

Projects will be assessed for their contribution to both output and result indicators related to the Programme specific objective. They have to demonstrate how they contribute to achieving the Programme's output and result indicators by providing the relevant targeted values of the project's indicators, based on specific measurement units and according to the Programme's methodology on indicators.

### ***Objectives, expected results and outputs***

The most important step in the development of the project proposal is to define the objectives and the expected results clearly and precisely.

An objective as set out in the Project Application Form (AF) is defined at two distinct levels:

- general objective is the expectation and the effects/benefit of the project in the long-term on beneficiaries' territories and for Programme's area beyond the specific project purpose and the temporary funding received;
- specific objectives are what the project is going to achieve concretely at the end of the project lifetime; what are the changes produced in the field tackled and on the project target groups.

Both of them must be concrete, quantifiable and realistic, thus it can be useful while defining them to answer the following questions:

- What type of change/s is/are going to be achieved in the short and in the long run?
- Where shall the change/s happen?
- For whom is it going to be done (project target group/s)?

The expected results are direct and immediate advantages resulting from the project's activities and from the production of the outputs, they are the effects to which the outputs lead to and tell us about the benefit of funding the outputs. Results imply a qualitative value, though they should also be measured in concrete units (result indicators).

When planning the project results, the partnership can reach a common understanding answering the following questions:

- What kind of positive change does the project aim at?
- Where will the change happen?

- Who will be affected by the change?
- When will the change happen?
- What should be the quality of the planned result?
- What is the cross-border value of the result?

In addition, a project should define also outputs, which, practically, tell us what has actually been produced with the funds given to the project. The project outputs are tangible deliverables and visible products of the project directly resulting from the activities carried out in the project (e.g. manuals, tools, events, etc.). They are typically measured in concrete units (output indicators). When planning the project outputs, the partnership can reach a common understanding answering the following questions:

- What is the content of the outputs (e.g. database, action plan)?
- Who will be using the outputs (e.g. database) after the project?
- Who will be participating (e.g. in the network) after the project?
- How will the outputs (e.g. database, action plan and network) be used after the project?

When submitting the Application Form, both the defined results and outputs should be measured by indicator targets (target value), which define the level of achievement to be reached respectively for results and for outputs. The realisation of the defined indicators will be taken into consideration to monitor the project’s performance, thus projects should indicate a realistic unit for the defined results and outputs that are likely to be achieved.

### **Indicators**

The indicator targets set by a project in the Application Form define its level of ambition, help to monitor progress throughout implementation and demonstrate at the end of the project whether the objectives have been achieved. Therefore, the definition of output and result indicators requires special attention. For each output indicator chosen from the projects under a particular specific objective, there is a corresponding result indicator.

**The table below shows some (not exhaustive and only for illustration purposes) examples of Programme indicators set respectively for outputs and results:**

Programme’s Specific Objective	Output Indicator (immediate result of the project)	Result Indicator (effect/consequence of the immediate result)
<b>RSO1.1</b>	RCO84 - Pilot actions developed jointly and implemented in projects	RCR104 - Solutions taken up or up-scaled by organisations
<b>RSO4.2</b>	RCO82 - Participations in joint actions promoting gender equality, equal	RCR104 - Solutions taken up or up-scaled by organisations

	opportunities and social inclusion	
<b>RSO4.6</b>	RCO77 - Number of cultural and tourism sites supported	RCR77 - Visitors of cultural and tourism sites supported

The information on the achievement of the output and result indicators of the projects will be requested in the Progress Reports, so that progress is measured on all important project activities. The success of the Programme links to the success of the financed project. If projects achieve their objectives, and reach their targeted output and result indicators, then the Programme will achieve its objectives.

In the application phase, the projects shall point out result and output indicators corresponding to their activities, by choosing them from the list defined by the Programme.

In order to develop project indicators' system consistent with project's objectives/activities/outputs considering the Programme's expectations, the partnership can review the following points as a guide.

<b>Checklist for defining indicators</b>		
<b>Consistent with Programme:</b>	<b>with</b>	<ul style="list-style-type: none"> <li>Which are the Programme's indicators for the related specific objective?</li> <li>To which of these indicators will the project contribute?</li> </ul>
<b>Consistent with the project objectives:</b>	<b>the</b>	<ul style="list-style-type: none"> <li>Are the envisaged outputs and results related to the project's objectives?</li> <li>Is there a logical flow between objectives/activities, outputs and results?</li> <li>Are results clearly defined, realistic (achievable) and precisely quantified according to the project's objectives?</li> </ul>
<b>Nature of the envisaged outputs:</b>		<ul style="list-style-type: none"> <li>What should be produced by the end of the project?</li> <li>What type of outputs is the project going to deliver?</li> <li>Will these outputs have the needed cross-border character?</li> </ul>
<b>Considering groups:</b>	<b>target</b>	<ul style="list-style-type: none"> <li>Do the selected results identify specific target groups?</li> <li>Are there results depicting involvement/degree of influence of the project at Programme level?</li> </ul>

Each project is requested to select those indicators that will best fit to the particular planned results and outputs of the project.

## ***Development of a project proposal***

A satisfactory project proposal shall include:

- ✓ A convincing project idea
- ✓ A robust partnership
- ✓ A dedicated Communication Plan

### *Convincing project idea*

The description of the project idea should cover the following topics:

- **SWOT analysis of the project.** This section shall reflect on the Programme's objectives and priorities targeted. Based on the common cross-border problems and challenges of the Programme as a whole, the project idea (and relevant activities) shall be elaborated in a way to address specific needs of the Programme area.

The applicants are invited to underline the cross-border territorial "cooperation" element with respect to the Programme objectives. Good cooperation between border areas is vital for good neighbourly relations, economic development and preservation of natural heritage. It is also important in emergency situations, such as natural disasters and epidemics, which do not recognize administrative borders.

In this respect the 'Interreg' additionality shall be demonstrated; i.e. the added value of the cross border cooperation compared to national or regional approaches.

- **What are the project's objectives?** A clear description of the project goals and outputs and which impacts are expected in the area.
- **What is the relevance to the Programme?** Are the project objectives and outputs pertinent to the Programme's objectives and priorities? If so, does the project contribute to the Programme expected results and outcomes?
- **How is the project going to achieve the stated project objectives?** What is the approach in project implementation?
- **What is the maturity of the project?** The proposal shall demonstrate its maturity and 'guarantee' its outputs. This is particularly important in the case of works or provision of equipment. Specific instructions and terms may apply for projects involving infrastructure. These terms will be clearly outlined in the respective calls for proposals. As a minimum, the submission of a Maturity Sheet will be required.
- **Which are the main target groups?** The proposal shall describe who is benefiting directly or indirectly from the project (e.g. final beneficiaries, target groups, the general public, end-users, etc.).

- **What is the overall impact of the project on the Programme area?** The description should cover direct and indirect impact (environmental / climate; visibility of EU funds, etc.) The description should also cover the involvement of relevant stakeholders.

Further to the relevance specific to the Programme area, the proposal shall also demonstrate its **alignment with the EU Horizontal principles** as per Article 9 of the Regulation (EU) 2021/1060.

Specifically, these principles include: sustainable development in line with “do no significant harm” principle, equal opportunities and non-discrimination, equality between men and women (gender dimension), respect of fundamental rights as per EU Charter of Fundamental Rights and of the Union environmental acquis, durability of results. The durability and sustainability refer to the long-term use and benefits of the deliverables, beyond the normal duration of the project.

### *Partnership*

The partnership is crucial in a cross-border cooperation project. The description of the partnership should highlight the following:

- ✓ **Description of each beneficiary**

This section should explain the motivation of each beneficiary and the relevant competencies and strengths that they bring to this specific project and the activities under their responsibility. Essentially, the ‘fit’ of each beneficiary to the project outcomes and results shall be demonstrated.

- ✓ **Lead Beneficiary’s Role**

The project is managed by the Lead Beneficiary with the lead partner principle. The overall capacity of the LB shall be demonstrated in the Application Form. The description shall cover previous experiences, participation and leading of similar projects, skills to coordinate beneficiaries and experts and overall capacity to organise the partnership to implement activities on time.

- ✓ **Complementarity of the beneficiaries**

The proposal shall ideally bring together beneficiaries with complementary competences. The description shall highlight the added value of the selected partnership for the realization of the specific project tasks organised in work packages.

- ✓ **Joint character of the project**

The cooperation character of the activities is a fundamental aspect of the project. Ideally, beneficiaries shall be jointly engaged in all stages of the project cycle, including planning of activities. The implementation of activities shall take place concurrently in both countries, to maximise the overall impact across borders.

### *Dedicated communication plan*

The need for a communication plan for individual projects derives from the Programme’s communication objectives. Applicants are invited to consult the Programme and its Communication Strategy before drafting the project’s communication plan.

The projects shall contribute to reaching the Programme’s Communication objectives, the relevant activities shall be planned and implemented accordingly.

It is mandatory for the partnership identify a professional communication manager with professional skills for the communication activities and social media.

### *Tips for developing a good project proposal*

- **A good project has a clear and relevant intervention logic**

Each project has to clearly address the territorial challenges and needs of the Programme area and especially of the regions involved and to contribute to achieving at least one of the Programme SOs.

The Programme does not support project proposals not clearly contributing to programme objectives and results and not demonstrating their need and relevance for the involved cities and regions.

- **A good project shows clear added value of transnational cooperation**

Transnational cooperation has to be at the heart of every project. This means that the project approach and work plan have to demonstrate that the challenges addressed cannot be solved efficiently by individual regions or countries alone. Cooperation in the project should bring a clear cross border added value compared to regional, or national approaches.

- **A good project is well focused with a sound approach and a mature work plan**

Projects need to apply a sound methodological approach, which is suitable and realistic for reaching the project specific objectives and expected results. This has to be reflected in the work packages in a logic and consistent way. The work plan should demonstrate the concrete implementation process of the project and concentrate on the most important implementation steps.

- **A good project has a relevant, competent and committed partnership**

In order to effectively achieve the project objectives and ensure the sustainability of project results, it is crucial to have the right partners on board. Therefore, when setting up the partnership, the required thematic competences and expertise, geographical coverage as well as institutional relevance and capacity have to be considered. Depending on the goals and thematic scope of the project, this can imply the involvement of different governance levels (national, regional and local authorities) as well as other organisations such as research institutions, agencies, enterprises or relevant stakeholders and end-users. Partnerships should also be multi-disciplinary and cross-sectoral, thus combining different experiences and skills in order to allow integrated approaches and achieve best results in the involved regions.

However, partnerships do not necessarily have to be large. They should remain focused and manageable, with each partner having a specific role to play. All partners have to be actively involved in a way that demonstrates the joint implementation and cross border cooperation character of the project.

- **A good project has a strong management that ensures high quality outputs and results and mitigates risks in coordination with partners**

The implementation of a cross border cooperation project with partners from both countries, different institutional backgrounds and working cultures can be challenging. Therefore, an effective project management structure with clear decision-making procedures as well as clear definition and distribution of roles is essential. **A good project delivers value for money.**

Projects need to demonstrate value for money. The project budget needs to reflect the main outputs and must be in line with the principles of adequacy of costs and sound financial management (i.e. economy, efficiency and effectiveness).

- **A good project ensures the uptake of its results generating a long-lasting change and benefits for its target groups and the regions involved**

Projects are expected to achieve tangible and sustainable results that are taken up by the relevant institutions. Projects have to clearly set whom they will target and who will benefit from the project results. It is therefore essential that the needs and institutional contexts of key stakeholders are considered and that they are actively involved in the project design and implementation. The uptake and transfer of results, the deployment at a larger scale and the mainstreaming are therefore a crucial success factor.

## ***Submission of a project proposal***

The Applicants' Package can serve as a reference document for all bodies interested in applying for funding under the Calls for Project Proposals within the framework of the Interreg VI-A Cooperation Programmes, which are under the administration of the Managing Authority "INTERREG 2021-2027".

The Applicants' Package include information about:

- The Cooperation Programme;
- The submission procedure and required documents;
- Selection Criteria;
- Filling in the Application Form in MIS;
- Eligibility of Expenditure and Budget Categories;
- The development and selection of operations;
- Implementation of approved projects

The Application Form has to be filled in and submitted through the Interreg electronic monitoring system "MIS-OPS". The Lead Applicant is the one that will be given access to the electronic system MIS via a personal user account in order to complete all the fields of the Application Form on behalf of the whole partnership. Upon confirmation with the latter, the Lead Applicant is the one to submit the Application Form via MIS.

More detailed guidance on how to fill in the Application form is available in the annex MIS Guide/ User Manual attached to the Call for proposals.

It is advised to those interested in submitting a proposal under the Programme, to examine carefully – in addition to the present Manual - the Interreg Programme document as approved by EC. Useful information is also available on the website of the Managing Authority at [www.interreg.gr](http://www.interreg.gr) and that of the Cooperation Programme at [www.greece-italy.eu](http://www.greece-italy.eu).

Moreover, in the phase of preparing the proposal, interested parties may contact the Joint Secretariat in Italy and its branch in Greece, as well as the Antenna Office and the five Info Point Offices of the Programme hosted both in Greece and Italy.

### ***i. Eligibility Framework***

The institutional framework defining the general eligibility criteria is the following:

#### **EU Regulations:**

- The European Structural and Investment Funds Regulations, Delegated and Implementing Acts for the 2021-2027 period, especially:
- ✓ Regulation (EU) No 2021/1060 of the European Parliament and of the Council of 24 June 2021, laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, the Just Transition Fund, and the European Maritime, Fisheries and Aquaculture Fund and financial rules for those and for the Asylum, Migration and Integration Fund, the Internal Security Fund and the Instrument for Financial Support for Border Management and Visa Policy, and repealing Council Regulation (EC) No 1303/2013, and any amendment

- ✓ Regulation (EU) No 2021/1058 of the European Parliament and of the Council of 24 June 2021 on the European Regional Development Fund and on the Cohesion Fund, and repealing Regulation (EC) No 1301/2013, and any amendment
- ✓ Regulation (EU) No 2021/1059 of the European Parliament and of the Council of 24 June 2021 on specific provisions for the European territorial Cooperation goal (Interreg) supported by the European Regional Development Fund and external financing instruments, and repealing Regulation (EC) No 1299/2013, and any amendment
- ✓ Regulation (EU) No 2021/1529 of the European Parliament and of the Council of 15 September 2021, establishing the Instrument for Pre-Accession assistance (IPA III)

#### **National Legislations:**

- Greek national legislation, as in force, especially:
  - ✓ Law 4914/2022 "Management, control and implementation of development interventions for the Programming Period 2021-2027" (Government Gazette 61/A/21.3.2022)
  - ✓ Ministerial Decision 45820/17-05-2023 (Official Gazette 3281/B/17-05-2023) "Eligibility rules of expenditure, public procurement control and complaint procedures by beneficiaries under the INTERREG programmes 2021-2027", as in force (for Greek beneficiaries only)
- National legislation of the European Union Member States, as in force

#### **Specific Regulatory Framework:**

- Public procurement
- State aid
- Environmental laws
- Non-discrimination and equal opportunities
- Programme, Call for proposals, Programme and Project manual, Guidance on management verifications, etc.

All applicants are strongly recommended to consult these documents before starting to draft their project proposals.

#### *ii. Procedures for Calls of proposals*

Calls for Proposals will be launched during the Programme implementation period. They will consider the challenges and the development needs of the Programme Area. The Terms of Reference of the Call for proposals will set detailed rules for participation of beneficiaries, as well as specific eligibility requirements.

Different types of calls are expected to be launched within the Programme.

- **Calls for common projects** – cross-border partnerships constituted of eligible potential beneficiaries can submit proposals in line with the specific objectives open with the particular call for proposals
- **Calls for small-scale projects** - relatively small budget projects which elaborate their objectives and implement their activities with the involvement of

local civil societies. The Monitoring Committee selects the small projects of the Programme.

- **Targeted calls for strategic projects (Operations of Strategic Importance - OSI)**, focusing on specific Programme priorities/specific objectives, elaborating specific thematic projects with tailored eligibility criteria regarding the number and type of beneficiaries/ activities
- **Calls for projects under the small project fund** – The small projects' fund (SPF) constitutes an operation within the meaning of point 4 of Article 2 of Regulation (EU) 2021/1060 which shall be managed by a beneficiary. The SPF beneficiary shall select the small projects which are implemented by the final recipients within the meaning of point (18) of Article 2 of Regulation (EU) 2021/1060. Specific cross-border measures are elaborated in the small projects with the involvement of local civil societies.

The Calls for proposals are competitive.

Application procedures and templates will be developed for each Call for proposals and included in call-specific Applicants' Package, which will be widely circulated and available on the website of the Programme to provide necessary guidance for the preparation of project applications. The relevant methodology for selection of operations is described in the 'Project Selection Methodology' of each Call for proposals.

The type of Call for Project Proposals is specified in each call-specific Applicants' Package.

In short, the following stages are expected to be followed:

- Submission of a Concept Note (for common projects)
- Preparation and submission of complete proposals
- Admissibility (Check of proposal completeness & eligibility)
- Evaluation of proposals per criterion/group of criteria
- Eligibility check of beneficiaries of the projects proposed for funding

### *iii. Eligible beneficiaries*

In order to be eligible for co-financing, the Lead Beneficiary and the project beneficiaries must belong to one of the following categories:

#### **a) national, regional or local public bodies**

#### **b) bodies governed by public law** (as defined in Article 2(4) of Directive 2014/24/EU) meaning bodies that have all of the following characteristics:

- a. they are established for the specific purpose of meeting needs in the general interest, not having an industrial or commercial character;
- b. they have legal personality; and
- c. they are financed, for the most part, by the State, regional or local authorities, or by other bodies governed by public law; or are subject to management supervision by those authorities or bodies; or have an administrative, managerial or supervisory board, more than half of whose

members are appointed by the State, regional or local authorities, or by other bodies governed by public law;

- c) bodies governed by private law**, non-profit organisations founded according to private law can be eligible under the following conditions as a whole:
- they are not established with the goal to obtain profit,
  - they do not distribute profits to the shareholders,
  - they should have at least completed one accounting year of operation before the launch of the specific call for proposals. This rule is also applicable for the local-regional subsidiary/branch offices.

**It should be noted that private companies, not falling under the conditions listed at point (c) are not eligible.**

- d) international organisations** registered under the national law of the Member States of the Programme can be considered as eligible if they fulfil the criteria foreseen for the non-profit bodies governed by private law. However, international organisations operating under international law are not eligible.
- e) European Grouping of Territorial Cooperation (EGTC).** Eligible EGTC must be governed by the law of one of the participating countries where the EGTC has its registered office. An EGTC cannot be a sole beneficiary of a project proposal.
- f) SME's** if applicable under specific Calls for proposals.

Bodies governed by public law (under category b. above) and private organisations (under category c. above) and EGTC (under category e. above) should have at least completed one accounting year of operation before the launching of the Call for proposals. If a body governed by public law or a private organization is participating through a branch located at the Programme area, the branch must be operational for at least 12 months before the launching of the call for proposals.

**Attention:**

**The Applicants' Package of each Call for proposals launched under the Programme, will detail further the types of beneficiaries eligible under the specific Call for proposals.**

### *LP Principle*

#### ***The Lead Beneficiary***

The Lead Beneficiary shall:

- lay down the arrangements with the other beneficiaries in an agreement comprising provisions that, inter alia, guarantee the sound financial management of the respective Union funds allocated to the Interreg operation, including the arrangements for recovering amounts unduly paid<sup>1</sup>;

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<sup>1</sup> International banking transactions should be ensured

- b. assume responsibility for ensuring implementation of the entire Interreg operation; and
- c. ensure that expenditure presented by all beneficiaries has been paid in implementing the Interreg operation and corresponds to the activities agreed between all the beneficiaries, and is in accordance with the document provided by the Managing Authority pursuant to Article 22(6) of Reg. 1059/2021.

### ***The Project Beneficiaries***

All beneficiaries (including LB) participate in designing and implementing the project by carrying out the activities assigned to them in the approved Application Form.

Indicatively, the beneficiaries' responsibilities entail that they:

- a. ensure the implementation of the project activities under their responsibility according to the project plan and the Partnership Agreement.
- b. cooperate with the other project beneficiaries in the implementation of the project, the monitoring and the reporting and ensure full cooperation for the timely and accurate performance of verifications.
- c. assume responsibility in the event of any irregularity in the expenditures they have declared, and repay the lead beneficiaries the amounts unduly received.

The details on the cooperation between the Lead Beneficiary and the project Beneficiaries is defined in the Partnership Declaration (at the stage of the submission of the project proposal) and specified, in the Partnership Agreement (at the stage of implementation when a project is selected for funding), signed by all parties involved in the partnership.

Associated beneficiaries might join the partnership of the project. Each Call for proposals will define, if applicable, specific requirements in regards to the associated beneficiaries to the project.

### ***Cooperation Principle***

The project should include at least one beneficiary from each country of the bilateral Program. The maximum number of beneficiaries will be defined in the relative Call for Proposals. All beneficiaries must have explicit and clear roles in the development and implementation of the project.

According to Art.23 par.4 of Reg.1059/2021 *"Partners shall cooperate in the development and implementation of Interreg operations, as well as in the staffing or financing, or both, thereof."*

Thus, beneficiaries should co-operate in the following ways:

### ***Development of operation***

All beneficiaries should contribute to the development of the project. Beneficiaries should define how the project will operate, i.e. objectives and outcomes, budget, scheduling and responsibilities for work packages and tasks required to achieve the objectives, on the basis of knowledge and experience that each of them can bring to the project.

### ***Implementation of operation***

The Lead Beneficiary bears the overall responsibility for the project. All beneficiaries should undertake responsibilities for different parts of the implementation of the operation. Each beneficiary responsible for a work package should coordinate and ensure that planned activities are carried out, interim targets are met and unexpected challenges are dealt with effectively. Several beneficiaries may contribute to each work package.

In addition, the beneficiaries shall cooperate in either one or both of the following ways:

### ***Staffing of operation***

All beneficiaries should have a defined role and allocate staff to fulfil this role. Staff members should coordinate their activities with others involved in the activity or work package, and exchange information regularly. There should be no unnecessary duplication of functions in different beneficiaries' organisations.

### ***Financing of operation***

The project should have a budget with funding allocated to beneficiaries according to the activities that they will be called to carry out; the budget split should reflect the beneficiaries' tasks. The budget should include annual spending targets and spending targets per work package.

#### ***iv. Building a project budget***

It is important that projects consider financial issues from the very beginning. This approach requires the involvement of all beneficiaries in the preparatory work and planning meetings during the development phase of the project application. Time invested prior to the submission of the application results in strong partnerships with clear responsibilities and well justified budget allocations. Good preparation is fundamental to ensuring a prompt start of the project's activities after approval, as well as smooth project implementation thereafter.

It is certainly useful to estimate the funds potentially available and to take into account the recommendations for a reasonable project budget. The overall budget has to be in line with the activities planned, the project's duration and the number of beneficiaries involved. This implies that the detailed budget is always prepared on the basis of the activities needed to meet the project's objectives and the resources required to carry out these activities within the time allowed. When the allocation of activities / outputs per beneficiary is clear, the drafting of the budget can start. On the contrary, it is not advisable to start with a total budget and then try to allocate the budget to activities.

Each project proposal shall contain information regarding:

- ✓ Work Packages and activities
- ✓ Budget per work packages and deliverables
- ✓ Budget annual allocation
- ✓ Budget allocation per budget category (budget line)
- ✓ Projects financing

- ✓ Budget per beneficiary

#### *v. Project Budget Categories (Budget Lines)*

The project costs under the Programme are divided into six (6) budget categories.

These are:

- Staff costs
- Office and administrative costs
- Travel and accommodation costs
- External expertise and services costs
- Equipment costs
- Costs for infrastructure and works

For each budget category, a description of the costs that falls under the budget category is provided below. Concrete guidance about the verification process and the audit trail to be kept by the projects in regards to each budget category will be provided in the "Guidance on Management Verification" document.

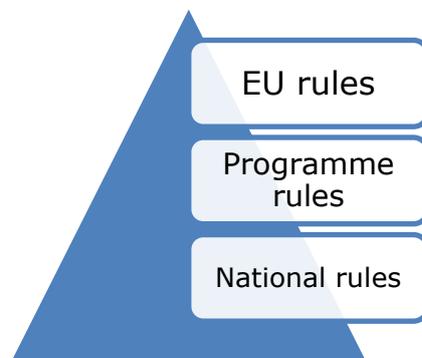
**Attention:**

**Please note that each Call for project proposals will specify further the budget categories available and the calculation methods eligible under the specific Call.**

#### *Hierarchy of rules on eligibility of expenditures*

The application of the rules on the eligibility of the expenditures follow the below ranking:

1. EU rules on eligibility as set out in the CPR, ERDF and Interreg Regulations;
2. Programme eligibility rules as set out in this Manual and detailed in each call for proposals
3. National legislation eligibility rules. They apply only for matters not covered by EU and Programme eligibility rules.



All applicable EU and national rules on other than eligibility of expenditure matters, (e.g. rules on public procurement) should be followed by the beneficiaries considering the stricter applicable rule.

### **General Eligibility Principles**

Expenditure is eligible for funding when fulfilling all general eligibility requirements listed below. Therefore, expenditure has to:

- ✓ be incurred and paid (except for costs calculated as flat rates, unit costs or lump sums) by a beneficiary for implementing a project for actions identified in the approved Application Form in force within the eligibility period of the project;
- ✓ be essential for the achievement of the project objectives/outputs and it would not be incurred if the project is not carried out (additionality principle);
- ✓ relate to cost items that did not receive support from other EU Funds or other contributions from third parties;
- ✓ comply with the principle of real costs except for costs calculated as flat rates, unit costs and lump sums;
- ✓ be justified by a proof of payment;
- ✓ comply with the principle of sound financial management;
- ✓ be registered in the beneficiary's accounts through a separate accounting system or an adequate accounting code set in place specifically for the project (with the exception of costs calculated as flat rates unit costs and lump sums);
- ✓ not to be in contradiction with any specific eligibility criterion applicable to the respective cost category;
- ✓ respect the eligibility rules of the EU, the Programme and the country in which the beneficiary is located (the hierarchy of rules should be respected with priority of EU rules, Programme rules and national rules, only in cases the EU and Programme rules do not preview specific actions);
- ✓ comply with all relevant procurement rules;
- ✓ respect the rules of branding and communication established by the European Regulations and the Programme;
- ✓ be approved in MIS by an authorized controller.

### **Non-eligible expenditure:**

The following costs are not eligible:

- Interest on debts;
- Purchase of land (over 10% of total eligible cost);
- Fines, financial penalties and expenditure on legal disputes and litigation;
- Costs of gifts;
- Costs related to fluctuation of foreign exchange rate;
- Value added tax ('VAT'), except:
  - for operations the total cost of which is below EUR 5 000 000 (including VAT);
  - for operations the total cost of which is at least EUR 5 000 000 (including VAT) where it is non-recoverable under national VAT legislation.
- Infrastructure located outside the Programme area, even if it is directly related to the project either for the development or for implementation, shall not be eligible.

**Types of costs:**

1. Real costs

The project beneficiaries commit and pay the expenditures. The incurred expenditure is backed by invoices or any other equivalent accounting documents. The registration in the accounting system is based on the delivery of works, services or supplies.

2. Simplified cost options (SCOs)

Predefined unit costs, lump sums or flat rates are used as the basis for calculating a beneficiary's expenditure. The SCOs exempts project beneficiaries from presenting any evidence of the existence or payment of expenditure covered by the category.

Under the Programme the following SCOs are available according to Article 54 of the Regulation (EU) 2021/1060:

- flat rate for the calculation of staff costs
- flat rate for the calculation of office and administrative expenditure
- flat rate for the calculation of travel and accommodation expenditure
- lump sum or unit costs could be available for small scale projects "flat rate of up to 40 % of eligible direct staff costs (real costs) in order to cover the remaining eligible costs of an operation.

**Detailed information on the flat rates is provided under each cost category.**

**Attention:**

**Please note that according to Article 53(2) of Regulation (EU) 2021/1060, operations with total budget up to €200.000,00 have the obligation to use simplified cost options.**

*Project expenditures/ budget lines*

Staff Costs

Office and  
administrative  
costs

Travel and  
accommodation  
costs

External  
expertise and  
services costs

Equipment costs

Infrastructure  
costs

***g. Staff Costs***

Staff costs shall consist of gross employment costs of staff employed by the Interreg beneficiary in one of the following ways:

- full time,
- part-time with a fixed percentage of time worked per month,
- part-time with a flexible number of hours worked per month, or
- on an hourly basis.

Staff costs shall be limited to the following:

- a)** salary payments related to the activities which the entity would not carry out if the operation concerned was not undertaken, provided for in an employment document, either in the form of an employment or work contract or an appointment decision, or by law, and relating to responsibilities specified in the job description of the staff member concerned.

Payments to natural persons working for the Interreg beneficiary under a contract other than an employment or work contract may be assimilated to salary payments and such a contract shall be considered to be an employment document.

- b)** any other costs directly linked to salary payments incurred and paid by the employer, such as employment taxes and social security including pensions as covered by Regulation (EC) No 883/2004 of the European Parliament and of the Council, on condition that they are: (i) provided for in an employment document or by law; (ii) in accordance with the legislation referred to in the employment document and with standard practices in the country or the 21 specialized 21 where the individual staff member is actually working, or both; and (iii) not recoverable by the employer.

Staff costs may be reimbursed either:

- in accordance with point (a) of Article 53(1) of Regulation (EU) 2021/1060, proven by the employment document and pay slips; (real costs)
- under simplified cost options as set out in points (b) to (f) of Article 53(1) of Regulation (EU) 2021/1060; (simplified cost options)
- as a flat rate of up to 20 % of the direct costs other than the direct staff costs of that operation, or
- as an hourly rate in accordance with Article 55(2) to (4) of Regulation (EU) 2021/1060 either for direct staff costs of individuals who work on full-time assignment on the operation or for individuals who work on part-time assignment on the operation pursuant to point (b) of paragraph 4 of Article 39 of Regulation (EU) 2021/1059.

Staff costs related to individuals who work on part-time assignment on the operation, may be calculated as either:

- ✓ a fixed percentage of the gross employment cost in accordance with Article 55(5) of Regulation (EU) 2021/1060, or

- ✓ a flexible share of the gross employment cost, in line with a number of hours varying from one month to the other worked on the operation, based on a time registration system covering 100 % of the working time of the employee.

For staff employed on an hourly basis, the hourly rate shall be multiplied by the number of hours actually worked on the operation based on a time registration system.

The option selected for the calculation of staff costs applies on a beneficiary level for the entire project period. Each beneficiary should select the staff costs calculation option which has to remain unchanged through the entire project period. This option must be declared in the Application form in the Partnership Section.

The beneficiaries should justify their choice of the selected cost option. During the project evaluation process the stated by the beneficiaries' calculation of the staff costs will be checked and can be subject to revision before signing the SC.

Each beneficiary will have to provide the rationale of the staff costs estimations in the Justification of the Budget document. The participation of the beneficiaries' staff must be linked to specific project deliverables according to their role and expertise.

Examples and the audit trail of the available Staff costs calculation options, will be defined in the "Guidance on Management Verification" document.

**Attention:** Staff costs must relate to activities which the beneficiary organisation would not carry out if the project was not undertaken. Daily allowances and any other Travel and accommodation costs, as well as Office and administrative costs cannot be included under this budget category. Staff costs do not cover the expenses of externals; remuneration of external experts should be budgeted under the "External expertise and services costs" category.

#### ***h. Office and administrative costs***

Office and administrative costs shall be limited to the following elements (exhaustive list):

- a)** office rent
- b)** insurance and taxes related to the buildings where the staff is located and to the equipment of the office, such as fire or theft insurance
- c)** utilities, such as electricity, heating, water
- d)** office supplies
- e)** accounting
- f)** archives
- g)** maintenance, cleaning and repairs
- h)** security
- i)** IT systems
- j)** communication, such as telephone, fax, internet, postal services, business cards

- k)** bank charges for opening and administering the account or accounts where the implementation of an operation requires a separate account to be opened, and
- l)** charges for transnational financial transactions.

The following options for calculating Office and administrative costs are available under the Programme:

1. Real costs, or
2. Simplified costs – fixed percentage of the gross employment cost (Flat rate). Where a flat rate is used to cover indirect costs of an operation, it may be based only up to 15 % of eligible direct staff costs.

Office and administrative costs shall be eligible if they are related to the implementation of the project, charged to the project proportionately and calculated on a fair and duly justified distribution method.

In both cases – use of real costs or simplified costs, office and administrative costs cannot exceed the 4% of the total beneficiary’s budget.

In case the flat rate calculation method is adopted, the following example provides an overview on the approach:

A beneficiary calculates Office and administrative costs using the 15% flat rate of eligible direct staff costs option:

A	Travel and accommodation	10.000€
	External expertise and services	20.000€
	Equipment	30.000€
B	Staff Cost (either on Real costs basis or Flat rate)	12.000€
C	Eligible Office and administrative costs (B*15%)	12.000€*0,15 = 1.800€
Total Project budget (A+B+C)		73.800€

The option selected applies on a beneficiary level for the entire project period. Each beneficiary should follow either the flat rate or the real costs calculation option, which will remain unchanged through the entire project period. This must be declared in the Application form in the Partnership Section.

#### ***i. Travel and accommodation costs***

Travel and accommodation costs, regardless whether such costs are incurred and paid inside or outside the Programme area, shall be limited to the following cost elements (exhaustive list):

- a)** travel costs, such as tickets, travel and car insurance, fuel, car mileage, toll, and parking fees
- b)** the cost of meals
- c)** accommodation costs
- d)** visa costs, and
- e)** daily allowances.

Any cost element listed in the above points covered by a daily allowance shall not be reimbursed in addition to the daily allowance.

Travel and accommodation costs of external experts and service providers must be budgeted under external expertise and services costs.

Travel and accommodation costs of an operation may be calculated as a flat rate of up to 15 % of the direct staff costs of that operation (simplified costs).

The option selected (real costs or simplified costs) applies on a beneficiary level for the entire project period. Each beneficiary should follow either the flat rate or the real costs calculation option, which will remain unchanged through the entire project period. This must be declared in the Application form in the Partnership Section.

National legislation rules should be followed on the eligibility and reporting of travel and accommodation costs.

#### ***j. External expertise and services costs***

External expertise and service costs shall be limited to the following services and expertise provided by a public or private body or a natural person, other than the beneficiary, and all beneficiaries of the operation (exhaustive list):

- a)** studies or surveys, such as evaluations, strategies, concept notes, design plans, handbooks
- b)** training
- c)** translations
- d)** development, modifications and updates to IT systems and website
- e)** promotion, communication, publicity, promotional items and activities or information linked to an operation or to the Programme as such
- f)** financial management
- g)** services related to the 24pecialized24 and implementation of events or meetings, including rent, catering or interpretation
- h)** participation in events, such as registration fees
- i)** legal consultancy and notarial services, technical and financial expertise, other consultancy and accountancy services
- j)** intellectual property rights
- k)** verifications pursuant to point (a) of Article 74(1) of Reg. (EU) 2021/1060 and Article 46(1) of Reg. (EU) 2021/1059

- l)** costs for the accounting function on Programme level pursuant to Article 76 of Regulation (EU) 2021/1060 and Article 47 of this Regulation
- m)** audit costs on Programme level pursuant to Articles 78 and 81 of Reg. (EU) 2021/1060 and pursuant to Articles 48 and 49 of Reg. (EU) 2021/1059
- n)** the provision of guarantees by a bank or other financial institution where required by Union or national law or in a programming document adopted by the Monitoring Committee
- o)** travel and accommodation for external experts, speakers, chairpersons of meetings and service providers, and
- p)** other specific expertise and services needed for operations.

The travel and accommodation costs of the external experts involved in the project must be directly related to the activities of the project, adequately justified and clearly described in the relevant contract.

When awarding external expertise and service contracts, all ERDF project beneficiaries must ensure that EU and national rules on public procurement are respected, in accordance with the amount of the contract. All contracts must comply with the basic principles of transparency, non-discrimination and equal treatment.

#### ***k. Equipment costs***

Costs for *equipment purchased, rented or leased* by the beneficiary of the operation other than those covered by Office and administrative costs shall be limited to the following (exhaustive list):

- a)** office equipment
- b)** IT hardware and software
- c)** furniture and fittings
- d)** laboratory equipment
- e)** machines and instruments
- f)** tools or devices
- g)** vehicles, and
- h)** other specific equipment needed for operations.

Costs for the purchase of *second-hand equipment* may be eligible subject to the following conditions:

- a)** no other assistance has been received for it from the Interreg funds or from the funds listed in point (a) of Article 1(1) of Regulation (EU) 2021/1060
- b)** its price does not exceed the generally accepted price on the market in question, and
- c)** it has the technical characteristics necessary for the operation and complies with applicable norms and standards.

Costs for the purchasing of equipment are eligible under the condition that the equipment is necessary for the project implementation and is foreseen in the approved Application Form. There should be an analytical description of the technical specifications and the relative costing (Justification of the budget).

The selection of the suppliers for the purchasing of any equipment item shall comply with the relevant public procurement rules in force.

***f. Costs for infrastructure and works***

Costs for infrastructure and works shall be limited to the following:

- a)** purchase of land in accordance with point (b) of Art. 64(1) of Reg. (EU) 2021/1060
- b)** building permits
- c)** building material
- d)** labour, and
- e)** 26 specialized interventions (such as soil remediation, mine-clearing).

Expenditures for infrastructure and works are eligible under the condition that the cross-border impact of the investment is demonstrated and the activity has been approved in the Application Form. The contractor cannot be a beneficiary of the project. The description of these expenditures should be provided by "Bill of Quantities and Costs" based on technical studies and/or appropriate justification according to national legal framework. The latter will be described in the "Maturity Sheet" and the documentation will be attached to the Application Form in MIS.

Infrastructure located outside the Programme area, even if it is directly related to the project either for the development or for implementation, shall not be eligible.

***g. Special Categories of costs and budget limits***

***Preparation Costs***

Costs within the budget lines "*staff costs, travel and accommodation costs and external expertise and services*", which have been incurred for the preparation of the project, are eligible for funding in accordance to the following conditions:

- ✓ If the services or activities were implemented and there is at least a commitment decision for them between 1<sup>st</sup> of January 2021 and the date of submission of the Application Form. The related payments should be made and should be included preferably in the first request for verification.
- ✓ If they show direct connection to the approved project and are included in the Application Form in the Deliverable 1X1 "Preparation Activities" (where X is the number of the beneficiary).
- ✓ If they do not exceed the amount of €30.000 at project level

Specifically, the following *external expertise costs and/ or staff costs* for the preparation of the application documents are eligible:

- a)** joint meetings for the preparation of the project;
- b)** travelling expenses directly related to joint meetings, including participation in info days for the Call for proposals;
- c)** cost analysis and preparatory research reports for the project activities;
- d)** costs for the preparation of technical design studies, compliance reports, licenses

fees, environmental impact assessment studies, technical assessment reports.

Attention:

Office and administrative costs are **not** eligible and cannot be claimed under "preparation costs"

### ***Management Costs***

Management costs should be included **only in WP1** of the Application Form and concern the costs related to the administrative activities to be implemented for the efficient management and coordination of the project.

The management costs of each project beneficiary should not exceed 10% of the total approved beneficiary's budget. For the Lead Beneficiary this percentage shall be limited to 15% of its budget.

The following WP1 costs are not calculated in the above percentage limits:

- ✓ Deliverable 1 X 1 "Preparation Activities" (where X is the number of the beneficiary).
- ✓ Any costs incurred for meetings and events and travel and accommodation of beneficiary's staff.
- ✓ FLC fees (if applicable)

### ***Communication Costs***

'Communication' costs should be included **only in WP2** of the Application Form and describe the actions for carrying out the external communication of the project efforts and outputs, dissemination of results, etc. The WP2 budget cannot exceed the 15% of the total project budget, without limits at beneficiary level.

In the teamwork of the partnership must be a communication manager, with professional skills in the communication activities and social network. The communication manager will have the responsibility to coordinate and realize the communication activities of the project and to give all the necessary information about the communication activities to the MA/JS.

### ***Eligibility Rules***

As a general rule, expenditures shall be eligible for funding if:

- a)** they have been incurred and paid out within the time frame in which expenditures can take place. Under no circumstances can the final date of eligibility of expenditure exceed the 31st of December 2029;
- b)** they are directly related to the project either for the development or implementation of the project and they are planned in the Application Form in force;
- c)** they have been incurred in the Programme area of the cross-border Programme. Any expenditure outside the Programme area could be eligible if it is explicitly mentioned in the Application Form in force or if it is first approved by the JS/MA before it is actually incurred;
- d)** they have been incurred without infringement of EU, national and Programme rules;

- e) they are in compliance with the principles of efficiency, economy and expediency of all actions. Especially the cost/benefit ratio has to be ensured.

Each call for proposals defines the minimum and the maximum threshold for the project's budget.

### *Period of eligibility of expenditures*

The starting date for the eligibility of expenditures is the 1<sup>st</sup> of January 2021. The closing date of the eligibility period should be the end date of the Subsidy Contract in force. Under no circumstances the final date of eligibility of expenditures can exceed the 31<sup>st</sup> of December 2029.

The projects' budget range is specified in each Call for proposals.

### *Specific Eligibility Rules*

In principle, to become a project beneficiary, the legal address of the beneficiary's organisation has to be located in the eligible area of the Programme with the exception of:

- organisations located outside the Programme area but having local/regional subsidiary/branch office established in the Programme area<sup>2</sup>
- bodies of the central government located outside the Programme area (e.g. Ministries or other governmental authorities with specific competencies on national level)
- organisations located outside the Programme area but inside the Member states participating in the cross-border Programme if their participation in the project brings added value and expertise to its implementation and benefits the Programme cooperation area.

Organisation located outside the Programme area not registered in one of the Member States participating in the cross-border Programme are not eligible for funding.

All project activities should take place within the eligible Programme area. If a project plans to finance activities or events outside the eligible Programme area they should clearly be necessary for the achievement of the project results. This should be done in duly justified cases and described in a single dedicated WP in the AF. If such activities or events outside the Programme area occur during the project implementation, they must be approved by the MA.

If activities (including travel and accommodation) and/ or events are planned outside the Programme area, the following conditions need to be satisfied:

- a) the activity and/ or event is for the benefit of the Programme area;
- b) the activity and/ or event is essential for the implementation of the project;
- c) the implementation and/ or the relevance of the activity and/ or the event has been foreseen in the AF and approved by the Programme.

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<sup>2</sup> The subsidiary/branch office should be operational during the whole implementation period of the project.

**During the project submission phase, all activities to be implemented outside the Programme area should be described in a single dedicated WP in the Application Form.**

In addition, consider that the aim of cross border cooperation is to integrate areas divided by national borders that face common problems that require common solutions.

If the project proposal includes infrastructure, it should take into account the Member state's risk assessments made in compliance with EU Civil protection legislation ([Regulation 2021/836 - Amendment of Decision No 1313/2013/EU on a Union Civil Protection Mechanism](#)) for the evaluation of the project's vulnerability to disaster risks, including longer-term expected effects from climate change.

### ***Assessment of submitted project proposals***

Proposals are graded against predetermined evaluation criteria, which have been approved by the Programme Monitoring Committee for each specific Call for proposals. The evaluation criteria aim to maximise the result-oriented approach of the projects in regards to the Programme's objectives. The projects shall deliver concrete and visible outputs and results, in response to well identified challenges affecting the programme area and addressing development needs in an integrated manner.

In short, the evaluation criteria include:

**Stage A: Ex-ante Evaluation of the Concept Note** (not applicable for Targeted Calls for proposals), which includes assessment of:

- a) the main idea of the proposal, ii) the partnership, iii) the proposed activities and the appropriate indicators iv) the indicative budget of activities v) the information regarding the eligibility of the beneficiaries participating in the partnership vi) the added value of the cross border cooperation vii) the relevance to the specific objectives of the Call

The proposals are evaluated by the MA/JS in collaboration with the National Authorities of the two countries if required, based on a targeted set of criteria and examining whether each proposal is consistent with the strategy, the intended targets, the indicators of the Programme etc.

At this stage the Managing Authority reserves the right to propose modification of the partnership structure in cases of beneficiaries that do not have the competence to perform the proposed activities.

The results of the evaluation are approved by the Monitoring Committee and are communicated to the Lead Beneficiaries of each partnership by the Managing Authority.

**Stage B: Evaluation of the full project proposal** (submitted by beneficiaries successfully passed Stage A or for Strategic/Targeted Projects).

Performed in 3 distinct sub-stages: Stage B1 (Proposal completeness and eligibility check), Stage B2 (Evaluation of proposals per criterion/ group of criteria) and Stage B3 (Eligibility check of beneficiaries positively evaluated in stages B1 and B2).

**Phase B1': Proposal completeness and eligibility check** – It is an on-off procedure with the performance of check on administrative compliance, eligibility requirements under the Call for proposals and compliance with horizontal policies.

Phase B1' is carried out by the Joint Secretariat in collaboration with the MA. If the project proposal undergoes successfully Phase B1', it proceeds to further evaluation in Phase B2'.

**Phase B2': Evaluation of the proposal per criterion/ group of criteria** – Quality assessment based on scoring system using core selection criteria for project proposals that have successfully passed Phase B1'.

The core selection criteria are divided into:

- Content related criteria (project quality) – relevance of the proposal, quality of the results, impact and sustainability, innovation, cross-border cooperation and capitalization.
- Implementation related criteria – quality of the partnership, methodological approach, project maturity, budget and finance criteria).
- Evaluation of the Climate endurance validation report (for infrastructure projects with expected duration of more than 5 years)

Phase B2' is carried out by two Assessors from the Register of Assessors. In certain cases, as specified in the Project Selection Methodology Interreg 2021-2027, a third assessment may also take place.

In all cases, the evaluation procedure is under the responsibility of the MA, which finalizes the results of the evaluation and submits the proposed projects for approval to the Monitoring Committee.

**Phase B3': Beneficiary eligibility check / state aid check** – This check is carried out by the Joint Secretariat in regards to the eligibility of beneficiaries for those project proposals whose evaluation is positive after the completion of Phases B1' and B2'. The State aid check is performed by the MA/JS.

The results of this check are approved by the Monitoring Committee of the Programme.

**Attention: The specific evaluation criteria and the scoring are further detailed in the Applicant's Package of each Call for proposals.**

**For Targeted Calls for proposals the evaluation procedure and the evaluation stages might differ, and they will be specified in the Applicant's Package of each Call for project proposals.**

The Managing Authority will ensure that the procedure for evaluating proposals is carried out in accordance with the Terms of the Call for proposals and the Call's selection criteria.

## **Project Selection**

The Monitoring Committee is responsible for project selection.

Following evaluation of the project proposals, the Managing Authority submits to the Monitoring Committee the project proposals ranked according to the scores obtained in the evaluation procedure (from highest to lowest).

Based on the budget availability, the project proposals are divided into:

- Project proposals to be accepted
- Project proposals to be further discussed at the MC (proposals that could be acceptable under conditions)
- Project proposals to be rejected

The Monitoring Committee has the ultimate responsibility for the selection of operations. The MA communicates the results of the evaluation to the Lead beneficiaries (Applicants) of each partnership.

The project selection decision of the Monitoring Committee is binding and leads to the issuance of a Subsidy Contract by the MA for those projects that succeeded.

The signing of the Subsidy Contract by the two contracting parties indicates the completion of the integration procedure in the Programme.

## **Joint Complaint Committee**

### *Scope of the Joint Complaint Committee*

To ensure fair, just and unbiased treatment of all project proposals, in line with the Programme's provisions, the two States participating in the Programme ensure that effective arrangements are set in place for the examination of complaints<sup>3</sup>. The latter are to be submitted by the Lead beneficiary (Applicant) of the project proposal in writing or by email on behalf of the whole partnership against the Decision of the MC of the Programme treating assessment and selection of operations.

The Joint Complaint Committee is the body entitled to examine the admissibility of the complaints, the legality of the actions against which the complaints are launched and the legal and factual arguments and claims of the complaints on the decision of the Monitoring Committee of the Cooperation Programme Interreg VI-A Greece-Italy 2021-2027 as per projects selected for funding under the Programme.

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<sup>3</sup> The constitution of the Joint Complaint Committee follows the respective institutional framework.

## *Submission and Management of the Complaints*

### *Complaints related to project evaluation*

Only the Lead beneficiary (Applicant) of a project proposal, as representative of the partnership, has the right to submit a written complaint against the Decisions of the MC concerning the results of the selected for funding operations. The Lead beneficiary (Applicant) may submit a complaint in regards to the admissibility and eligibility of the project proposals or the qualitative assessment and selection of operations. In the complaint all legal arguments, factual grounds and claims should be stated in writing. Complaints are sent to the MA/JS/ Joint Complaint Committee within seven (7) working days, following the official notification of the relevant Decision of the MC in English (official language of the Programme). If a complaint is submitted after the deadline, it is inadmissible and will be rejected without further examination.

In order to be admissible the complaint should include:

- i. the name and address of the Lead beneficiary (Applicant);
- ii. title and acronym of the project proposal concerned;
- iii. the date of the submission, signature and stamp of the legal representative of the Lead beneficiary (Applicant);

The complaint should not contain any additional documents to the ones already submitted during the proposal's submission stage, providing new information or correcting deficiencies identified in the assessment process already made of the proposal in question. In case of submission of such documents or new information provided, the Joint Complaint Committee will discard them and not consider them for its conclusion.

The JS in cooperation with MA assists to the work of the Joint Complaint Committee and provides it with all possible support during the examination of the complaints.

The MA/JS shall provide the Joint Complaint Committee with:

- the complaint of the Lead beneficiary (Applicant)
- the original Application Form and all supporting documents that were taken into consideration during the project assessment and selection process
- all documents relating to the assessment of the application in question and the record of the MC's decision,
- any other document requested by the members of the Joint Complaint Committee relevant to the complaint.

The Joint Complaint Committee will not perform a quality assessment or re-evaluation of the project proposal.

The Joint Complaint Committee will examine and evaluate the legal and factual argument(s) and claims of the complaint, will state its opinion and reach a conclusion on the complaint.

The Joint Complaint Committee submits its conclusions on the justification of the complaint to the MC of the Programme within fifteen (15) working days from the last date indicated for the submission of complaints. The MC examines the conclusion reached by the Complaint Committee and takes a decision on whether to accept or reject the complaint within the period defined in the Management and Control System of the Programme.

In case a complaint is accepted by the Decision of the MC, the MA/JS shall be requested to re-assess the project proposal in question. The MC, on the basis of the results of the re-evaluation of the given project proposal, may review its initial Decision on the selection of the operations to be funded by the Programme.

In case a complaint is rejected by the Decision of the MC, this decision is final and binding to the complainant and it may not be subjected to a second similar complaint procedure.

Once a complaint is submitted and a decision is reached on the matter by the MC of the Programme according to the above mentioned procedure, the same complainant has exhausted its right to submit a complaint, not only on the same grounds but on any grounds against the final Decision of the MC of the Programme regarding the selection of operations to be funded by the Programme.

The MA/JS shall notify in writing immediately the complainant on the decision of the MC on its complaint. In case the complaint is accepted, the complainant is informed on the relevant procedure of re-evaluation of the project proposal. In case the complaint is rejected, the MA/JS informs the complainant of its legal rights before the competent Greek Courts and the relevant procedure under the Greek Administrative Law, place of the headquarters of the Managing Authority of the Cooperation Programme Interreg VI-A Greece-Italy 2021-2027.

### ***Complaints related to project implementation***

During the project implementation phase, the following types of complaints are foreseen:

#### ***Complaints related to MA/JS on the implementation of the Subsidy Contract***

The LB, on behalf of the partnership may submit a complaint in relation to an act; a decision or omissions of the MA/JS or related to any issue covered by the Subsidy Contract. Following the complaint, the MA/JS shall put in place a mediation procedure. If an agreement cannot be reached among the parties, the LB is entitled to address its complaint to the competent court jurisdiction (i.e., Civil Court of Thessaloniki) as laid down in the Subsidy Contract of the project. Greek law shall apply to all legal relations arising in relation to the Subsidy Contract.

#### ***Complaints related to Audit and Control Bodies***

Complaints related to decisions, acts or omissions of the control and audit bodies (national controllers; auditors or any other national or EU institution) must be addressed to the responsible Authority or participating country institution in charge for these controls according to the procedures laid down at national and EU level.

#### ***Any other complaint outside the competence of MA/JS***

Complaints against any other person or institution that might affect the activities or the rights of beneficiaries or partners and that are outside the sphere of the competence of the MA/JS shall be submitted directly to the employing or contracting institution or competent administrative offices and must not be addressed to MA.