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.

26. **Question:** We have a question regarding the eligibility of certain costs before requesting quotations. Our joint product development project with a Hungarian partner would include product certification (testing and issuance of a certificate by an authorised certification body). In the Guidelines for Applicants, Section 7.6, certification is not explicitly mentioned. Could you please clarify whether such costs fall under the category of external expert services, specifically under "other specific expertise and services needed for the Light Project" (Section 7.6, item 7)?

    Answer: For a cost to be considered eligible under the *7.6. External expertise and services* category, it must meet the following criteria:

    Under the "*Other*" subcategory, which covers intellectual property, the issuing of guarantees by a bank or other financial institution where required by EU or national legislation, as well as other specific expertise and services needed for the implementation of the Light Project (other specific expertise and services needed for the Light Project).

    It is also important to highlight the general conditions applicable to this cost category:

    The 'external expertise and services' category covers costs paid on the basis of contracts or written agreements and against invoices or requests for reimbursement to external experts and service providers, sub-contracted to carry out certain tasks or activities directly linked to the implementation of the Light Project."

    This means that the costs must be based on contracts or written agreements and supported by invoices or requests for reimbursement, while the services in question must be directly linked to the implementation of the Light Project.

    Furthermore, the Guidelines for Light Partner Applicants (GfA) refer to the programme document Eligibility of Expenditure, which provides further clarification of the cost eligibility requirements. The document specifically emphasises that external expertise and services must be clearly linked to the project and necessary for its effective implementation:

    External expertise and services must be clearly linked to the project and be essential for its effective implementation.

    In light of the above, the eligibility of a specific cost must be assessed based on its link to the Light Project, its necessity for the effective implementation of the Light Project, and compliance with all other applicable eligibility requirements.

27. **Question:** We would appreciate clarification regarding the implementation of Light Projects under the B Light 2 project, specifically concerning the requirement to achieve sales of the jointly developed product/service amounting to at least 20% of the total grant awarded, either during the Light Project implementation period or no later than two years after the Light Project has ended.
    Given that the development and commercialisation of a new product involve a certain degree of market risk, we would appreciate clarification regarding the financial consequences in the event that this indicator is only partially or not achieved at all.
    Specifically, we would appreciate your response to the following questions:
    - What happens if a project successfully completes all development activities and develops the planned product, but the total sales achieved within the prescribed period amount to less than the required 20% of the grant awarded?
    - Does failure to achieve the 20% sales target automatically constitute grounds for the repayment of part or all of the grant awarded?
    - If partial repayment of the grant is envisaged, is there a defined methodology or proportional calculation for determining the financial penalty? For example, how would the situation be handled if the project achieved sales amounting to 15% of the total grant instead of the required 20%?
    - If the Partnership Agreement between the partners defines in advance the individual sales obligations of each Light Partner, is each partner financially liable only for failing to meet its own share of the sales target, or do the partners have joint and several liability for achieving the overall project target?
    - Can higher sales achieved by one partner compensate for lower sales achieved by the other partner, provided that the minimum requirement of 20% is achieved at the overall Light Project level?
    - Is there a maximum amount of any potential financial correction or grant repayment that may be required from an individual Light Partner due to failure to achieve this indicator?
    - How are justified circumstances for failure to achieve the planned results assessed? More specifically, what circumstances could be considered a “duly justified” failure to meet the sales target within the meaning of the Partnership Agreement?

    These clarifications are important to us before we proceed with the final definition of the partnership, the allocation of sales obligations between the Croatian and Hungarian partners, and the assumption of financial commitments under the project.

    Answer: The answers to your questions are as follows:
    - What happens if the project successfully develops the product but fails to achieve 20% in sales? The development of the product alone does not mean that all mandatory project indicators have been fulfilled. If sales within the prescribed period do not reach 20% of the total grant awarded, the sales indicator has not been fully achieved. Article 21(1)(g) of the Addendum of the Partnership Agreement allows HAMAG-BICRO to terminate the agreement and request the recovery of funds if the project fails to achieve its planned objectives, results and indicators to a significant extent, unless such failure is duly justified. Article 21 also provides for other grounds for termination

and recovery of funds. Failure to achieve the sales indicator represents a contractual risk; however, the consequences will be assessed in the context of the Light Project as a whole and the specific circumstances of the case.

- Does failure to achieve the indicator automatically constitute grounds for the recovery of funds? Pursuant to Article 21 of the Addendum of the Partnership Agreement, HAMAG-BICRO may terminate the agreement and request full or partial recovery of funds due to non-compliance with contractual obligations or significant failure to achieve the planned results, subject to the aforementioned exception for duly justified underachievement.

  Therefore, the agreement provides for the possibility of recovery of funds, but does not stipulate that failure to achieve any individual indicator necessarily results in the recovery of the entire grant amount.
- Is there a proportional calculation of the financial penalty, for example, if 15% rather than 20% in sales is achieved? No specific methodology for calculating financial corrections has been prescribed. The assessment takes into account the extent to which the indicator has been achieved, the activities carried out and the stage of implementation of the project as a whole.
- Is each partner responsible only for its own target, or is there joint responsibility? The partners agree among themselves on each partner's contribution to achieving the indicators, while the indicators are assessed at the level of the entire Light Project. The agreement also explicitly stipulates that sales may be generated through one or all Light Partners. This means that, for the purpose of the 20% sales indicator, the overall project result is decisive, rather than each partner necessarily achieving a separate percentage of the target.
- Can higher sales achieved by one partner compensate for lower sales achieved by the other partner? Yes, in principle, provided that the sales relate to the jointly developed product, technology or service and qualify for the purposes of the indicator. Article 18(2)(ii) of the Partnership Agreement allows sales to be generated through one or all Light Partners. Therefore, it is not necessary for each partner to individually achieve an equal share of the sales target.
- Is there a maximum recovery amount applicable to each individual partner? What constitutes a duly justified failure to achieve the target?

  No specific correction methodology for calculating financial corrections has been prescribed. The assessment takes into account the extent to which the indicator has been achieved, the activities carried out and the stage of implementation of the Light Project as a whole.

  All situations relating to termination of the agreement and the recovery of all or part of the awarded co-financing are stipulated in the contract (Addendum of the Partnership Agreement), under Article 21 – *Termination of the Agreement*.

  Article 22 further specifies the payment instruments required from each Light Partner, including a promissory note issued by the partner and a personal promissory note issued by the founder in the case of Croatian partners, up to the full amount of the requested EU funding.

As the Lead Partner, we aim to support entrepreneurs in implementing their Light Projects. Therefore, Light Partners are required to immediately inform HAMAG-BICRO of any circumstances arising during the Light Project that could in any way jeopardise or affect its implementation.

Once the overall situation of the Light Project has been assessed, a decision will be made regarding the appropriate course of action in relation to the Light Project and the Light Partners.

28. **Question:** Since the Call within the B Light 2 project does not provide for advance payments (GfA, Section 9.3), the reimbursement timeline following the submission of reports is crucial for our partners' cash flow planning. Could you please let us know approximately how much time elapses between the submission of a report covering a four-month reporting period and the payment of EU funds into the partner's bank account? If you have any experience from the first B Light project, even an approximate estimate would be of great help to us.

Answer: With regard to your enquiry about the timeframe between the submission of the report covering a four-month reporting period and the payment of funds into the Light Partner's bank account, please find below a clarification of the reporting procedure and the applicable deadlines.

At the end of each reporting period, each Light Partner submits a separate Partner Report through the Interreg+ system, which includes a description of the activities carried out, a declaration of costs and the relevant supporting documentation. The deadline for submitting the Partner Report is 10 calendar days from the end of the reporting period.

The submitted reports and declared costs of Croatian partners are verified by the national control body – the Ministry of Regional Development and EU Funds of the Republic of Croatia (MRRFEU) in Zagreb, while the verification of Hungarian partners is carried out by the competent national control body in Hungary, Széchenyi Program Office Nonprofit LLC, regional offices in Pécs and Zalaegerszeg.

Once the reports of all Light Project partners have been approved at national level, the Lead Partner (HAMAG-BICRO) can prepare the consolidated Project Report. A deadline of 90 days from the end of the reporting period is envisaged for its submission to the Joint Secretariat (JS). Once the conditions for submitting the Project Report have been met, the Lead Partner has 10 days to submit the consolidated Project Report through the Interreg+ system.

Following the submission of the Project Report, the JS carries out its verification and may request additional information or clarifications, if necessary. The deadline for submitting the requested additional information is 10 days, and the request and subsequent processing of such information may further extend the procedure.

It is important to note that the exact timeframe for the payment of funds into the partners' bank accounts cannot be guaranteed in advance under this procedure. The duration of the process depends, among other things, on the time required for the verification and approval of Partner Reports at national level, the timely submission of complete documentation and any potential requests for additional information or clarifications.

For internal cash flow planning purposes, an indicative estimate of approximately four months from the submission of the Partner Report until payment may be considered, provided that all authorities and partners involved act in a timely and efficient manner and no significant

requests for additional information arise. However, this timeframe is merely an indicative estimate and does not constitute an officially prescribed or guaranteed payment deadline. In practice, the procedure may take longer.
Since no advance payments are provided, we recommend taking into account the possibility of a longer processing period when planning your cash flow.

29. **Question**: We are preparing a Light Project Application for the 1st Call with a Hungarian SME partner, and would like to ask for clarification on how the de minimis ceiling is applied to Hungarian Light Partners.
The Guidelines for Light Partner Applicants (Chapters 3.5 and 4.2) and point 3.11 of the Checklist for eligibility criteria state that the Light Partner can be granted de minimis aid of maximum EUR 300,000 in Croatia, and that the de minimis aid received over the previous three years in Croatia will be deducted from this threshold. At the same time, sheet 2 of the Light Project Application form asks for the amount of de minimis aid awarded both in Hungary and in Croatia in the current and the previous two fiscal years.
Could you please confirm:
    1. For a Hungarian Light Partner, is only de minimis aid received in Croatia deducted from the EUR 300,000 ceiling, or is de minimis aid received in Hungary also taken into account?
    2. If aid received in Hungary is not deducted, how will the Hungarian amount requested in sheet 2 be used in the assessment?
    3. Which reference period applies: the previous three years counted from the date of granting the aid (Guidelines, Chapter 4.2), or the current and the previous two fiscal years (Application form, sheet 2)?

    Answer: Please find answers to your questions.

    1. For a Hungarian Light Partners only the de minimis aid received in Croatia is deducted from the EUR 300,000 ceiling. De minimis aid received in Hungary will not be taken into account / will not be deducted.
    2. The Hungarian amount will not be used in the assessment.
    3. Reference period which applies in this Call is during the previous three years, based on the chapter 4.2 in the GfA. The total de minimis aid granted to each Light Partner shall not exceed EUR 300,000 over period of previous three years from the date of granting the aid.

    The previous three years are calculated backwards from the date of the Light Project Application submission. A the later stage, the Light Projects Applicants who will enter in the precontracting process, will be asked for the updated de-minimis declaration.

    The references to cuntry “Hungary” and period “the current and the previous two fiscal years” were inadvertently retained in the Light Project Application form.

30. **Question**: With regard to the 1st Call for Light Project Proposals under the B Light 2 project, we kindly ask you to clarify the rules on de minimis aid applicable to Hungarian project partners. According to Section 4.2 of the Applicant Guidelines, the Republic of Croatia is the aid-granting authority, and the EUR 300,000 limit applies to de minimis aid granted in Croatia.

Does this mean that de minimis aid previously received by a Hungarian company (including its linked enterprises) from Hungarian aid-granting authorities is not taken into account when calculating its available de minimis aid limit for the B Light 2 project?
In other words, can a Hungarian company that has already exhausted its de minimis aid limit in Hungary still receive aid under the B Light 2 project, provided that it has sufficient remaining de minimis aid capacity with regard to aid granted by the Republic of Croatia?

Answer: For Hungarian project partners under the B Light 2 project, only de minimis aid previously received by the company in the Republic of Croatia is deducted from the total de minimis aid ceiling of EUR 300,000. De minimis aid granted in Hungary, including aid awarded by Hungarian granting authorities, is not taken into account and does not reduce the available de minimis aid ceiling for the aid granted under the B Light 2 project.
Consequently, a Hungarian company that has fully exhausted its de minimis aid ceiling in Hungary may still receive aid under the B Light 2 project, provided that it has sufficient remaining de minimis aid capacity with regard to the aid previously received in the Republic of Croatia.
We would also like to point out that, pursuant to Section 4.2 of the Applicant Guidelines, the relevant reference period covers the preceding three years, calculated backwards from the date of submission of the project proposal. At a later stage, applicants entering the pre-contracting procedure will be requested to submit an updated de minimis declaration.

31. **Question**: In the case of Croatian Light Partner Applicants with two founders, what type of promissory notes must be submitted to provide a financial guarantee when contracting Light Project part?

Answer: In the event that a Light Project is selected for funding, the Light partners will have to provide a financial guarantee when contracting their Light Project parts on the full amount of the requested EU funds for each Light Partner's Light Project part. If a Light Project will be selected, Light Partners will be obliged to submit to the Lead Partner (LP):

- One (1) blank promissory note issued by the Light partner and one (1) personal blank promissory note issued by its founder(s), covering the full amount of EU funds requested by the respective Light partner (applicable to Light partners established in the Republic of Croatia).

With regard to the personal blank promissory note(s) issued by the founder(s), where an applicant has multiple founders, it is permissible to submit several personal blank promissory notes, with the founders being free to determine how the amounts to be covered are distributed among them individually.
However, it is important to ensure that the total amount covered by all personal blank promissory notes submitted by the founders equals the full amount of EU funds requested.

32. **Question**: We kindly request clarification regarding the applicant eligibility requirements under the first Call for Light Project Proposals of the B Light 2 project.
The company in question is a limited liability company whose sole founder and 100% owner is the city. The company has one employee and its registered office is located within the programme area, where it carries out organisational, administrative and agency activities.

However, part of its tourism programmes is implemented at a children's holiday resort located outside the eligible programme area.
Considering the company's ownership structure, we kindly ask you to confirm whether the company can qualify as an eligible Croatian Light Partner, or whether ownership by a local self-government unit excludes it from applying under the Call for Light Project Proposals.

Answer: In accordance with the Call for Light Project Proposals and the eligibility conditions set out in the Guidelines for Light Partner Applicants (GfA), eligible applicants are autonomous micro, small and medium-sized enterprises (SMEs), as defined in Annex I to Commission Regulation (EU) No 651/2014, as well as research organisations qualifying as "organisations for research and knowledge dissemination" within the meaning of Article 2 of the aforementioned Regulation, provided that they bring innovative added value to the respective Light Project.
With regard to your inquiry, we would particularly like to draw your attention to Article 3(4) of Annex I to Commission Regulation (EU) No 651/2014, which stipulates that, as a general rule, an enterprise cannot be considered an SME if 25% or more of its capital or voting rights are directly or indirectly owned or controlled by one or more public bodies. This rule provides for certain exceptions, the applicability of which should be assessed on a case-by-case basis.
In light of the above, and considering the information that the city is the 100% owner of the company in question, the impact of such an ownership structure on the company's ability to qualify as an SME, and consequently on its eligibility as a Croatian Light Partner, needs to be specifically examined.
A final assessment of the eligibility of the company in question can only be made following verification of all relevant criteria and circumstances relating to the applicant within the selection procedure.

33. **Question**: We would like to clarify whether, when procuring certain machinery under the 1st Call for Light Project Proposals, for example machinery with a value exceeding EUR 80,000–100,000, project partners are still only required to obtain three independent quotations, or whether they are required to conduct a formal public procurement procedure depending on the value of the procurement. Based on our interpretation of the documentation, obtaining three quotations is sufficient for all procurements exceeding EUR 10,000. However, we would appreciate your confirmation that we are interpreting the rules correctly.

Answer: In accordance with the Guidelines for Light Partner Applicants (GfA), as well as the Eligibility of Expenditure document governing the eligibility of expenditure under the Programme, procurement procedures must comply with the applicable European Union rules, Programme and national public procurement rules, depending on the type of Light Partner applicant and the estimated value of the procurement.
Specifically, Chapter 2.6 "Equipment" of the Eligibility of Expenditure document stipulates the following:

- For contracts with a value of less than EUR 10,000 excluding VAT, the principles of sound financial management must be applied, while no specific selection procedure or specific evidence of market prices is required.

- For contracts with a value equal to or exceeding EUR 10,000 excluding VAT, project partners are required to carry out and document appropriate market research, for example, by obtaining at least three different quotations.

Please note that the obligation to conduct market research and obtain quotations does not exempt Light Project partners from complying with public procurement legislation. Namely, the same document explicitly stipulates that the selection procedure must comply with the applicable European Union, Programme and national public procurement rules, depending on the type of applicant and the estimated contract value.

In light of the above, if a project partner is not subject to public procurement legislation, for the procurement of machinery with a value of EUR 80,000–100,000 excluding VAT, the Programme rules require appropriate market research to be carried out and documented, with obtaining at least three different quotations given as an example.

On the other hand, if a project partner is subject to public procurement legislation, it is required to conduct the appropriate procurement procedure in accordance with the applicable national and European rules, irrespective of the aforementioned Programme requirement to conduct market research.

We would also like to emphasise that, in the event of differences between European, Programme, national and internal rules, the stricter rules shall apply. Furthermore, procurement must not be artificially split in order to avoid the applicable thresholds.

B Light 2 project team therefore recommends verifying the Light Partner Appliocant's legal status, in particular whether it is subject to public procurement legislation, before initiating any specific procurement procedure, in order to ensure compliance with the applicable rules and the eligibility of the expenditure incurred under the Light Project.

34. **Question**: According to the Guidelines for Light Partner Applicants (GfA), Light Partner Applicants must qualify as micro, small or medium-sized enterprises (SMEs), as defined in Annex I to Commission Regulation (EU) No 651/2014.

In 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 the aforementioned legislation, micro, small and medium-sized enterprises may all be Light Partners of the scheme.

We kindly request clarification regarding the applicant eligibility requirements under the 1st Call for Proposals under B Light 2 project.

Considering that 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) covers business entities and trades (sole proprietorships), we would like to know whether flat-rate taxed sole proprietorships (*paušalni obrti*) are also eligible to apply under this Call, provided that they meet the other criteria for qualifying as a micro, small or medium-sized enterprise.

Is there any specific restriction applicable to flat-rate taxed sole proprietorships, or can they be considered eligible SME applicants?

Answer: According to Chapter 3.1 “Legal Status” of the Guidelines for Light Partner Applicants (GfA), eligible Light Partners are micro, small and medium-sized enterprises (SMEs), as defined

in Annex I to Commission Regulation (EU) No 651/2014, as well as research organisations qualifying as "organisations for research and knowledge dissemination" within the meaning of Article 2 of the aforementioned Regulation, provided that they bring innovative added value to the respective Light Project.

For Croatian applicants, the GfA also refers to 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) which defines small business entities.

Please note that eligibility is not limited exclusively to companies. Sole proprietorships (trades), including flat-rate taxed sole proprietorships, may also qualify as eligible applicants, i.e. Light Partners, provided that they meet all other eligibility criteria stipulated in the Call for Light Project Proposals.

Flat-rate taxed sole proprietorships may therefore qualify as eligible applicants under the 1st Call for Light Project Proposals, provided that they have at least one employee and meet all other applicable eligibility requirements and evaluation criteria.

35. **Question**: We are contacting you on behalf of a company engaged in the design, supply, installation, commissioning, servicing and maintenance of heating, cooling, ventilation and air-conditioning (HVAC) systems.

    The company has been actively operating in eastern Croatia for more than 20 years, including in Osijek-Baranja County and Vukovar-Srijem County.

    The company also has a registered branch office in the eligible programme area, established in 2018, as evidenced by the official decision on the registration of the branch office in the Court Register.

    Over the years, the company has established business relationships with numerous corporate clients.

    It continuously provides installation, servicing, maintenance and optimisation services for heating, cooling and ventilation systems in the aforementioned areas.

    The company is interested in participating in the B Light 2 Programme, through which it would develop innovative, energy-efficient and environmentally friendly heating and cooling solutions together with a Hungarian business partner.

    We would kindly ask you to clarify the following:

    - Can the employee requirement in the programme area be considered fulfilled if the company's employees actually and demonstrably performed work in Osijek-Baranja County during 2025, even though their officially registered place of work was administratively linked to the company's headquarters located outside the programme area?
    - Can work orders, service reports and issued invoices be considered appropriate supporting documentation to demonstrate compliance with the above-mentioned requirement?
    - Can the company's registered branch office, established in 2018, as well as its long-standing and continuous business operations in the programme area, be taken into consideration when assessing its eligibility?
    - Do you consider that the proposed project idea would, in principle, be in line with the objectives and eligible activities of the B Light 2 project, and would there be any possibility of assistance in identifying a suitable Hungarian business partner?

Answer: Please find below our clarifications.

- According to *Chapter 3.3 Professional and financial background* of the Guidelines for Light Partner Applicants (GfA), one of the basic eligibility criteria is that the Light Partner must have at least one employee in the programme area during the last closed business year.
- As compliance with the employment criterion must also be demonstrated, the Light Partner Applicant is required to provide appropriate documentation confirming the employee's employment status and their connection to the business operations in the programme area, such as an employment contract and any amendments thereto relating to work at the branch office, as well as other relevant supporting evidence.
  The final assessment of the submitted documentation and compliance with the aforementioned criterion will be carried out as part of the applicant eligibility assessment procedure.
- According to *Chapter 3.2 Geographical location* of the GfA, a Light Partner should have its seat or branch registered and acting in the eligible programme area.
  In case the Light Partner's seat is not registered in the eligible programme area listed above but only its branch, the organisation has to prove the operation of said branch of at least one year counted back from the date of submitting the Light Project Application (examined by company registry document). Considering that your branch office in programme area was established in 2018, the minimum one-year requirement for the existence of the branch office is, in principle, fulfilled, subject to the provision of appropriate evidence of its registration and business operations.
  Nevertheless, all criteria set out in *Chapter 3.3* of the GfA, including the employment criterion, must be fulfilled.
  According to o *Chapter 5.1* of the GfA, eligible sectors include, among others, manufacturing (C), electricity, gas, steam and air conditioning supply (D), and construction (F). Accordingly, the project idea, if it involves the development or significant improvement of energy-efficient and smart HVAC solutions, technologies or systems, could, in principle, be in line with the objectives of the Programme.
  Please note that the final assessment of the eligibility of individual applicants and project ideas is carried out as part of the Light Project selection procedure.
  Regarding the identification of a suitable Hungarian business partner, the Centre for Entrepreneurship Osijek as the territorial partner responsible for Osijek-Baranja County and Vukovar-Srijem County, provides support to interested businesses in establishing contacts with potential Hungarian partners.
  Potential partners can also be identified through the official B Light 2 platform: https://cbchb.eu/cbc-hu-cro/b-light-2/partners/

36. **Question**: The question concerns a potential Light partner in Croatia, namely a private company that is not subject to public procurement legislation. We would kindly ask you to confirm that the Croatian Public Procurement Act applies only to contracting authorities and entities operating in the utilities sectors. In other words, please confirm that neither the rules applicable to this Call for Light Project Proposals nor the rules governing the procurement of

goods under this Call impose an obligation to extend the application of the Croatian Public Procurement Act to other entities that do not qualify as contracting authorities or entities operating in the utilities sectors within the meaning of the Croatian Public Procurement Act. If the potential Light partner is a private company that is not subject to public procurement legislation, is it sufficient to conduct market research by obtaining three independent quotations and, based on the selection of the most suitable offer, conclude a contract with the supplier for the delivery of machinery with a value of EUR 90,000–100,000?

Answer: Croatian potential Light partners that are private companies and are not subject to public procurement legislation are required, when submitting a Light Project Application under the currently open 1st Call for Light Project Proposals, to provide the following documentation for equipment costs:

- For costs having a value equal to or above 10.000 EUR (excluding VAT), Light Partners shall conduct and document adequate market research (e.g. at least three different offers requested). This shall allow Light Partners to collect sufficient information on the relevant market and perform a sound comparison of offers in terms of price or quality, and a comprehensive assessment of the adequacy of the price.

If they successfully pass the assessment phases and sign an Addendum to the Partnership Agreement about the Light Project implementation, they will be required, during Light Project implementation, to follow the National Control guidelines on the eligibility of expenditure and reporting for Croatian project partners. These guidelines are published on the Programme website.

37. **Question**: We noticed errors in the formulas used in certain cell of the *Sheet 7. Light project budget summary* table of the Light Project Application form excel.
The formulas in all cells of the Office and Administration budget line refer to LP1 (including in the case of LP2, LP3 and LP4). Furthermore, in the Travel and Accommodation budget line, the formulas for both the LP4 SME and LP4 R&D partners also refer to LP1. As a result, when the LP1 budget is filled in, the corresponding costs for the other partners are automatically populated in the table as well.

Answer: Thank you for bringing this issue to our attention.
The Light Project Application form for the 1st Call for Light Project Proposals under the B Light 2 project has been updated to correct errors in the formulas in *Sheet 7 – Light Project budget summary*.
The amendment concerns the correction of calculation formulas to ensure the accurate calculation and presentation of the Light Project budget summary. It is of a technical nature and does not affect the eligibility rules or any other provisions of the 1st Call for Light Project Proposals.
Applicants are invited to use the updated version of the **Light Project Application_v1** form when preparing their Light Project Proposals.

38. **Question:** We are planning a cross-border research and innovation project focused on the development of new genetic lines of industrial hemp, plant monitoring technologies, and joint

research activities in Croatia and Hungary. The project would involve one Croatian and one Hungarian SME, with the possibility of including the R&D organisation as partner.
We would appreciate your clarification on the following questions:

- Are research activities and the development of new genetic lines of industrial hemp eligible activities, provided that the applicants have the appropriate registered business activities?
- Are the salaries of three existing employees who would be assigned to the project's research activities eligible for funding?
- Is a project duration of 24 months permitted?
- Can a Croatian business act as the Lead Partner in a partnership involving a Hungarian business and a research institution?
- Can land purchased during 2026, prior to the submission of the project application, be recognised as an eligible cost or as part of the applicant's own contribution?
- Are there any specific restrictions applicable to projects involving the breeding and development of industrial hemp varieties?

Answer: Thank you for your inquiry and for expressing your interest in participating in the 1st Call for Light Project Proposals under the B Light 2 project.
Without reviewing a specific project application, it is not possible to provide a definitive answer to the questions raised.
Please find below our clarifications and responses to your questions.

- The B Light 2 project team is unable to provide an answer to this question. This can only be determined through the formal evaluation process, based on a review of the complete Light Poject Application and all supporting documentation submitted.
- Staff costs for existing employees are eligible under the conditions set out in the GfA:
  a) For enterprises acting as Light Partners in the project: Personnel costs are calculated on a flat-rate basis, applying a rate of either 10% or 20% to direct costs, depending on whether the Light Project component includes works component (10%) or does not include works component (20%). Real costs include equipment, external expertise and services and costs of infrastructure and works.
  b) For research and development organisations: Where staff costs account for the majority of expenditure within the Light Project component (e.g. when a significant number of in-house experts are working on the Light Project), these costs are planned and reimbursed on the basis of real costs, while all remaining costs are covered by applying a flat rate of 40% of direct costs (real costs) staff costs.
- According to the published Call requirements and the eligibility criteria set out in the Guidelines for Light Partner Applicants (GfA), the permitted duration of an individual Light project must be between 6 and 12 months.
- According to the published call requirements and the eligibility criteria set out in the GfA, applicants participating in the open 1st Call who may become Light Partners in contracted Light projects have equal roles. There is no designated Lead Partner.
- According to Section 7.9, *Non-eligible Expenditure*, of the GfA, the purchase of land is not an eligible cost.

- The B Light 2 project team is unable to provide an answer to this question. This can only be determined through the formal evaluation process, based on a review of the complete Light Project Application and all supporting documentation submitted.

39. **Question:** The potential Light Partner applicant will import fresh vegetables and fruits, as well as apple juice, from the partner, they will process and produce the apple juice, they will process and sell the other vegetables domestically.
Is it possible for them to purchase a truck with a refrigerated body in the project, so that due to the nature of the goods they can be transported at the appropriate temperature? They have our own trucks, but not with a refrigerated body. Is it possible to purchase a refrigerated trailer for their own trucks?

Answer: Based on the eligibility rules set in Guidelines for Light Partner Applicants (GfA), page 21 under *Eligible activities*: purchase of vehicles is prohibited.
Purchase of new equipment for the sake of moving materials, packaging and storing in the phase of joint technology, service and product development (purchase of vehicles is prohibited).
Based on the chapter 7.7 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.
Purchase of the following types of equipment is eligible costs on real cost basis:
• IT hardware and software (clear Light Project relevance is necessary);
• Furniture and fittings;
• Laboratory equipment;
• Machines and instruments;
• Tools or devices;
• Other specific equipment needed for the Light Project.

Based on these provisions, any equipment purchased must be essential for achieving the objectives of the Light Project and directly related to its activities and indicators.
The final eligibility of the proposed costs will be assessed during the evaluation process, once the evaluators have access to the complete project application and all supporting documentation**.**

40. **Question:** While reviewing the call requirements, we noticed the eligibility criterion concerning positive equity in the last completed financial year.
A potential SME applicant recorded a positive net profit in 2025; however, according to its financial statements, the company reports negative equity.
We would kindly appreciate your clarification on the following questions:
    - Does negative equity in 2025 automatically disqualify a company from participating in the B Light 2 project, regardless of its positive financial result?
    - Is there a possibility for the company to participate as a project partner, but not as the Lead Partner (Light Partner)?
    - If the company does not meet the financial eligibility criterion, is it possible to participate through another business entity that fulfils the requirements of the call?

Answer: Please find below our clarifications and responses to the questions raised.

- According to the eligibility criteria set out in the Guidelines for Light Partner Applicants (GfA), the Light Partner's equity for the last completed financial year must be positive for its registered office and/or branch located within the programme area (see page 16 of the *Guidelines for Light Partner Applicants* and eligibility criterion 2.4 of the *Checklist for Eligibility Criteria*).
  The enterprise must not be considered an undertaking in difficulty (within the meaning of Commission Regulation (EU) No 651/2014 of 17 June 2014).
- Each Light Project must involve at least two Light Partners, one from Croatia and one from Hungary, both located within the programme area.
  Applicants are eligible provided that they meet the requirements of the 1 st Call for Light Project Proposals. There is no Lead Partner in Light Projects.
- Any business entity that meets the eligibility criteria of the Call is entitled to participate in the Call within the B Light 2 project.
  Please note that the final assessment of the eligibility of individual applicants and project ideas is carried out as part of the Light Project selection process.

41. **Question:** With regard to the 1st Call for Light Project Proposals under the B Light 2 project, we kindly request written clarification on the possibilities for financing the procurement of equipment, demonstrating the applicants' financial capacity, and the planned purchase of the business premises in which the project equipment would be installed.
We are considering an investment in equipment that would form an integral part of the eligible project activities, using a combination of grant funding and appropriate loan instruments. In order to structure the financing correctly, we would appreciate your clarification on the following questions.

    1. Pre-financing the procurement of equipment through an HBOR (Croatian Bank for Reconstruction and Developmen) loan

    Under the B Light 2 rules, is it permissible to temporarily finance the full purchase price of eligible equipment through an HBOR loan, with the eligible portion of the expenditure subsequently reimbursed from B Light 2 grant funds?
    More specifically, we are considering HBOR's loan programmes "EU Projects" and "Private Sector Investments". We would appreciate clarification as to whether there are any restrictions related to the selected loan programme, the source of the loan funds or any potential interest rate subsidy, and how the corresponding aid component is taken into account when calculating the cumulation of state aid.

    2. Combining grant funding, a HAMAG-BICRO loan and an investment loan

    According to the terms of HAMAG-BICRO's financial instrument "Small Loans for Industrial Transition", the instrument is not intended for refinancing existing liabilities, reimbursing previously paid liabilities, or double financing and pre-financing of grants. At the same time, the possibility of combining it with other sources of financing is предусмотред, subject to the applicable restrictions.
    We would therefore appreciate clarification as to whether the following financing model would be acceptable for the same equipment purchase:

A HAMAG-BICRO loan would finance a clearly defined portion of the investment, for example approximately one-third of the equipment purchase price, representing the applicant's own contribution and not being claimed for reimbursement from grant funds;
An HBOR loan or a commercial bank loan would finance the remaining amount required to pay for the equipment, including the pre-financing of the portion that would subsequently be reimbursed from B Light 2 grant funds.
In particular, we would appreciate your response to the following questions:

- Is it permissible to use the above financing sources to finance different portions of the purchase price of the same individual piece of equipment, provided that the allocation is clearly documented, or must the financing be separated by individual cost items, invoices or separate pieces of equipment?
- Would the proposed financing model be considered impermissible double financing or pre-financing of grant funds, even though the portion financed through the HAMAG-BICRO loan would not be submitted for reimbursement?
- If a partial write-off of the loan principal were approved under the HAMAG-BICRO loan, how would such write-off and other aid components associated with the loan be taken into account when calculating the cumulation of state aid and the maximum permissible aid intensity for equipment co-financed under B Light 2?

3. Demonstrating the financing structure and financial capacity

In order to ensure sufficient funds to cover the applicant's own contribution, any applicable VAT, and the pre-financing of costs pending reimbursement, we would appreciate clarification on the following:

- What documentation must the applicant submit at the time of submitting the project proposal as evidence of secured financing and sufficient financial capacity?
- Is a binding bank decision, a loan agreement or confirmation of available own funds required, or are an indicative bank offer, a letter of intent or other similar documents acceptable at the application stage?
- At what stage must the financing covering the project's total financial requirements be secured and documented: at the time of application, before signing the Grant Agreement, or before the start of project implementation?

d) Is the financial capacity assessed separately for each project partner, based on its respective project budget and pre-financing requirements, or is the partnership assessed as a whole?

4. Purchase of business premises – Section 9.2 of the Guidelines for Applicants (GfA)

We plan to install the project equipment in business premises that we currently occupy under a long-term lease agreement and in which we have continuously carried out our business activities since 2018.
During 2027, we intend to purchase these same premises, thereby changing the status of the project partner from tenant to owner. The investment location, purpose of the premises, ownership of the project equipment, and the project's objectives and results would remain unchanged.

Please note that our question does not concern the eligibility of the purchase price of the premises as an expenditure for co-financing, but rather the permissibility of the change in ownership itself.
We would appreciate confirmation as to whether the restriction on changes in ownership set out in Section 9.2 of the *Guidelines for Light Partner Applicants* also applies to the situation described above, i.e. whether such a purchase is permitted during the project implementation period and the sustainability period.
We would also appreciate clarification as to whether prior approval is required, whether amendments to the project documentation or the Grant Agreement would be necessary, or whether timely notification to HAMAG-BICRO would be sufficient, and what supporting documentation would need to be submitted.
We kindly ask that your responses include references to the relevant provisions of the Applicant Guidelines and any other applicable rules, so that we can properly structure the investment and financing sources before submitting the application.

Answer: Please find below our responses and clarifications to the questions raised.

1. Pre-financing the procurement of equipment through an HBOR (Croatian Bank for Reconstruction and Developmen) loan

Each Light Partner should provide minimum 20% of the total eligible expenditure as own contribution for implementation of the Light Project. Own resources can be composed of any kind of financial resources (e.g. money on bank account, bank loan and other fund donors) with the exception of grants requested from the European Union or from National co-financing resources. (See chapter 6.3. Own contribution).

2. Combining grant funding, a HAMAG-BICRO loan and an investment loan

Response from colleagues responsible for Financial Instruments at HAMAG-BICRO:
Regarding the combination of financial instruments and other forms of aid, there are two conditions that must be met. First, the same equipment must not be financed twice (i.e. financed through a loan and subsequently covered by grant funding). Second, the applicable state aid cumulation limits, in accordance with the relevant regulations, must not be exceeded. If both conditions are met, the combination is acceptable, provided that the total amount of grant funding and financial instrument financing does not exceed the total investment value.
The entire investment must be presented, with a clear breakdown of the investment structure by financing source, so that it is unequivocally clear which part of the investment is financed from each source.
The aid calculation is carried out at the time of contracting. In the case of the proposed combination, the prerequisite for approving the loan would be a decision on the grant award and a decision confirming the remaining financing, meaning that all aid amounts would already be known.
The aid component under the Industrial Transition (IT) loan already includes the principal write-off, and no subsequent recalculations are carried out.

3. Demonstrating the financing structure and financial capacity

Chapter *8.2. Submission of Light Project Applications (LPAs)* provides an exhaustive list of the documentation to be submitted with the application.

The GfA do not require applicants to submit proof of secured financing (e.g. a loan agreement, bank account statement or bank confirmation) at the time of Light Project Application submission. However, applicants must demonstrate their financial and administrative capacity to implement the Light Project.
The document specifies that:
Partners must demonstrate their financial and administrative capacity to manage their respective part of the Light Project, including ensuring sufficient pre-financing and their own contribution;
Basic eligibility criteria are verified through extracts from the relevant registers and annual financial statements;
Financial information must be provided as part of the application through the Light Project Application form, information on sources of financing and other mandatory supporting documentation.
The GfA do not prescribe any of the aforementioned types of evidence as mandatory supporting documents to be submitted with the Light Project Application.
The document does not specify that financing must be formally secured at the time of application submission. The clearly defined obligation arises at the latest during the contracting phase, when the financial guarantee must be provided (see *chapter 3.3. Professional and financial background*).
Financial capacity is assessed individually for each Light Partner.

4. Purchase of business premises – Section 9.2 of the Guidelines for Applicants (GfA)

Pursuant to the provisions of chapter *9.2 Sustainability period*, of the GfA, the restriction applies to changes that could affect the nature, objectives, implementation or sustainability of the Light Project results.
In your case, there would be no change in the investment location, the purpose of the premises, ownership of the Light Project equipment, or the Light Project's objectives and results. The only change would concern the legal basis for using the property (from a long-term lease to ownership).

42. **Question:** We would like to request further clarification regarding the eligibility of certain costs and the equipment procurement procedure.
    - **Eligibility of raw materials and supplies used for prototype development**

The project involves the joint development of new products, which requires prototype manufacturing, development testing and the optimisation of production processes.
In the official document *1st Call Q&A v3*, Question 19 already addresses the eligibility of raw materials and consumables used for prototype development. However, based on the response provided, it is not possible to conclusively determine whether such costs are eligible for separate funding.
I would therefore kindly ask you to explicitly confirm the following:
Are the costs of raw materials and supplies used exclusively for prototype manufacturing and testing eligible Light Project costs?
If so, under which budget category can these costs be included, and how should their eligibility be demonstrated?

Can these costs be planned and reimbursed on the basis of actual expenditure, supported by invoices?

- **Eligibility of consumables and specialised tools**

During product development, various tools and accessories required for material processing, prototype manufacturing and the optimisation of production processes will be used.
I would appreciate clarification on whether the following are eligible:
Consumable tools that are used up during prototype manufacturing and testing.
Specialised tools intended for the development of new products, including tools that may also be used after the project has been completed.
If these costs are eligible, please confirm the applicable budget category and any additional conditions that may apply.

- **Eligibility of internal machine operating hours**

During prototype development and testing, the project partners will use their own production machinery.
Could you please confirm whether the operating hours of existing machinery used for project activities can be planned as a separate eligible cost?
If such costs are eligible, I would appreciate clarification on the applicable calculation methodology, documentation requirements and relevant budget category.

- **Procurement of equipment from an exclusive distributor**

The Hungarian project partner is planning to purchase a CNC lathe with an estimated value of EUR 90,000.
According to the programme rules, for procurements with a value of EUR 10,000 excluding VAT or more, appropriate market research must be carried out and documented, for example by requesting quotations from at least three different suppliers.
I would appreciate your clarification on the following:
Is it eligible to purchase the machine from the exclusive distributor of a particular manufacturer?
If the manufacturer has only one authorised distributor in a given market, can a manufacturer's confirmation of exclusive distributorship serve as sufficient evidence to justify the procurement procedure?
In such a case, is it nevertheless necessary to request three quotations for technically comparable machines from other manufacturers?
Which documents must be submitted together with the project application, and which documents should be retained as evidence of a properly conducted procurement procedure during project implementation?
Given that the project partner is based in Hungary, we will also verify in parallel whether any additional obligations apply under Hungarian national procurement rules. Nevertheless, we would greatly appreciate your opinion and guidance on these matters.

Answer: Please find below our clarifications and responses to the questions raised.

- **Eligibility of raw materials and supplies used for prototype development**

According to the chapter *5.1 Eligible activities*, joint innovation projects may include the development of new products, services and technologies, as well as prototype manufacturing and testing activities.

The costs of raw materials and supplies that are necessary and used exclusively for prototype manufacturing and testing may be considered eligible, provided that they are directly related to the Light Project activities and included in the approved Light Project budget.
The GfA do not provide for a separate budget category for raw materials and supplies; rather, their eligibility is assessed under the relevant direct project cost category.
Costs reported under categories reimbursed on the basis of actual expenditure (real costs) must be supported by appropriate accounting and procurement documentation and are reimbursed based on actual costs incurred and verified. (chapters 5.1, 7.1, 7.6, 7.7, 9.5 and 9.6.)

- **Eligibility of consumables and specialised tools**

The costs of consumable and specialised tools used for material processing, prototype manufacturing and testing, and the development of new products may be considered eligible, provided that they are necessary for the implementation of Light Project activities, directly related to the development of a new or improved product, service or technology, and included in the approved Light Project budget.
In accordance with chapter *7.7 Equipment*, machinery, instruments, tools, devices and other specific equipment required for Light Project implementation are eligible.
These costs must be planned under the Equipment budget category and are reimbursed on the basis of actual expenditure (real costs).
The purchased equipment may remain the property of the beneficiary and may continue to be used after the completion of the Light Project, subject to compliance with the project sustainability requirements and other conditions stipulated in chapters 7.7, Equipment, 9.2, Sustainability Period, and 9.6, Procurement Rules.

- **Eligibility of internal machine operating hours**

The costs of using the Light Partners' existing production machinery, calculated on the basis of machine operating hours, internal cost calculations or depreciation, are not forseen as an eligible budget category under the 1st Call for Light Porject Proposals.
In accordance with chapter *7.7 Equipment*, depreciation costs are not eligible ("Depreciation costs are not eligible"), while chapter *7.1 Simplified cost options*, does not provide for a separate category covering the use of the beneficiaries' own equipment or machine operating hours.
Consequently, the use of existing machinery may form part of the implementation of Light Project activities; however, it cannot be budgeted or reimbursed as a separate eligible Light Project cost.

- **Procurement of equipment from an exclusive distributor**

The procurement of a machine from an exclusive distributor may be considered eligible, provided that the equipment is necessary for Light Project implementation and that the beneficiary can demonstrate that the procurement represents good value for money and complies with the procurement rules.
A manufacturer's confirmation stating that there is only one authorised distributor for a particular market may serve as appropriate evidence of exclusive distributorship.
However, in accordance with chapter *9.6 Procurement rules*, the beneficiary is still required to ensure an appropriate verification of the market price. For procurements amounting to EUR 10,000 excluding VAT or more, at least three quotations must be obtained or, alternatively,

adequate documentation must be provided explaining why it was not possible to obtain comparable quotations.

Throughout Light Project implementation, the beneficiary must retain the complete procurement documentation, including evidence of market research, exclusive distributorship, supplier selection, payment and the use of the equipment for Light Project purposes. The key relevant chapters are 7.7 Equipment; 9.5 Reporting procedures; 9.6 Procurement rules.

43. **Question:** We would like to raise one question about the eligibility of purchase of equipment: Is it eligible to purchase autonomous solar system (photovoltaic) that is not connected to the grid? Autonomous system means to permission procedures, no construction. The system needs fixing equipment to the roof, which would be also purchased and installed, but no permission procedure is in question.

    Answer: 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 (see Guidelines for Light Partner Applicants - GfA chapter 7.7).

    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 equipment and installation must be in accordance with national regulations.

    Eligibility of costs for equipment is subject to the full respect of procurement rules, according to the thresholds defined in chapter 9.6 Procurement rules of the GfA. For all equipment purchased, the relevant visibility and publicity requirements of the Programme must be respected.

    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.