1ST CALL WITHIN B LIGHT 2 PROJECT

LIGHT PROJECT PROPOSAL PREPARATION QUESTIONS AND ANSWERS

Guidelines for Light Partner Applicants (GfA)

1. **Question**: The potential Light Partner Applicant has been operating its production facility in rented premises in Osijek for 15 years. This can be documented through official decisions and lease agreements for the production facility.
   However, the branch was registered with the Commercial Court only in early 2026, in order to align with the relevant industrial strategies.
   Would it be possible to apply under the B Light 2 project 1st Call for Light Project Proposals in this case? On the HAMAG-BICRO website, it is stated that the date of establishment of the branch is subject to verification. However, Section 3.2 of the Guidelines for Applicants (GfA) states that "the organisation must demonstrate that the branch has been operating for at least one year prior to the date of submission of the application for a B Light Project", which could imply that continuity of operations may be demonstrated.
   Could you please clarify whether the applicant would be eligible in this case, given that the production facility has been operating in Osijek for 15 years, despite the branch having been formally registered only in early 2026?

   Answer: According to the basic eligibility criteria set out in the Guidelines for Light Partner Applicants (GfA), each applicant must meet the requirements specified in *Section 3.3, Professional and Financial Background*, which states that the **Light Partner must have at least one closed business year for seat and/or branch in the programme area.**
   In other words, the Light Partner must have completed at least one financial year for its registered office and/or branch located in the programme area.
   Compliance with this criterion will be verified on the basis of information provided in company register extracts/company annual financial reports.

2. **Question:** We kindly request clarification regarding the eligibility criteria for Light Partners under the B-Light 2 Call for Light Project Proposals, according to which an applicant must not generate more than 50% of its annual turnover from activities classified under NACE code Section A - Agriculture, forestry and fishing (01 – 03).
   Could you please confirm which specific AOP items are taken into account when calculating annual turnover for the purpose of verifying compliance with this 50% threshold?
   In particular, we would like to clarify whether the revenue reported under AOP 133 – Other operating income is included in the annual turnover calculation. This includes income such as subsidies/direct payments and income related to the sale of fixed assets, or whether only

revenue from the sale of products and services reported under AOP 129 and AOP 130 is taken into account.
Furthermore, we would appreciate confirmation as to whether the share of revenue generated from activities classified under NACE Section A is calculated in relation to the company's total revenue or exclusively in relation to its annual turnover, understood as revenue from the sale of products and services.
Thank you in advance for your clarification, as this interpretation is essential for determining the company's eligibility as a Light Partner under the B Light 2 project.

Answer: With regard to your inquiry about which items are taken into account when calculating annual turnover, please find our clarification below.
Annual turnover refers to revenue from sales rather than total operating income.
Accordingly, for the purpose of applying the 50% eligibility criterion under the B Light 2 Call for Proposals, we interpret annual turnover as revenue from the sale of products and services, namely AOP 129 and AOP 130. Other operating income (AOP 133), including subsidies/direct payments, as well as income from the sale of fixed assets, is not included in annual turnover.
Therefore, the share of revenue generated from activities classified under NACE Section A is calculated in relation to total annual turnover (revenue from sales), rather than the company's **total revenue, including other operating income.**

3. **Question:** We would appreciate a more detailed clarification of the provision concerning eligible activities and the corresponding NACE codes.
The GfA state that the activities carried out under a Light Project must fall within the eligible activities listed in Section 5.1, and that, under Section P – Education, only activity 85.4 – Higher education is eligible. We also understand that the project team cannot confirm the eligibility of a specific company or project application in advance of the formal evaluation process.
However, our question is not a request for a preliminary assessment of the eligibility of a specific applicant, but rather a request for clarification on how the criterion used to determine the classification of a project activity should be interpreted.
In other words, is the classification of an activity under an eligible NACE section determined by the nature of the activity actually carried out within the project, or by the sector or target group for which the results of that activity or the resulting product are intended?
For example, would the development of a new software application for the education sector be considered an activity under Section J – Information and Communication, since the project involves the development of an ICT product, or would it be classified under Section P – Education for the purposes of this Call, because the final product is intended for use in education?

Answer: The specific activity carried out and funded under the Light Project and the new product/service developed need to fall under eligible activities listed under 5.1 chapter of the GfA.
The Call for Light Project Proposals and the Guidelines for Light Partner Applicants (GfA) stipulate that project activities must be carried out within an eligible field of activity, which means that the product or service developed under the project must fall within an eligible field of activity.

4. **Question**: Could you please let us know whether any documentation in Croatian is available regarding the following Call for Light Project Proposals and, if so, where it can be accessed? "B Light 2 – Fostering Cross-Border Business Cooperation of SMEs Operating on Different Sides of the Hungary-Croatia Border."

   Answer: A summary of the information about the B Light 2 project, the open 1st Call for Light Project Proposals and the application requirements in Croatian is available on the HAMAG-BICRO website: https://hamagbicro.hr/bespovratne-potpore/b-light-2/
   All other documentation is available in English: https://cbchb.eu/cbc-hu-cro/b-light-2/.

5. **Question**: Could you please clarify whether an interested Hungarian entrepreneur, who is owned by four Hungarian natural persons and a Turkish company with 5% can apply or is Turkish ownership a disqualifying factor in the 1st Call for Light Project Proposals?

   Answer: Based on the chapter 3.1 Legal status in GfA,
   Eligible applicant Light Partner is:
   - micro, small and medium-sized enterprises (SMEs) stipulated in 651/2014/EU Regulation, Annex 1, and R&D organisations referred to as "research and knowledge-dissemination organisations" under Commission Regulation (EU) No 651/2014, (Article 2) if they bring innovative added value to the Light Project concerned.

   Classification of enterprises:
   Micro, small and medium-sized enterprises (SMEs)
   In Hungary SMEs are considered enterprises falling under the criteria stipulated under § 3 of the Act on Support for Growth of Small and Medium Enterprises (2004. évi XXXIV. törvény a kis- és középvállalkozásokról, fejlődésük támogatásáról).
   For Croatia SMEs are defined by the Article 2 of the Act on Incentives for the Development of Small Economy (Zakon o poticanju razvoja malog gospodarstva – NN 29/02, 63/07, 53/12, 56/13, 121/16).
   According to these regulations, medium, small and micro enterprises may all be Light Partners of the scheme.
   Classification of enterprises:
   - Micro enterprise (<10 employees and annual turnover ≤ EUR 2 million, or annual balance sheet ≤ EUR 2 million);
   - Small enterprise (10-49 employees and annual turnover >EUR 2 million ≤ EUR 10 million or annual balance sheet in > EUR 2 million - ≤ EUR 10 million).
   - Medium enterprise (50-250 employees and annual turnover ≤ EUR 50 million, or annual balance sheet ≤ EUR 43 million)

   Owner interweaves should be excluded among Light Partners applicants of each Light Project. This means that Light Partner applicants cooperating under a single Light Project should be 'autonomous enterprises' from each other, stipulated under 651/2014/EU Regulation, Annex 1, Article 3. Partner or linked enterprises cannot be granted under a single Light Project.

The size of the enterprise and its status as an autonomous, partner or linked enterprise are assessed based on the information provided in the Joint Statement.
Please also note that the Joint Statement is an integral part of the application and must be submitted together with Light Project Proposal. All owners of the enterprise must be listed accurately when completing the document. The Joint Statement is used to provide the relevant information on the enterprise's ownership and control structure, as well as, where applicable, the data concerning partner and linked enterprises, in order to determine whether the applicant qualifies as a micro, small or medium-sized enterprise under Annex I to Regulation (EU) No 651/2014.
By completing the Joint Statement, the applicant will be classified according to its e**nterprise size** (micro, small, medium-sized or large) and **status** (autonomous, partner or linked enterprise). Large enterprises are not eligible as Light Partners.

6. **Question**: We would like to ask for your assistance in interpreting the eligibility criteria based on the NACE codes set out in sections 3.5 and 5.1 of the B Light 2 application guidelines.
As part of a planned project, an online platform would be developed which, as an IT development, may fall within an eligible NACE sector (J – Information and communication, NACE 58–63, in particular 62.01 – Computer programming); however, the platform's future users would primarily be tourism service providers (accommodation providers, catering businesses), whose activities are not listed among the eligible NACE sectors.
Our question is whether eligibility based on NACE codes should be assessed on the basis of the activity actually developed within the framework of the project, or on the basis of the economic activity of the end-users who will subsequently utilise the results of the development?
A further question is: from what point in time must the eligible NACE code be included amongst the applicant company's registered areas of activity? Is it sufficient for the company to include the relevant activity by the time the application is submitted, or is it required that it has already been carrying out that activity previously?

   Answer: At the time of submission of the Light Project Application, Light Partners must be registered for an eligible activity, as defined in chapter 5.1 Eligible activities of the Guidelines for Light Partner Applicants (GfA), under which they carry out eligible activities of the Light Project.
   Chapter 3.5 defines all exclusion criteria that eliminates potential Light Partner Applicants as this is also elimination criteria during eligibility phase assessment in Annex II_Checklist for eligibility criteria.

7. **Question**: We would like to request your clarification regarding the eligibility of a potential applicant.
The company in question previously implemented a project under the GINOP-1.2.3-8-3-4-16-2017 funding scheme. Irregularities were identified in relation to this project, and as a result, the Grant Agreement was withdrawn. As a consequence, under the Hungarian GINOP Plusz programmes, the company is excluded from applying for funding for a period of five years.
Our question is whether this exclusion also applies to the present call.

Could you please clarify whether a company affected by such an exclusion under the Hungarian GINOP Plusz programmes is also considered ineligible under this call, or whether the above exclusion does not apply in the context of this programme?

Answer: We unfortunately do not have sufficient information or a sufficiently clear basis to conclude that the applicant is definitely ineligible under the B Light 2 1st Call.
Nevertheless, based on the information provided, we cannot exclude the possibility that the case could fall under the exclusion criterion concerning applicants who have been guilty of "grave professional misconduct proven by any means which the LP/MA/NA can justify".
As the exact nature and circumstances of the irregularities that led to the withdrawal of the previous Grant Agreement are not known to us, we cannot assess with certainty whether this exclusion criterion would apply. In particular, we do not have sufficient information to establish what exactly happened, whether the irregularities were intentional or unintentional, whether they involved any prohibited or otherwise improper conduct, or whether they were of an administrative nature.
This would ultimately have to be assessed during the eligibility check, based on the available evidence and documentation.
Therefore, we would not be in a position to advise the applicant that it is definitely eligible, nor would we consider it appropriate to state that it is definitely ineligible at this stage.
However, we would strongly recommend that the potential applicant and its Croatian partner are made aware of this uncertainty and the associated risk before deciding to submit an application. In particular, if the applicant is subsequently found ineligible during the eligibility assessment, this could affect the entire project and, consequently, the Croatian partner as well.
Considering that the Croatian partner would be committing time and resources to the preparation and implementation of the project, they may wish to carefully consider whether to proceed with a partner whose eligibility cannot be confirmed in advance, or whether it would be more appropriate to cooperate with a partner whose eligibility is clear.
In our view, the final decision on whether to submit an application should therefore be left to the applicant and its Croatian partner, with full awareness of the potential eligibility risk.

8. **Question**: We have a question regarding the NACE eligibility of Light Partners and the eligible activities set out in Chapter 5.1 of the Guidelines for Light Partner Applicants.
If the main registered activity of a Croatian Light Partner falls outside the NACE sectors listed in Chapter 5.1, but the activities carried out by that partner within the Light Project relate entirely to the development of a new ICT/AI product and fall, for example, under NACE J62 or C26, would such a partner be considered eligible?
In other words, must the relevant NACE activity already be registered by the Light Partner before the application is submitted, or is it sufficient for the project activities to be carried out by the Light Partner to fall within one of the eligible NACE sectors?

Answer: Yes, the Light Partner must be registered to carry out an eligible activity under the 1st Call for Light Project Proposals before submitting the Light Project Application.

9. **Question**: We kindly ask for further clarification regarding the costs of purchasing second-hand equipment, which, according to the Interreg HUHR Programme rules on eligibility of expenditures and consequently, the Guidelines for Light Partner Applicants (GfA), may be eligible under the following conditions:
   Expenditure of second-hand equipment may be eligible, under the following conditions:
   - 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;
   - its price does not exceed the generally accepted price on the market in question; and
   - it has the technical characteristics necessary for the project and complies with applicable norms and standards.

   Could you please clarify how it should be demonstrated that no other support from the funds referred to in the above conditions has been received for the equipment? Also, do any specific time limits apply to such equipment (e.g. in terms of depreciation or the duration of the project)?

   Answer: Purchasing of second-hand equipment is eligible but still not to be recommended to use in projects as it is hard to be properly documented and checked by the national controllers during Light Project implementation phase.
   A second-hand equipment financed by any EU funds is not eligible due to the fact to avoid double financing in question even if the sustainbility period is over.

10. **Question**: We have a question about eligible costs. Our partnership wants to open a shop in the other country. Can the rental costs of shop be eligible in the framework of the project?
    In point 7.6 of the guidelines, rental costs related to events are listed as eligible costs, but otherwise this is not explained.

    Answer: In the chapter 7.6 of the GfA rental costs related to project events are eligible. Other rental costs are not mentioned as eligible, so, based on the GfA and Programme manual on eligibility, the list of costs are exhaustive and projects cannot add additional cost types to it.
    Another issue related to this rental costs of shop is whether is this relevant from Light project point of view? But this will be clear in assessment stage when the evaluators will go through whole application and made a decision is this relevant for the Light Project or is this operational cost of Light Partner applicant.
    HAMAG-BICRO project team cannot give prior opinions on the eligibility of costs, which will be checked during the review and assessment of the submitted Light Project application.