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.

11. **Question**: 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 in August 2024. 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: At this stage, 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.

12. **Question**: We have an inquiry regarding the B Light 2 Call for Light Project Proposals.
We are interested in applying under this call and would appreciate some clarification regarding the eligibility criteria for applicants.
Section 5.1 lists the eligible activities, which must fall under the specified NACE codes. Does this mean that applicants must have a registered business activity under one of the eligible NACE codes in order to qualify for co-financing, or is it sufficient for the activities covered by the proposed investment to fall under the eligible NACE codes?
For example, would a veterinary clinic be eligible to apply for the call if the proposed investment focused on business digitalisation and the development of new services?
Furthermore, I would like to know whether a sole proprietorship engaged in manufacturing, such as the production of distilled spirits, may apply if the product in question is not listed in Annex I to the Treaty. The business activity falls under Section C of the NACE classification.

Answer: The Light Partner applicant / potential Light Partner must be registered for an eligible business activity under which the eligible activities are carried out at the time of submission of the Light Project application.
Light Project activities must fall within the eligible project activities specified in Section 5.1, Eligible activities, of the Guidelines for Light Partner Applicants (GfA).

13. **Question**: The Hungarian company and its Croatian partner intend to jointly develop a service through which users can book the location where the service will be provided via a web application. According to the current concept, IT development and the related physical infrastructure would each account for approximately 50% of the project costs.
The application would be developed by the applicant's own employees. The company already has the necessary expertise and development capacity.
Consequently, the IT development costs would consist entirely of internal staff costs, as the applicant intends to carry out the development in-house.
Our understanding of Section 7.3 of the GfA is that, for SMEs, staff costs can only be reimbursed through a flat rate of 20% of the relevant direct costs, or 10% where the partner's project part includes a works component. For a project requiring substantial in-house software development, this flat rate would be unlikely to cover the actual development staff costs.
Could you please clarify the following:
Is our understanding correct that the staff costs of application development carried out by the applicant's own employees can only be reimbursed through the staff cost flat rate, even when the development directly produces the project's marketable output?
Could internally developed software be capitalised as an intangible asset and claimed under the equipment cost category? If so, what conditions, valuation methods and supporting documentation would apply?
If this is not possible, is there any other eligible approach within the framework of the call that would allow the actual costs of development carried out by in-house staff to be supported?
It would be helpful to understand how companies with their own development capacity can structure such projects under the call. Please indicate the applicable provisions and the conditions of any possible solution so that we can provide accurate guidance to the applicant.

    Answer: If the potential applicants have their own internal capacity for the software development, their work falls under staff costs budget line. Staff costs are calculated as flat rate defined under chapter 7.3 in the GfA.
    Based on the GfA, the Equipment costs the purchase of new equipment, including IT hardware and software. In the case of in-house software development, there is no purchase of software from a third party; rather, the cost relates to the work performed by the partner's own employees. Consequently, the same internal software development cannot be presented as an equipment cost solely because the resulting software is capitalised as an intangible asset.

14. **Question**: I am the owner of a sole proprietorship that provides services for older people, including day care services and assistance at home. I would like to develop a cross-border project with a Hungarian partner that would bring together active ageing, day care and activities for older people, nature and gardening, as well as the development of new programmes and services for the elderly population. I would kindly appreciate your clarification on the following questions:
    - Is a sole proprietorship an eligible applicant under this call?
    - What status must the Hungarian partner have to be eligible?
    - Can the project cover the costs of equipment and premises refurbishment necessary for the development of new services?

- Is it possible to finance a vehicle if it is directly related to the implementation of project activities?
- Is there any support available to help applicants find a suitable Hungarian business partner?

We would also like to involve the active ageing association and other local organisations that bring older people together in the project activities, provided that this type of cooperation is permitted under the programme.

Answer: Detailed information on who is eligible to apply under the 1st Call for Proposals of the B Light 2 project can be found here: https://hamagbicro.hr/bespovratne-potpore/b-light-2/tko-se-moze-prijaviti/
The minimum forms of cooperation eligible for support under Light Projects for SMEs are:

- Business cooperation between small and medium-sized enterprises (SMEs) aimed at developing business models based on the creation of value-added products and services;
- Joint innovation activities between small and medium-sized enterprises (SMEs) and research and development organisations.

Support will be provided through a grant scheme requiring mandatory cross-border cooperation. Each Light Project must involve at least two (2) Light Partners, one from Croatia and one from Hungary, both located within the programme area.
To find a suitable partner, please register on the B Light 2 project platform and provide a brief description of your company and the type of cooperation you are seeking. You can also use the platform to search for Hungarian and Croatian partners who have already registered.
For additional support and assistance in finding a suitable Hungarian partner, you may contact our Territorial Partners in your County: https://cbchb.eu/cbc-hu-cro/b-light-2/contact/.

15. **Question**: We would kindly ask you to clarify whether a private healthcare institution providing nursing care services is an eligible applicant. The institution is part of the healthcare network and generates 99% of its revenue through the Croatian Health Insurance Fund (HZZO). Based on the description provided in the Guidelines for Applicants, we are unsure whether this type of institution is eligible to apply.

    Answer: According to the open call and conditions set in the Guidelines for Light Partner Applicants (GfA), eligible applicants are 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. Inquiries may be used to clarify individual provisions of the Call; however, specific assessments of the eligibility of individual applicants will be carried out as part of the Light Project selection procedure.

16. **Question**: We organise tourism and cultural programmes that connect Croatian Baranja with southern Hungary for organised groups. We would like to know whether a project focused on the joint development of new cross-border tourism services, digital guides and multilingual

content could be eligible under this call and would kindly appreciate clarification on the following questions:

- What are the requirements regarding the applicant's legal form, registration and length of time in business?
- Is tourism an eligible business activity if the project involves innovative digital services?
- Can a Croatian-Hungarian partnership be established during the application preparation process, and do you provide assistance in finding a suitable partner?
- What are the requirements regarding the applicant's own contribution and project pre-financing?
- Whom can we contact for an initial assessment of the project idea?

Answer: All activities listed as eligible in the Guidelines for Applicants are permitted (see pages 20 and 21 at the following link: https://cbchb.eu/wp-content/uploads/2026/10/B-Light-2_Guidelines-for-LP-Applicants_v1.pdf).
Applicants must be registered to carry out an eligible business activity under the B Light 2 Call before submitting their application. The relevant activity does not have to be registered as the company's principal business activity; it is sufficient for it to be registered in the court register.

- Applicant eligibility

Eligible applicants are SMEs in accordance with the legislation of the applicant's country. Since applicant eligibility is also assessed, among other things, on the basis of annual financial statements, the applicant must have been operating for at least one year and must have financial statements demonstrating that the required indicators have been achieved (see pages 15 and 16).

- Eligible activities

Eligible activities are as described above. One of the requirements is that the project must also be innovative in nature.
Inquiries may be used to clarify individual provisions of the Call; however, specific assessments of the eligibility of individual applicants and projects will be carried out as part of the grant award procedure.

- Finding a project partner

You can find a potential partner online via the following link: https://cbchb.eu/cbc-hu-cro/b-light-2/partners/
Alternatively, you can contact the Territorial Partner in your County: https://cbchb.eu/cbc-hu-cro/b-light-2/contact/.

- Co-financing and pre-financing

Applicants must pre-finance project costs using their own funds or credit and subsequently claim reimbursement of these costs.
Up to 80% of the project costs, amounting to a maximum of EUR 300,000 per project, can be claimed through the reimbursement method, while the remaining 20% of the project costs must be covered by the applicants' own funds.
The total eligible project costs may not exceed EUR 375,000 per project.
Applicants must ensure that double funding is avoided (see Section 6.4, pages 24 and 25).

- Initial assessment of the project idea

Inquiries may be used to clarify individual provisions of the Call; however, specific assessments of the eligibility of individual applicants and projects will be carried out as part of the Light Project selection procedure.
We recommend contacting the Territorial Partner in your County.

17. **Question**: We are contacting you on behalf of a geodesy company which is interested in applying for the B Light 2 programme in cooperation with a Hungarian geodesy company.
After reviewing the call documentation, we would kindly ask you to clarify several questions regarding applicant eligibility.

- **Eligibility of surveying activities**

Our company's principal business activity under the NKD 2025 classification is 71.12.1 – Surveying and geoinformatics activities.
In Section 5.1 (*Eligible Activities*) of the call documentation, we could not find NACE group 71 among the eligible activities.
We noticed that NACE groups 69–75 were eligible under the previous B Light programme, so we would like to know whether their omission from the current programme represents an intentional change in the eligibility requirements.

- **Possibility of applying under other registered business activities**

In addition to our principal business activity, our company has other activities registered in the court register, including building design and construction, construction and reconstruction of public roads, website development and maintenance, as well as other technical and manufacturing activities.
We would appreciate clarification as to whether the applicant's principal business activity must fall within the eligible NACE groups, or whether it is possible to submit a project relating to another, additionally registered business activity, provided that the project activities themselves fall within an eligible group.
Our initial project concept involves the joint development and enhancement of digital services, the application of GNSS technology and 3D scanning, as well as the use of relevant software solutions.

- **Previously liquidated company**

As the owner and director of current company, I was previously the owner of another company that ceased operations properly through voluntary liquidation before current company was established. The company did not undergo bankruptcy proceedings.
We would kindly ask you to confirm whether this circumstance could constitute any obstacle to the participation of current company in the B Light 2 programme.

Answer: Applicants must be registered to carry out an eligible business activity under the B Light 2 Call before submitting their application. The relevant business activity does not have to be registered as the company's principal activity; it is sufficient for it to be registered in the court register.
The activities listed under the previous call applied to the previous B Light project and do not apply to the current project or open call.
If there were no issues during the company's operations and the previous entity was properly wound up, there should be no problems. Evaluators will conduct a review once the application has been submitted and establish the facts of the case.

18. **Question**: We kindly request your responses to the following questions:
    - Responsibility for the sales indicator: If, in the Light Project Application, the entire sales target (scheme-specific indicator *signed contractual business agreement with third parties for selling the jointly developed new or upgraded product, technology or services*) is assigned to one Light Partner, while the other partner has a target of 0, is the partner with a target of 0 liable for the recovery of funds and the enforcement of financial guarantee instruments if the sales indicator is not achieved at the Light Project level?
    - RCR25 SMEs with higher value added per employee indicator: Is the achievement of the RCR25 indicator (an increase in value added per employee of at least 2%) mandatory for each Light Partner individually? Does failure to achieve this indicator result in a financial correction or recovery of funds and, if so, to what extent?
    - Proportionality of the recovery of funds: Is any recovery of funds due to the failure to achieve the indicators proportionate to the extent to which the targets have not been met? Is there a prescribed methodology for determining the amount to be recovered?
    - Durability period: Section 9.2 of the Guidelines for Light Partner Applicants (GfA) specifies a three-year durability period following the completion of the Light Project, while also stipulating the obligation to repay funds within three years of the final payment to the Lead Partner. From which exact date is the period during which Light Partners are subject to these obligations calculated?
    - Withdrawal of a partner: What are the financial and contractual consequences for the remaining Light Partner if the other partner withdraws from participation during Light Project implementation?

    Answer: The objective of the B Light 2 project is to support collaborative projects between Hungarian and Croatian entrepreneurs. The focus is on cooperation between partners in carrying out joint activities during the implementation of Light projects and in achieving the planned results of the Light projects.
    The indicators that each Light Project must achieve are defined in the Guidelines for Applicants (GfA), Section 8.7, Light Project Indicators, and in the contract (Addendum of the Partnership Agreement) to be signed by the Light Partners of each Light Project (Article 18, Sustainability and Follow-up Activities, and Article 21, Termination of the Agreement).
    - According to the Light Project Application Form (Sheet 5: Indicators), the Light Partners are required to describe how the indicators will be achieved, specifying the contributions of each partner. It is not explicitly stated which partner must achieve each indicator; the partners are responsible for agreeing among themselves on how to allocate and distribute the indicators in the way that best suits their needs.
    - According to the Addendum of the Partnership Agreement to be signed by the Light Partners of each Light project (Article 18), the Programme Result Indicator RCR25 must be achieved at the Light Project level, rather than by each individual Light Partner. The Light Project partners agree among themselves on which partner will achieve the mandatory indicator at the Light Project level.

- All situations relating to the termination of the Agreement are stipulated in Article 21, Termination of the Agreement, of the contract (Addendum of the Partnership Agreement).
  Although no correction methodology has been prescribed, an assessment will be made of the extent to which the indicators have been achieved, the activities implemented, and the stage of implementation of the Light Project as a whole.
  Our general approach is to support entrepreneurs in implementing their Light Projects. Therefore, Light Partners must immediately inform HAMAG-BICRO, as the Lead Partner, of any circumstances arising during Light Project implementation that could in any way jeopardise or alter the implementation of the Light Project.
  Once the overall situation of the Light Project has been assessed, a decision will be made on the appropriate course of action regarding the Light Project and its Light Partners.
- According to Article 18, Sustainability and Follow-up Activities, of the contract (Addendum of the Partnership Agreement), the sustainability period of the Light Project ends three years after the completion of the Light Project.
  The completion date of the Light Project is the last day of the Light Project implementation period. Light Partners are required to maintain and use the results developed within the framework of the Light Project until the end of the sustainability period.
- According to Article 9 of the contract (Addendum of the Partnership Agreement), changes to the partnership structure of the Light Project are not permitted after the Light Project has been approved.

19. **Question**: Based on the available B Light 2 Guidelines for Light Partner Applicants, the eligibility of material costs required for product development is not entirely clear. While equipment used for product development may be eligible for funding, this does not necessarily imply that raw materials and consumables used in the development process can also be reimbursed separately on the basis of invoices.
    We would therefore appreciate your clarification as to whether the costs of materials used exclusively for prototype production and development testing within a joint product development activity are eligible under the B Light 2 scheme.
    If such costs are eligible, please confirm the applicable budget category and the conditions for their reimbursement.
    In particular, could these costs be included under the “Equipment” category and reimbursed on a real-cost basis?

    Answer: The chapter 7. Eligibility of costs of Light Partners of the Guidelines for Light Partner Applicants (GfA) is based on the Eligibility of Expenditure document of the Programme with the aim to present its content in a comprehensive manner to the Light Partner Applicants.
    Under chapter 7.7. Equipment it is stated:
    For SMEs as Light Partners
    Purchase of new equipment is eligible only if the items are essential and directly related to the implementation of the Light Project, and if they are listed in the approved Light Project budget. All equipment shall be other than those covered by the expenditures of cost categories ‘Office

and administration' and 'Infrastructure and works' and are necessary and shall exclusively be used for Light Project implementation, having a clear contribution to the achievement of the Light Project's objectives. Equipment shall be directly linked to (or forming part of) the Light Project outputs or deliverables which will be used by Light Partners and target groups in line with the Light Project objectives. The list of the types of equipment eligible on real cost basis is stated on page 30 and 31 of the GfA.

For R&D organisations as Light Partners equipment costs are already included in the 40% flat rate of eligible staff costs.

Other requirements necessary to verify the costs to be reported for reimbursement are mentioned in the Eligibility of Expenditure document and the national level guidelines regarding the eligibility of expenditure / instructions on reporting.

20. **Question**: Croatian and Hungarian companeis are preparing an application for the smart parking under the B Light 2 – Interreg Hungary–Croatia programme. The project involves the joint development of an innovative smart parking system. As part of the project, they plan to pilot-test the system at approximately 20 public parking spaces in the city.
The city has expressed its interest in and support for the project and is willing to issue a letter of intent regarding the implementation of the pilot test, with the specific locations and conditions to be defined at a later stage in cooperation with the competent parking operator.
We would kindly ask you to clarify the following:
Can the city, as a local self-government unit, participate in the project as a beneficiary of the pilot system, i.e. as a testing location, without having the status of a project partner and without incurring any financial obligations?

Answer: According to the published 1 st Call and the Guidelines for Light Partner Applicants (GfA), the eligibility conditions and criteria for Light Partners, as well as the activities eligible under a Light Project, are defined as follows.
All project partners must meet the requirements set out in Chapter 3, **Eligibility of Light Partner Applicants**.
One of the basic requirements is that they must qualify as small and medium-sized enterprises (SMEs), as defined in Annex I to Commission Regulation (EU) No 651/2014.
Research and Development (R&D) organisations may be eligible as Light Partners only if at least two small and medium-sized enterprises (SMEs) participate in the Light Project as Light Partners, with at least one SME from Croatia and the other from Hungary.
In addition, a number of requirements must be met by the Light Project itself. The activities of the Light Project must be implemented within the eligible programme area of Hungary and Croatia, specifically in the counties listed below.

Hungary:

- Zala County (HU223);
- Somogy County (HU232);
- Baranya County (HU231).

Croatia:

- Međimurje County (HR 046);
- Koprivnica-Križevci County (HR 045);
- Virovitica-Podravina County (HR 048);

- Osijek-Baranja County (HR 04B);
- Varaždin County (HR 044);
- Bjelovar-Bilogora County (HR 047);
- Požega-Slavonia County (HR 049);
- Vukovar-Srijem County (HR 04C).

B Light 2 project team is unable to provide information on the eligibility of specific cases or project ideas. However, we would like to point out that eligible business cooperation activities under a Light Project must fall within the NACE codes representing the target economic sectors of the B Light 2 project, as specified in Chapter 5.1, **Eligible Activities**.

Eligible business cooperation activities under a Light Project must fall within the following NACE codes, representing the target economic sectors of B Light 2:

- **C – Manufacturing** (10–33);
- **D – Electricity, gas, steam and air conditioning supply** (35);
- **E – Water supply; sewerage; waste management and remediation activities** (36–39);
- **F – Construction** (41–43);
- **J – Publishing, broadcasting, and content production and distribution activities** (58–60);
- **K – Telecommunications, computer programming, consultancy, computing infrastructure and other information service activities** (61–63);
- **O – Administrative and support service activities**, limited to the following activity:
  - Investigation and security activities (80);
- **Q – Education**, limited to the following activity:
  - Tertiary education (85.4);
- **R – Human health and social work activities** (86–88).

Furthermore, Chapter 5.2, **Eligible Levels of Cooperation**, sets out the eligible levels of cooperation expected of Light Projects, which contribute to increasing the added value of the projects.

21. **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, 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.

22. **Question**: I am interested in applying for funding for an IT development project under the B Light 2 Call as the owner of a sole proprietorship, through which I personally carry out development activities. My business has been operating successfully for three years, and I am currently in the highest tax bracket.

    Since, as a sole proprietor, I do not receive a salary under an employment contract, I would appreciate your clarification on the following questions:

    Can the sole proprietor's own work be recognised as an eligible personnel cost?

    If so, what methodology is used to determine the hourly rate, and what supporting documentation is required?

    Is it possible to calculate the cost of the sole proprietor's own work using simplified cost options, such as unit costs or a flat rate?

    Can such work be recognised as part of the project's own contribution, even if it is not eligible for reimbursement?

    Answer: According to the conditions set out in the Guidelines for Light Partner Applicants (GfA), staff costs of Light Partners are eligible for existing employees and newly hired employees employed for the purposes of the implementation of the Light Project.

    For autonomous micro, small or medium-sized enterprises participating as Light Project partners, staff costs must be budgeted using a flat rate.

    The applicable flat rate is calculated as a percentage of direct (real) costs, which include costs for external experts and services, equipment, infrastructure and works.

    The applicable flat rate at the Light Partner level is **10%** for project components involving works, or **20%** for project components that do not involve works.

    Further information about the 1 st Call and the application requirements in Croatian is available at the following links:

- **General information about the 1st Call within B Light 2 project:** https://hamagbicro.hr/bespovratne-potpore/b-light-2/grant-shema-b-light-2/
- **Information on eligible applicants:** https://hamagbicro.hr/bespovratne-potpore/b-light-2/tko-se-moze-prijaviti/
- **Information on how to find a Hungarian project partner:** https://hamagbicro.hr/bespovratne-potpore/b-light-2/kako-pronaci-projektnog-partnera/
- **All documentation required to apply under the first call of the B Light 2 project:** https://hamagbicro.hr/bespovratne-potpore/b-light-2/dokumenti/

  The same information is also available in English on the B Light 2 project platform, which is used to submit applications. To access the relevant information, select **CBC HU-CRO** from the *Programme CBC area* drop-down menu.

23. **Question**: We would appreciate your clarification as to whether a surveying company whose principal activity is classified under NKD 2025 – 71.12.1 (Geodetic and Geoinformatics Activities), corresponding to NACE Section M, Division 71, could be an eligible partner in a Light Project aimed at developing an innovative method for assembling construction structures.
Throughout the project, the Light Partner Applicanr+t would continue to carry out exclusively surveying activities, namely geodetic positioning, 3D laser scanning and construction quality control, while the Hungarian partner would carry out construction works falling under NACE Section F (41–43).
We would also like to point out that this Light Partner Applicant has registered activities related to the design and construction of buildings.
Could such a joint project be considered eligible, or are the activities of each partner assessed separately according to the NACE classification?

    Answer: All Light Partner Applicants must be registered, and the activities to be funded for both entities must be listed as eligible under the Programme (https://cbchb.eu/wp-content/uploads/2026/10/B-Light-2_Guidelines-for-LP-Applicants_v1.pdf). As indicated in the Guidelines for Light Partner Applicants (GfA), NACE codes F 41–43 are eligible activities, whereas NACE 71 is not.
    Individual provisions of the Call may be clarified through enquiries. However, specific assessments of the eligibility of individual applicants and projects will be carried out as part of the grant award procedure.

24. **Question**: Please give us information is it necessary to submit proof (extract from the Register) that the SME is registered in the activities from Chapter 5.1?

    Answer: The Light Partner Applicants must be registered to carry out an eligible business activity under the chapter 5.1 before submitting their application.
    The proof of registration is not an obligatory document when applying.

25. **Question**: We are considering applying for the for the 1st Call within B Light 2 project, and are currently in contact with several partners in Hungary regarding potential cooperation.
However, we would actually like to clarify one point from our side. For the development of the project, we are considering engaging a company we already work with as an external service provider. This company has offices in Bosnia and Herzegovina and Slovenia.
Would this company be eligible to act as an external service provider for our project, given that it is not based in Croatia?

    Answer: Eligible costs for external services are listed in Chapter 7.6, “External Expertise and Services,” of the Guidelines for Light Partner Applicants (GfA). In accordance with the above, services provided by providers located outside the programme area are not excluded.
    Please note that, according to Chapter 7.2, “Preparation Costs,” of the GfA, applicants that are enterprises have preparation costs in total EUR 4,000 per Light Project as a lump sum cost related to the preparation of the Light Project Application (LPA). Preparation costs need to be planned in the budget, in a division between the partners which is agreed between them when planning the budget. These costs also include external expert services related to the

preparation of the application, as specified under item 3: “External services costs such as translation and consultation (e.g. external expert contracted for supporting the preparation of LPA).”

We would also like to emphasise that external project management services cannot be included in the project budget in the form of external project management staff, except for specific expertise, such as a public procurement expert or a technical inspector/supervising engineer, as stipulated in Chapter 7.3, “Staff Costs”: “It is not possible to introduce external project management staff in the budget, except for special expertise, e.g. procurement expert, technical inspector/supervisor.”

Enquiries may be used to clarify individual provisions of the Call; however, specific assessments of eligibility will be carried out as part of the grant award procedure.

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