



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL  
REGIONAL AND URBAN POLICY  
Communication Unit

## **CALL FOR PROPOSALS**

2020CE16BAT099

***'Support for information measures relating to the EU Cohesion policy'***

## **Questions & Answers (Q&As)**

17/12/2020

You will find below a list of questions received for this call for proposals. Please note that the present document aims to complement and clarify the call for proposals and does not replace it. A Q&As document will be periodically published; applicants are invited to check this website regularly.

**Q1.** Referring to the “Eligible applicants” (public authorities (national, regional and local), with the exception of the authorities in charge of the implementation of Cohesion policy in accordance with Art 123. of Regulation (EU) No 1303/2013 of the European Parliament and of the Council of 17 December 2013), are Departments of Regions “not in charge of the implementation of Cohesion policy” (eg. Regional Health Departments) eligible?

**A1.** Please see Answers 1 and 3 of [Q&A 5](#) and answer 4 of [Q&A 4](#).

If the public authority applying to this call is an authority in charge of the implementation of Cohesion policy in accordance with Art 123. of Regulation (EU) No 1303/2013 of the European Parliament and of the Council of 17 December 2013, it is not eligible. This also applies if only one department of this public authority is in charge of the implementation of Cohesion policy in accordance with Art 123. of Regulation (EU) No 1303/2013 of the European Parliament and of the Council of 17 December 2013 as the whole public authority is considered as not eligible.

**Q2.** Regarding section 6.2 of the Call for proposals: **C. Measures required by law or under the specific public service contracts (in the case of publicly owned entities) are not eligible.”**

Does this mean that an applicant, which one of its activities “by law” is to inform about EU funds to local authorities, could not consider its activities eligible under this call? Even if they are innovative/new activities? Also, could you clarify “specific public service contracts in the case of publicly owned entities”?

**A2.** Section 6.2 of the call for proposals relates to eligible activities. If a proposal made by an applicant to this call for proposals includes activities which are measures required by law or under specific public procurement contracts (in the case of publicly owned entities), those activities are not eligible. This does not mean that other type of activities (which are then not required by law or under the specific public service contracts in the case of publicly owned entities) from this same applicant and for this call for proposals are automatically ineligible. For more information, please see also section 6.1 on eligible applicants.

**Q3.** Regarding the monobeneficiary Budget template :

- The template indicates to “insert categories based in section 11.2.1. of the call for proposals. However eligible costs do not always correspond to a category of expenditure. Are we allowed to create our own categories, i.e. Communication or to specify the expenditure by each of the activity/product as subcategories?
- Also, one of the eligible expenditures is VAT. Do we have to create a sole category for VAT? Or can we include VAT in each of the expenditures since we cannot recover VAT?

- Do we have to separate the costs related to the main applicant and those related to an affiliated entity?
- Indirect costs (overheads), what should we do if we refuse to receive indirect costs? Should we “remove” the automatic calculation in the excel sheet?

**A3.** For both monobeneficiary and multibeneficiary budget template:

- Applicants are allowed to create their own categories provided that the costs are eligible. For details on eligibility of costs, please refer to section 11.2 of the Call for proposals.
- As mentioned under section 11.3 of the call, VAT<sup>1</sup> will be ineligible when the activities to be supported through the grant are taxed activities/exempt activities with right of deduction or activities engaged in by bodies governed by public law acting as a public authority of a Member State (i.e. activities resulting from the exercise of sovereign powers or prerogatives exercised by Member States under the special legal regime applicable to them in line with Article 13(1) of Council Directive 2006/112/EC<sup>2</sup>: e.g. police, justice, definition and enforcement of public policies, etc.).

Non deductible VAT must be included in each cost of expenditure.

- Affiliated entities should be identified in the budget annex and the costs related to an affiliated entity should be detailed in the costs of the entity with which it has this relationship.

This can be done, for example, by separating the costs related to an applicant and those related to its affiliated entity in the budget of this applicant.

- Indirect costs are general administrative costs – overhead costs incurred in connection with the eligible direct costs. They are limited to a flat-rate of 7% of the total eligible direct costs. These can include maintenance, stationery, photocopying, mailing postage, telephone, internet and fax costs, heating, electricity or other forms of energy, water, office furniture, insurance and any other expenditure necessary for the successful completion of the information measure.

If the accepted budget includes a provision for flat-rate funding in respect of indirect costs, such costs do not need to be supported by accounting documents.

Indirect costs are not eligible for an information measure where the beneficiary already receives an operating grant from the EU budget during the period in question.

Applicants may refuse reimbursement of indirect costs. In that case, they can delete the formula in the Excel table. Applicants’ attention is drawn to the fact

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<sup>1</sup> Article 186 (4) (c) of the Financial Regulation

<sup>2</sup> OJ L 347, 11.12.2006, p.1

that if they refuse reimbursement of indirect costs in their application, they will not be able to ask for it at a later stage, including during implementation of the action in case their project is selected.

**Q4.** I need some clarification about point 6.1. of "Support for information measures relating to the EU Cohesion policy".

*It says "Applicants who participated in the calls launched by the European Commission in 2017, 2018 and 2019 (Call for proposals 2017CE16BAT063, 2018CE16BAT042, and 2019CE16BAT117 respectively, for "Support for information measures relating to the EU Cohesion policy") are eligible notwithstanding the outcome of their previous applications."*

The participation to "Support for information measures relating to the EU Cohesion policy" is mandatory or our company can participate without having previously applied?

**A4.** All eligible applicants may participate to the call even if they have not participated in our previous calls for proposals. This means that it is not necessary that an applicant has already participated in previous editions of this Call for proposals.

**Q5.** According to the paragraph 6.1 of the Call for proposal (Eligible applicants) private entities can submit an application. We are interested in preparing our proposal but we're not sure if our legal form will be accepted in this call. We are a company from Poland and as far as we know our legal form doesn't exist outside Poland. The form is called 'spółka cywilna' (civil law company) and it's based on a type of contract known to Polish civil law. Therefore, civil law company does not constitute an independent legal entity. It acts as a partnership of partners who are entrepreneurs and act jointly on the basis of a civil partnership agreement. However, company has it's own tax identification number (NIP), REGON number (Register of National Economy Entities) and is an active, registered VAT payer. Thus is our enterprise form acceptable in this call?

**A5.** As indicated under footnote 11 of the call for proposals, the list of eligible applicants is not exhaustive. This means that the legal form to which you refer to could be considered eligible. Please note that the only entities that are not eligible for this call for proposals are the authorities in charge of the implementation of Cohesion policy in accordance with Art 123. of Regulation (EU) No 1303/2013 of the European Parliament and of the Council of 17 December 2013.