

Frequently Asked Questions Master document

Business Development, Innovation and SMEs – All Countries

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Content

- i. General
- ii. Terminology
- iii. Grant Size and Rates
- iv. State Aid – Categories and Activities
- v. Applicants and Project Partners
- vi. Project Partnerships and Project Cooperation
- vii. Application Documents and Guidance
- viii. Programme Specifications
- ix. Projects - Eligibility and Activities
- x. Projects - Costs and Co-Financing
- xi. Assessment Process
- xii. Romania Specific
- xiii. Greek Specific
- xiv. Bulgaria Specific

i. General		
i. 1	Which language should be used when communicating with the Fund Operator?	The Programme language is English, and therefore it is mandatory to use English in written communication with the Fund Operator.
ii. Terminology		
ii. 1	Where can I find the definitions of the relevant terms used in the Programme?	A Glossary of Terms is always provided as an Essential Reading on the website of the Call for Proposals in question. If further terms are necessary, additional definitions can be found in the GBER , under Article 2.
ii. 2	What is a Project Promoter?	Project Promoter within EEA and Norway Grants Programmes operated by Innovation Norway is the legal person having the responsibility for initiating, preparing and implementing a project.
ii. 3	What is meant by 'products/services ready to	This refers to the phase where a product/service has been successfully developed, indicating that the next phase is the introduction of the product/service into the market.

	be commercialized', as mentioned in the Call text?	
ii. 4	What is a project?	A project is defined in the rules as “an economically indivisible series of work”. This means that it will be negatively assessed if the project application contains different purchases and activities not directly linked to each other and the main objective of the project.
iii. Grant Size and Rates		
iii. 1	Can we get 100% of our project covered with the grant?	No. The aid intensity you can expect will depend on the State Aid Category and will be specified in the Call for Proposal text (in %). But you will never get a 100% covered.
iii. 2	Will the size of the enterprise be considered when deciding the grant rate for a project?	Yes, the size of an enterprise will have an impact when determining the type and size of the grant awarded, and the grant rate. For example, only SMEs are eligible for the state aid category “Aid for SMEs”. For the State Aid Category “Regional Aid”, a different grant percentage is awarded depending on the size of the enterprise (see respective call text, section "Grant rates and co-financing").
iii. 3	If the applicant is registered in one administrative region of the Beneficiary Country, but the activities envisaged as part of the project will take place in another administrative region in the country, what will be intensity of the financial aid under the Regional Aid regime?	The grant intensity under State Aid Category "Regional Aid" will be determined according to the region the project will take place and where it will continue to be maintained. Your activities will have to continue for least 5 years in the region you were given support for.
iii. 4	How is the size of the grant determined?	The grant rate (%) is based on several variables. These are primarily related to the project activities and costs; the type of the state aid category; the type of applicant; and the applicant’s financial strength. Specifically, the grant rate (%) for the different type of project activities could vary (investments, R&D, training etc.). You can consult the section "Grant rates and co-financing" in the call text to see the specification for the Call in question.
iii. 5	Does the amounts for minimum and maximum grant assistance refer only to the financing (grant) or to the overall budget of the project?	The minimum and maximum amounts of grants refer the amount one project can receive as grant from the Programme, not the overall budget.
iii. 6	Can the Applicant ask for more than the maximum grant available? Or can they	No, the Applicant cannot ask for funding above or below the thresholds specified in the section of "1.3 Minimum and Maximum Grant Amount per Project" in the Call for Proposals text.

	ask for less than the minimum grant offered?	
iv. State Aid – Categories and Activities		
iv. 1	Which economic activities are excluded from funding under the regional aid?	The full text can be found under Article 13 in the <u>GBER</u> . But in general the following activities are excluded from the scope of regional aid: the steel sector, the coal sector, the shipbuilding sector or the synthetic fibres sector; aid to the transport sector as well as the related infrastructure, and aid for energy generation, distribution and infrastructure.
iv. 2	Can research and development projects be funded for example under GBER Article 25?	The aid category which is eligible under the Article 25 is "Experimental Development." "Experimental Development" is comparable to R&D activities that correspond to TRL 5-8. Additionally, you must use the <u>OECD Frascati Manual</u> to define whether the project activities that you are planning could be characterized as R&D activities.
iv. 3	How is the degree of innovation assessed in R&D activities?	The goal of all R&D activity is the creation of new knowledge. The R&D activity must fulfill all of the following 4 criteria: It must be 1) novel at an international level of the industry concerned, 2) creative, 3) uncertain in outcome, and 4) systematic and transferable/reproducible. The new knowledge must have concrete business applications, having the potential to lead to new or improved products, processes or services. More can be read in the <u>Frascati Manual</u> and in Section 4 the <u>GBER</u> .
iv. 4	What state aid category would software development belong to?	Simple software development would not qualify for state aid, but development involving new knowledge would mainly fall under the state aid category Experimental Development under Research, Development and Innovation aid (Article 25 in Commission Regulation (EU) 651/2014).
iv. 5	The applicant guidelines state that “exceptionally, financial support will be awarded as de minimis”. Could you clarify what “exceptionally” refers/applies to?	“De minimis support” will usually only be awarded in case a specific project activity, which is of crucial importance for achieving the project outcomes/outputs, cannot be financed by the other state aid categories included in the call for project proposals. Please try to deploy your project costs under the other available state regimes in the frameworks of the respective call. “De minimis support” will not be used to “boost” the total grant rate for a project.
v. Applicants and Project Partners		
v. 1	Can a consortium of enterprises or other entities be the applicant?	No, the applicant must be a single entity. Consult the call text.
v. 2	Can an enterprise from another EU country be a project partner?	No, only entities from the Beneficiary State or a Donor State (Norway for Norway Grants and Iceland/Norway/Liechtenstein for EEA Grants) will be accepted as project partners.
v. 3	Does the applicant need to have been legally registered as an entity for a certain amount of time before the	Yes. In most cases the entity must have been established at least three years prior to the deadline. The exact requirement will be stated in the Call for Proposals, under "Eligible applicants and partners".

	deadline for the Call for Proposals?	
v. 4	What additional information is required if the applicant is part of a larger group of companies (corporate group)?	In the case that an Applicant has a parent company, the latter's financial accounts will also be submitted and evaluated separately. Furthermore, according to GBER State Aid "Annex I", legally linked enterprises and/or partner enterprises in which the Applicant is either a shareholder or a member of another company will need to be mentioned, and the calculation of staff members and financial situation of the linked company will also be taken into account.
v. 5	What is meant by an undertaking in difficulty? How would we know if we were one?	The definition of "undertaking in difficulty" is to be found in art 2.18 of GBER . A typical situation putting a company in such a situation is when accumulated net losses exceed 50 % of the subscribed capital of the company.
vi. Project Partnership and Project Cooperation		
vi. 1	What defines a Donor Partnership Project?	It is when the proposed project will be implemented in close cooperation with a Project Partner legally registered in a Donor State. The definition used in this Programme is included in the Call text, section 1 "Projects and project funding".
vi. 2	Is Donor Partnership a mandatory condition for project eligibility?	No, it is not mandatory, but it is strongly encouraged. Donor Partnership Projects will receive extra points during the assessment process which will be conducted based on the "Assessment Criteria and Methodology" published together with the Call for Proposals. In general, the Donor Partnership should be well-justified and to bring value added to project to the project objectives.
vi. 3	Can an applicant propose a project in partnership with a parent company or subsidiary based in the Donor State?	No. The project partnership should involve cooperation between entities which are legally independent of each other.
vi. 4	How will the responsibilities be divided among the Project Partners?	The Applicant is fully responsible for the project towards the Fund Operator (Innovation Norway). This includes, but is not limited to, securing the co-financing for the total project. The responsibility of the Partner(s) towards applicant will be defined by the Partners in the Partnership Agreement (template provided with the Calls).
vi. 5	What is the role of the partner in a Partnership Project?	In general, the project partner is expected to provide competence/knowledge/technology or a similar type of contribution. This contribution must be essential for the successful implementation of the project. It must be noted that if the contribution by the partner is defined as standard ("off the shelf"), and could be provided by several companies/entities, then it might be subject to procurement regulations.
vi. 6	Can the role of the Donor State Partner be to supply a product or a service for the project?	The simple provision of products or services do not qualify as a Project Partnership. The Project Partner's contribution cannot merely be "off the shelf".

vi. 7	Can the role of the Donor State Partner be to become a provider of our product or service?	No. The simple import/redistribution of products or services do not qualify as a Project Partnership.
vi. 8	How to include the costs of a partner into the budget?	It must be noted that the grant rate is calculated per project activity, and not per entity. When the Applicant prepares the project budget, it needs to include the total expenses for the project, including the total cost and the remuneration of the partner(s). Partners are not allowed to charge consultancy fees. As a partner you can expect cost coverage for actual salary costs, social contributions, etc., as well as overhead as described in the Call for Proposals text.
vi. 9	Can the Donor State Partner contribute financially to project implementation?	Donor State partner/ Project partner could contribute to the project financially. If that is the case it must be clearly stated in the Application form, the Detailed Activity Budget and the Partnership Agreement. If the partner benefits from the results of the project (e.g. shared IPR or investment) the partner will also be subject to a state aid assessment. In a case where only the Promoter benefits from the project, and the partner contribution is competence and/or technology based on a contract, the partner will invoice the project promoter for the contribution. The co-financing will then be ensured by the project promoter.
vi. 10	How can a company from a third country be involved in the project?	A company from a third country, as defined in the Glossary of Terms, can participate as a subcontractor based on procurement, but will not be considered a project partner.
vii. Application Documents and Guidance		
vii. 1	Where can I find guidance to help me fill out the Electronic Application Form?	A guidance is provided when you enter the electronic application portal. This is done from the website of the Call of Proposals.
vii. 2	Where can I find more information about the documents I need to provide together with the application?	The "Annex I - List of mandatory documents" in the Call for Proposals text will list all the documents you must provide.
vii. 3	Where can I find the templates for the documents that must be provided in the application?	All the available templates can be found on the site of the Call for Proposals, under "Mandatory attachments to the project application".
vii. 4	Some of the documents requested as mandatory attachments to the application are issued by national authorities in local language. Do we have to submit an English translation	Official certificates and annual financial accounts issued in the local language can be submitted and presented in local language. For the rest of the documents, an unauthorized translation into English language is required.

	together with the documents?	
vii. 5	What language should be used when filling in the application form?	The application must be in English. Any other language will lead to an automatic rejection of the application. This is further elaborated on in the section for "Assessment criteria" in the Call for Proposal text.
vii. 6	Which financial documents should be attached to the application?	Certified annual financial accounts of the Applicant for the years 2019, 2018 and 2017.
vii. 7	What should we do if we do not form and publish annual balance sheet?	You should then submit any other form/information relevant according to national legislation that was submitted to the national financial authority for 2019, 2018 and 2017. In case the data is not sufficient and information on e.g. Liabilities or Assets is needed, the Fund Operator will ask for this during the project assessment.
vii. 8	What information should the Communication Plan include?	The purpose of the Communication Plan is to declare how you intend to:1) Inform the public about the financial source (EEA and Norway Grants) of the project funding; 2) To present and promote the project result; 3) To communicate the bilateral opportunities offered by the Programme. It should not include activities related to marketing of products and/or services. The Communication Plan template can be found on the website of the Call for Proposals, under Mandatory attachments.
viii. Programme Specifications		
viii. 1	What procurement rules apply to the Programme?	EU and national rules on procurement, including possible national procedures designed for private beneficiaries of grants, must be complied with. A project promoter that receives 50 % or more of eligible costs in a projects as grant shall apply national procurement rules. Project promoters receiving less than 50 % should follow more simplified procedures. For more details, see the call text. Additionally, upon contracting the project, Applicants will be informed about the specific procedures on publication of tenders.
viii. 2	Can an applicant submit more than one application under the same Programme?	An Applicant can only submit one project application under each Call for Proposals, but it could submit a new project application in different Calls in the Programme.
viii. 3	Can we participate as a partner in more than one project under the Programme?	Yes. There is no limit on the number of other projects which you can participate in as a partner (not promoter) if you have the necessary resources to do so.
viii. 4	Can we receive funding from different programs simultaneously (e.g. both the EEA and Norway Grants, and Horizon)?	No, there can be no double funding of the same project costs. Assuming you have the capacity to implement another project, you can receive funding from other programmes simultaneously to doing another project, but the funding cannot be for the same project.
	Does the Business Development Programme operate with a minimum threshold for annual revenue	There is not, as such, a minimum threshold. It is assessed on a case by case basis. See the sections "4. Unrealistic financial forecasts" and "6. The Applicant is too small for the size of the project" in the document Essential Reading "Top

	and net operational profit growth which should be achieved in order to have a project approved for financing?	Common Mistakes”. More details about discount rate, IRR and NPV is provided under section “Project profitability” in the Essential Reading “Guideline for Detail budget and financial forecast”. Exaggerations or overestimations could negatively impact the project ranking.
ix. Projects - Eligibility and Activities		
ix: 1	What defines an eligible project idea?	There are many aspects which are taken into account when determining the eligibility of a project. The fundamental factors are that a project must contribute to increased turnover and profit, and preferably to job creation, for the applying company. Through the project, the applicant is expected to 1) either develop new technologies/solutions/services/products for the market. 2) Or apply existing technologies/solutions for business development purposes within their enterprise. In addition, there will be case-specific requirements based on the focus area. This can be found in the Call for Proposals.
ix: 2	How could the applicant prove that a project is innovative? Is it necessary to attach any documents to the application?	The term “innovation” is defined in the Glossary of Terms and applicant should use this definition to make their own assessment. The applicant should then clearly explain in the project description and business plan what makes their product/solution innovative.
ix: 3	How can I find out if my project is eligible?	The Call for Proposal text will have a section titled "Areas of support and eligible activities." There you will be informed about the Programme indicators which your application must achieve in order to be considered eligible. You can also consult the “Project Assessment Criteria and Methodology” document published under Essential Reading on the Programme website.
ix: 4	If the Applicant wants to apply for a significantly new production (compared to its main activity) and to implement a new green production technology, would it be considered for funding?	Possibly. If the Applicant justifies how such activities will increase the business and competitiveness of the company.
ix: 5	How do you determine whether a product/service is ready to be commercialized?	The Fund Operator will assess two aspects. First, it will be conducted a verification of the project idea to evaluate its feasibility. Specific milestones, functional characteristics and operational capacities will be assessed. In addition, the expected cashflow forecast (when the product/service is introduced into the market) will be assessed to establish its feasibility.
ix: 6	If the planned project also contain some activities related to energy efficiency, do we need to present an energy efficiency audit prepared by a licensed auditor?	No, it is not a requirement. Yet, the Applicant should be able to document the results achieved by the project.

ix: 7	Is the purchase of vehicles eligible for funding?	Vehicles can be eligible under the state aid rules under certain conditions. However, the Fund Operator does not finance projects with purchase of vehicles as the main component of a project or passenger vehicles. To replace one vehicle with another vehicle would not be an eligible project. It could be different if the purchase of a vehicle is a minor part of a project and important for the changing of the production process of a company. Please also note that the transport sector (commercial transport) is excluded from regional investment aid.
ix: 8	How is the degree of innovation assessed in R&D activities?	The goal of all R&D activity is the creation of new knowledge. The R&D activity must be 1) novel on the level of the industry concerned 2) creative, 3) uncertain in outcome and 4) systematic and transferable/reproducible. The new knowledge must have concrete business applications, having the potential to lead to the development of new or improved products, processes or services.
ix: 9	Can a part of our project include investment in renewable energy sources (such as solar panels or a wind park) for our own use?	No, energy production is not an eligible activity within the Business Development Programmes.
ix: 10	Are batteries for energy storage eligible for funding?	No, not under the Business Development Programmes.
ix: 11	Can agricultural projects receive funding?	The primary agricultural production sector is excluded from the GBER . It might be possible to receive regional aid for the processing of agricultural products, assuming you fit under the criteria defined in Article 13 and 14 of the GBER .
ix: 12	We would like to upgrade machines which we lease out to customers. Would this be eligible for funding?	No, regional investment aid can only be awarded to initial investments for increased production capacity, diversification and fundamental change.
ix: 13	A company is working in the fuel supply sector. Is an investment in constructing of charging points (electrical power stations and those with LNG for freight transport) eligible for funding under the Business Development Programmes?	The fuel supply sector falls in under the category of energy infrastructure in the GBER , and is, according to Art. 13 (b), therefore not eligible.
ix: 14	We, as a partner, have an existing solution which must be adapted to the local needs of the project promoter, can the purchase and adjustment costs be eligible for funding?	The purchasing of an already existing technology does not qualify for funding. But adjustment activities in relation to R&D might be eligible if it meets the criteria to be categorised as R&D, as defined in the question: <i>'How is the degree of innovation assessed in R&D activities?'</i> .

x. Projects - Costs and Co-Financing		
x. 1	Are project preparation costs eligible for funding?	No. Costs incurred prior to project confirmation are not eligible and should not be included in the project budget.
x. 2	Can we apply for funding for a project which has already been started?	No, you can not apply for funding for an already started project.
x. 3	Is cash co-financing a requirement in the Programmes?	Yes. Cash co-financing must be provided and can be supplied by either the Applicant or the Partner(s), or a combination of the two. This must be specified and explained in the Partnership Agreement. Man-hour contributions from the Applicant and Project Partner(s) may be accepted as cash contribution based on the approved hourly rate for salaries. Despite how it is supplied, the co-financing remains the responsibility of the Applicant and the Letter of Commitment must be filled out for the application. The financial ability of the involved parties to carry out the project will be assessed on a case-to-case basis. Innovation Norway will make their independent assessment of the creditworthiness of the applicant and partners and obtain credit reports as well. The grant offer letter will outline in detail the financing requirements in special conditions.
x. 4	How should the applicant prove that they are able to provide the necessary co-financing for the project and what kind of documents are required?	The applicant will attach a Letter of Commitment in the application (template is found on the Programme website). In the precontracting phase, the applicant must provide a document which proves the availability of the co-financing for the project. In case the co-financing is delivered with the support of a financial institution, the applicant should submit a document confirming the support (bank loan contract). No bank guarantee is requested when submitting the application, but the formal confirmation of co-financing will have to be submitted before the project contract is signed.
x. 5	If the Applicant is asking the bank for a guarantee for a loan, should this be done before the application is submitted, or after the application has been evaluated?	If you intend to have a bank loan as co-financing, you must have entered in conversations with the bank and this must be ready to be provided to the Fund Operator if the Applicant is offered the grant.
x. 6	Is man-hour contribution accepted in the co-financing as cash contribution?	Yes, as long as they are relevant and proportional to the work demanded by the project.
x. 7	What can we include in the hourly rate when estimating the man-hours as cash co-financing?	The calculation of man-hours shall be based on the actual cost of the employer, but must be limited to salaries, social security charges and other statutory costs included in the remuneration. This method of calculation is applicable both for the Applicant and the Partner(s). It must also be in accordance with the sections on "Eligible direct expenditures" and "Eligible indirect costs in projects (overheads)" in the Call for Proposals text.
x. 8	What would a typical formula for the calculation of	A common formula would be the following: Actual salaries paid to the employee + social charges, (in Norway typically up to 30 % (Holiday pay (12%), Employer's national insurance contribution (14 ,1%) + pension costs (2-2,5%)

	the hourly rate for man-hour look like?	and occupational injury insurance) + other Statuary costs (if any). On top of that: 15 % overhead, or 25 % if relevant (research component in the project) and/or documented. The calculated amount should then be divided on the number of hours in one man-year (in Norway 1650 h).
x. 9	What is "in-kind contribution" and will this type of contribution be accepted as source of co-financing?	"In-kind contribution" typically refers to non-monetary contributions. The donation of equipment or voluntary work performed for the enterprise would be "in-kind" contributions. This will not be accepted as a source of project co-financing.
x. 10	Is VAT an eligible cost?	Recoverable VAT is not an eligible cost.
x. 11	Can I include indirect costs in the project budget?	It depends. The section "Eligible indirect costs in projects (overheads)" in the Call text addresses this. The Applicant must also take into account the relevant provisions on eligible costs under the respective state aid category, which is addressed in the section "Grant rates and co-financing." The eligibility of indirect costs will vary between categories.
x. 12	Can we ask for funding for costs related to activities which are nice to have, but are not directly necessary for the proposed project?	All funding should go to costs which directly contribute to the successful achievement of the proposed projects. If a project application asks for funding for costs which appear unrelated to this goal, the application might be considered ineligible.
x. 13	Should a detailed budget be submitted with the application, or should it be submitted after the project has been approved?	You must submit a detailed budget with the application. The mandatory documents can be found on the Programme website. If your project is approved, the Project Contract from Innovation Norway might require an updated budget.
x. 14	Are costs for project management eligible? And if they are, who should have the role?	Yes, the cost for project management are eligible if they are listed as an eligible cost under the state aid category applicable to the project in question. It is for the Project Promoter to decide how the project is managed, but it is recommended that there is one project manager, and that the Project Promoter is as involved in the project management as possible. General functions, such as company management, accounting, HR and communication, are not project management, but expected to be covered by the overhead.
x. 15	Are costs for reconstructions eligible? E.g. Applying energy efficiency measures, such as insulation, in a building?	No, if the main purpose of a project is reconstruction it will not be eligible under the Business Development Programme. If your project has a minor part consisting of reconstruction, you must carefully check the provisions under the relevant state aid category.
x. 16	Is acquisition of second-hand equipment permitted within the category of regional aid? What procedure should be followed by the applicant to get the approval of the acquisition?	Yes, acquisition of second-hand equipment is listed as an eligible expenditure in the Call text (section on "Eligible direct expenditures"). It is, however, not unconditional. Only SMEs can include such costs in the project budget. The applicant must justify the selection of second-hand equipment. Moreover, the lifetime of the equipment from the moment of procurement should exceed the project implementation duration. A decision will be taken by Innovation Norway on case by case basis and special conditions will be included in the Project Contract.
x. 17	We need to acquire and integrate new equipment for	No, long-term investments in production equipment for products that will be sold on the market will not be supported under a development project.

	the development of our new product/service. This will be utilized also after the commercialization of our product/service. Will this be covered by the funding?	
x. 18	If we want to introduce a technology developed in a third country as an important part of our project, will the cost of the technology be an eligible expense?	For an investment project, e.g. to increase capacity or improve the production process of a company, the total costs of the technology could be eligible. In case of a development project, only the costs that would qualify as R&D, e.g. modifications/adaptations necessary because of local conditions, would be eligible.
x. 19	Is the participation in relevant fairs an eligible cost?	As described in the <u>GBER</u> Article 19, the renting, setting up and running of a stand can be an eligible cost. There are no specific parameters to assess the relevance of the fair to the Applicant's project success. As a result, the Applicant must carefully explain the reasoning for why participation in this fair is necessary for project success.
xi. Assessment Process		
xi. 1	Are the national authorities in the Beneficiary State involved in project assessment and selection?	EEA and Norway Grants Programmes operated by Innovation Norway (role of Fund Operator) will not involve national authorities in the decision and selection making process of the project applications. However, Innovation Norway will be in close cooperation with the National Focal Point, National Programme Partners, other Programme Operators and other relevant national authorities in order to ensure a smooth implementation of the Programme.
xi. 2	Is it recommended for an SMEs to use consultants and would this provide more scores to the application?	Innovation Norway does not recommend the use of consultants. The application form has been designed and intended to be answered by the applicants themselves, in their own words. A project application prepared with the help of consultants will not receive a higher score.
xii. Romania Specific		
xiii. Greece Specific		
xiii. 1	If we are requesting a guarantee from the Hellenic Development Bank (HDB, former ETEAN), how will that work?	If a guarantee from HDB is requested this must be mentioned in the Application Form under "Financing Plan". If you are offered the grant, your request for guarantee will be forwarded to HDB for assessment and decision.
xiii. 2	When do we need an E3 form?	For applicants that do not form and publish annual balance sheet, you should submit the form "E3" that was submitted to the financial authority for 2019, 2018 and 2017". In case the data from "E3" is not sufficient and information on Liabilities or Assets is needed, the Fund Operator will ask for this during the project assessment.

xiv. Bulgaria Specific		
xiv. 1	What national procurement rules apply to the Programme?	A project promoter that receives 50 % or more of the eligible expenditure of the total project as grant from the Programme, shall conduct its procurement for that project in compliance with the Decree No. 118/2014 of the Council of Ministers on the terms and conditions for selecting contractors by the grants beneficiaries from the Financial Mechanism of the European Economic Area, the Norwegian Financial Mechanism, Fund "Asylum, Migration and Integration" and Fund "Homeland security".
xiv. 2	Can an agricultural producer, registered as per the Ordinance № 3 of 29.01.1999 of the Ministry of Agriculture, be considered as an eligible applicant ?	If a company/or a sole trader is registered as a legal entity in the Trade register, they can be eligible applicants. A physical person, registered only as an agricultural producer should not be considered as eligible applicant. However, please see the answer to the question on regional aid to the agricultural sector.