



Answers to requests for clarifications

Call for proposals

Call ID : 127-G-ENT-PPA-14-7722

Transnational cultural tourism products and Tourism and accessibility for all

THEME A: Cooperation projects to support transnational tourism based on European cultural and industrial heritage

THEME B: Fostering accessible tourism entrepreneurship and management

<u>Question 1</u>	<p>After reading carefully through the text of the call for proposals (27-G-ENT-PPA-14-7722) on <i>Transnational cultural tourism products and Tourism and accessibility for all</i> point 5.1 Eligible Applicants, paragraph g) g7), it's not clear that International Organizations could be part of the consortium as partners or not.</p> <p>Hence, would you be so kind to clarify what role international organizations could play in this specific call?</p>
<u>Answer 1</u>	<p>International organisations are eligible for this call of proposals as coordinator or partner. There is no restriction as to the role they may play in a project</p>
<u>Question 2</u>	<p>I would like to ask if, within the partnership, the mandatory partner described in the Theme B at page 10 as "1 business federation/and or Chambers of commerce, industry and crafts or similar bodies and their umbrella associations" could be considered a local consortium, such as a network of entrepreneurs operating in the tourism (hotels, restaurants, dmcs, etc.) or must be a national organization. As an alternative, could also be a local chamber of commerce?</p>
<u>Answer 2</u>	<p>A "business federation/and or Chamber of Commerce..." can certainly be local for the purposes of the call. A local business consortium or local association of business operators is also acceptable – it is essential however that such body is a registered entity according to the legislation in force in the relevant Member State. It should be a body that pre-exists the call, i.e. not constituted for the purposes of the call, but already operational in its specific area of activity (in the case of our call tourism, for example).</p>

<u>Question 3</u>	I would like to know if the affiliated do have a proper budget? Do they appear in the B1/B2 form as applicants or are they under the budget of their network (affiliated of the network)?
<u>Answer 3</u>	<p>The budget of an affiliated entity can appear within the budget sheets of the beneficiary it is affiliated to. Some identification should be possible, e.g. staff member of whom (between brackets?</p> <p>The costs made by affiliated entities can be eligible, provided that:</p> <ul style="list-style-type: none"> • the entities concerned are identified in the grant agreement; • the entities concerned abide by the rules applicable to the beneficiary under the grant agreement with regard to eligibility of costs and rights of checks and audits by the Commission, OLAF and the Court of Auditors. <p>We also would like to remind that affiliated entities have to comply with the eligibility & exclusion criteria and must submit the same documents as the other applicants.</p>
<u>Question 4</u>	Please respond to our enquiry regarding the eligibility of our company for the call for proposals ID no. 127 – 6 – ENT – PPA – 14 – 7722 "Transnational cultural tourism products and Tourism and accessibility for all".
<u>Answer 4</u>	<p>Please note that the Commission services cannot, for reasons of equal treatment, neither assess proposals at this stage nor help to draft proposals. Assessing the proposal is the exclusive competence of an appointed evaluation committee. Such committee can under no circumstances perform its duties prior to the submission of proposals. Our reply to your questions has to be considered as a clarification of the published call for proposals document and under no circumstances as an assessment of parts of a proposal.</p> <p>Hence, it is not possible for us to judge on the eligibility of a specific candidate partner. It is up to the applicant the onus to demonstrate that each partner, as well as the whole consortium, fulfils the compulsory requirements of the present call (see section 5.1 of the call text).</p>
<u>Question 5</u>	<p>In relation to the applicants definition (5.1), it is mentioned that a no-profit organization can apply as lead applicant (or co-applicant); is it necessary for the non-profit organization to have been in existence more than 1-2 months prior to the application being made? If so how long prior is necessary?</p> <p>The same question is about the SMEs: can a small enterprise just created participate to the call as co-applicants (being the other applicant more consolidated)?</p>
<u>Answer 5</u>	There are no other conditions as specified in point 5.1 of the call text " <i>Corporate bodies must be properly constituted and registered under the law. If a body or organisation is not constituted under the law, a physical person must be designated to provide the legal responsibility</i> ".

<u>Question 6</u>	<p>We would like to ask you the meaning of the sentence of the call:</p> <p><i>"Applicants must have stable and sufficient sources of funding to maintain their activity throughout the period during which the action is being carried out or the year for which the grant is awarded and to participate in its funding. The applicants' financial capacity will be assessed on the basis of the following supporting documents to be submitted with the application: For grants < EUR 60 000:</i></p> <ul style="list-style-type: none"> • <i>a declaration on honour"</i> <p>Does the limit of 60.000 be interpreted for each applicant or for the sum of the grants foreseen by the call?</p>
<u>Answer 6</u>	<p>As specified in point 7.1 of the call text, the amount of EUR 60.000 refers to the total amount requested by all applicants taken together. Therefore, for this call, all the members of the consortium should submit a declaration on honour and the form B/5.</p>
<u>Question 7</u>	<p>With regard to the call for proposal "Transnational cultural tourism products and Tourism and accessibility for all", can an organization be partner in more than one consortium applying for the same theme?</p>
<u>Answer 7</u>	<p>It is possible to participate as a partner in more than one project (by theme) under this call.</p> <p>However, you can only apply for one project (by theme) as a "lead organisation".</p> <p>Please note that in no circumstances shall the same cost be financed twice by the Union budget.</p>
<u>Question 8</u>	<p>I am writing to you with several questions regarding Project proposal preparation: THEME A - CULTURAL TOURISM.</p> <p>Particular questions are:</p> <ol style="list-style-type: none"> 1. What is the clear description of "consortium"? What steps we should take to form a consortium, in legally correct form? What concrete legal documents to provide: contract between all members of consortium, electronic A forms, letter of intentions, declaration of honours, etc? 2. Could a partner be a member without financial input into the project? 3. Could you explain the difference between the partnership and the consortium in this project context? 4. Does SMEs have to fill all forms like project partner? 5. How minimum partners there should be in the consortium : 5 or 5 +3? And if those (1public, 2 SMEs) must be included into the consortium or it is additional members?
<u>Answer 8</u>	<ol style="list-style-type: none"> 1. In the call terminology, a consortium should be considered as a group of legal entities. The registration of a consortium is not mandatory. All members of the consortium must satisfy the same eligibility criteria, fill in the same forms and submit the same supporting documents. 2. As specified in the point 5.1 of the call text, members of consortium must have duly filled in forms "A" (Electronic submission platform) and have tasks clearly defined in the technical proposal and the budgetary annex). Therefore a partner without financial input into a project will not be considered as concurring to the eligibility criteria. 3. There is no difference. 4. All members of the consortium including SME must satisfy the same eligibility criteria, fill in the same forms and submit the same supporting documents. 5. As specified in points 5.1.e and 5.1.f: For Theme A, the consortium must be composed of "... a minimum of five (5) different

	<p>legal entities (having their legal seats in at least 5 different countries...)....". One (1) public authority and two (2) SMEs must be included in this group of minimum 5 legal entities.</p> <p>For Theme B, the consortium must be composed ".. of a minimum of three (3) legal entities...". One (1) public authority, one (1) tourism training provider (university, school, vocational training providers) and one (1) business federation/and or Chambers of commerce, industry and crafts or similar bodies and their umbrella associations must be included in this group of minimum 3 legal entities</p>																
<u>Question 9</u>	<p>In section 4.2.1. of the text "Eligible direct costs" I read the following: [...] "SME owners and other natural persons who do not receive a salary may declare eligible personnel costs for the work carried out under an action or work programme, on the basis of unit costs specific to the programme under which the call is launched. [...]"</p> <p>Here are my questions:</p> <p>A) 1575 standard number of productive hours is intended yearly?</p> <p>B) Hourly rate calculation tool: http://cordis.europa.eu/fp7/find-doc_en.html; it is a broken link;</p> <p>C) where can I find the appropriate Hourly rate calculation tool ?</p>																
<u>Answer 9</u>	<p>In the context of this call, no cost can be budgeted for SME owners or other persons who do not receive a salary.</p> <p>Indeed, as specified in this paragraph of the call text, the use of unit costs should be included in the programme or in a Commission decision which is not the case in the frame of preparatory actions.</p>																
<u>Question 10</u>	<p>1. Can a freelance (self-employed) apply as co-applicant if the lead applicant is a legal and recognised organisation?</p> <p>2. Can a recently created SME or cultural association can participate as co-applicant?</p>																
<u>Answer 10</u>	<p>1. No, he/she cannot. As specified in point 5.1 of the call text, the applicant and its partners must be legal entities.</p> <p>2. Please refer to answer 5.</p> <p>In addition, we would like to clarify that entities are qualified as micro, small and medium-sized enterprises (SMEs) if they fulfil the criteria laid down in the Commission Recommendation of 3 April 1996 concerning the definition of small and medium-sized enterprises (Text with EEA relevance) (96/280/EC) which are summarized in the table below. In addition to the staff headcount ceiling, an enterprise qualifies as an SME if it meets either the turnover ceiling or the balance sheet ceiling, but not necessarily both.</p> <table><tr><td>Enterprise category</td><td>Headcount</td><td>Turnover</td><td>Balance sheet total</td></tr><tr><td>medium-sized</td><td>< 250</td><td>€ 50 million</td><td>€ 43 million</td></tr><tr><td>small</td><td>< 50</td><td>€ 10 million</td><td>€ 10 million</td></tr><tr><td>micro</td><td>< 10</td><td>€ 2 million</td><td>€ 2 million</td></tr></table>	Enterprise category	Headcount	Turnover	Balance sheet total	medium-sized	< 250	€ 50 million	€ 43 million	small	< 50	€ 10 million	€ 10 million	micro	< 10	€ 2 million	€ 2 million
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<u>Question 11</u>	<p><u>THEME 2: Fostering accessible tourism entrepreneurship and management.</u></p> <p>Referring to document "Call of Proposal", section 2.2. financed action it is said that "The present call focuses on the "product development " and "product implementation" of capacity building schemes. Promotion of the scheme is also considered as part of the "implementation". While in further parts (eligible costs) it's written that categories of costs that can be considered as eligible are such as: the costs of personnel working, salary costs of the personnel, costs of travel and related subsistence allowance and so on.</p> <p>I would appreciate some information about eligible costs. Can we apply for tourism investment projects that include construction costs, strategic documents and analysis and marketing campaign - advertisement, promotional materials, activity of advertising agency etc.?</p>
<u>Answer 11</u>	<p>On page 9 of the Call Text, there is a paragraph that clarifies what are the possible financed actions and it states that:</p> <p>Applicants are free to design, implement and promote the capacity building scheme as they see fit, bearing in mind that the purpose of the scheme is to enable tourism managers, national and local tourism organizations, other public authorities with conceptual and practical tools that will allow them to develop policy, strategy, marketing and product plans for accessible tourism. The capacity schemes should have therefore a strong practical approach, such as: analysis of real-case scenarios, participation of leading figures and successful entrepreneurs, guidance and support tools, including ICT tools , etc...</p> <p>The capacity building scheme should also aim at building new relationships and networks for participating entrepreneurs and policy makers. The proposal should therefore clearly explain how "active networking" will be implemented and evaluated. [.....].</p> <p>In designing their proposal, the applicants have to bear in mind also the objectives of the call, the expected results as well as the characteristics listed on page 10. It is up to the applicant to make the proposal and to demonstrate why they have made a certain choice and how the proposal will help achieving the objectives.</p>
<u>Question 12</u>	<p>Es posible encontrar TODA la convocatoria en castellano?</p>
<u>Answer 12</u>	<p>Los documentos de la licitación están disponibles sólo en inglés por el momento y es imposible en esta etapa proporcionar traducciones sin retrasar todo el procedimiento.</p> <p>Sin embargo, como se indica en la convocatoria de texto (sección 5.2):</p> <p>Las solicitudes deberán redactarse en uno de los idiomas oficiales de la UE. Si su propuesta no está en inglés, una traducción completa de dicha propuesta ayudaría a los evaluadores. Se puede incluir en dicha propuesta un resumen traducido al inglés (véase la Guía para los Solicitantes).</p> <p>-----</p> <p>The call documents are only available in English for the moment and it is impossible at this stage to provide translations without delaying the entire procedure.</p> <p>However, as indicated in the text call (section 5.2) :</p> <p>Applications must be drafted in one of the EU official Languages. If your proposal is not in English, a translation of the full proposal would be of assistance to the evaluators. An English translation of an abstract may be included in the proposal (see Guide for Applicants).</p>

<u>Question 13</u>	<ol style="list-style-type: none"> 1. What are the rules how to count Project's Manager, Project's Administrator salary? Is there common acknowledged (hourly, daily) rate for all EU member states? Whats is the document regulating that? 2. Could you please, specify is this call is considered as structural, technical or EU support? 3. If our total Project budget will be more than 250 000 eur+ 25% our input, can we put more than 25%, for example 30 % ? Will this affect the amount of grant coming from the EU?
<u>Answer 13</u>	<ol style="list-style-type: none"> 1. The hourly rate must be calculated as specified in point VII.8 of the Guide to Applicants based on the <u>current yearly gross salary</u> of the employees involved in the project. See also sheet B.1.1.b "Working hours" in the "Budgetary form template" & Article II.19.2 of the draft agreement. 2. The call is considered as an EU support (grant for an action). 3. As mentioned in point 4 of the call text, the maximum EU financing rate is 75% of the total eligible costs, with a maximum of EUR 250.000 (Theme A) and EUR 180.000 (Theme B). This means that if the total eligible cost exceeds EUR 333.333 (Theme A) and EUR 240.000 (Theme B), the percentage of EU co-financing will decrease and the percentage of the applicants will increase. <p><u>Example 1 – Theme A</u> Estimated total eligible cost = EUR 200.000 Maximum EU contribution = EUR 200.000 x 75% = EUR 150.000</p> <p><u>Example 2 – Theme A</u> Estimated total eligible cost = EUR 400.000 Maximum EU contribution = EUR 250.000 because EUR 400.000 x 75% = EUR 300.000 exceeds the maximum contribution for this theme.</p> <p>Therefore the percentage to be applied to the total eligible cost is 62,5%. In this case, the co-financing of the applicants is 37,5%.</p> <p>Please pay attention that this percentage of 62,5% will be used to calculate the final EU contribution at the end of the project even if the actual total eligible cost could be lower than EUR 400.000.</p> <p><u>Example 2 a) - Theme A</u> The final & actual eligible cost of the project amounts to EUR 333.333.</p> <p>The EU contribution will be EUR 333.333 x 62,5% = EUR 208.333.</p>

Question 14	<p>A higher education institute wishes to put forward a project proposal under each theme in this call as lead partner (i.e. One department in the organisation would be lead partner for a project in Theme A and another department would be lead partner for a project in Theme B). Can you clarify if this is allowed?</p> <p>I know you have answered a similar question already (no. 7 in the Q&A document) but the wording did not really state clearly whether this is allowed.</p>
Answer 14	Usually departments cannot be considered as separate legal entities. The institute is the legal entity. Therefore, the answer n°4 applies
Question 15	<p>We have five-members consortium located in five different countries. In the call for proposals on page 28 is mentioned that each organisation should attach letter of support. Please give us information whether this letter is mandatory and is an eligibility condition. Could we obtain this letter at regional level and what kind of information it should include?</p>
Answer 15	<p>The letter of support is mandatory and is an eligibility criterion. This letter should express the formal support to the general project idea from one EU Member State national governmental authority - namely a Ministry - in charge of tourism (depending on the political organization of each Member State, this governmental authority usually is at national/federal or federate/regional level).</p> <p>In case the public authority participating in the consortium is a local or regional authority and has, according to the legislation of the relevant Member State, primary competence on tourism matters (i.e. tourism matters have been entirely devolved to such local or regional authorities), this letter is not necessary. We would appreciate however receiving supporting documents explaining such circumstances.</p>
Question 16	Can a medium-size enterprise (meaning headcount, turnover and balance sheet total) be a project partner or even lead organization if more than 25% of shares is owned by the city – public authority?
Answer 16	<p>Please note that the Commission services cannot, for reasons of equal treatment, neither assess proposals at this stage nor help to draft proposals. Assessing the proposal is the exclusive competence of an appointed evaluation committee. Such committee can under no circumstances perform its duties prior to the submission of proposals. Our reply to your questions has to be considered as a clarification of the published call for proposals document and under no circumstances as an assessment of parts of a proposal.</p> <p>The call for proposal provides a short definition of an SME “SME is defined as a company engaged in economic activities having less than 250 employees, with a turnover of less than € 50 million or a balance sheet total of less than € 43 million” and refers for more details to Europa (http://ec.europa.eu/enterprise/policies/sme/facts-figures-analysis/sme-definition/index_en.htm).</p> <p>The Commission recommendation underpinning the SME definition http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2003:124:0036:0041:EN:PDF says:</p> <p><i>“It should also be made clear that, [...] , an enterprise should be considered to be any entity, regardless of its legal form, engaged in economic activities, including in particular entities engaged in a craft activity and other activities on an individual or family basis, partnerships or associations regularly engaged in economic activities.”</i></p> <p>but adds that</p> <p><i>“In order to avoid arbitrary distinctions between different public bodies of a Member State, and given the need for legal certainty, it is considered necessary to confirm that an enterprise with 25 % or more of its capital or voting rights controlled by a public body is not an SME.”</i></p>

	You said that 25% of the capital of the SME asking the question is in 'public' hands. The company can therefore join a consortium but it will not count as an SME as far as the eligibility criteria is concerned.
Question 17	<ol style="list-style-type: none"> 1. All the participants should fill in the B1/B2 forms (ANNEX 1) but only the Coordinator should upload it (the consolidated data) in a PDF format. Is that correct? 2. What do you mean by "Annex 8 (B9 - Any other document needed for better evidencing Annex 1, Annex 6 or Annex7)"? Could you please define which these documents are? 3. There is no available template for Annex 7 (B8 - Professional references and details of past similar projects). We could use another template from past proposals where declaring our experience in similar projects? 4. The requested funding of our proposal is above the limit of €60.000 in a Consortium consisting of at least 6 partners. Taking into account that 2 of them are Public Bodies, should they also submit the B5 form? 5. Finally, can third country parties, such as Switzerland, participate in the Proposal without requesting any EC funding? If yes, which forms should they fill in.
Answer 17	<ol style="list-style-type: none"> 1. Yes, it is. 2. This annex should be used for further requirements and evidence to be provided: letter of support from the Ministry, letter of intent from Partners, evidence related to the legal status of Partners if not uploaded in another section, etc. 3. Yes, of course. 4. As specified in point IV.2 of the Guide for Applicants, Public bodies and international organisations are not requested to submit any proof in relation to their financial capacity. They do not have to submit a form B5. 5. The participation of partners from other countries (including candidate countries) as "silent" partner is allowed but will not be considered as concurring to the eligible costs, nor as concurring to satisfy the minimum consortium requirements stated in point 5. A letter of intent of this partner to participate should be sufficient.
Question 18	Most of the forms (Annexes) to be uploaded in the electronic submission platform are mandatory. What can we do if we don't need to use one or several of them? (<i>ex. Form B3 Co-financing statement from a third party</i>)
Answer 18	You have to upload a page with the mention "NOT APPLICABLE".
Question 19	Situation: the coordinator of Project is a public authority (not VAT payer) and when purchasing goods or services is unable to recover VAT. Therefore, we would like to know whether VAT sums paid (by this public authority, non VAT payer) for the project activities will be recognized as eligible costs under this Call provisions?
Answer 19	<p>VAT paid by public authority is not eligible. Please refer to article 10 of the draft grant agreement.</p> <p><u>ARTICLE I.10 - INELIGIBILITY OF VALUE ADDED TAX</u></p> <p>By way of derogation from Article II.19.2(h), amounts of value added tax (VAT) paid are not eligible under the Agreement for the following activities:</p> <ul style="list-style-type: none"> • taxed activities or exempt activities with right of deduction. For those activities, VAT is deductible, hence ineligible; • activities engaged in as a public authority by the beneficiary where it is a State, regional or local government authority or another body governed by public law.