

Contracting authority: Standing Conference of Towns and Municipalities
(SCTM)

Belgrade, 27/10/2025

1st Call for Proposal EU Support to Integrated Territorial Development EU INTEGRA
Reference: GRT-3656/25

CONTRACTING AUTHORITY'S CLARIFICATIONS No. 4

No	Question	Answer
1.	In the guidelines, it is stated that the conceptual design (idejni projekat) must be submitted only in its original form. If the conceptual design is signed electronically, how should we submit it in the original? Is it sufficient to simply print it, or must the printed version in that case also be physically signed and stamped?	It is not necessary for the printed copy to be physically signed and stamped. However, it is the applicant's responsibility to ensure that the printed version fully corresponds to the original electronic document. The contracting authority shall bear no responsibility in case of any inconsistency between the electronic and the printed version.
2.	Is it sufficient to enclose a Certificate (Uverenje) stating that it is not necessary to initiate an Environmental Impact Assessment Study? The justification for this is that the subject building, for which reconstruction is planned, is not included in the List of projects for which an Environmental Impact Assessment Study is mandatory (List I), nor in the List of projects for which such an assessment may be required (List II) ("Official Gazette of the Republic of Serbia", No. 114/2008). Furthermore, it does not represent a project that could	According to the Guidelines for Grant Applicants (Section 2.2.1. – Application form) 11. "Environment Impact Assessment Study (Studija o proceni uticaja na životnu sredine) or Decision that Environment Impact Assessment Study is not required (Rešenje da nije potrebna izrada Studije o proceni uticaja na životnu sredine) issued by relevant institutions, in accordance with the Law on Environment Impact

	be considered a significant pollutant of the environment.	Assessment (Zakon o zaštiti životne sredine);” We will accept any document issued by relevant institutions, providing that it is a proof that the initiation of the Environmental Impact Assessment Study is not required, which complies with the Law on Planning and Construction (Zakon o planiranju i izgradnji), Law on Environmental Protection (Zakon o proceni uticaja na životnu sredinu) (“Official Gazette of the Republic of Serbia”, No. 94/2024) and currently applicable Law on Environment Impact Assessment (Zakon o zaštiti životne sredine). In addition, please see the response under Question No. 10 in Contracting Authority’s Clarifications No. 2.
3.	Is it a requirement for the Bill of Quantities to be signed and certified, and should the Excel version also be submitted?	The electronic version of the documentation must be signed with a qualified electronic signature. The printed version does not need to be additionally signed or stamped, provided that it is identical to the electronically signed version. It is not specifically required that the Bill of Quantities (BoQ) be submitted in Excel format; it can be provided in any suitable format duly signed by the authorised person. However, the Excel version may also be submitted in addition, for the purpose of easier verification and review of cost structure.
4.	If the project is approved, will VAT exemption apply to the entire project	Yes. Pursuant to Article 28 of the Framework Agreement on Financial Partnership (IPA III) ,

	amount (both the EU grant and the co-financing share)?	Article 24(1)(16a) of the Law on VAT , and Article 112(5) of the Rulebook on VAT , VAT exemption applies to the entire project implemented under the Union contract, including the part financed from the beneficiary's own co-financing, provided that such mixed financing is foreseen in the project agreement and duly registered with the Tax Administration.
5.	Can travel costs (BH2 – Travel) be used for persons who are not formally members of the project team but belong to a co-applicant organization?	Yes. In accordance with Section 2.1.3 of the Guidelines for Grant Applicants and Article 14 of the General Conditions (Annex G), travel costs are eligible provided that: • they are directly related to the implementation of the action • they are necessary for achieving the project's objectives, and • they are actually incurred and duly justified with appropriate supporting documents (e.g. travel order, invoices, tickets, receipts). This means that travel costs budgeted under Budget Heading 2 – Travel may also be used for staff members or representatives of the co-applicant organization, even if they are not individually listed as members of the core project team, provided that: • their travel is clearly linked to specific project activities for which the co-applicant is responsible; • the justification in the budget narrative explicitly specifies that the "Local travel" and "International travel" lines include travel of co-

		applicant representatives implementing certain activities; and all expenditures are supported by appropriate financial and administrative documentation, in the same manner as for the project team. In summary: Travel costs can be charged for persons from a co-applicant organisation who are directly involved in the implementation of project activities, even if they are not formally designated as members of the project team, as long as these costs are necessary, justified, and properly documented.
6	Please explain how to fill in the part of the application form 5. AFFILIATED ENTITY(IES) PARTICIPATING IN THE ACTION/ 5.1 Description of the affiliated entity(ies) in which it is requested to fill out the following fields that are not provided by the application form Annex A- Grant Application Form: Category (refer to Section 3.2.1) Sector(s) (refer to Section 3.2.2) Target group(s) (refer to Section 3.2.3.3)	In older versions of Application form, there were sections 3.2.1, 3.2.2 and 3.2.3 which referred to specific sectors. However, in the newer versions of PRAG, the application form has been simplified and as a result, sections abovementioned have been removed. Nevertheless, the content in Section 5 of the AF was not synchronized accordingly. In this case, those fields in the table should remain empty or put n/a.
7	Please clarify the method of submitting the electronic version of the documentation. According to the definition from the document Guidelines for grant applicants: The complete application form (Part A: concept note and Part B: full application form), PADOR registration form, the declaration on honour on exclusion criteria, the rest of	Documents to be completed must be submitted in the same form as they are published within the Public Call for Submission of Project Proposal, i.e. each annex is a separate file.

	supporting documents, budget and logical framework must also be supplied in electronic format (USB stick) in a separate and single file (i.e. the application must not be split into several different files) it is not the clearest whether in the electronic version of the documentation it is necessary to submit each document in a separate file including the budget in excel or is it necessary to submit the entire application including all annexes and additional documentation in one word document („single file, “ i.e. the application must not be split into several different files“)?	
8.	Are staff costs for project team members employed by a Regional Development Agency (RDA) eligible, and can they be financed from the EU grant or only from the co-financing share?	Yes. Regional Development Agencies (RDAs) established as limited liability companies (d.o.o.) are not considered public administrations. Therefore, staff costs for RDA employees directly involved in the implementation of the project are eligible. Such costs may be financed either from the EU grant or from the co-financing share, provided that: • the employees perform tasks directly linked to project activities, • costs are based on actual salaries paid, and • they are properly supported by employment contracts, payslips and timesheets. Accordingly, staff costs of RDA employees may be financed either from the EU contribution or from the beneficiary's co-

		financing, as both sources cover eligible project-related expenditures in line with the approved budget.
9.	In accordance with the terms of the ongoing Call for Proposals, one of the mandatory documents is Annex F – PADOR registration form, along with the documents required to be submitted through it. While filling in the above-mentioned form, we have noticed that the form does not allow for the attachment of the required documents in the designated fields. In this regard, we kindly ask you to provide instructions on how to resolve this issue in order to comply with the conditions of the CfP and submit the complete project documentation within the given deadline.	The issue appears to be of a technical nature or results from certain limitations introduced in the latest version of Adobe, which now provides full functionality only to paid users. Accordingly, Annex F - PADOR registration form will be accepted as valid without the requirement to include attachments in the designated fields.