



EUROPEAN UNION

Delegation of the European Commission
to Montenegro

CONTRACTING AUTHORITY'S CLARIFICATIONS

Request for clarifications no 1

Open Call: **Cross-border Programme Croatia-Montenegro, 2007-2008**

Reference: **EuropeAid/128959/L/ACT/MULTI**

Q1: We would like to know whether it is possible to finance expenses of a consultant for project preparation and writing, as well as the costs associated to holding meetings with partners, out of the project budget.

A1: Please see for reference section 2.1.4 of the Guidelines for Applicants (GfA) “Eligibility of costs”, sub-section “Eligible direct costs”, where the first paragraph and first bullet point reads:

“Eligible costs are costs actually incurred by the beneficiary of this grant which meet all the following criteria:

- *they are incurred during the implementation of the action as specified in Article 2 of the Special Conditions with the exception of costs relating to final reports, expenditure verification and evaluation of the action, whatever the time of actual disbursement by the Beneficiary and/or its partners...”*

The costs you are referring to in the question would have been incurred prior to the implementation of the action and would therefore not be eligible.

Q2: Smaller NGOs have problems in providing funds for the implementation of the action. Is it possible within this Programme to ask for funds for pre-financing, as it is in the frame of the Adriatic Programme? Are there some funds allocated by the Government of Montenegro for such activities?

A2: Please read for reference section 1.3 of the GfA “Financial allocation provided by the Contracting Authority”, sub-section “Payment of the action”, which provides for options and modalities of payment and pre-financing. You will note that depending on the size of the grants and duration of the action, pre-financing payments varies but they are in all cases foreseen.

As for the second part of the question, there are no funds foreseen within the budget of the Government of Montenegro for co-financing, as it is the case with the

Adriatic Programme. There might be however some municipalities which decided to provide funds to support projects implemented in their territories and for the benefit of their municipal population, as there is as well a possibility to find donors other than the European Community.

Q3: What will happen if someone is not satisfied with a given answer to a question posed during the period of the Call, and if there is no time to ask for further clarification?

A3: Please see section 2.2.4 of the GfA *“Further information for the applicant”* where it is stated:

“Questions may in addition be sent by e-mail or by fax only in English language no later than 21 days before the deadline for the submission of applications...”

“The Contracting Authorities have no obligation to provide further clarifications after this date.”

“Replies will be given no later than 11 days before the deadline for the submission of applications.”

Given the above provisions, applicants are encouraged to ask questions as soon as they have some, allowing the Contracting Authority to provide answers as soon as possible, leaving time for themselves to ask further clarification before the above deadlines, if need be.

Q4: Why are deadlines for answering questions so short, there used to be longer period for questions in other EU Programmes?

A4: This Call for Proposals is published, in many aspects, according to procedures set out in the *“Practical Guide to Contract Procedures for EC external actions”*, (PRAG), (http://ec.europa.eu/europeaid/work/procedures/implementation/practical_guide/index_en.htm), whereby the PRAG provides for the following:

“6.4.4. Additional information before the deadline for submission of proposals during the time between publication and the deadline for the submission of proposals, and in addition to the eventual information session mentioned in point 6.4.1, applicants should be able to ask questions to help them fill in the form and put together their applications. The Contracting Authority should therefore provide a contact point to which questions may be addressed. Applicants may submit questions in writing up to 21 days before the deadline for the submission of proposals. The Contracting Authority must reply to all such questions at least 11 days before the deadline for submission of proposals.

In the interests of transparency and equal opportunity, the answer provided to one applicant on points which may be of interest to the other applicants should be made available to all the others. The way to achieve this is to publish on the Internet a table of questions and answers provided. This must be updated regularly until 11 days before the deadline for submission of proposals.”

Please note that all Calls for Proposals (except those which are intended for the EU Member States) are obliged to follow these PRAG provisions, and will therefore have the same time limits as this one.

Q5: Is it possible to submit the project proposal in the Antenna in Dubrovnik?

A5: Please see section 2.2.2 of the GfA “Where and how to send the Application”, which contains the following provisions:

“Applications must be submitted in a sealed envelope by registered mail, private courier service or by hand-delivery (a signed and dated certificate of receipt will be given to the deliverer) at the address below:

*Joint Technical Secretariat
Cross-border programme Croatia-Montenegro
Škaljari bb
85330 Kotor
Montenegro*

Applications sent by any other means (e.g. by fax or by e-mail) or delivered to other addresses will be rejected.”

Q6: How long can our project last?

A6: Please see section 2.1.3 of the GfA “Eligible actions: actions for which an application may be made”, “Duration”, which reads:

“The planned duration of an action may not be shorter than 6 months nor may it exceed 24 months.”

Q7: What will happen with the last payment from the Contracting Authority if the final financial report is not approved?

A7: All of the provisions answering your question are laid down in the standard “Annex II - General Conditions applicable to European Community-financed grant contracts for external actions”, and specifically in articles 2 - Obligation to Provide Information and Financial and Narrative Reports; 12 - Termination of the Contract; 15 - Payment and Interest on Late Payment; and 17 - Final Amount of Financing by the Contracting Authority. The above mentioned document was published together with the Guidelines for Applicants, as part of the “Documents for information”.

Q8: Do both applicants have to provide the same amount of min. 15% co financing of the project, or one can provide less and other more?

A8: Please see section 1.3 of the GfA “Financial allocation provided by the Contracting Authority”, sub-section “Size of Grants”, which reads:

“Any grant awarded under this programme must fall between the following minimum and maximum amounts as shown below. Each action will consist of two grants: one awarded in Croatia and one in Montenegro.”

Furthermore, “*co-financing rules*” under the same article provide the following:
“*The grant requested by an applicant may not be for less than 50% of the total eligible costs included in the applicant’s budget. In addition, no grant may exceed 85% of the total eligible costs included in the applicant’s budget (see also section 2.1.4). The balance must be financed from the applicant’s or partners’ own resources, or from sources other than the European Community budget.*”

In other words, co-financing should be provided by both partners, as it is per grant (i.e. per contract). Each should contribute minimum 15% and maximum 50% of the grant budget submitted to the relevant Contracting Authority. One partner can contribute less, and other more, but each and always within the given minimum and maximum limits mentioned above.

Q9: Does the applicant have to be registered in PADOR?

A9: Please see section 2.2 of the GfA “*How to apply and the procedure to follow*” where you can find:

“*Please note that prior registration in PADOR for applicants and their partners for this CfP is not obligatory. However the applicants and their partners can register their organisation data, and upload supporting documents in PADOR.*”

Q10: We are registered in Podgorica but we implement our activities on the entire territory of Montenegro. Are we eligible for the Programme?

A10: Please see section 2.1.1 of the GfA “*Eligibility of applicants: who may apply?*” with the specific reference to the following provision:

“*In order to be eligible for a grant, applicants must be established in Croatia, Montenegro, a Member State of the European Union, other IPA beneficiary country, a country that is a beneficiary of the European Neighbourhood and Partnership Instrument, or a Member State of the European Economic Area, and...*”.

In view of this provision, please be aware that there is no geographical restriction for the eligible nationality of an applicant.

Furthermore, partners “*must therefore satisfy the same eligibility criteria as applicants*” (see section 2.1.2 *Partnership and eligibility of partners*).

Finally, please note that the action “*must take place in the programme area of Croatia and/or Montenegro*” (see section 2.1.3 *Eligible actions: actions for which an application may be made*).

Q11: One of the procedures state that the salaries of the employees in the organizations / institutions paid by the State budget could not be financed from the Project. Does it mean that those people will work for free in the Project?

A11: Please refer to section 2.1.4 of the GfA “*Eligibility of costs: costs which may be taken in consideration for the grant*” where the following provision is laid down:

“Civil servants or other public employees of central or local administrations which participate under this call for proposals may not receive fees for their contribution to the action other than their salaries in the respective institution. The salaries of the civil servants or other public employees of the central and local administrations may be presented as co-financing contribution of the applicant.”

In other words, civil servants and other public employees of central, regional or local administrations are not expected “to work for free” on the project, but they cannot receive any fees in addition to the salary they are entitled with their employer.

Q12: Why are there two Contracting authorities?

A12: EU funding for the Cross-border Cooperation Programme Croatia-Montenegro is allocated per country and each Contracting Authority can only commit (sign contracts) for the funds it is responsible of, those of its respective country. This is a procedural limitation, but has no impact on the effectiveness of the implementation of the Programme as both Contracting Authorities are collaborating closely on all matters, ensuring smooth implementation.

Q13: Public institutions usually cannot afford to engage their employees to work only on one project, but they should at the same time perform their everyday tasks. In this case, they are engaged in two assignments and receive only their normal salary. What is the solution for such cases?

A13: The top management in public institutions should be aware of the restriction this call entails as per question and answer no. 11 above and in consequence this top management should make certain decisions in order to reallocate tasks of their staff in accordance with their engagement in the implementation of projects. We will make recourse to an example for clarification purposes: we assume that the employees in question perform 8 working hours per day and work on project one (at present) 25% of their time, will work on project two (grant in question) other 25% and on day to day duties for their employer the remaining 50% of their time. In such case where their involvement in the project submitted under call is expected to be 25% of their working time, what is eligible for financing under the grant is 25% of their gross monthly salary.

In addition, the budget table will have as a unit rate their gross monthly salary, but the number of units in a yearly budget will correspond to their actual involvement (25% of 12 months), which is 4 months.

Q14: How should one organization/ institution prove that is capable to co-finance 15-50% of the project?

A14: This is somehow tested in the assessment of the selection criteria according to the evaluation grid (see section 2.3 of the GfA “*Evaluation and Selection of Applications*”), specifically when assessing the stability and sufficiency of the applicants’ sources of funding. The assessment will take into account the financial data provided by the applicants in the Part II of the Application Form (AF) in

terms of their turnover, revenue, capital, variety of previous and current sources of funding, etc., and against the amount of expected co-financing for the particular application in question.

Please note also that the share of co-financing from the applicants' or partners' own resources, or from sources other than the European Community budget, must be established in advance and it should be explicitly stated in the Application Form – indicating both the total project value and the amount requested from the EU.

Please mind as well that a grant beneficiary is not obliged to have the respective amount of co-financing on its account by the start of the project implementation.

Once the activities are carried out and the project finalized, the grant beneficiary will provide the Contracting Authority with a Final Financial Report recording all incurred costs. In principle, the grant beneficiary shall be able to provide evidence that all eligible costs are, at that date, paid and accounted for or prove that the expenditure was committed (in the latter case, however, the beneficiary must be able to prove that the corresponding costs will ultimately be met).

When proper verification of the financial statements are completed, the Contracting Authority will pay the balance between the sum of all advance payments and the contracted proportion of community contribution (maximum 85%) of the final amount of eligible costs. This procedure obviously implies that the grant beneficiary may have already covered the rest of the eligible costs.

Q15: Are customs costs eligible for co financing?

A15: Please see section 2.1.4 of the GfA *“Eligibility of costs: which costs may be taken in consideration for the grant”*, sub-section *“Ineligible costs”*, where it is quoted:

“Customs and import duties, or any other charges” are not eligible costs.

Q16: We plan to apply with a partner from Croatia who is registered in the adjacent area. Do we have to find a partner from the eligible area?

A16: Please see section 2.1.1 of the GfA *“Eligibility of applicants: who may apply”* which reads:

“In order to be eligible for a grant, applicants must be established in Croatia, Montenegro, a Member State of the European Union, other IPA beneficiary country, a country that is a beneficiary of the European Neighbourhood and Partnership Instrument, or a Member State of the European Economic Area, and...”

Furthermore, under the section 2.1.2 of the GfA *“Partnership and eligibility of partners”*, you may also read:

“If the applicant for funds from the Croatian Contracting Authority is not originating from Croatia, he must have at least one partner originating from Croatia. If the applicant for funds from the Montenegrin Contracting Authority is not originating from Montenegro, he must have at least one partner originating from Montenegro.”

Please refer also for more details to the question and answer 10 above.

Q17: Why an organization / institution should be non-profit making when at the same time it should have stable financing sources?

A17: The Operational Programme upon which this call is based was agreed by the relevant authorities of the Participating Countries (HR & MNE) and approved by the European Commission by the end of 2007. The Authorities of the two countries determined and agreed upon the type of organisations/institutions that could apply per measure under the programme. Besides, the EC standard rules for grants (see section 2.1.3 of the GfA “Eligible actions”) stipulate that actions related to profit making activities are ineligible.

Please note also that as for the stable financial sources, being a profit making organization does not guarantee that stability either.

Q18: Could the project finance preparatory activities performed before signing of the Contract?

A18: Please see the answer under the question number one above.

Q19: Usually, according to the practice, the general aim of a project is related to the programme aim. Is it accepted in this Programme that a general aim is connected to the Programme measures? Should we have one or two project purposes, and the same number of project results?

A19: Applicants and partners are free to judge whether the overall objective of their project could fit the way in which the relevant measure for which they will submit an application under the call is formulated. Applicants and partners are advised to submit an application containing one single project purpose or specific objective. In very complex operations, two project purposes could however be technically justified.

Q20: Should we erase the questions on the cells of the Logframe Matrix (LFM) table?

A20: Questions and instructions on the LFM are there for guiding purposes, you may well want to erase them in the version submitted with the application form and budget.

Q21: Can we add charts, tables, pictures etc. in the Application form? Do we have to provide original documents (Budget, Declaration of partnership etc.)?

A21: Please see section 2.2.1 of the GfA “Application form” which contains all the information on how to fill in the application form, what to supply and what not to. Whenever the applicant deems that the introduction of charts, tables and pictures can improve his argumentation in any of the sections of the description of the action (part B I of the application form), the Contracting Authorities welcome this initiative.

Furthermore, please note that in section 2.2.2 of the GfA *“Where and how to send the application”* it is stated that the *“Applications must be submitted in one original and two (2) copies”*. This requirement relates to each and every declaration which is part of the application form.

Q22: It is required that applicant should prove its experience in implementing and managing projects. But the public institutions usually implement programmes, not projects. How could they prove such experience?

A22: A project is defined as a set of interrelated activities, which has a clearly defined start and end time, and a budget. A project is implemented to achieve an outcome or goal and to address an identified problem. Applicants are requested to provide information about projects defined as above in the AF under Part B “Full Application Form”, section I “Description of the action”, subsection 4 “Experience of similar actions” and in Part II “The Applicant” section 3 “Capacity to manage and implement projects”. These pieces of information will be the base for proving experience in managing and implementing projects.

Q23: Could our partner be a profit-making organization from Italy?

A23: Please see the section 2.1.1 of the GfA *“Eligibility of applicants: who may apply”* where it is stated that:

“In order to be eligible for a grant, applicants must be non profit making legal persons, excluding private educational centres and research institutes, established by public or private law for the purposes of public interest or specific purpose of meeting needs of general interest”

Furthermore, according to section 2.1.2 of the GfA *“Partnership and eligibility of partners”*, *“Applicant’s partners [...] must therefore satisfy the same eligibility criteria as applicants”*.

Q24: Which projects should be presented in the part requiring evidence of project implementation and management experience?

A24: Applicants are requested to provide information under Part B “Full Application Form”, section I “Description of the action”, subsection 4 “Experience of similar actions”. The instructions under the title of the subsection provide guidance on which information to enter:

“Maximum 1 page per action. Please provide a detailed description of actions managed by applicant 1 and applicant 2 over the past five years.

This information will be used to assess whether you have sufficient and stable experience of managing actions in the same sector and of a comparable scale to the one for which a grant is being requested.”

Q25: How will the project sustainability be evaluated?

A25: Applicants will elaborate upon the sustainability of their project under point 3 of the concept note (Part A of the AF) and under point 1.10 of the full application form (Part B I of the AF), preferably using the instructions specified therein. This elaboration will then be scored solely using the criteria specified in the two evaluation grids and their respective parts, which are published in section 2.3 of the GfA.

Q26: If certain equipment is bought within the project, which ownership it will have after the project ends?

A26: The ownership of equipment is regulated by article 7.3 of the General Conditions applicable to European Community-finance grant contracts for external action, which reads:

“Where the Beneficiary does not have its headquarters in the country where the Action is implemented and unless otherwise specified in the Special Conditions, the equipment, vehicles and supplies paid for by the Budget for the Action must be transferred to an local partners of the Beneficiary and/or the final recipients of the Action, at the latest by the end of the implementation of the Action. Copies of the proofs of transfers of equipments and vehicles, the purchase cost of which was more than 5,000 Euros per item, must be attached to the final report. Such proofs must be kept for control in all other cases.”

The same General Conditions do not specify any provision on what to do when the beneficiary has its headquarters in the participating country and therefore the equipment purchased under the project budget remains the property of the applicant unless the latter requests to do otherwise to the relevant Contracting Authority.

Q27: For works such as building water supply systems, a tender procedure should be respected. Should the selected company be noted in the project proposal?

A27: If proper tendering procedure is to be followed, the applicant cannot know nor can it pre-select a company at the stage of project proposal preparation. Therefore this information is not to be provided with the application. For more information please consult “Annex IV Procurement by grant Beneficiaries in the context of European Community external actions”, which is published under “Documents for Information” in this call.

Q28: If there is more than one construction work planed in the project, should there be more than one tender, separate ones for each?

A28: The Contracting Authority is not in a position, with limited information provided, to give an objective opinion on the matter. However, as a rule of sound financial management, wherever appropriate, supply and work tenders should encompass as many items or lots as possible in order to obtain the best price-quality ratio available in the market. Please see general principles under the aforementioned document “Annex IV Procurement by grant Beneficiaries in the context of European Community external actions”.

Q29: Can revenue obtained by project activities be included as co financing?

A29: In terms of sources of funding, direct revenue from the action can be computed as co-financing as reflected in the working sheet “Sources of Funding” within the annex B “Budget” of the Application Package. If there is finally some revenue generated during the project implementation, it is to be deducted from the final cost of the action. The final payment by the Contracting Authority will be calculated based on the new balance amount and the respective percentage agreed in the contract.

Q30: Tourist organizations gain revenue from tourist taxes. Should it be included in the project?

A30: If the revenue is generated from the project activities, then and only then it should be included in the project accounts.

Q31: Do we have to transfer the co financing amount from our accounts to the account opened specially for the project?

Q31: Not necessarily, but it is recommended. Co-financing does not need to be proved at the moment of submitting the application form (for instance, by a contract with another donor), but it should be proved in the final financial report.

Q32: Can a profitable organization (company) apply for a grant within this Programme if the project is related to public benefit (for example, repairing the water (sewerage) system in Buljarica)?

Q32: Please see the answer 23 above.

Q33: If one organization applies for the CB Programme Albania – Montenegro, can it apply also for the CB Programme Croatia – Montenegro?

A33: This call for proposals has no restriction on applicants who may apply or have applied under other CBP where Montenegro was a participating country. For the provisions on the number of applications and number of grants under this call, please refer to section 2.1.3 of the GfA “Eligibility of actions”.

Q34: Can the project be part of another, long term initiative, which will last more than 24 months?

A34: Please refer to the definition of a project under the answer 22 above. A project may theoretically be considered as a phase in a much longer term and wider initiative, but the applicant must well justify the action and prove its internal coherence and autonomy.

Q35: If the applicant is a non-profit organization, how can it provide its co financing?

A35: Co-financing does not have to come from profit. The sources of co-financing can be multiple as indicated in Annex B of the application package “the Budget”, e.g.: contributions from other European Institutions or EU Member States, from other organisations such as foundations, UN bodies, USAID, local, regional or central governments, etc. or revenue from the action.

Q36: Applicants should provide information about their financial working in 2006, 2007 and 2008. But non-profit organizations’ balance sheet should be on 0 at the end of the year. How will we present our financial capability in this situation?

A36: Non-profit organizations should provide their balance sheets as they are. The financial capacity can be evaluated by the turnover, which can be observed through the balance sheets.

Q37: Can we ask the assistance of the JTS or Antenna for finding our cross border partners?

A37: The JTS has developed a database derived from the Partner search forums and other meetings organized within this Programme. This database is uploaded on the Programme website. You may also use the partner search tool developed by CBIB (www.cbib-eu.org).

Q38: Could the local self-government units like “mjesna zajednica” that exists in Montenegro apply for a grant within this Programme?

A38: You will find under section 2.2.4 of the GfA “Further Information for the applicant” the provision the provision by which “*in the interest of equal treatment of applicants, the Contracting Authorities cannot give a prior opinion on the eligibility of an applicant, a partner, an action or specific activities*”. Please refer to section 2.1.1 of the GfA for the rules on the eligibility of applicants.

Q39: What will happen with the project and with the grant if one cross border partner’s financial report is not approved, i.e. if he doesn’t implement its activities as required by the Programme?

A39: Please see the answer number seven above.

Q40: There is a provision that alcoholic beverages cannot be promoted or be a subject of projects within this Programme. But in Montenegro wine is registered as food stuff, not as alcohol. Could in these conditions a project be related to wine?

A40: According to the section 2.1.3 of the GfA “Eligibility of the actions”, actions related to the economic activity under CAEN code 1591 are not eligible. The code 1591 refers to the manufacture of distilled potable alcoholic beverages. By contrast, please note that the CAEN code number for the manufacture of wines is 1593.

Q41: If the applicant has limited experience in project implementation / management, how that will affect the evaluation of his application?

A41: One of the selection criteria in the evaluation grid is the capacity of applicants, including operational and financial capacity. Organizations which deem their experience and capacity as insufficient might consider taking part in the project as partners, and not as applicants. The reason for such decision should not be only securing enough points during the evaluation, but also securing capacity to manage the project.

Q42: Who should carry out the audit and the independent evaluation of the projects?

A42: An audit or expenditure verification is compulsory in line with the provisions of article 15.6 of the General Conditions applicable to European Community-finance grant contracts for external action whenever the EC grant is over € 100,000. There are certified auditing companies in every country which can perform the expenditure verification.

As for the evaluation, please read article 8.2 of the aforementioned General Conditions. The European Commission encourages applicants whose grant amount exceeds € 100,000 to include the costs of an independent evaluation at either mid-term or end of implementation, or at both stages.

Q43: Is it acceptable if the project generates employment and profit?

A43: Yes, it is acceptable that a project can generate employment and eventually profit after its implementation and this can be used during the evaluation for the assessment of its sustainability.

But as a matter of principle, grants may not in any case have the purpose or effect of producing a profit for the beneficiary during the project implementation.

A profit means a surplus of actual receipts over the actual costs of the Action in question when the request is made for payment of the balance, as stipulated in the Article 17.3 of the General Conditions to the Standard Grant Contract (enclosed in the annex F of the Documents for Information).

To ensure that this rule has been observed, when examining the request for final payment, the Contracting Authorities will require a summary statement of all the actual costs and receipts (both eligible and non-eligible) with regards to the implemented Action.

Furthermore the Contracting Authorities will take account of all revenues which, on the date when the request for payment of the balance is submitted, are established (i.e. have been collected and entered in the accounts), generated or confirmed (i.e. have not yet been collected but which have been generated or for which the beneficiary has a commitment or written confirmation).

On the basis of this, the Contracting Authorities will be in a position to identify any surplus or deficit of receipts, in relation to the actual costs of the action:

- where there is a deficit of receipts, the action has not generated a profit and the theoretical Community grant is maintained;**
 - where there is a surplus of receipts, by applying the no-profit rule the Community grant must be revised downwards in order to balance all revenue and expenditure of the action.**
-

Q44: Is the nomination of a functional lead partner subject of agreement between the two lead cross-border partners?

A44: Yes, the two lead partners (indeed, applicants) should agree which one of them will be the functional lead partner and perform the duties foreseen for this body as per section 2.1.2 in the GfA.

Q45: Since our project has to do with education and tourism we belong to measure 1.2. (1.1 is out of question). But our project is only partly connected with tourism since we plan to make only 4-5 programs that have something to do with tourism, other programs have a goal of improving craftsmanship in general. According to this fact we think we belong to measure 1.3., but we have not found our institutions on the list of eligible applicants for this measure (it says educational institutions – we are only partly an educational institution. We would rather apply for measure 1.2, but we are not sure are we eligible for this measure. Please help us with solve this problem as urgently as you can.

A45: Please note that section 2.1.1 of the GfA “*Eligibility of applicants: who may apply*” provides for the following:

“In order to be eligible for a grant, applicants must... belong to one of the following categories...” (listed therein per measure).

Please note that there is a clear difference in eligibility per measure and that applying to the measure where your organisation/institution is not eligible would imply the refusal of your application.

Furthermore, under section 2.1.3 “*Eligible actions: actions for which an application may be made*”, sub-section “*types of action/activity*”, in pages 15, 16 & 17 you will find a long list of activities which displays the following message:

“The following list of possible types of action is indicative only and not exhaustive. Appropriate innovative activities that are not mentioned below may also be considered for support...”

Eventually, your organisation or institution will have to carefully consider, in view of the eligibility criteria per measure and the major bulk of activities foreseen in the project, to which of the measures you are submitting an application. Please mind that it is possible that an application has aspects that would belong to different measures, but you have to make the choice and that choice has to be based on your assessment of to which measure of the programme the core of your activities belong.
