

THE INTERREGIONAL COOPERATION PROGRAMME (INTERREG IVC)

PUBLIC CONSULTATION SUMMARISING STATEMENT

IN ACCORDANCE WITH ARTICLE 9 DIRECTIVE 2001/42/EC

26 July 2007

Responsible Authority:

The Managing Authority of the INTERREG IVC Programme:

Conseil Régional Nord - Pas de Calais

Hôtel de Région

59555 Lille Cedex

France

Prepared by

ECOSYSTEMS LTD

SPRL/BVBA



Brussels

PURPOSE OF THE SUMMARISING STATEMENT

This summarising statement has been prepared as part of the Strategic Environment Assessment which was carried out on the Interregional Cooperation Programme (INTERREG IVC) as amended and adopted on 27 July 2007. This statement should be read in conjunction with the Operational Programme and the Environmental Report (all available under www.interreg3c.net/)

According to Directive 2001/42/EC, the SEA process is designed to ensure that the *'likely significant (positive or negative) effects on the environment of implementing the plan or programme, and of reasonable alternatives, are identified, described, evaluated and taken into account before the programme is adopted.'*

To reflect this process, the SEA Directive (Article 9) requires that an **summarising statement** is produced at the end of the process to explain:

1. How the environmental considerations have been integrated into the programme
2. How the recommendations of the Environmental Report have been taken into account
3. How the opinions of the Environmental Authorities and the General Public received during the consultation period have been taken into account
4. The reasons for choosing the programme as adopted, in light of the other reasonable alternatives considered and
5. The measures that are to be taken to monitor the significant environmental effects of the implementation of the programme.

1. Environmental considerations

The overall objective of the INTERREG IVC programme is to:

To improve the effectiveness of regional development policies and to contribute to economic modernisation and increased competitiveness in Europe in the areas of innovation, knowledge economy, environment and risk prevention by means of interregional cooperation.

Environment is therefore one of its key objectives. The Environmental Report produced on the basis of the 3rd Revised Draft Operational Programme for INTERREG IVC concluded the following:

- there are no obvious significantly or moderately negative effects of the INTERREG IVC Operational programme.
- On the contrary, many aspects under the second priority axis 'environment and risk prevention' are likely to have positive, albeit indirect, effects on Europe's environment.
- none of the INTERREG IVC Programme's operational objectives are incompatible with the 6th EAP priorities or thematic environmental strategies. Indeed, the for second priority axis: environment and risk prevention, the relationship with the 6th EAP and European environmental policy priorities is overall positive.

2. Recommendations of the Environmental Report

The Environmental Report did nevertheless identify a number of areas where the wording of the operational objectives could be improved in order to bring them fully into line with EU environmental policies and priorities. It also recommended that environmental safeguards be introduced later on when drawing up the implementation rules of the programme (eg in the project selection procedure) to ensure that there are no significant negative environmental effects at project level.

The following table lists the findings/recommendations of the ER and summarises the Management Authority's decisions as regards their integration into the final Operational Programme.

Findings from the Environmental Report	Integrated into OP	How findings were integrated/ reasons for not taking into account
<p><u>5.3 priority 2: environment and risk prevention</u></p> <p>Proposed rewording on page 44 of the OP (new words in bold) :</p> <p><u>Objective 2: - supporting integrated, sustainable and participatory approaches to management of inland and marine waters, including waterway infrastructure.</u></p>	Yes	Objective 2 has been reworded accordingly
<p><u>5.3 priority 2: environment and risk prevention</u></p> <p>Under Objective 2 - deletion of the example on page 46:</p> <p><i>'exchange of regional policies for reaping the benefits of the sea'</i></p> <p>And replace with:</p> <p>'- developing of ecosystems based approach to the sustainable management of the seas.</p>	Yes	The example has been replaced
<p><u>5.3 priority 2: environment and risk prevention</u></p> <p>Proposed rewording on page 44 of the OP (new words in bold) :</p> <p><u>Objective 4: supporting integrated, sustainable and participatory approaches to management of inland and marine waters, including waterway infrastructure.</u></p>	Yes	Objective 4 has been reworded accordingly
<p><u>Annex 3 (page 74) :</u> It is not clear how the fast track examples relate to the thematic objectives under the priority axis 2</p> <p>Propose to include an example for nature and biodiversity on page 77 under the territorial dimension of European Cohesion Policy</p> <p>'Integrating the management of Natura 2000 into EU regional, rural and fisheries policies ' or Integrating the management of Natura 2000 into other land use and management sectors '</p>	No	The examples given are merely indicative, it is clearly stated in the OP that 'further themes may be added at a later stage, as appropriate'

Findings from the Environmental Report	Integrated into OP	How findings were integrated/ or reasons for taking into account
<p><u>6.2 Procedures for project selection (page 58)</u></p> <p>Because of the high level of the INTERREG IVC programme much of the detail as regards the choice of projects, etc is left to later when implementation rules will be drawn up together with application manual and project assessment criteria. It is recommended that :</p> <ul style="list-style-type: none"> ⇒ environmental safeguards are considered in the project application manual and during the project selection procedures to avoid any potential conflicts or incompatibilities with or between different environmental objectives ⇒ Guidelines for the environmental assessment of project applications could be drawn up to help with project selection and 'screen out' projects that could be potentially incompatible with the protection of the environment ⇒ Further it could be useful, under axis 1 that information about certain types of innovation is supported by information about how any associated environmental risks can be assessed, avoided or mitigated (for instance raising awareness of the SEA Regulation) 		<p>The Managing Authority agrees to introduce further environmental safeguards when preparing the implementation documents for the OP, in particular with reference to the project application guidelines + project selection criteria.</p>

3. Results of Consultation with Environmental Authorities /General Public

The INTERREG IVC Operational Programme (3rd revised draft) was put out to consultation on the 20 December 2006, together with the Environmental Report, produced in accordance with the SEA Directive 2001/42/EC.

Public consultation was done via the INTERREG website <http://www.interreg3.net> whilst consultation with the Environmental Authorities and national public of the Member States was done via the National Contact Points responsible for the Operational Programme within the different Member States.

A deadline of 14th February was set for comments from the general public and the majority of Member States. For Netherlands, Slovenia, Germany and UK the deadline was set at 14th March and for Greece 20th April 2007.

To facilitate the consultation process a series of 8 consultation questions were raised. These were devised to help structure the replies to the Operational Programme, taking into account the findings of the accompanying Environmental Report.

More than 300 comments from 46 authorities were received from 15 countries. About 100 of these comments contained opinions on environmental issues within the Operational Programme and on the strategic environment assessment, as well as the Environment Report and its recommendations. 200 comments submitted concerning the Operational Programme are attached as Annex 1.

The comments received on the SEA are summarised in the table below.

Country/ Organisation	Summary of comments on the SEA	Response
AT-CZ-FI-SL/ Stratcult Inter-reg IIC consortium	<p>Propose to add in the operational objectives, chapter 5: "6. Enhancing the attractiveness of the territory in support of socio-economic development and sustainable tourism by <u>protecting and developing in a creative way the cultural heritage and landscape.</u>"</p> <p>proposes to integrate the following amendments into the list of supported activities, chapter 5:</p> <ul style="list-style-type: none"> - "Development and exchange of common strategies and tools in the fields related to the protection, enhancement and <u>creative development of cultural heritage and landscapes.</u>"; - "Exchange of know-how among territorial authorities on good practice in tourism development <u>and/or cultural regional development with a particular focus on integrating sustainability aspects.</u>"; - "Development and exchange of common strategies for the promotion of cultural assets as potential for the economic development of the regions, <u>notably for sustainable tourism.</u>" 	<p>Objective 6 does not preclude creative approaches</p> <p>See response above</p> <p>This has been included</p> <p>Strategies other than for sustainable tourism are not excluded.</p>
AUSTRIA/ Lebensministerium:	<p>Considers the Environment Report is lacking in information in some areas and criticizes the wording/ methodology used.</p> <p>Considers that the operational objectives for priority axis 2 are highly appropriate for interregional cooperation and agrees that, due to the nature of the programme, no significantly negative effects seem to arise from the programme outline.</p> <p>It considers also however that appropriate implementation rules, selection criteria and environmental safeguards are necessary to ensure adequate evaluation of potentially significant effects of projects and activities funded by the programme.</p>	<p>The Management Authority and the Member States have approved the environment report and endorsed the methodology used which it considers appropriate for a strategic level plan such as this.</p> <p>This will be taken into account when preparing the programme's implementation rules</p>
BELGIUM/ Departement Leefmilieu, Natuur en Energie:	<p>Considers that an assessment of the environmental effects later on in the implementation of the programme (e.g. during project selection) is required. Therefore monitoring measures to assess environmental effects are necessary.</p> <p>It also asks why soil protection is not covered un-</p>	<p>This will be taken into account when preparing the programme's implementation rules.</p>

	<p>der priority 2.</p>	<p>Soil protection can be covered under thematic objective 6 of priority 2 – nevertheless considering the importance of this issue the following example has been included in section 5.3.4 of the OP: “- development of innovative approaches to soil protection, and to land rehabilitation ...”;</p>
<p>CZECH REPUBLIC Ministry of Environment:</p>	<p>Launched a public consultation on the OP and Environment Report and received 23 opinions. This included the following comments on environmental issues regarding the OP</p> <p>‘..(the OP and ER) do not contain any evaluation of the implementation of operational programme on air quality, and consequently, any assessment of risks attaching to potential implementation’</p> <p>‘ some parts of the text (in the ER) evoke the impression of spreading emergency news (page 27-29 Desertification of Europe). An assessment of the potential beneficial effect of projected climatic changes on living organisms is completely omitted.’</p> <p>‘outlining unrealistic goal like e.g. arresting biodiversity reduction in Europe during a very short period of time constitute a mere wishful thinking...’</p>	<p>Air pollution and health is addressed in section 4.2.8 of the ER and is covered under Objective 1 of priority axis 2 .</p> <p>The information in the ER is based on the 2005 ‘State of the Environment’ Report of the European Environment Agency which is the considered the most comprehensive and well accepted source of information on environmental threats and issues in Europe.</p> <p>The commitment to stop biodiversity loss in Europe by 2010 was made by the all EU governments at the Gothenburg</p>

		summit in 2001
<p>GERMANY/ Bundesministerium für Umwelt, Naturschutz und Reaktorsicherheit:</p>	<p>Remarks that there is no objective for the promotion of sustainable transport and requests that there is a new objective 7 ‘developing integrated transport and logistic plans to stimulate efficiency and intermodality of transport systems.’</p> <p>Under priority 1 ‘innovation and knowledge economy’ it proposes the following changes to the objectives;</p> <p><i>Obj 1: (...) in order to reduce resource consumption</i></p> <p><i>Obj 2: promoting and enabling entrepreneurship and the development of <u>sustainable</u> business initiatives in all sectors....</i></p> <p><i>Obj 5 (...) in order to decrease transport.</i></p> <p>It also asks whether the Environmental Report conclusions will be taken on board.</p>	<p>Sustainable transport is covered under objective 5</p> <p>This is not in line with rationale for objective 1; however it is not excluded that projects under objective 1 could lead to a reduction in resource consumption – see examples under 5.2.4</p> <p>An example on eco-innovations and environmental management systems has been inserted into objective 2</p> <p>This is not in line with rationale for objective 5; however it is not excluded that projects under objective 5 could lead to a reduction in transportation.</p> <p>The ER recommendations have been integrated into the final OP.</p>
<p>GERMANY/ Umwelt Bundesamt:</p>	<p>Considers that the activities undertaken under the OP (study trips, meetings, studies and reports...) will lead to significant negative environmental effects in terms of energy and paper consumption, air travel etc...and recommends an assessment of the environmental impacts of these communication and consultation activities.</p>	<p>It is acknowledged that the activities under the OP could lead to increased consumption and transportation but this will be more than offset by the</p>

		<p>environmental gains achieved through inter-regional cooperation.</p> <p>Projects will be encouraged to use least consumptive and environmentally damaging forms of communication</p>
<p>GERMANY/ Umwelt Bundesamt:</p>	<p>Would also like cooperation as regards the soil strategy to be included as a thematic objective under priority 2.</p> <p>It considers certain issues in the Environment report should be reworded or expanded on. But otherwise agrees with its recommendations as regards the rewording of certain objectives and the need for additional environmental safeguards during project selection and implementation of the OP.</p> <p>It considers that the monitoring of the environmental effects of the implementation of the programme is required</p>	<p>Soil protection is covered under objective 6 of priority 2 – the following example has been included in section 5.3.4 of the OP: “-development of innovative approaches to soil protection, and to land rehabilitation ...”</p> <p>The ER recommendations have been integrated into the final OP.</p> <p>This is addressed in chapter 6.3 of the OP. Performance indicators are provided in annex 2. The indicators can only on a very general level measure achievements. To assess the detailed environmental effects further studies are necessary. As the impacts materialise only in the long term after closing the projects, this evaluation may</p>

		be done at or after the closure of the programme.
GERMANY/ Sächsisches Staatsministerium für Wirtschaft und Arbeit:	<p>Agrees with the recommendations and conclusions of the SEA, especially as regards the introduction of additional environmental safeguards in the implementation of the OP and in project selection.</p> <p>It considers that theme „energy and sustainable transport“ should be enlarged.</p>	<p>The ER recommendations have been integrated into the final OP.</p> <p>This is not considered necessary</p>
GERMANY/ Baden Württemberg Ministry of Economic Affairs:	<p>Asks that the EU soil protection strategy be included as a thematic objective and gives a list of possible cooperation activities in this regard.</p>	<p>Soil protection can be covered under objective 6 of priority 2 – the following example has been included in section 5.3.4 of the OP: “-development of innovative approaches to soil protection, and to land rehabilitation ...”</p>
HUNGARY/ National Inspectorate for Environment, Nature and water:	<p>Expresses satisfaction the Environmental Report and asks that its recommendations be adopted and integrated into the final OP.</p> <p>Considers that environmental safeguards are needed at the project selection stage and that it is important to appoint specific indicators that could measure the environmental impact of the programme and the projects financed</p> <p>Finally, they ask whether sustainable use of thermal waters (for tourism and as an alternative energy source) can also be covered under priority 2.</p>	<p>The ER recommendations have been integrated into the final OP.</p> <p>This will be taken into account when preparing the programme’s implementation rules</p> <p>Yes, provided it is in line with the operational objectives (e.g. obj 2 on promoting water management activities)</p>
IRELAND/ Airport regions conference	<p>Main comment is to support the Commission’s proposal in the European transport policy for 2010 which places emphasis on exchanges of good practice to improve transport and infrastructure to achieve sustainable regional development</p> <p>In this respect it would like that ‘quality of life in urban areas with major transport systems and severe environmental impacts’ is included in the OP, particularly under priority axis 1 in objectives 1, 5,</p>	<p>Urban environmental issues including sustainable transport are already covered</p>

	<p>7 and under priority axis 5 under objective 5</p> <p>Also propose that European Transport policy for 2010 be included in the programme document under chapters 2.1 and 2.2 and as a separate chapter under 2.3</p> <p>Believe the European Transport Policy for 2010 be considered under the Environment Report</p>	<p>under priority 2</p> <p>The Environment Report does address the issue of transport (chapter 4.3.1) in general terms. The Report will not be updated following consultation but the Management Authority wishes to thank the consultee for drawing attention to the European Transport Policy for 2010.</p>
<p>IRELAND/ Department of Communications, Marine and Natural Resources:</p>	<p>Had no comments.</p>	
<p>ITALY/ Ministry of Environment, Territory and Sea Protection:</p>	<p>Asks that further environmental safeguards be introduced during project selection phase to safeguard against negative environmental impacts. It is in particular concerned about the potential negative environmental impacts of project activities that <i>'develop common conceptual and methodological frameworks'</i> and <i>'elaborate and pilot experiment new instruments and approaches'</i></p> <p>It also asks that the revised EU Strategy on Sustainable Development of June 06 be referred to and included in the next implementation phases. In particular priority 1 activities must also respect the EU SDS.</p>	<p>This will be taken into account when preparing the programme's implementation rules</p> <p>Reference to the EU SDS Strategy of June 06 has been included in the final draft Operational Programme (chapter 2.3)</p>
<p>ITALY/ Ministry of Environment, Territory and Sea Protection:</p>	<p>Finally, it considers the indicators and targets in annex II of the OP are not useful to understand how the financed projects contribute to the Gothenburg objectives and requests that monitoring of environmental effects be fully considered during the development of implementing rules for the OP. An environmental assessment regarding the operational manuals and monitoring procedures should be done and submitted to national environmental authorities.</p>	<p>The indicators can only on a very general level measure achievements. To assess the detailed environmental effects further studies are necessary. As the impacts materialise only in the long term</p>

		after closing the projects, this evaluation may be done at or after the closure of the programme.
LITHUANIA/ Ministry of Interior :	Carried out a national public consultation on the OP and the Environment Report. 13 responses were received, including from the Ministry of Environment, all stated they had no substantive comments and agreed with the SEA document.	The ER recommendations have been integrated into the final OP.
NORWAY/ Norwegian Institute for Urban and Regional Research:	Expresses overall satisfaction with the Environmental Report and endorses its recommendations.	The ER recommendations have been integrated into the final OP.
PORTUGAL/ Ministry of Environment:	Has no objection to the contents of the OP or Environment Report. It, nevertheless, draws attention to the need to safeguard the principle of sustainability during the whole programming period, with particular attention being paid to monitoring the evolution of the Programme. It recommends the further development of the environmental monitoring measures.	Further environmental safeguards will be taken into account when preparing the programme's implementation rules. Monitoring is addressed in chapter 6.3 of the OP. Performance indicators are provided in annex 2.
PORTUGAL/ National Public Health Dept:	Draws attention to the lack of a regionalized/spatial analysis in the SEA Report of the environmental impacts of the Op	Considering the wide geographical scope of the OP and its high strategic level it was not considered appropriate to do a regionalized spatial analysis of the environmental impact of the OP
PORTUGAL/ Municipality of Caminha:	Recommends a stronger monitoring system to guarantee that there are no negative environmental effects and the inclusion of environmental indicators in the programme.	This will be taken into account when preparing the programme's implementation rules
POLAND/	Would like to see: 'innovative policies for rehabilitation of contaminated, desertified and brownfield	These issues can be covered under

Marshal Office of the Silesia Region	sites promoted' as well as 'innovative approaches to land management, <u>especially in brownfield sites</u> and environmentally sensitive areas'.	objective 6 of priority 2 – the following example has been included in section 5.3.4 of the OP: “-development of innovative approaches to soil protection, and to land rehabilitation ...”
SLOVAKIA/ Ministry of Environment:	<p>Ref <u>Opinion N°2258/2007 -3.5/tč</u> issued by Ministry of Environment of Slovak Republic ‘... it is recommended that the OP is approved, provided that the recommendations for redrafting, completing and amending the draft OP are observed (as follows)</p> <ul style="list-style-type: none"> ⇒ We agree with the conclusions and recommendations presented in the environmental report and with their incorporation in the draft strategic document. ⇒ When selecting projects, criteria should primarily be taken into account that would screen out or adjust the individual projects so as to be compatible with the protection of the environment and landscape and public health. ⇒ The environmental impact assessment should be carried out consistently at the level of individual projects in accordance with national laws and EIA and SEA directives in order to optimize the selected solutions and their localization, time schedule and individual implementation steps, and balance the environmental, social and economic aspects of implemented projects. 	<p>The ER recommendations have been integrated into the final OP.</p> <p>This will be taken into account when preparing the programme's implementation rules</p> <p>The EIA and SEA Directives will be applied as appropriate but considering the nature of the activities funded it is highly unlikely that any of the projects will require an EIA or SEA as stipulated in the two Directives.</p>
SLOVAKIA/ Ministry of Environment:	<ul style="list-style-type: none"> ⇒ When selecting projects, account should be taken of the sustainability of the supported activity after the termination of the project co-financing, and of the balance between short-term and long-term effects. ⇒ When selecting projects, account should be taken of the balance among local, regional and national level effects of the projects. ⇒ Transparency should be ensured, including as regards access to information throughout the entire process of opening calls, select- 	<p>This will be taken into account</p> <p>MC will select projects and take into account local, regional and national level effects.</p>

	<p>ing and allocating funds, monitoring and project assessment, individual priority axes and the programme whilst respecting the competition protection rules.</p> <p>⇒ Effects of the ICP on the environment and landscape and public health should be monitored and assessed.</p> <p>⇒ Environmental and public health protection criteria should be included among the selection and assessment criteria for individual activities.</p> <p>⇒ A monitoring system for the ICP should be set up.</p> <p>⇒ Sufficient information should be provided to the applicants concerning the environmental issues and possible linkage between the submitted projects and the environment.'</p> <p>⇒ The ozone layer protection, contamination of rocky matter and monitoring of individual environment and landscape components are recommended to be considered as examples of activities or potential themes for fast track option networks.</p>	<p>Transparency will be ensured</p> <p>This is addressed in chapter 6.3 of the OP. Performance indicators are provided in annex 2. The indicators can only on a very general level measure achievements. To assess the detailed environmental effects further studies are necessary. As the impacts materialise only in the long term after closing the projects, this evaluation may be done at or after the closure of the programme</p> <p>This is foreseen</p> <p>The examples of fast track examples in annex III of the OP are indicative only, other issues that are in line with the OP objectives will be considered as appropriate.</p>
<p>SLOVAKIA/ Ministry of Environment:</p>	<p>The monitoring of implementation: According to the SEA Directive, they are obliged to ensure the monitoring and assessment of the effect of the approved ICP on the environment and landscape... The Opinion asks therefore that following should be ensured:</p> <ul style="list-style-type: none"> • outline and approval of criteria for the selection of activities and assessment of the progress made and objectives achieved within the activities through which the strategic 	<p>Monitoring is addressed in chapter 6.3 of the OP. Performance indicators are provided in annex 2. The indicators can only on a very general level measure achievements. To assess the de-</p>

	<p>document is performed so that priority is given to the assessment of long-term synergy effects, including environmental, of the project implementation whilst respecting the sustainable development principles;</p> <ul style="list-style-type: none"> • monitoring the effects on the environment, landscape and public health; • preparation and publication of monitoring reports along with the monitoring results and current effects of the ICP implementation; • linking the monitoring system to the project selection and assessment system using the environmental and public health protection criteria 	<p>tailed environmental effects further studies are necessary. As the impacts materialise only in the long term after closing the projects, this evaluation may be done at or after the closure of the programme</p>
<p>SWEDEN Ministry of Enterprise, Energy and Communications:</p>	<p>Launched a national public consultation on the OP and Environment Report. 17 opinions were received. Overall, they considered the draft programme and Environmental report to be good although some pointed out that the OP lacked descriptions of implemental questions such as procedures for selection of projects etc...</p> <p>Most organizations also expressed a wish that there be equal financial weighting between the two priority axes.</p> <p>Many authorities also considered that environmental safeguards should be established in the project application manual and during project selection procedures and that follow up concerning environment aspects after project implementation is important.</p> <p>The Swedish Forestry Agency requested that better consideration be given to the effect of storms as natural risks.</p> <p>The Swedish Road Administration points out that there is a lack of description of consequences of people exposed to noise.</p>	<p>The financial split (55% - 39%) has been accepted by the Member States.</p> <p>This will be taken into account when preparing the programme's implementation rules</p> <p>This is already included under operational objective 1 even if not explicitly mentioned.</p> <p>This is an issue best addressed at national or local level.</p>
<p>UK/ Scottish Environment Protection Agency:</p>	<p>Considers the Environment report is clear and concise and supports its recommendations.</p> <p>Considers, in particular, that building environmental safeguards into the project application manual and project selection procedures are essential mitigation measures, in order to ensure that projects submitted for funding under the OP</p>	<p>The ER recommendations have been integrated into the final OP.</p> <p>This will be taken into account</p>

	<p>are consistent with environmental objectives.</p> <p>It asks that the Responsible Authority make more firm comment about how this might be achieved.</p> <p>It would also like to see a commitment to a cross cutting sustainable development theme to ensure compliance with the Gothenburg Strategy across priority 1 and 2. In particular, steps should be put in place to ensure the support for innovation and knowledge economy does not extend to inherently unsustainable activities and contradict priority 2</p> <p>It is important that a suitable monitoring programme is developed at the earliest stage of the OP. This monitoring should be supported by a suite of indicators and there must be a commitment to respond to the results of the monitoring when they show this is necessary.</p>	<p>when preparing the programme's implementation rules.</p> <p>Cross cutting proposals will be considered with priority (chapter 4.3).</p> <p>This is addressed in chapter 6.3 of the OP. Performance indicators are provided in annex 2.</p>
<p>UK/ UK contact point for INTERREG IIIC (Liz Mills):</p>	<p>Considers that the Environment report has a competent summary of the environmental baseline and policy framework but notes that the EU SDS is not mentioned and that other key documents/issues could also have been consulted as well (eg on eco-innovation, EMAS and green procurement, LIFE).</p>	<p>Reference to the EU SDS Strategy of June 06 has been included in the final draft Operational Programme (chapter 2.3)</p>
	<p>The suggestion to draw up guidelines for the environmental assessment of project applications is considered useful and should be followed up.</p> <p>Remarks that the re-use of brownfield land has been on the EU agenda since at least 1998, and in some new Member States is one of the main challenges.</p>	<p>This will be taken into account when preparing the programme's implementation rules</p> <p>These issues can be covered under objective 6: the following example has been included in section 5.3.4 of the OP: “-development of innovative approaches to soil protection, and to land rehabilitation of contaminated land and brown-fields”</p>
<p>UK/ Department of Agriculture and Rural Development:</p>	<p>Supports the inclusion of the ‘development of integrated coastal management (ICZM) activities’ which it considers could benefit significantly from interregional cooperation.</p>	<p>This is included in objective 4</p>
<p>UK/</p>	<p>Broadly endorses the Environment Report and its recommendation to include environmental safe-</p>	<p>The ER recommendations have</p>

<p>Scottish Natural Heritage:</p>	<p>guards in the project application manual and during project selection procedures.</p> <p>It also asks that consideration be given to how the knowledge transfer programme eligible for funding under INTERREG IVC might contribute to, or make some connection with the European Network for Rural Development as required under the ERDF.</p>	<p>been integrated into the final OP.</p> <p>Rural issues are eligible as long as they are related to the programme objectives</p>
<p>UK/ South East England Development Agency:</p> <p>UK/ South East England Development Agency:</p>	<p>Feels that this integrated approach (cf section 4.3 of OP) should be strengthened in the OP with a strong message that projects spanning both Priorities 1 and 2 (i.e. joint delivery of the Lisbon and Gothenburg goals) will be favoured.</p> <p>Supports the comments raised in the SEA with regard to the budget share between Priorities 1 and 2 (section 4.3). Environmental sustainability has a key role to play in making the EU a stronger and more competitive knowledge-based economy, capable of sustainable economic growth with more and better jobs and greater social cohesion. We would prefer to see allocations equally divided between the 2 priority axes.</p> <p>Some areas of relevant environmental policy, important for setting the context for the detailed operational objectives and examples of actions later on, are omitted from the policy review in Chapter 3. An example is civil protection strategy relevant for environmental risks (http://ec.europa.eu/environment/civil/index.htm). In 5.3.2 of the OP, plans and measures to cope with risks and 'existing Community action plans aiming at dealing with major disasters' are mentioned as suitable topics for projects but there is no specific reference to the established policy.</p> <p>The SEA could also have pointed out that there are opportunities in INTERREG IVC to capitalise on good practices developed using the LIFE Nature, LIFE Environment and LIFE Third Countries programmes and other funding programmes previously run by DG Environment e.g. Forest Focus and the Community Framework for Cooperation to Promote Sustainable Urban Development.</p> <p>While the 2001 Gothenburg agenda identified four key challenges (climate change, sustainable transport, threats to public health and managing natural resources more responsibly), the EU Sustainable Development Strategy (http://ec.europa.eu/sustainable/docs/renewed_eu_sds_en.pdf), adopted by the European Council in June 2006 added others, notably sustainable consumption and production, including green public procurement. The references to the Gothenburg agenda should be updated to include these.</p>	<p>Cross cutting proposals will be considered with priority (chapter 4.3).</p> <p>The financial split (55% - 39%) has been accepted by the majority of Member States.</p> <p>Under 5.3.2 it is stated that 'the operational objectives will be implemented in close articulation with existing Community mechanisms and actions plans, particularly those dealing with natural disasters such as marine pollution and chemical accidents to avoid duplication of efforts...' this includes the environmental policy instruments mentioned by the consultee.</p> <p>Reference to the EU SDS Strategy of June 06 has been included in</p>

	<p>Some environmental policies relevant to exchange of experience are neglected such as eco-innovation, green economic development using instruments like EMAS, green procurement and supply chain, sustainable construction, sustainable urban development and Environmental Management Systems.</p> <p>The SEA infers that the re-use of Brownfield land (one of the Fast Track themes) is not a priority. We consider that this is still a key challenge particularly in some new Member States (e.g. Poland).</p>	<p>the final draft Operational Programme</p> <p>Such projects are eligible under the 1st priority axis – the example under 5.2.4 has been adjusted to reflect this clearly</p> <p>These issues can be covered under objective 6: the following example has been included in section 5.3.4 of the OP: “-development of innovative approaches to soil protection, and to land rehabilitation of contaminated land and brown-fields”</p>
<p>UK/ South East England Development Agency:</p>	<p>In 5.3.2, climate protection and dealing with the impacts of climate change should be explicitly referred to in the list of Operational Objectives.</p> <p>In section 5.3.4, the “Examples of cooperation activities” may be better grouped under the relevant operational objective headings to improve consistency. At present, there are items under inappropriate headings (e.g. ICZM under water management; health care and air quality under Biodiversity).</p> <p>In section 5.3.4, under the heading “Natural and technological risks”:</p> <ul style="list-style-type: none"> ▪ “Strategies for improving the monitoring of environmental risks should be rephrased: “Strategies for improving the monitoring and the minimising of environmental risks.” ▪ This sub-theme could support the “exchange of experience in adapting to climate change 	<p>Climate change, like the EU’s Sustainable Development Strategy is an overarching consideration for priority axis 2 and for objective 1 in particular</p> <p>Examples not fitting to objective will be taken out.</p> <p>List of examples have been updated.</p>

<p>UK/ South East Eng- land Develop- ment Agency:</p>	<ul style="list-style-type: none"> ▪ We support the finding of the Environmental Report that activities to protect and enhance biodiversity should be supported outside protected areas. ▪ The wording of the example cooperation activity, “Development of measures to cope with health care related environmental problems” is not clear and could lead to misunderstanding. <p>We consider that an example activity should be given relating to the tackling of soil degradation (i.e. combating soil erosion; combating soil contamination; to combat landslides etc), in order to open the door to potential projects in this field, as there will be future EC legislation on soil. (See “Ideas Paper” of DG ENV March 2006).</p> <p>Sustainable construction should be mentioned within Priority 2. It is an essential component of addressing environmental issues and particularly climate change related to buildings.</p> <p>Within Priority 2, the spatial dimension should be strengthened: innovative approaches to spatial planning and land development are key aspects of all proposed Objectives within the Priority.</p> <p>While the operational objectives as such do not seem to be incompatible with EU Environmental policy priorities, we support the SEA recommendation that measures need to be taken during the project generation and appraisal process that ensure that project activity approved under axis 1 is in line with these policies.</p> <p>Eco-innovation should be included among the examples in 5.2.4. The bullets for SMEs should be ‘greened’ to reflect win-win policy on improving the environmental performance of enterprises.</p>	<p>This is stated in objective 4</p> <p>Examples have been updated</p> <p>These issues can be covered under objective 6: the following example has been included in section 5.3.4 of the OP: “-development of innovative approaches to soil protection, and to land rehabilitation of contaminated land and brown-fields”</p> <p>It is not possible to cover all environmental issues in the OP</p> <p>Are already included in the examples given</p> <p>This will be taken into account when preparing the programme’s implementation rules</p> <p>The issues mentioned are already included in the examples given.</p>
	<p>In section 5.2.4, under the heading “Innovation and Research and Technology Development”: - the sentence regarding “Strategic cooperation aimed at optimising/enhancing the use of new environmentally friendly technologies” should be re-</p>	<p>This has been amended.</p>

	<p>phrased as follows: “Strategic cooperation aimed at optimising/enhancing the <i>development</i> and use of new environmentally friendly technologies, <i>products, processes and services</i>” in areas such as:</p> <ul style="list-style-type: none"> ▪ Water supply and use management (waste water treatment and sewerage; sustainable drainage systems; technologies); ▪ Resource efficiency (energy, water) in soil remediation technologies and techniques. <p>This wording would go further toward supporting the Commission’s Environmental Technologies Action Plan (ETAP), which in itself should be explicitly encouraged through specific actions. It also opens the possibility of new sources of employment to be developed (http://ec.europa.eu/environment/etap/index_en.htm).</p> <p>Regarding the operational objectives under thematic axis 1, we believe that the economic opportunities of an improved environment should be emphasised, in order to draw a closer link between axes 1 and 2.</p> <p>In section 5.2.4 under the heading “Employment, Human and Education” the programme should support activities aimed at improving and developing skills. Such activities include:</p> <ul style="list-style-type: none"> - Exchange of best practices to improve training systems and qualifications in environmental management and sustainable business practices; - Exchange of best practices about integrating the environment into skills development programmes; - develop joint environmental training and advice to SMEs. <p>This above are supported by the “Ideas paper” produced by DG ENV (27 March 2006).</p> <p>The spatial dimension to Priority 1 is missing. Within the objectives or potential activities, there should be references to innovative approaches to the provision and management of land/premises to facilitate economic development, employment and diversification.</p>	<p>Cross cutting proposal will be considered with priority (chapter 4.3).</p> <p>Activities will be supported. Examples given allow also the themes proposed.</p> <p>Is covered by the example business support.</p>
<p>UK/ South East England Development Agency:</p>	<p>We agree that safeguards are required, particularly at the project selection stage. Environmental experts should be involved in the project assessment process to ensure that no activity is incompatible with EU Environmental policy. Environmental criteria could be used within the assessment scoring system with environmentally negative projects being excluded. The suggestion to draw up guidelines for the environmental assessment of project applications is useful and should be followed up. In addition, those assisting in project generation/preparation (under Technical As-</p>	<p>This will be taken into account when preparing the programme’s implementation rules</p>

	sistance) could be informed on relevant environmental policies so they can reduce the chance of incompatibilities arising during the preparation phase and can propose solutions to strengthen the positive environmental impacts of projects.	
UK/ Luton Borough Council :	Broadly endorses the OP and ER provided there will be no negative impact on health and quality of life.	

4. Consideration of alternatives

The Environment Report examined one alternative option for the proposed Operational Programme based on the areas identified for interregional cooperation in the European Regional Development Fund¹ under environmental and risk prevention (Article 5). This is the legal reference for developing the Interreg IVC Operational Programme.

These objectives were tested against the same SEA objectives used for testing the operational objectives of the Draft Programme. This assessment revealed that the alternative objectives offer, overall, less positive environmental effects than the proposed programme objectives.

The overall conclusion was therefore that the current operational objectives as defined in the INTERREG IVC Operational Programme (3rd Draft) are likely to lead to more and stronger positive indirect environmental effects than the original thematic objectives identified for interregional cooperation in the European Regional Development Fund under environmental and risk prevention (Article 5)

5. The measures to be taken to monitor environmental effects during implementation of the programme.

The Environmental Report clearly pointed out that the assessment indicated that there are no obvious significantly or moderately negative environmental effects of the Interregional Cooperation Programme. However, the following measures are proposed to safeguard that the projects will not harm the environment.

In the application form there will be a request for projects to produce a statement containing a detailed description of the environmental effects of the project.

During the six-monthly reporting, the projects will be asked to indicate any change from the initial statement in the application.

The final project report will again request an evaluation of the environmental effects of the project.

The information given in the application, the six months report and the final reports will be carefully assessed. Reports with not sufficient or unconvincing information on this issue, or which demonstrate that there are negative environmental effects will not be approved and payments will be stopped.

¹ Regulation EC N°1080/2006 on the European Regional Development Funding and repealing Regulation (EC) N°1783/1999 OJ L 210/1 31.7.2006

Annex 1 to Summarising Statement on Public Consultation in accordance with Article 9 Directive 2001/42/EC

Country/ Organization	#	Comments on the Operational Programme (OP)	Response
ESTONIA/ Coordinated by Ministry of the Interior	1	<p>Remarks regarding the content of the draft document:</p> <p>1) In the document, the experience (results and lessons) of the previous programme Interreg IIIC are analysed (section 3.5). Among else, it is considered that some of the objectives of the previous programme were not met as they were somewhat too ambitious perhaps. However, the same can be said about the current Interreg IVC programme as it is planned – it is rather wide in scope and ambitious, particularly when considering the limited resources available for the programme in the next seven years. It is worth to reconsider if the thematic focus of the programme could be increased further. For example, the eligible sectors and activities under the two rather general priorities of the programme could be more limited and targeted.</p>	Member States made a big effort to agree on a common programme. Reopening the discussion would endanger the start-up of the programme.
	2	2) In the section "3.1 Introduction (to the chapter "Analysis")" on page 9 it is mentioned: "The new Member States have markedly lower levels of ... employment rates than other EU countries". This statement should be rephrased, because this generalization is not true for all new Member States. In several of them, the employment rates are considerably higher (and unemployment lower) than in the other EU countries. Estonia is a good example of such a new Member State.	Rephrased in "Many new Member States..."
	3	3) It has been identified in the document, including the SWOT-analysis on page 30, that the regions in the new Member States have the greatest challenge in terms of catching up to the knowledge economy. Yet, this issue is not addressed with the proposed activities under the priority 1. We propose to determine in the programme a principle to be followed during its implementation: under the priority 1 activities related to innovation, R&D development and information society, preference should be given to projects that involve new Member States. This would allow to address better the intra-EU gap in the development of knowledge economy. Greatest synergy in this field can indeed rise from co-operation between old and new Member State institutions and regions.	Member States are not likely to agree to give projects with new MS priority
	4	4) It has been also identified in the document, including the SWOT-analysis on page 31, that the adoption of ICT application in business remains relatively low. This is a crucial aspect of the development of ICT and information society. Yet, no supporting activities are planned in the programme to overcome the issue. For example, activities to promote e-business development, the environment ICT intake and diffusion, knowledge transfer, could be foreseen in the programme under priority 1.	Is already included in priority 1, sub-theme "The information society".
	5	5) In the section "3.2. General trends and developments in Europe" , challenge No. 2 is identified as the demographic developments in Europe. Under the challenge, the issue of migration and immigration from outside Europe is briefly mentioned. We recommend to expand the treatment of migration and immigration issues more in the analysis of trends and their impact. The movement of people has considerably affected the labour market situation in both old and new Member States and will increasingly do so already in the near future. Among else, the intra-EU migration could receive more attention in the document.	MS agreed on this part of the OP already. Unlikely that they are willing to reopen the discussion. Also ex-ante evaluation confirms on page 23 that the analysis reflects correctly the existing and future-oriented issues of regional and territorial development.
	6	6) In the section "3.6. SWOT analysis" on page 31 the sentence "The vast majority of EU regions contain none of these has no or underdeveloped innovation infrastructure (universities, science parks, innovation centres)" should be rephrased. It is not clear what is meant by "none of these".	Rephrased in "- Innovation infrastructure (universities, science parks, innovation centres) is non-existent or underdeveloped in the vast majority of EU regions"
	7	7) In the section "3.6. SWOT analysis" , on page 31-32, it has been brought out as an opportunity that the new Member States demonstrate rates of economic growth above EU averages. However, there is also a risk attached to this – if the growth should come to a halt and an economic cool-down occur in the new Member States, the convergence process would decelerate and accordingly also the potential of gains from territorial co-operation fall as environment/context deteriorates. Thus, the latter issue could also be mentioned under the threats in the SWOT analysis.	MS agreed on this part of the OP already. Unlikely that they are willing to reopen the discussion. Also ex-ante evaluation confirms on page 23 that the analysis reflects correctly the existing and future-oriented issues of regional and territorial development.

Annex 1 to Summarising Statement on Public Consultation in accordance with Article 9 Directive 2001/42/EC

Country/ Organization	#	Comments on the Operational Programme (OP)	Response
	8	8) We would like to draw attention that if the Switzerland's contributions will be added to Table 7.2 (total programme budget, page 64), the relevant co-financing rate for the partners from Switzerland should be also determined in Section "7.4. Co-financing rates" on page 65.	Contribution of Switzerland and co-financing rate are added
	9	<p>Additional comments</p> <p>Considering that the preparation and implementation of the mainstream programmes is organised in very different ways in different MS's, we propose therefore to restore the section 3, section 3 under Ch "Fast Track projects as it was in the previous version as follows:</p> <p><i>"An important prerequisite for participation of a region in a fast Track Project is the involvement of the authority managing the respective Convergence or Competitiveness and Employment programmes since the action plan developed could then be implemented in the framework of these programmes. These programmes mentioned before should have a reference to the Regions for Economic Change initiative so as to facilitate making funding available for implementing the action plan elaborated"</i></p>	Chapter has been rephrased to reflect the content proposed.
FRANCE Mission Opérationnelle Transfrontalière (MOT)	10	<p><u>La prise en compte des territoires transfrontaliers dans le programme Interreg 4 c</u></p> <p>Interreg 4 C devrait logiquement prendre en compte la coopération territoriale. Or la rédaction actuelle du projet de programme se concentre quasi exclusivement sur la mise en œuvre des objectifs 1 et 2 de la politique de cohésion ; l'objectif 3 n'est mentionné qu'au § 8.1.2 du projet, où il est dit que le programme « encouragera la coopération entre les territoires des programmes transfrontaliers et transnationaux afin de rendre possible l'échange d'expériences et un transfert de bonnes pratiques sur les thèmes « innovation/économie de la connaissance » et « environnement/prévention des risques ».</p> <p>S'agissant d'INTERACT, le projet de programme prévoit une concentration sur la mise en oeuvre des programmes, au détriment du contenu de la coopération, tel qu'il était notamment traité par les « projets individuels » INTERACT.</p> <p>Les acquis de ces projets justifient amplement la poursuite de leur soutien par les fonds européens ; la contribution de la coopération territoriale aux objectifs de Lisbonne –Göteborg légitime qu'un tel soutien soit possible via Interreg 4 C.</p>	In chapter 4.4.2 the transfer of results into European Territorial Co-operation programmes is now explicitly mentioned.
GERMANY/ Land Brandenburg	11	<p>The new Operational Programme INTERREG IV C exposes only aging and its influence on the employment market as main aspects of the demographic change. Therefore we like to suggest the following modifications and amendments (in italic):</p> <ul style="list-style-type: none"> • Chapter 2.2, page.4, point 4.; amendment: <i>"- the demographic challenges and their impacts on labour markets, migration, immigration, social care systems, educational programs et.al.</i> 	Chapter 2.2 highlights only the developments. Further analysis is provided in chapter 3.
	12	<ul style="list-style-type: none"> • Chapter 2.3.1, page 6, paragraph 5, point 3; amendment: <i>growing negative impacts of the demographic evolution (population ageing, declining fertility rate, migration in terms of brain drain or even diminishing population) on regional labour markets, on public and private infrastructure and services.</i> 	Amendments suggested do not add to main information already given.

Annex 1 to Summarising Statement on Public Consultation in accordance with Article 9 Directive 2001/42/EC

Country/ Organization	#	Comments on the Operational Programme (OP)	Response
	13	<ul style="list-style-type: none"> Chapter 3.2, page 10 Challenge 2, paragraph 2; amendment: <i>The negative impacts of the natural demographic evolution on regional labour markets...immigration of qualified people into Europe. And there are some more important issues in the demographic sphere. A declining population will result in a corresponding decline in population density. This in turn has important consequences for social and material infrastructure. This problem is particularly pertinent in rural areas which already have difficulties in ensuring the provision of adequate public and private services. Strategies in terms of new standards, indicators or similar must be adapted to best meet the strengths and weaknesses of the European regions. The spatial proximity between growing, stagnating and shrinking regions requires flexible solutions to be adopted to deal with the specificities of the region. The cooperation between growing regions, especially Metropolitan regions, and the surrounding rural areas should be intensified.</i> <i>And also important, the potential, knowledge and experience in the workforce of the over 50s should be better explored in view of demographic change. This requires the prevention of age discrimination in all employment and action in order to overcome existing barriers. In achieving this the behaviour of employers will be key. Significant attitude changes towards older workers and changes to employment practices need therefore to be encouraged. At the same time, older workers need to be incited to return or be retained in employment or self employment or encouraged into business start ups.</i> 	<p>Current text covers indirectly the issues mentioned.</p> <p>Further extension would outbalance the analysis against the other points analysed.</p>
	14	<ul style="list-style-type: none"> Chapter 3.6, page 32 SWOT-Analysis "Threats", point 2; amendment: <i>The ageing and declining of Europe's population...and a new paragraph: A declining population will result in a corresponding decline in population density. There will be growing, stagnating and shrinking regions, which requires new and flexible solutions for social and material infrastructure, urban development as well as different educational programs and the prevention of age discrimination in employment.</i> 	<p>Table summarises the analysis made earlier.</p>
	15	<ul style="list-style-type: none"> Chapter 5.2.4, page 42, Innovation and Research & Technology Development, new paragraph: <i>Identification and development of new standards, indicators or similar for social and material infrastructure as well as urban development in declining areas.</i> 	<p>Issues related to demographic change are already included in chapter 5.2.2, point 7</p>

Annex 1 to Summarising Statement on Public Consultation in accordance with Article 9 Directive 2001/42/EC

Country/ Organization	#	Comments on the Operational Programme (OP)	Response
	16	<ul style="list-style-type: none"> Chapter 5.2.4, page 43, amendment "Examples of cooperation activities" and for the operational Objective 7 "Creating the necessary framework conditions for regional economies to adapt to major socio-economic changes, notably globalisation and demographic challenges" 	Examples have been amended.
	17	<ul style="list-style-type: none"> Chapter 5.3.4, page. 45 ff; Natural and technological risks, amendment: <i>Identification and development of new management systems for fire brigade, rescue, medical care systems et.al. in declining areas; Water and waste water management: Amendment to the first point: Strategies for improving quality...of water management, specially in declining areas;</i> 	Examples have been amended.
	18	<ul style="list-style-type: none"> Annex 2, page. 72: indicatorlist, figure 2.1.1 amendments for the Output und Result indicators with the paragraph "adaption to socio-economic changes, notably demographic change" 	Indicator list includes all subthemes mentioned in chapter 4.3
GERMANY/ Metropolregion Rhein-Neckar	19	The new management system for the programme providing only one central JTS and four Information Points certainly needs the installation of supplemental National Contact Points, which we would highly recommend at least for Germany.	Amendment of chapter 6.1.7: "The authorities of the countries participating in this Interregional Cooperation Programme are strongly recommended to set up National Contact Points."
	20	The differentiation of co-financing rates (i.e. 85 and 75%) depending on the Member States' GDP per capita will cause complications for lead partners by calculating and reporting of the financial situation of the projects concerned. It would have been more reasonable to provide only one common co-financing rate for all partners, especially since there is no appreciable difference between the two rates.	Majority of Member States rejected proposal for a flat co-financing rate
	21	A bit vague, though, appears the presentation of the complementarities between the interregional cooperation strands of the objective 1 and 2 programmes and the INTERREG IV Programme. In principal, the idea to allow the funding of interregional projects not only in the framework of the INTERREG IVC Programme but also in national objective 1 and objective 2 programmes seems to be a flexible measure, we fear, though, that this duplication might cause confusion.	Chapter 8.1 has been updated to add information about complementarity between INTERREG and the mainstream programmes

Annex 1 to Summarising Statement on Public Consultation in accordance with Article 9 Directive 2001/42/EC

Country/ Organization	#	Comments on the Operational Programme (OP)	Response
GERMANY/ Ministry of Economic Affairs - Baden- Württemberg	22	<p>The political priorities of the territorial agenda however are only in part included in the two priorities of INTERREG IVC:</p> <p>The political support required in the territorial agenda for transnational and innovative regional clusters (linking of economy, science and administration on regional level for a closer linking of investment- and regional development policy) is included in the framework of priority 1 of the programme – with focus on the fields of innovation and knowledge economy.</p> <p>In the framework of priority 2 – environment and risk prevention – the priorities of the territorial agenda “use of ecological structures and cultural resources for the development” and “promotion of a transeuropean risk management” are sufficiently considered.</p>	No requirement made to change the text of the OP
	23	<p>However, a subject which has not been explicitly foreseen in the interregional cooperation is the development of new forms of political governance and coordination between city and land as well as the – especially also the interregional - network between metropolis/cities and regional centres. Particularly with the development of innovative possibilities of cooperations and actions for an equal development of urban and rural areas and cities of different sizes an important contribution can be made for a well-balanced, poly central development in Europe in the sense of the aim of a territorial cohesion.</p> <p>Therefore, in INTERREG IVC should be indicated clearly the aim “support of partnerships of city - land and the (especially also the interregional) network of city-regions - including metropolis - and regional centres in order to identify common potentials and development strategies” in the two topics “innovation and knowledge-based society” and “environment and risk prevention”.</p>	To build networks and projects of local and regional authorities is the main purpose of the programme
	24	<p>Urban and rural areas have an equal position. We therefore suggest to replace the the term “Hinterland” (page 16) by another neutral term.</p>	Term “Hinterland” does not appear anymore in the

Annex 1 to Summarising Statement on Public Consultation in accordance with Article 9 Directive 2001/42/EC

Country/ Organization	#	Comments on the Operational Programme (OP)	Response
	25	<p>Programme Strategy</p> <p>The Ministry of Economic Affairs of Baden-Württemberg welcomes the initiative "Regions for Economic change", especially the opportunity to participate in the Fast Track Option. The topics described in Annex 3 are of great interest for us and a lot of our stakeholders. Therefore it would be very helpfully to have more information about the application procedure and the selection criterions.</p> <p>With regard to the issues that will be addressed in the analysis, there are additional points: Close cooperation and exchange of knowledge and experience between "knowhow" centres and SMEs is important, but also promoting innovative research and entrepreneurship in Europe's regions. Technology transfer events are an important instrument. It is also necessarily supporting the transformation of research results into products and services, that are suitable for global markets, too.</p> <p>Digital literacy is a another important prerequisite for success in the knowledge economy and should be supported on all levels, particularly in rural areas.</p>	Annex 3 is a copy of the respective annex of the Region for Economic Change document published by the EC.
	26	<p>Priority 1</p> <p>It is important that this priority will support interregional cooperation projects that contribute also to:</p> <ul style="list-style-type: none"> • fostering regional clusters, including players from research, industry and the public sector ("triple helix"); • promoting the use of new information and communication technologies it is very important supporting e-business solutions, Web 2.0 and Web 3.0 based applications by businesses, public services and the general public, especially in rural areas 	Subthemes and examples given (5.2.4) clearly allow the projects mentioned.
	27	<p>Further examples of cooperation activities that could be supported under Regional Initiatives (RfEC):</p> <p>Concerning Innovation and Research & Technology Development</p> <ul style="list-style-type: none"> - Awareness raising among and training for actors involved in setting up and managing regional innovation systems regarding the dynamics of regional innovation. - Bringing innovative ideas to the market more quickly, i.e. by means of technology transfer events as well as by programmes which link researchers to business managers or VC-institutions, thereby facilitating the commercialisation of research results. 	See comment above to Programme Strategy

Annex 1 to Summarising Statement on Public Consultation in accordance with Article 9 Directive 2001/42/EC

Country/ Organization	#	Comments on the Operational Programme (OP)	Response
	28	<p>Concerning Entrepreneurship and SMEs</p> <ul style="list-style-type: none"> - Cooperation in the field of financial assistance to SMEs and the development of risk capital. - One focus should also lie on looking into strategies of regional innovation actors (public and private) for attracting venture capital outfits to a region, i.e. through the establishment of public/private co-investment funds. 	See comment above to Programme Strategy
	29	<p>Concerning Information Society</p> <ul style="list-style-type: none"> - Exchange on development of ICT based public services to increase the effectiveness and competition of businesses and entrepreneurs, i.e. public electronic procurement services, Web 2.0-technology based networking portals etc. - Joint development of strategies to enhance participation of the public to the information society, e.g. programmes for improving computer skills, digital and information literacy. Such focus should also sound out the potential of Open Content and Open Access initiatives with regards to improving regional knowledge and education systems, by facilitating transfer of know-how and skills to the general public. 	See comment above to Programme Strategy
	30	<p>Concerning Employment, Human Capital and Education</p> <ul style="list-style-type: none"> - Improving qualifications for innovation in private companies as well as in the public sector and in research institutions. Such focus could also include awareness raising and training regarding the dynamics and workings of regional innovation systems. 	See comment above to Programme Strategy
	31	<p>Priority 2</p> <p>With our opinion to priority 2 we take up the EU soil protection strategy and suggest to include the following supplementing items in the examples of cooperation activities:</p> <ul style="list-style-type: none"> • Monitoring large scale soil contamination (POPs, PCB, e.g.) • Identify new soil relevant pollutions • Developing soil mapping systems (for precision farming and quantification of infiltration) • Developing concepts for Soil Stock Market (civil engineering) • Developing concepts against landscape fragmentation and landscape sealing • Design permaculture systems • Design semi-natural green roof systems 	Examples have been amended.

Annex 1 to Summarising Statement on Public Consultation in accordance with Article 9 Directive 2001/42/EC

Country/ Organization	#	Comments on the Operational Programme (OP)	Response
GERMANY/ MFG Baden- Württemberg mbH	32	<p>p. 37/81 and p. 74/81 Fast Track Option and TYPE 2 activities</p> <p>In principle, MFG welcomes the opportunity to participate in projects under the Fast Track Option (Type 2). The topics described in Annex 3 are of great interest for our organisation. As an innovation agency from one of the most innovative European regions we have the experience and understanding to participate in such actions.</p> <p>However, we are concerned regarding the transparency and openness of the application procedure and would encourage a mechanism which ensures that our organisation will be able to participate in and obtain tender information regarding each of the planned initiatives under the Fast Track Option. Our current understanding is that this would not be the case in the context of the current programme status of Baden-Württemberg.</p>	Text on 4.4.2 has been reworded.
	33	<p>Furthermore, MFG suggests to amend the following parts of the document, which are marked in <i>italics</i> :</p> <p>p. 11</p> <p>The issues that will be addressed in this analysis relate to: Innovation, research and technology development <i>and transfer, commercialisation of ICT-research results</i></p>	ICT research results are included in the word "Research"
	34	<p>p.13, 2nd paragraph</p> <p>Close cooperation and exchange of knowledge and experience between "know-how" centres and SMEs play an important role in this process. <i>But also technology transfer events, activities promoting and supporting the commercialisation of research results (e.g. technology transfer events, business coaching for scientists) are central to promoting innovative research and entrepreneurship in Europe's regions.</i></p>	The activities proposed are included in the wording
	35	<p>p.14, 4th paragraph</p> <p>This applies to both high- and low-skilled positions and to both manufacturing and services. <i>Digital literacy is a necessary prerequisite for success in the knowledge economy and should be supported on all levels, particularly in rural areas.</i></p>	Details proposed to add in included in the already more general wording.
	36	<p>pp. 41 – 44: Priority 1: Innovation and knowledge economy</p> <p>5.2.2 Operational objectives</p> <p>This priority will support interregional cooperation projects that contribute to:</p> <p>1. Improving the capacity of regions for strengthening ICT-based research, technology and innovation; particularly by fostering regional clusters, including players from research, industry and the public sector ("triple helix");</p> <p>2. Promoting and enabling entrepreneurship and the development of new business initiatives in all sectors of relevance to regional economies, in particular those that are knowledge based and innovative. In order to unleash regional innovation, a particular focus should also lie on technology transfer as well as the commercialisation of research results as these are considered weaknesses in the context of regional capacity development;</p> <p>5. Promoting the use of new information and communication technologies such as e-business solutions and Web 2.0 based applications by businesses, public services and the general public, especially in rural areas;</p>	Examples to explain the general aims of this priority are listed in 5.2.4.

Annex 1 to Summarising Statement on Public Consultation in accordance with Article 9 Directive 2001/42/EC

Country/ Organization	#	Comments on the Operational Programme (OP)	Response
	37	<p>Examples of cooperation activities that can be supported:</p> <ul style="list-style-type: none"> * Innovation and Research & Technology Development <ul style="list-style-type: none"> - Awareness- raising among and training for actors involved in setting up and managing regional innovation systems regarding the dynamics of regional innovation; - Bringing innovative ideas to the market more quickly, <i>i.e. by means of tech-nology transfer events as well as by programmes which link researchers to business managers or VC-institutions, thereby facilitating the commercialisation of research results.</i> * Entrepreneurship and SMEs <ul style="list-style-type: none"> - Cooperation in the field of financial assistance to SMEs and the development of risk capital. One focus should also lie on looking into strategies of regional innovation actors (public and private) for attracting venture capital outfits to a region, <i>i.e. through the establishment of public/private co-investment funds.</i> 	<p>Awareness raising and training is already mentioned in examples under bullet point "Employment, ..." All useful means are possible concerning the point "Bringing innovative ideas to the market more quickly". Example proposed could lead to the misunderstanding that the actions supported are limited to the example mentioned. "Cooperation in the field of financial assistance to SMEs..." already mentioned</p>
	38	<ul style="list-style-type: none"> * Information Society <ul style="list-style-type: none"> - Exchange on development of ICT based public services to increase the ef-fectiveness and competition of businesses and entrepreneurs, <i>.i.e. public electronic procurement services, Web 2.0-technology based networking portals etc.</i> - Joint development of strategies to enhance participation of the public to the information society, e.g. programmes for improving computer skills, <i>digital and information literacy. Such focus should also sound out the potential of Open Content and Open Access initiatives with regards to improving re-gional knowledge and education systems, by facilitating transfer of know-how and skills to the general public.</i> * Employment, Human Capital and Education <ul style="list-style-type: none"> - Improving qualifications for innovation in private companies as well as in the public sector and in research institutions. <i>Such focus could also include awareness raising and training regarding the dynamics and workings of re-gional innovation systems.</i> 	<p>Further specification of examples would for some potential application rather reduce the scope of possible actions.</p>
GERMANY/ Ministry of Intergenerational Affairs, Family, Women and Integration of the State of North Rhine Westphalia	39	<p>Amendments in red: Chapter 2.2, page 4, point 4, amendment. <i>"the demographic change with its influence on labour markets as well as its inherent opportunities to generate economic growth via silvereconomy initiatives aiming at the creation of new products and services for the elderly and thereby securing/creating new employment possibilities;"</i></p>	<p>Chapter 2.2 highlight only the developments. Further analysis is provided in chapter 3.</p>
	40	<p>Chapter 2.3.1, page 6, paragraph 5, point 3, amendment. <i>"the effects and inherent opportunities of the demographic change on regional labour markets and on public and private infrastructures and services via the creation of work-force in the product and service sectors aimed at the needs of the elderly."</i></p>	<p>Rewording: Growing impacts of the demographic evolution on the regional economy and the labour markets.</p>
	41	<p>Chapter 3.2, page 10, challenge 2, new paragraph 1, amendment. <i>"If the ageing society is not understood as one of the most important successes of European history with all the economic, social, political and cultural implications and opportunities, if the inherent opportunities of cross-sectoral silvereconomy initiatives will not be utilised; if the prevention of age discrimination in employment and in the third age will not be promoted; if educational programmes will not be adapted to the change in needs of Europe 's future population; if European learning processes concerning the different regional demographic developments as well as concerning specific regional answers to these developments will not occur - Europe will miss out on the chance to be competitive on a world-wide scale which will have far-reaching consequences for local employment markets and economic growth.</i></p>	<p>Paragraph 2 ahs slightly been reworded</p>

Annex 1 to Summarising Statement on Public Consultation in accordance with Article 9 Directive 2001/42/EC

Country/ Organization	#	Comments on the Operational Programme (OP)	Response
	42	<p>Chapter 3.6, page 29, paragraph 2, amendment. "It emerges from this analysis that there is a strong need to focus on actions aiming at curbing the effects in the EU of accelerating globalization, <i>the demographic developments in Europe</i> and climate change. This is why actions at local and regional level, in a complementary way to those implemented at national level, related to innovation, <i>the demographic change</i> and environment preservation are so crucial in this programming period."</p> <p>(In section 3.2 "the demographic developments in Europe" are listed as one four "major challenges that have significant territorial impacts in the European Union and beyond". As indicated above there is so far no mentioning of demographic change as a challenge that needs to be tackled by the INTERREG IV C in section 3.6 although the other challenges mentioned in section 3.2, i.e. accelerating globalisation and climate change are explicitly noted in section 3.6. The fourth challenge listed in section 3.2 entitled "towards a new energy paradigm" does also find no mentioning in section 3.6)</p>	MS agreed on this part of the OP already. Unlikely that they are willing to reopen the discussion. Also ex-ante evaluation confirms on page 23 that the analysis reflects correctly the existing and future-oriented issues of regional and territorial development.
	43	Chapter 3.6 , page 32, SWOT-Analysis table, segment "Opportunities", amendment, new point. " <i>Silvereconomy initiatives have the potential to generate economic growth by creating the needed framework conditions for the emergence of new products and services for the elderly and therefore creating new employment opportunities.</i> "	See comment above to 3.6, page 29
	44	Chapter 3.6 , page 32, SWOT-Analysis table, segment "Threats", point two, delete this point.	See comment above to 3.6, page 30
	45	Chapter 4.2 , specific objective 2, amendment. "...employment, human capital, education <i>and demographic change</i> ."	Demographic change is part of human capital
	46	Chapter 4.3 , page 35, priority 1, point four, amendment. "employment, human capital, education <i>and demographic change</i> " [see above]	See comment above to 4.2
	47	Chapter 5.2.2 , page 41, point seven, amendment. "Creating the necessary framework conditions for regional economies to adapt to major socio-economic changes, notably globalisation and <i>demographic change</i> ."	Changed accordingly
	48	Chapter 5.2.4 , page 42, Examples of cooperation activities that can be supported under Regional Initiatives (TYPE 1), Innovation and Research & Technology Development, point six, amendment. "Bringing innovative <i>products and services</i> to the market more quickly."	Ideas have to be developed to products and services that can be provided to the market.
	49	Chapter 5.2.4 , page 42, Examples of cooperation activities that can be supported under Regional Initiatives (TYPE 1), Entrepreneurship and SMEs, point six, amendment. "Cooperation activities for the support and promotion of female <i>and senior</i> entrepreneurship"	Too specific. Senior entrepreneurship is indirectly tackled in first bullet point.
	50	<p>Chapter 5.2.4, page 43, Examples of cooperation activities that can be supported under Regional Initiatives (TYPE 1) - a brand new category "European Silver Economy" with the following new points (2nd best: the incorporation of the new points in the category Information Society) amendments.</p> <ul style="list-style-type: none"> - "<i>Stock-taking of silver economy-related activities in European regions to achieve an overview of relevant regional policies and actions throughout Europe which other regions can use as a starting point for their own silvereconomy strategy and policy development</i>" - "<i>Bundling and integration of practical silver economy project examples which can be used as a platform for the exchange and sharing of knowledge and experiences throughout European regions</i>" - "<i>Europe-wide exchange and co-operation regarding the creation of a general greater awareness of the opportunities of an ageing society, supporting regional companies and service providers in the silvereconomy to develop and offer suitable products and services for the for the rapidly developing European and worldwide silvereconomy market</i>" - "<i>Initiation and stimulation of an interchange of know-how on the creation and development of regional networks for the silvereconomy, thereby promoting political initiatives at European level and creating a worldwide leading European silvereconomy</i>" 	As proposal on 3.6, page 32

Annex 1 to Summarising Statement on Public Consultation in accordance with Article 9 Directive 2001/42/EC

Country/ Organization	#	Comments on the Operational Programme (OP)	Response
	51	Chapter 5.2.4 , page 43, Examples of cooperation activities that can be supported under Regional Initiatives (TYPE 1), Employment, Human Capital, Education and demographic change [see above], amendment, new points corresponding to the operational objective 7 (5.2.2). - " <i>Creation of framework conditions for regional economies to adapt to demographic change</i> " - " <i>Exchange of experiences from regional cultural initiatives dealing with collaborative learning across cultures and generations to support inter-generational communication which can help to create stronger regional identification of young and old and the building of a European identity as a Europe of the regions.</i> "	Examples have been amended.
	52	Annex 2 , page 72, indicatorlist, figure 2.1.1, amendments for the Output und Result Indicators within the paragraph. "Employment, Human Capital, Education and Demographic Change ." [see above]	Demographic change is covered in human capital. Indicator list includes all subthemes mentioned in chapter 4.3
	53	Annex 2 , page 72, indicatorlist, figure 2.1.1, amendments for the Output und Result Indicators within the paragraph, new indicator for the lists of both Output and Input Indicators. " <i>Adaptation to socio-economic changes, especially demographic change.</i> "	Demographic change is covered in human capital. Indicator list includes all subthemes mentioned in chapter 4.3
	54	Annex 3 , page 76, III. more and better jobs, meeting the demographic change[see above], amendment. "... knock-on effects to business. <i>The positive chances and opportunities of the demographic change also need to be identified and grasped by European regions in order to take appropriate actions. This should include the development of regional silvereconomy markets which are able to develop and offer suitable products and services for customers and different silvereconomy actors to improve the quality of life of older people, to have a positive impact on economic growth and for improving Europe's competitiveness. Regions working on...</i> "	Annex 3 is a copy of the respective annex of the Region for Economic Change document publish by the EC.
GERMANY/ Ministry for Economic Affairs and Labor of SAXONY-ANHALT	55	As an european region with important automotive, chemical, mining and food processing industrial sectors, Saxony-Anhalt has a strong interest in that the RfEC Initiative extends the industry focus. In consequence it is herewith proposed, either to extend the scope of the current topics (Option A) or to ensure an industrial focus in a number of topics during the implementation of the REC Initiative (Option B):	The Region for Economic Change is initiated by the EC. The EC may add further themes at a later stage.
	56	Option A: Introducing a new topic "The role of industry for regional development". Industry has an important impact on regional development. Regional policy is: - supporting initiatives at regional level to maintain industrial competitiveness such as clusters, industrial innovation schemes or strategic dialogues at regional level; - helping to restructure regions most heavily dependent on traditional industries. Some regions are still heavily dependent on traditional industries and vulnerable to relocation decisions, particularly by large employers. The aim of regions working on this theme could be: * to discuss the future role of industry in regional development: * to encourage and to present new schemes in fostering industrial competitiveness in the regions; * to develop policy mechanisms on how best to anticipate, or respond to, closures through restructuring and diversification, or through retraining, business support, advice and financing and nurturing local clusters.	See comment above
	57	Option B: ensure the industry link in the various subjects by developing a mechanism which would allow: * identification of good practices of industry-related measures in regional development in a number of thematic areas; * involvement of industry and regional representation of industrial regions in the ongoing debate of the REC Initiative; * fostering the co-operation between industries in developing successful tools for regional development.	See comment above

Annex 1 to Summarising Statement on Public Consultation in accordance with Article 9 Directive 2001/42/EC

Country/ Organization	#	Comments on the Operational Programme (OP)	Response
	58	As to the implementation strategy of Fast Track Networks and Regional Initiatives (Table Overview on page 38) it is considered very negative that for the the latter instrument no EC-financial support for expertise and administration is foreseen . The INTERREG IIIC working experiences of the last 3 years clearly have shown that particularly this kind of support is not only important but vital/indispensable for the succesful managing and outcome of Networks and Regional Framework Initiatives. Since this support is still foreseen for Fast Track Networks, this paragraph would represent an unequal treatment vis-à-vis the Regional Initiatives.	Chapter 4.4.2 is rephrased. For capitalisation, including Fast Track Projects, financial support is provided in the same way as for Regional Initiatives.
GERMANY Freistaat Thüringen, Staatskanzlei	59	1. Do you agree the analysis (chapter 3) of the Programme? No objections - Chapter 3 gives a good overview of the major trends and developments for the next period in the EU 27. All regions in the Member Staates have to recognize the four main Challenges.	No requirement made to change the text of the OP
	60	2. Do you agree the stretegy, operational objectives and policy priorities? No objections - The objectives of the programme, the thematic priorities for interregional co-operation and the strategy of the programme will help actors at the regional and local level in Thuringia to learn from each others experiences in the field of innovation, knowledge economy, environment and risk prevention.	No requirement made to change the text of the OP
	61	3. Do you have proposals for activities that bring added value for european development by means of interregional co-operation ? No objections	No requirement made to change the text of the OP
	62	4. How do you see the Fast Track Option within the Community initiative of Regions for Econmic Change? No Fast Track Option! The Fast Track Option as type of intervention <u>exclude</u> actors at the regional and local level from the programme implementation. The best practices from the period 2000-2006 should be involved in the normal INTERREG IV C programming procedure. The Joint Technical Secretariat (JTS) can play an active role by supporting best practices.	Chapter 4.4 has been changed.
GERMANY Rheinland-Pfalz Struktur- und Genehmigungsdir ektion Süd	63	No comments	No proposal for amendment

Annex 1 to Summarising Statement on Public Consultation in accordance with Article 9 Directive 2001/42/EC

Country/ Organization	#	Comments on the Operational Programme (OP)	Response
IRELAND Airport Regions Conference	64	<p>1. The ARC and the ARC Quality of Life Network propose that the subjects of:</p> <p style="text-align: center;"><i>Quality of Life in Urban areas with major transport systems and severe environmental impacts</i></p> <p>generally should be included in the programme documents and as input to point 1.), 2.), 3.) and 4.) under The Strategic Environmental Assessment of the draft Interregional Cooperation programme (INTERREG IVC) and the accompanying Environmental Report.</p>	Urban issues will be covered by the URBACT II programme
	65	<p>2. Furthermore we recommend the subjects above are emphasized and included under:</p> <p><i>Priority 1; Innovation and the knowledge economy</i></p> <p><i>Objective 1 improving the capacity of regions for strengthening research, technology and innovation; Objective 5 Promoting the use of new information and communication technologies by businesses, public services and the general public, especially in rural areas; and 7 Creating the necessary framework conditions for regional economies to adapt to major socio-economic challenges, notably globalisation and demographic challenges.</i></p> <p><i>Priority 2; Environment and risk prevention</i></p> <p><i>Objective 5 Stimulating energy efficiency and the development of renewable energies as well as better coordinated efficient energy management systems and promoting sustainable transport.</i></p>	Urban issues will be covered by the URBACT II programme
	66	<p>3. We also propose that</p> <p>European transport policy for 2010</p> <p>is included In the Programme Document under the chapters:</p> <p style="padding-left: 40px;"><i>2.1. Interregional Cooperation in a changing context</i></p> <p style="padding-left: 40px;"><i>2.2. Developments in the global and territorial context</i></p> <p>and as separate subchapter under</p> <p style="padding-left: 40px;"><i>2.3. Developments in the policy context</i></p>	MS agreed on this part of the OP already. Unlikely that they are willing to reopen the discussion. Also ex-ante evaluation confirms on page 23 that the analysis reflects correctly the existing and future-oriented issues of regional and territorial development.
LITHUANIA/ Ministry of Environment	67	Suggest to update the number of EU member states in pages 30, 42, 45 and 49	Figures are correct as the SWOT summarises the analysis in chapter 3.
LITHUANIA/ Utena County Governor Administration	68	Expressed wish for a more detailed analysis of separate regions and territories	MS agreed on this part of the OP already. Unlikely that they are willing to reopen the discussion. Also ex-ante evaluation confirms on page 23 that the analysis reflects correctly the existing and future-oriented issues of regional and territorial development.

Annex 1 to Summarising Statement on Public Consultation in accordance with Article 9 Directive 2001/42/EC

Country/ Organization	#	Comments on the Operational Programme (OP)	Response
POLAND/ Marshal Office of the Silesia Region	69	Chapter 3. Analysis 3.4.2 State of play - (p. 19) proposal for complementing the sentence: "Finally, the utilisation of contaminated, desertified and brownfield lands is an increasingly important element of sustainable spatial development. Their regeneration can help to reduce the effects of city expansion, to reduce the environmental risk and can help to restore these areas to social-economic activities.	MS agreed on this part of the OP already. Unlikely that they are willing to reopen the discussion. Also ex-ante evaluation confirms on page 23 that the analysis reflects correctly the existing and future-oriented issues of regional and territorial development.
	70	Chapter 4. Programme strategy 4.4.2 The Fast Track option (TYPE 2) The chapter does not answer the question how the „Fast track option“ is to be connected with regional operational programmes (mainstream). Is it necessary to guarantee in the programmes that funding for the FTO follow-up actions will be provided? If so, how much funds? How the action plan will be implemented – according to regional programme rules, IV C rules, separate set of rules?	Chapter 4.4.2 is rephrased. For capitalisation, including Fast Track Projects, financial support is provided in the same way as for Regional Initiatives. However, the follow-up and the implementation of the action plans have to be covered by the respective Objective 1, 2 and 3 programmes.
	71	Chapter 5. Priority Axes 5.3.2 Operational objectives - (str. 44) proposal for additional item on the list: "Priority will support interregional cooperation projects that contribute to:"- please add: "Stimulating innovative policies for the rehabilitation of contaminated, desertified and brownfield sites and lands" - (str. 46) proposal for complementing the text "Examples of cooperation activities", point "Biodiversity and preservation of natural heritage": "- Exchange on the development of innovative approaches to land development, especially in brownfield sites and environmentally sensitive areas."	Examples have been amended
POLAND/ Marshal Office of the Lubelskie Region	72	The new programme should include the possibility of continuing the sub-projects implemented within RFOs.	Further details will be development the Programme Manual as part of the application pack.
SWEDEN/ Ministry for Enterprise, Energy and Communications	73	SWOT analysis We feel the description does not fully take into account opportunities neither in rural conditions, nor concerning how to <u>improve policy implementation systems</u> . Further observations merit adding under 3. Opportunities, p. 32 <u>Innovation and knowledge economy</u> - There is considerable surplus labour in rural areas and capital is sometimes available as collateral, while housing costs are low, which provides opportunity for investments, including in internetbased solutions. <u>Environment and risk prevention</u> -Net increment in EU forests exceeds cuttings by more than 50 % and the management of forest land is far from using the opportunities to produce biomass. This is an opportunity to combat climate change. <u>Related to interregional cooperation activities</u> -National implementation of policies for development is supported by EU-funding. This is a particular opportunity to review and compare Programmes between countries in order to enhance national implementation.	MS agreed on this part of the OP already. Unlikely that they are willing to reopen the discussion. Also ex-ante evaluation confirms on page 23 that the analysis reflects correctly the existing and future-oriented issues of regional and territorial development.

Annex 1 to Summarising Statement on Public Consultation in accordance with Article 9 Directive 2001/42/EC

Country/ Organization	#	Comments on the Operational Programme (OP)	Response
	74	Operational objectives for Environment and risk prevention We propose to alter slightly priorities 1 and 6 on p. 44, with proposed changes in bold letters: "1. Developing plans(.....fires, floods," storms , "desertification ...) ... risks." "6. Enhancing.....protecting" and utilising " the cultural landscape"	Examples mentioned will be deleted to open clearly to all natural and technological risks.
	75	In the Examples of cooperation activities, p. 45-46 we feel that the problems caused by storms are forgotten. We propose under Natural and technological risks an addition to the 5th example making it read "-Strategies for preventing and reducing floods" as well as damages from storms.	Rephrasing of the examples to allow exchange and transfer on all themes of natural and technological risks.
	76	Under Energy and sustainable transport we feel that it is not appropriate to exclude sustainable production of energy. We propose the following wording for the third example: "-Exchange to stimulate investment in" sustainable production of energy as well as "in energy efficiency projects;"	Rephrasing as proposed.
UK national response - Department for Communities and Local Government (DCLG)	77	General Comments * The text is often unclear and would greatly benefit by being proof-read and amended by an English copy editor. There are fundamental mistakes in the text. E.g. Section 4.5 on Result and impact indicators - the word 'immaterial' in the first paragraph is not correct. Its usual meaning is 'unimportant' or irrelevant. Better to re-phrase and say, for example, that the activities will not be of the type that result in measurable impacts 'on the ground'? Avoid implying that the impacts will be trivial.	Proof reading carried out by native English speaker
	78	* The analysis of challenges and associated EU policy is at too basic a level and is not up to date. It relies too much on one particular ESPON study. An additional source for the environmental challenges would be the reports by the European Environment Agency, which is the main source used in the accompanying SEA document.	MS agreed on this part of the OP already. Unlikely that they are willing to reopen the discussion. Also ex-ante evaluation confirms on page 23 that the analysis reflects correctly the existing and future-oriented issues of regional and territorial development.
	79	* Lisbon/ Goteborg - reference to Goteborg needs to be updated to refer to the new EU Sustainable Development Strategy. The draft OP underestimates the sustainable communities policies that we, UK, and the rest of the EU 15 already has.	MS agreed on this part of the OP already. Unlikely that they are willing to reopen the discussion. Also ex-ante evaluation confirms on page 23 that the analysis reflects correctly the existing and future-oriented issues of regional and territorial development.
	80	* There needs to be a better explanation (not necessarily longer – just more informative) of how the current INTERREG IIIC has operated. Currently the text takes existing knowledge by the reader too much for granted and the partial explanation given is confusing. For current IIIC there especially needs to be a brief explanation of the 3 different types of operation.	MS agreed on this part of the OP already. Unlikely that they are willing to reopen the discussion. Also ex-ante evaluation confirms on page 23 that the analysis reflects correctly the existing and future-oriented issues of regional and territorial development.
	81	* Clarify what is meant by "regional policies", i.e. does the OP mean regional development using Structural Funds, or policies developed by regions - both meanings used in text.	Wording in 4.4 has been amended. Further information will be provided in a Programme Manual.
	82	* All figures and tables need headings and sources. A separate list of figures and tables at the beginning of the document would be helpful.	Table heading will be added

Annex 1 to Summarising Statement on Public Consultation in accordance with Article 9 Directive 2001/42/EC

Country/ Organization	#	Comments on the Operational Programme (OP)	Response
	83	* Re-inforce the point on projects addressing more than one sub-theme. It would be better to have a dedicated section in the OP, not just a passing mention.	Further information may be provided in the Manual.
	84	* The role of the private sector could be clarified and also how the public sector and private sector could work together.	Further information will be provided in the Manual.
	85	* The issue of results is not covered in necessary detail. The operational plan should make clear what outcomes are expected from the programme and who will be responsible for the delivering these outcomes etc?	Further information will be provided in the Manual.
	86	Regions for Economic Change (REC) initiative & Fast Track proposal The UK welcomes the principles of the these proposals and understands that the European Commission is still considering the detail. It will be important if the proposals are intended to go ahead that Member States have the opportunity to be consulted and further involved in their development. Specific Objective 1: The UK would like to see more emphasis on technology transfer and the links between R&D and entrepreneurship.	Technology transfer and links between R&D and entrepreneurship are supported by priority 1, subthemes 1 "Innovation and Research & Technology Development".
	87	Overlap between initiatives At EU level, IVC and URBACT II are intended to be complementary. The Member States need to establish how they will ensure the complementary delivery of IVC, URBACT, ESPON and INTERACT, along with the presumably modified role of INTERACT now that the interregional strand is to run as one programme rather than four. In particular, how will the complementary roles of IVC and URBACT in relation to the Fast Track be managed? The desirability of 'achieving synergies' with other EU funding programmes coming on stream for 2006-13 is briefly mentioned (the SWOT table p.32), but the OP does not mention funds providing opportunities which may overlap with IVC (Eg FP7, the Competitiveness & Innovation Programme. There needs to be some consideration of how the different funds will operate in a complementary way.	Further information will be provided in the Manual.
	88	Environment/ climate change/ sustainable development Some areas of relevant environmental policy, important for setting the context for the detailed operational objectives and examples of actions later on, are omitted from the policy review. An example is civil protection strategy important for environmental risks. In 5.3.2 (p.44) plans and measures to cope with risks and 'existing Community action plans aiming at dealing with major disasters are mentioned but there is no specific reference to the established policy. Other policy areas are given only the briefest mention. An example is the Environmental Technologies Action Plan (ETAP). This is a major initiative and actions to implement it could be explicitly encouraged, rather than simply referring vaguely to 'enhancing the use of new environmentally friendly technologies' (5.2.4).	Any useful policy development with or without a policy framework is eligible to exchange on, to transfer or to further develop.
	89	The OP recognises the need to increase expenditure in R&D. This should include R&D in Environmental Industries in particular in order to both tackle action on climate change and assist in the delivery of Priority Axis 2. It should also recognise the need for closer links between academia and industry.	Exchange and transfer of R&D policies in any relevant regional or local policy area is eligible to be supported.
	90	The sections that deal with the information society should highlight the role that ICT can play in tackling climate change.	ICT plays a important role in all different kind of policy areas.
	91	Migration, Immigration and Demographic Change The OP acknowledges aging and its influence on the employment market, however, there is no mention of the implications of the recent enlargement of the European Union and the effect that this has had on the mobility of workers from the new member states. The OP should acknowledge the affect that this will have, for example upon the labour market.	MS agreed on this part of the OP already. Unlikely that they are willing to reopen the discussion. Also ex-ante evaluation confirms on page 23 that the analysis reflects correctly the existing and future-oriented issues of regional and territorial

Annex 1 to Summarising Statement on Public Consultation in accordance with Article 9 Directive 2001/42/EC

Country/ Organization	#	Comments on the Operational Programme (OP)	Response
	92	<p>Rural Economy</p> <p>The OP does not mention how the activities within the rural economy could be more closely integrated into innovation and competitiveness programmes and how they can link to urban development.</p> <p>Rural and outlying areas and areas where traditional industries are in decline need to be connected to the global marketplace as well as within the EU. Annex 3 includes reference to telecommunications networks and their importance to rural and outlying communities. While the OP recognizes the importance of interconnecting regions and global markets, this could be acknowledged more strongly.</p>	Urban issues should be tackled by URBACT II. Support to the economic diversification of rural areas is mentioned.
UK final comments - Department for Communities and Local Government (DCLG)	93	<p>Chapter 4.</p> <p>4.4 : This new wording adds considerably to informing what the different types of interventions are and their intended contribution to the programme. However we feel that it remains unclear how the interventions will operate in practice (we agree with a number of our other Member State colleagues who have described this section as, "lacking in specifics on how the programme will be operationalised").</p>	More details will be provided in a Programme Manual
	94	<p>Chapter 6 Implementing Provisions:</p> <p>6.1.3. The wording follows the regulations but fails to make clear how this will be implemented in Member States. We assume this will be for an FCG meeting or that FCG representatives will be invited to discuss for inclusion in a Programme Complement.</p>	Yes, the Financial Control Group (FCG) will further discuss details.
	95	6.2.2. The final sentence "In addition, the Commission informs the Monitoring Committee about which projects it considers as candidates for the Fast track projects". The UK does not consider this meets the spirit of cooperation with Member States or that it is transparent. It will be very important that the process for selection of 'Fast Track Projects' allows Member States, possibly through the Monitoring Committee, to take a view and decide on candidate projects.	Chapter 4.4 has been adjusted. The MC will take the decision on the Fast Track projects.
	96	6.3.1. The UK remains concerned that is far from clear on key aspects of programme management. Regulations are quoted without any indication of how these will be applied eg how the requirement for first level control (Article 16 of Reg 1080) will be delivered in the context of the programme see para 6.3.2. We assume that if this is not being clarified in the Programme that there will be separate discussions in an FCG Working Group to provide for this clarification in an accompanying Programme Complement	The Member States are responsible for the set-up of the first level control systems. Further information on this will be provided by the JTS.
UK/ North West Regional Assembly	97	<p>The new Operational Programme INTERREG IV C exposes only aging and its influence on the employment market as main aspects of the demographic change. Therefore we like to suggest the following modifications and amendments (in italic):</p> <p>Chapter 2.2, page.4, point 4. ; amendment: "- the demographic challenges and their impacts on labour markets, <i>migration, immigration, social care systems, educational programs et.al.</i></p>	MS agreed on this part of the OP already. Unlikely that they are willing to reopen the discussion. Also ex-ante evaluation confirms on page 23 that the analysis reflects correctly the existing and future-oriented issues of regional and territorial development.
	98	<p>Chapter 2.3.1, page 6, paragraph 5, point 3; amendment: growing negative impacts of the demographic evolution (population ageing, <i>declining fertility rate, migration in terms of brain drain or even diminishing population</i>) on regional labour markets, on public and private infrastructure and services.</p>	MS agreed on this part of the OP already. Unlikely that they are willing to reopen the discussion. Also ex-ante evaluation confirms on page 23 that the analysis reflects correctly the existing and future-oriented issues of regional and territorial development.

Annex 1 to Summarising Statement on Public Consultation in accordance with Article 9 Directive 2001/42/EC

Country/ Organization	#	Comments on the Operational Programme (OP)	Response
	99	Chapter 3.2 , page 10 Challenge 2, paragraph 2; amendment: The negative impacts of the natural demographic evolution on regional labour markets....immigration of qualified people into Europe. <i>And there are some more important issues in the demographic sphere. A declining population will result in a corresponding decline in population density. This in turn has important consequences for social and material infrastructure. This problem is particularly pertinent in rural areas which already have difficulties in ensuring the provision of adequate public and private services. Strategies in terms of new standards, indicators or simular must be adapted to best meet the strengths and weaknesses of the European regions. The spatial proximity between growing, stagnating and shrinking regions requires flexible solutions to be adopted to deal with the specificities of the region. The cooperation between growing regions, especially Metropolitan regions, and the surrounding rural areas should be intensified.</i>	MS agreed on this part of the OP already. Unlikely that they are willing to reopen the discussion. Also ex-ante evaluation confirms on page 23 that the analysis reflects correctly the existing and future-oriented issues of regional and territorial development.
	100	<i>And also important, the potential, knowledge and experience in the workforce of the over 50s should be better explored in view of demographic change. This requires the prevention of age discrimination in all employment and action in order to overcome existing barriers. In achieving this the behaviour of employers will be key. Significant attitude changes towards older workers and changes to employment practices need therefore to be encouraged. At the same time, older workers need to be incited to return or be retained in employment or self employment or encouraged into business start ups.</i>	MS agreed on this part of the OP already. Unlikely that they are willing to reopen the discussion. Also ex-ante evaluation confirms on page 23 that the analysis reflects correctly the existing and future-oriented issues of regional and territorial
	101	Chapter 3.6 , page 32 SWOT-Analysis "Threats", point 2; amendment: The ageing and declining of Europe's population...and a new paragraph: <i>A declining population will result in a corresponding decline in population density. There will be growing, stagnating and shrinking regions, which requires new and flexible solutions for social and material infrastructure, urban development as well as different educational programs and the prevention of age discrimination in employment.</i>	MS agreed on this part of the OP already. Unlikely that they are willing to reopen the discussion. Also ex-ante evaluation confirms on page 23 that the analysis reflects correctly the existing and future-oriented issues of regional and territorial development.
	102	Chapter 5.2.4 , page 42, Innovation and Research & Technology Development, new paragraph: <i>Identification and development of new standards, indicators or simular for social and material infrastructure as well as urban development in declining areas.</i>	Example is already covered by second bullet point. Urban issues should be tackled by URBACT II.
	103	Chaper 5.2.4 , page 43, amendment "Examples of cooperation activities" and for the operational Objective 7 " <i>Creating the necessary framework conditions for regional economies to adapt to major socio-economic changes, notably globalisation and demographic challenges</i> "	Regional economy development is covered under "Entrepreneurship and SMEs."
	104	Chapter 5.3.4 , page. 45 ff; Natural and technological risks, amendment: <i>Identification and development of new management systems for fire brigade, rescue, medical care systems et.al. in declining areas;</i>	Change that "all relevant natural and technological risks" are covered.
	105	Annex 2 , page. 72: indicatorlist, figure 2.1.1 amendments for the Output und Result indicators with the paragraph "adaption to socio-economic changes, notably demographic change"	Demographic change covered within "Employment, Human Capital and Education", see indicator under 1.1.1
UK/ Local Government Association & Local Government International Bureau	106	About Interregional Cooperation (INTERREG IVC) 1. Interregional cooperation should have a significant element which is open to all. All regions have useful experiences to offer in terms of improving their competitiveness.	New regulations require focus mentioned.
	107	2. UK local government has been very concerned by the squeeze on the overall levels of resources for INTERREG IVC and is further concerned at the proposed top slicing of the already very modest interregional strand to fund the ESPON, INTERACT and URBACT programmes.	Decision on funding has been made by the EU Member States.
	108	3. Additional support through mainstreaming interregional cooperation within regional Convergence and Competitiveness and Employment operational programmes is welcome. This should help good practice from across the EU to be integrated into local and regional economic policies. This is important as such integration of good practices is not happening well at the moment. Local authorities should however be involved in mainstreaming interregional cooperation.	All responsible stakeholders of the mainstream programme will be involved.

Annex 1 to Summarising Statement on Public Consultation in accordance with Article 9 Directive 2001/42/EC

Country/ Organization	#	Comments on the Operational Programme (OP)	Response
	109	4. However, mainstreaming interregional cooperation should not be to the detriment of a future dedicated stream, given that the capacity of any region to participate in interregional cooperation could be limited by the budget and priorities of its operational programme. It is important to ensure that there are mechanisms within operational programmes to protect any allocations for Cooperation activities from being unduly diverted to other priorities.	Has to be taken care within the mainstream programmes.
	110	5. The new development of the fast track initiative looks potentially interesting. However, we would welcome more detail on these proposals and on the definition of 'weak' and 'strong' regions. More consideration should be given to how this might operate effectively in the UK.	Chapter 4.4 has been adjusted.
UK contact point for Interreg IIIC	111	1 General points 1.1 This document is not as well drafted as other Operational Programmes. There are many minor errors of English. The whole text needs to be proof-read and amended by a native English speaker so as to ensure clarity of meaning. This may seem a tiresome point, but if the meaning is not clear in English it will be difficult for non-native speakers to understand. Ambiguous text, in particular, is almost impossible to translate. This problem is worst for those parts of the OP that are crucial in explaining the rationale for the programme and how it will work; these bits are not very user-friendly for native speakers either !	English language check carried out.
	112	1.2 There needs to be a better explanation (not necessarily longer – just more informative) of how the current INTERREG IIIC has operated and also of the Regions for Economic Change proposal. Currently the text takes existing knowledge by the reader too much for granted and the partial explanation given is confusing. For current IIIC there especially needs to be a brief explanation of the 3 different types of operation.	MS agreed on this part of the OP already. Unlikely that they are willing to reopen the discussion. Also ex-ante evaluation confirms on page 23 that the analysis reflects correctly the existing and future-oriented issues of regional and territorial development.
	113	1.3 Somewhere include a clarification of what is meant by 'regional policies'. Is it regional development using Structural Funds or/and policies developed by regions themselves – like the RES and RSS in England ? This was unclear in IIIC and both meanings were used.	MS agreed on this part of the OP already. Unlikely that they are willing to reopen the discussion. Also ex-ante evaluation confirms on page 23 that the analysis reflects correctly the existing and future-oriented issues of regional and territorial development.
	114	1.4 To establish a proper balance between the two main policy areas addressed by this programme – broadly, Lisbon and Goteborg – the references to the Goteborg strategy need to be updated to refer to the new EU Sustainable Development Strategy adopted by the Council (Prime Ministers) in June 2006. http://ec.europa.eu/sustainable/docs/renewed_eu_sds_en.pdf For example, while the 2001 Goteborg agenda identified four key challenges (climate change, sustainable transport, threats to public health and managing natural resources more responsibly), the EU SDS adds others, notably sustainable consumption and production – including green public procurement - (big issues for the UK – DEFRA lead) and the promotion of sustainable development worldwide. For the UK it is worth noting that the overall aim of the renewed strategy highlights 'the creation of sustainable communities'. (para. 5 p.3) All Member States have national SDS too. The analysis in the OP underestimates the policy we already have, at least in the UK and the rest of the EU 15.	MS agreed on this part of the OP already. Unlikely that they are willing to reopen the discussion. Also ex-ante evaluation confirms on page 23 that the analysis reflects correctly the existing and future-oriented issues of regional and territorial development.
	115	1.5 The potential contribution of this programme to capacity building and skills for sustainable communities is not mentioned in the OP (though 'skills development' gets a passing mention in 5.2.2). (Ref. the informal ministerial to take place in Leipzig in May 2007 where a Skills Commitment will be adopted http://www.ascskills.org.uk/pages/international/skills-symposium) - a missed opportunity to connect the programme to delivery of the Bristol Accord which has high profile at national level.	MS agreed on this part of the OP already. Unlikely that they are willing to reopen the discussion. Also ex-ante evaluation confirms on page 23 that the analysis reflects correctly the existing and future-oriented issues of regional and territorial development.

Annex 1 to Summarising Statement on Public Consultation in accordance with Article 9 Directive 2001/42/EC

Country/ Organization	#	Comments on the Operational Programme (OP)	Response
	116	1.6 Where EU strategies or instruments are already in place in policy areas covered by this programme they should be properly named and referenced, preferably in Chapter 3. Avoid waiting until the list of indicative actions that can be supported by IVC before mentioning that there is actually an EU action plan on the topic in question. Examples are civil protection strategy and the Environmental Technologies Action Plan (see detail on Chapter 3, below.)	MS agreed on this part of the OP already. Unlikely that they are willing to reopen the discussion. Also ex-ante evaluation confirms on page 23 that the analysis reflects correctly the existing and future-oriented issues of regional and territorial development.
	117	1.7 Too little attention is given to the encouragement of integrated projects which span Priorities 1 and 2 – ie approaches for the joint delivery of Lisbon and Goteborg goals. Projects like this are already in progress in IIIC and there is a lot going on through other EU programmes, especially on energy.	Further information may be provided in the Manual.
	118	1.8 The desirability of 'achieving synergies' with other EU funding programmes coming on stream for 2006-13 is briefly mentioned (the SWOT table p.32), but the OP does not mention funds providing opportunities which may overlap with IVC (Eg FP7, the Competitiveness & Innovation Programme http://ec.europa.eu/enterprise/enterprise_policy/cip/index_en.htm LIFE+ http://ec.europa.eu/environment/life/news/futureoflife.htm). There needs to be some consideration of how the different funds will operate in a complementary way. In particular, implementation of the Fast track has implications for the URBACT II programme. At EU level, IVC and URBACT II are intended to be complementary. Is it the case that urban actions will be limited in IV C ? Preparation of the URBACT II programme is lagging behind but the draft OP should be out before the end of the public consultation period for IVC.	Chapter 8.2 has been amended. Further information will be provided in the programme manual.
	119	1.9 The Commission's proposal for the Fast Track allows for innovative approaches developed with funding from past programmes other than IIIC to be presented for 'roll-out' to more partners. For environmental topics the LIFE Environment programme should be mentioned. This has paid for many innovative demonstration projects/pilots. (UK local authorities, universities etc have done a lot of work on eg. integrated coastal zone management, marine issues, sustainable transport, sustainable urban development using LIFE Environment funding. Some current IIIC projects with UK partners are based on previous LIFE work. Eg MESSINA in which Isle of Wight is a partner).	Chapter 4.4 has been amended.
	120	1.10 The sections of the programme intended to establish what kinds of projects can be carried out and on what topics are very uneven, with some key topics not well-covered, especially climate change, sustainable urban development and the whole area of eco-innovation.	Examples under 5.2.4 and 5.3.4 have been updated.
	121	1.11 Where cultural heritage is mentioned it would be appropriate to mention approaches for built heritage - for example, strategies which bear upon the environmentally-sound renovation of historic buildings - and 'heritage-led regeneration'.	Is already covered in the examples mentioned.
	122	1.12 The OP does not tackle the tricky problem of assessing the mainly qualitative impacts of interregional cooperation, especially 'European added value'. The indicators presented in Annex 2 only refer to processes or simply count events, participants etc. Those in Annex 2.1.3 require some attempt to define 'good practice'.	It will not be possible to judge the qualitative impacts of an operation.
	123	1.13 As compared with other Operational Programmes, far too many details are left for further development, to emerge in various guides and manuals. The Operational Programme is the key document and its preparation far more transparent and open to scrutiny than is likely to be the case with the supplementary manuals.	Decision of the MS of have the key document with principle and to provide in a additional programme manual further information. The programme manual could be quickly and easy updated.

Annex 1 to Summarising Statement on Public Consultation in accordance with Article 9 Directive 2001/42/EC

Country/ Organization	#	Comments on the Operational Programme (OP)	Response
	124	1.14 What is the justification for the unequal split of funding between Priorities 1 and 2 ? Equal amounts should be allocated.	The decision of the MS reflect the demand of INTERREG IIIC projects working in these two priorities.
	125	1.15 All figures and tables need headings and sources. There should be a separate list of figures and tables at the beginning of the document.	Table heading will be added
	126	Chapter 1 p.3, the 8th para. 'The aim is to ensure that best practices identified will find their way into the Convergence and Competitiveness programmes' – surely this applies to all of IVC and not only to the Fast Track ? In the Fast Track it will be a requirement to embed good practices into the mainstream programmes.	Text updated.
	127	Chapter 2 2.3.4 needs to be revised to improve the explanation of Regions for Economic Change, including a definition of the term 'economic modernisation'.	MS agreed on this part of the OP already. Unlikely that they are willing to reopen the discussion. Also ex-ante evaluation confirms on page 23 that the analysis reflects correctly the existing and future-oriented issues of regional and territorial development.
	128	Chapter 3 As well as being poorly drafted in English, the analysis of challenges and associated EU policy is at too basic a level and is not up to date. It relies too much on one particular ESPON study. A better source for the environmental challenges would be the reports by the European Environment Agency, which is the main source used in the accompanying SEA document. For a more up-to-date view on EU environment policy DG Environment's work programmes could be consulted. DG Environment also produced a substantial document as input to the Community Strategic Guidelines. This is the Ideas Paper available from : http://ec.europa.eu/environment/integration/structural_funds_en.htm	MS agreed on this part of the OP already. Unlikely that they are willing to reopen the discussion. Also ex-ante evaluation confirms on page 23 that the analysis reflects correctly the existing and future-oriented issues of regional and territorial development.
	129	Table 1 p.9 of the Ideas Paper provides a handy summary of key environmental topics to be covered in the Territorial Cooperation OPs. From the UK both Defra and the Environment Agency have been involved in the ENEA group described on this web page. The Ideas Paper and a useful summary of the environmental requirements in the SFs Regs, also downloadable from the same site, are annexed to these comments. These sources are not cited in the OP or the accompanying SEA report. In any case, all sources used need to be properly referenced. For example, what are the sources used for section 3.4.2 ? Some areas of relevant environmental policy, important for setting the context for the detailed operational objectives and examples of actions later on, are omitted from the policy review. An example is civil protection strategy important for environmental risks http://ec.europa.eu/environment/civil/index.htm . In 5.3.2 (p.44) plans and measures to cope with risks and 'existing Community action plans aiming at dealing with major disasters' are mentioned but there is no specific reference to the established policy.	MS agreed on this part of the OP already. Unlikely that they are willing to reopen the discussion. Also ex-ante evaluation confirms on page 23 that the analysis reflects correctly the existing and future-oriented issues of regional and territorial development.

Annex 1 to Summarising Statement on Public Consultation in accordance with Article 9 Directive 2001/42/EC

Country/ Organization	#	Comments on the Operational Programme (OP)	Response
	130	<p>Other policy areas are given only the briefest mention. An example is the Environmental Technologies Action Plan (ETAP). This is a major initiative and actions to implement it could be explicitly encouraged, rather than simply referring vaguely to 'enhancing the use of new environmentally friendly technologies' (5.2.4). http://ec.europa.eu/environment/etap/index_en.htm</p> <p>Although it would obviously not be appropriate to list every relevant EU environmental Directive in the OP, the development of innovative approaches at local and regional level to tackle issues like air quality, water pollution and environmental management in SMEs should assist compliance with legislation. In new Member States, in particular, integrated strategies and new policy tools are highly likely to contribute to compliance with the environmental acquis. See for example : http://ec.europa.eu/environment/enlarg/pdf/benefit_short.pdf</p>	Reference to too many specific policy documents may confuse readers. Any relevant policy tool within the priorities given is eligible to cooperate on.
	131	As regards the context for Priority 1, it would be appropriate in this chapter to mention the National Reform Programmes which every national government has had to produce for Lisbon implementation.	Reference to too many specific policy documents may confuse readers. Any relevant policy tool within the priorities given is eligible to cooperate on.
	132	The table of lessons learned from IIIC gives rather a rosy view of previous programme management.	MS agreed on this part of the OP already. Unlikely that they are willing to reopen the discussion. Also ex-ante evaluation confirms on page 23 that the analysis reflects correctly the existing and future-oriented issues of regional and territorial development.
	133	Sections 3.5.2 and 3.5.3 fail to mention integrated projects in current IIIC which address both Lisbon and Goteborg themes eg the RFO GROW led by SEEDA, RFO Robinwood in which Forestry Commission Wales is a partner, RFO Hanse Passage – Yorks&Humber Assembly. Many others were represented/showcased at the recent INTERREG IIIC Forum in Lille, which at least one of the OP drafting team attended.	MS agreed on this part of the OP already. Unlikely that they are willing to reopen the discussion. Also ex-ante evaluation confirms on page 23 that the analysis reflects correctly the existing and future-oriented issues of regional and territorial development.
	134	Chapter 4 The programme strategy should somewhere include a statement to the effect that the Managing Authorities – not only individual projects - will need to achieve a proper tie to the mainstream Structural Funds programmes.	Chapter 4.4 is amended
	135	On p. 35 re-inforce the point on projects addressing more than one sub-theme. This should have a dedicated section in the OP and not just a passing mention. In 4.4.1 reinforce the requirement for projects to make a link with relevant strategies established at regional level. Eg in England the RES and RSS. Also encourage regions to develop regional level strategies for the joint implementation of Lisbon and Goteborg/SDS.	Further information may be provided in the Programme Manual.
	136	p.36 the description of the 'various grades of intensity' of cooperation is very unclear. If this is not clarified in the OP, project applicants are going to need much more detailed guidance. It will also be difficult to evaluate bids because the projects are likely to differ considerably. Better to spend time getting the position clear now and including it in the OP rather than leaving it open. (Bit late, but should the decision not to specify the network, IP and RFO be re-considered ?) Selection criteria are implied in 4.4.1 p.37 but they are not explicit enough to be operational. The box on capitalisation is especially in need of 'unpacking'. Section 4.4.2 on the Fast Track needs to include a short description of the Regions for Economic Change initiative and how IVC fits with this.	Further information may be provided in the Programme Manual.

Annex 1 to Summarising Statement on Public Consultation in accordance with Article 9 Directive 2001/42/EC

Country/ Organization	#	Comments on the Operational Programme (OP)	Response
	137	<p>p.38 criteria for the fast track have yet to be developed ?</p> <p>The table 'Overview of the implementation strategy' is useful clarification.</p> <p>It is unclear which programmes are being referred to in the 1st para p. 38 – new Obj1 and 2 rather than IVC ?</p>	Chapter 4.4 is amended
	138	Section 4.5 on Result and impact indicators – as a particular example of poor use of English - the word 'immaterial' in the first paragraph is not correct. Its usual meaning is 'unimportant' or irrelevant. Better to re-phrase and say, for example, that the activities will not be of the type that result in measurable impacts 'on the ground'? Avoid implying that the impacts will be trivial.	English language check carried out.
	139	In section 4.7 - on potentially negative environmental impacts - the SEA does not refer to the environmental impacts of the activities carried out in IVC projects. In IIIC many of the projects have partners from several countries very distant from one another. In IVC some attention should be given to discouraging project partners from travelling long distances by air for meetings of very short duration. For example, it should not be a requirement of networking projects that at least one meeting is held in every partner's locality; projects which involve travel to several places should be encouraged to include field visits, extended workshops etc lasting several days; partners could be encouraged to hold at least some of their meetings in a central location, such as in the Brussels offices of a partner region.	Programme Manual will encourage the use of environmental friendly means of transport.
	140	<p>Chapter 5</p> <p>The final paragraph on p. 40 states that 'preference will be given to public authorities to act as lead partner'. Experience of IIIC suggests that it would be better to require all lead partners to be public authorities rather than public equivalent bodies (PEBS). The definitions of PEBS vary considerably from country to country and some of the bodies involved in IIIC projects are of doubtful eligibility, especially given the highly strategic purpose of the programme. (Eg some small local agencies are actually private companies with no discernible connection to regional strategy and making no attempt to connect the IIIC work to practitioners or members from local or regional authorities in their own areas.)</p>	Chapter mentioned has been amended.
	141	<p>In 5.2.4 the examples of cooperation activities should include eco-innovation. The bullets for SMEs should be 'greened' to reflect win-win policy on improving the environmental performance of enterprises. eg 'exchange of experience on policies to support regional business clusters, including for example those based on supply chains'. Or draft some explicitly environmental bullets.</p> <p>In 5.2.5 actions currently carried out in RFOs need to be mentioned if this intense type of cooperation is to continue. So on p. 43 things like establishing common arrangements for financial management, holding calls for sub-projects, assessing applications and monitoring sub-projects could be itemised.</p>	Examples under 5.2.4 and 5.3.4 have been updated. Further information will be provided in the programme manual.
	142	<p>5.3 General Purpose p. 44. This would be an appropriate place to mention contributions to compliance with the environmental acquis.</p> <p>5.3.2 Operational objectives – surely climate protection and dealing with the impacts of climate change need to be explicitly referred to in the list ? Also, the drafting implies that actions for sustainable transport will be mainly urban. This topic is relevant also for rural areas and other kinds of territory.</p> <p>This list of objectives and the following indicative actions for Priority 2 could usefully be checked against DG Env Ideas Paper</p>	Examples under 5.2.4 and 5.3.4 have been updated.

Annex 1 to Summarising Statement on Public Consultation in accordance with Article 9 Directive 2001/42/EC

Country/ Organization	#	Comments on the Operational Programme (OP)	Response
	143	5.3.4 Indication of activities to be supported in Priority 2 – the table of example of cooperation activities - the first item could usefully be extended to cover strategies also for minimising environmental risks. This table needs to be revised. Some items seem to be under the wrong headings (eg ICZM under water, health care and air quality under biodiversity ?). Further examples of topics could usefully be included, including some under a heading 'sustainable urban development'. The points about air quality and health could go in here. Under biodiversity there has been a big Natura lobby but there is no mention of biodiversity in urban areas or development of multipurpose greenways. There is good practice on these topics, some from INTERREG IIIB and LIFE Environment, which could be incorporated into regional strategies for sustainable development or landscape, for example. In general, the points about landscape at the end of this table could reflect the wording in the European Landscape Convention. Although this is Council of Europe most EU Member States (including UK) have signed and ratified it.	Examples under 5.2.4 and 5.3.4 have been updated.
	144	5.4 Technical assistance Earlier remarks that the outcomes of IVC projects will be 'immaterial' contradict the statement that this will be a 'results oriented programme' (p. 48). A successful capitalisation process will depend more on efficient assessment of outcomes by the Monitoring Committee and Member States than on number crunching by the secretariats. In 5.4.2, 'facilitating an assessment of the effectiveness of the programme in Member States' could usefully be added as an operational objective. (5.4.3 3rd para supports this)	English language check carried out. Capitalisation on operations' results mentioned
	145	Chapter 6 6.1.7 There is potential overlap between the activities of the new 'Information Points' and NCPs where Member States decide to appoint them. Is there an intention to establish a common NCP job description ?	This will be up to the MS.
	146	Chapter 7 In section 7.2 p. 63 there should be an explanation/justification of how the decision to allocate unequal funding to Priorities 1 and 2 was reached. In section 7.4 p.65 – for clarity of understanding by project developers, transparency and simplification of the financial management of the programme (as intended in the reform of the Structural Funds in general), the co-financing rates of 75% and 85% should be fixed flat rates for the areas in question and not maxima.	The decision of the MS reflect the demand of INTERREG IIIC projects working in these two priorities. Decision of the MS on the co-financing rates are in line with the text of the regulations.
	147	Chapter 8 In 8.1.1 both paragraphs are very unclear and should be re-drafted. The relevant paragraphs in the General Regulation for SFs are a starting point. Section 8.1.3 is much too vague. The Member States need to establish how they will ensure the complementary delivery of IVC, URBACT, ESPON and INTERACT, along with the presumably modified role of INTERACT now that the interregional strand is to run as one programme rather than four. In particular, how will the complementary roles of IVC and URBACT in relation to the Fast Track be managed ?	Chapter has been updated.
UK/ Department of Enterprise, Trade and Investment	148	The draft Operational Programme puts great emphasis on exchanging information, best practice etc between regions which is very important. But what is of equal or even greater importance is ensuring that some positive action results from these exchanges. The Programme could be strengthened in that respect although the proposed fast track areas are operational. The operational plan could make clear what outcomes are expected from the programme, who will be responsible for the delivering these outcomes etc?	Chapter 4.4 has been amended.
	149	The programme reads a little like a high level academic exercise with perhaps the impression that sharing knowledge on its own is enough. This is reinforced by the annexes- possible themes for fast track networks. The building of knowledge networks should lead to change, to definite actions and outcomes.	Chapter 4.4 has been amended. Further information will be provided in a Programme Manual

Annex 1 to Summarising Statement on Public Consultation in accordance with Article 9 Directive 2001/42/EC

Country/ Organization	#	Comments on the Operational Programme (OP)	Response
	150	Annex 3 includes reference to telecommunications networks and their importance to rural and outlying communities. It also refers to the importance of interconnecting regions and global markets. While it recognizes the need to tie in with global markets, this could be acknowledged more strongly. Rural and outlying areas and areas where traditional industries are in decline need to be connected to the global marketplace as well as within the EU.	Annex 3 is a copy of the respective annex of the Region for Economic Change document published by the EC.
	151	The role of the private sector could be clarified and how the public sector and private sector could work together. It would be useful if the operational plan could state: - This is where we are now - This is where we want to be in 2013 (in measurable terms) - This is the operational programme's contribution to achieving this - This is what we expect other stakeholders (e.g. private sector) to contribute	Chapter 5.1 has been updated.
UK/ COMET Interreg Partnership	152	Interreg IVC Response The overall objective of the programme 'to improve the effectiveness of regional development priorities and to contribute to economic modernisation and increased competitiveness in Europe in the areas of innovation, knowledge economy, environment and risk prevention by means of interregional co-operation' is supported by the Comet Interreg Partnership and aligns with many of the Partnerships priorities of supporting the Lisbon and Gothenburg Agendas in attempting to increase the potential for growth in innovation and protection of the environment in the Comet region.	No proposal for amendment
	153	Thematic Priority Axis 1. Innovation and the Knowledge Economy Axis 2. Environment and Risk Prevention The Comet region would support the identification of the two thematic priority axes named above. In relation to the main sub themes we feel that the Comet Interreg Partnership can both offer and benefit from exchanging best practice and know-how on an interregional basis.	No proposal for amendment
UK/ Department of Agriculture and Rural Development	154	The operational objectives have correctly identified "development of integrated coastal management activities" (p. 44, section 5.3.2.) as a priority area for support. The coastal zone will come under increasing pressure from disturbance from man's activities and will suffer disproportionately under climate change as well. Some alternative energy scenarios will also impact the coastal zone. Successful ICZM requires a cross-boundary approach (as well as a cross disciplinary approach) and will be one of the challenges facing scientists and policymakers in future. The proposed European Marine Strategy Directive offers a policy driver for such an approach and should be directing member states to work in that direction.	No proposal for amendment
UK/ South East England Development Agency	155	General Remarks While the analysis of the Operational Programme document (Section 3.3) cannot go into detail due to the size of the area covered, it should be acknowledged that there are also significant disparities within regions. If these too are addressed, then the region as a whole will improve its performance.	MS agreed on this part of the OP already. Unlikely that they are willing to reopen the discussion. Also ex-ante evaluation confirms on page 23 that the analysis reflects correctly the existing and future-oriented issues of regional and territorial development
	156	We welcome that projects are encouraged to take a cross-sectoral approach and are not limited to address one particular theme (section 4.3). However, we feel that this integrated approach should be strengthened in the OP with a strong message that projects spanning both Priorities 1 and 2 (i.e. joint delivery of the Lisbon and Gothenburg goals) will be favoured. The OP could include a dedicated section calling for "win-win" projects that indicate how the assessment procedures for project applications will favour such integrated initiatives. Projects that take an integrated approach in this way could be given as examples in section 3.5.2 and 3.5.3 of the OP, e.g. RFO GROW represents one such example.	Further information may be provided in the Programme Manual.

Annex 1 to Summarising Statement on Public Consultation in accordance with Article 9 Directive 2001/42/EC

Country/ Organization	#	Comments on the Operational Programme (OP)	Response
	157	We welcome the business focus under Priority 1, however the social inclusion agenda should be strengthened under this priority in particular. There is much greater scope for outreach to be made to disadvantaged groups under the examples of cooperation activities associated with this priority. The GROW programme has demonstrated how these links can be successfully fostered through several projects, and believe this should be encouraged in the future. In addition this would support the horizontal priority on equal opportunities.	The INTERREG IVC programme is focused on Innovation and knowledge economy and environment and risk prevention. Social inclusion is not the main aim of the programme. However, some innovation related employment, human capital and education issues will be covered by the INTERREG IVC programme.
	158	We support the comments raised in the SEA with regard to the budget share between Priorities 1 and 2 (section 4.3). Environmental sustainability has a key role to play in making the EU a stronger and more competitive knowledge-based economy, capable of sustainable economic growth with more and better jobs and greater social cohesion. We would prefer to see allocations equally divided between the 2 priority axes.	The decision of the MS reflect the demand of INTERREG IIIC projects working in these two priorities.
	159	We support the simplification of 'project type' with regard to the subdivisions which were pre-sent under INTERREG IIIC with regard to Network and Individual Project operations as the distinction was not always clear (Section 4.4.1). However we feel that RFO operations are clearly distinct from other operations and the text in the OP referring to the varying intensity of activities confuses the situation. We think it is helpful to formalise this type of cooperation so as to give consistency with the previous programme and to demonstrate that this type of cooperation is permitted.	Further information will be provided in the programme manual.
	160	Further detail should be provided on how the European Commission will identify and invite regions interested in becoming part of a Fast Track Network (Section 4.4.2). The process by which regions can register their interest in becoming part of such a network should also be explained.	Section 4.4 has been amended
	161	The Operational Programme will be the key document establishing the ground rules for implementation of the INTERREG IVC programme. It is therefore essential that the document is clearly expressed and that it contains adequate information as to the types of projects which will be sought and supported. This document is not well drafted in English, and should be proof-read and amended so as to ensure clarity of meaning. As compared with other Operational programmes, many details regarding project specification (Chapter 4) remain to be developed.	English proofing has been carried out Further information concerning chapter 4.4 will be provided in a Programme Manual.
	162	There needs to be a better explanation of how the current INTERREG IIIC has operated and also of the Regions for Economic Change initiative. Currently the text takes existing knowledge by the reader too much for granted and the partial explanation provided is therefore confusing. For current INTERREG IIIC, there especially needs to be a brief explanation of the 3 different types of operation (Networks, Individual Projects and RFOs). Section 2.3.4 needs to be revised to improve the explanation of Regions for Economic Change, including a definition of the term 'economic modernisation'.	MS agreed on this part of the OP already. Unlikely that they are willing to reopen the discussion. Also ex-ante evaluation confirms on page 23 that the analysis reflects correctly the existing and future-oriented issues of regional and territorial development.
	163	We agree that complementarity and transfer of best practices between INTERREG IVC and other EU programmes should be encouraged at programming and implementation stages to achieve the greatest catalytic effect.	No proposal for amendment

Annex 1 to Summarising Statement on Public Consultation in accordance with Article 9 Directive 2001/42/EC

Country/ Organization	#	Comments on the Operational Programme (OP)	Response
UK Aberdeenshire Council - Transportation and Infrastructure	164	<p>The structure of the document is most welcomed. It is refreshing to have clear objectives and identification of target groups and eligible activities. This makes the proposed document easy to use.</p> <p>However, this ease would be greatly increased if information about the 'Fast Track' projects was provided within the main body of the document and not in an appendix. This information may warrant a separate section within the main document which outlines the complex procedure of this option and its many differences from the main, more familiar, programme.</p> <p>There is some concern that the adoption of two different kinds of project, the more traditionally structured and the Fast Track projects, could cause confusion. The operation of the Fast Track option is also complex and could be simplified.</p>	Text in chapter 4.4 has been updated.
	165	<p>Aberdeenshire Council would like to raise the related issue of payment for projects. The Council has frequently experienced difficulty in receiving payments from INTERREG and the time taken to process them. It is hoped that the revised administrative structure will seek to address this matter in the new programme, to allow timeous processing and settlement of claims.</p>	Details on the first level control and payment procedures will be tackled outside the OP with the MS directly.
UK Natural England	166	<p>The Programme is structured around two priorities: "Innovation and the knowledge economy", and "Environment and risk prevention". This structure does have the benefit of clearly identifying the environmental component of the Programme. However, we are concerned that, as a result, environmental activity will be confined to the environmental priority and that opportunities linked to innovation and the knowledge economy, where the environment contributes, will be lost. We recognise that the Programme does not preclude environmental activity under the "Innovation and the knowledge economy" priority; but our concern is that it does not encourage such activity.</p> <p>To address this concern Natural England proposes that the Programme highlights an environmental dimension to the general purpose of Priority 1: Innovation and knowledge economy.</p>	There is a clear reference in chapter 4.3 that a cross sectoral approach will be considered with priority in the selection process.
	167	<p>Climate change as an issue is recognised within the Programme, but we question the weight given to it. The Programme does not reflect the current view that Climate change is one of the greatest environmental, economic and social challenges facing the planet.</p> <p>It is dealt with only in the context of "Environment and risk prevention", which from a budget perspective is the smaller of the two priorities, rather than in the context of both Programme priorities. As with the point we raise on "Programme structure and environmental integration, this approach fails to capture the opportunities, in respect of innovation, arising from Climate change.</p> <p>Natural England proposes that greater weight is given to climate change within the Programme.</p>	An project example for climate change will be added in 5.3.4. The decision of the MS reflect the demand of INTERREG IIIC projects working in these two priorities. Based on the demand expressed Member States may during the course of implementation shift funds provided between the priorities.

Annex 1 to Summarising Statement on Public Consultation in accordance with Article 9 Directive 2001/42/EC

Country/ Organization	#	Comments on the Operational Programme (OP)	Response
UK East of England - Regional Assembly	168	Regions for Economic Change – the document does not clearly identify how this will work in practice. There seem to be a number of disparities between the European Commission’s communication on the subject (COM(2006) 675 final) and this Interregional Cooperation programme, namely over “networking” activity and the “fast track initiative”.	Chapter 4.4 is amended
	169	INTERACT, ESPON and URBACT are mentioned in passing but the document does not explain how these programmes will operate. If these are to be funded through Interreg IVC then we would expect them to be the subject of consultation through this operational programme.	The programmes mentioned are not funded through INTERREG IVC
	170	Complementarity with other ERDF programmes – the document states that cooperation between cross-border and transnational programmes will be encouraged, but does not suggest how this might work, nor how this type of activity might be funded.	More details may be provided in a Programme Manual
	171	p.9: : “ESPON study”; there is no reference to this document – i.e. where can it be found? p.11: “ESPON study”, as above.	References added in Annex 5
	172	p.22: There is text hidden behind the graphs. p. 26: Reference is made to Map 2, this should probably read Map 5. Likewise, on p.27 reference is made to Map 3 and should probably read Map 6.	Will be corrected, Thanks.

Annex 1 to Summarising Statement on Public Consultation in accordance with Article 9 Directive 2001/42/EC

Country/ Organization	#	Comments on the Operational Programme (OP)	Response
	173	<p>p.13: transforming innovation input into innovation output (i.e. technology transfer) is very much at the top of our agenda and we therefore welcome this focus, however we feel that “close cooperation between.... SMEs...” may prove difficult as innovative businesses are fiercely protective of their product. However, there may be scope for encouraging different industry sectors to cooperate. Perhaps “technology transfer” could be amended to read “knowledge sharing” to make it more acceptable for companies.</p> <p>The lack of entrepreneurship throughout the EU could potentially be rectified through education (this could be dealt with under the reference to qualifications on p.43 of this document).</p> <p>p.21: There should be more emphasis on the linkages between pursuing the low carbon agenda and it being a driver for creating jobs.</p> <p>p.24: Approach/Results – shortcomings and aspects to be improved. We feel that the objective of mainstreaming good practice into mainstream structural funds programmes was not effective during the last funding period due to the lack of linkages between funding streams (p.67 (8.1) of this document attempts to rectify this, please see our comments below). The fact that ERDF programmes remain in “silos” during this funding period will not help. Another issue, recognised here, is a lack of effective dissemination and promotion of Interreg IIIC results. This needs to be rectified under this programme.</p> <p>p.29: the SWOT suggest matching “more-advanced” and “less advanced” regions to avoid an increase in disparity. OK in theory, but how will this work in practice? What indicators will be used to measure a region’s level in a certain area? The phrase beginning “Nevertheless...” seems appears to be premature here, this is the SWOT section of the document, conclusions such as these would be better placed in the Programme Strategy or Implementing Provisions sections of this document.</p>	<p>MS agreed on this part of the OP already. Unlikely that they are willing to reopen the discussion. Also ex-ante evaluation confirms on page 23 that the analysis reflects correctly the existing and future-oriented issues of regional and territorial development.</p>
	174	<p>p. 30: Environment and Risk Prevention – weaknesses: the last bullet point is a repetition of the second.</p>	<p>Will be corrected, Thanks.</p>
	175	<p>p.34: paragraph 3: we agree that there is great demand for interregional cooperation and that there is wide scope for improvement regarding dissemination of results to the wider public, and especially in the first instance to public authorities at the local and regional level.</p> <p>Specific Objectives 1 and 2: these are not specific objectives, they are thematic priority axes. To avoid confusion they should be taken out of this list, which, according to the paragraph above it, are tackling observations regarding dissemination of results and incorporation of findings into regional policy.</p> <p>Specific Objective 1: there should be more emphasis on technology transfer and the links between R&D and entrepreneurship.</p>	<p>MS agreed on this part of the OP already. Unlikely that they are willing to reopen the discussion. Also ex-ante evaluation confirms on page 23 that the analysis reflects correctly the existing and future-oriented issues of regional and territorial development.</p>

Annex 1 to Summarising Statement on Public Consultation in accordance with Article 9 Directive 2001/42/EC

Country/ Organization	#	Comments on the Operational Programme (OP)	Response
	176	<p>p.36: Types of intervention (para 4) – the document refers to regional initiatives and the Fast Track option (types 1 and 2) however it does not elaborate on how the programme will “undertake capitalisation of good practices related to the Lisbon and Gothenburg priorities that have been identified under IIIC/IVC or other cooperation programmes”. How will this dissemination be funded? Through Technical Assistance (TA)? Might this be through INTERACT? If that is the case then it would seem to be the subject of another operation programme, as INTERACT is not dealt with here. This document seems to propose that dissemination should be undertaken through Type 1 cooperation but is this confusing two types of activity: individual projects with broader dissemination activities? This issue needs to be clarified.</p> <p>Types of intervention – Type 1 – we are pleased to see this form of cooperation has been safeguarded and that it is more flexible under this programme (i.e. that different levels of intensity of cooperation are allowed rather than having to choose a project, network or RFO).</p> <p>p.37, para 4.2.2 – the quote from Article 8 of the Commission’s communication on RFEC is incorrect</p> <p>p.37, para 8: More detail is needed on the proposed action plans which are an “expected outcome” under Type 2 activity.</p>	Para 4.2 is updated, further information will be provided in a Programme Manual.
	177	<p>p.43: Suggests a project relating to “improving qualifications for innovation” – clarification is needed here. Does this mean improving, through the education system, graduates’ capacity to become innovative employees / entrepreneurs?</p>	Further information may be provided in a Programme Manual
	178	<p>p.45, para 2: refers to the URBACT II operational programme, which presumably will be funded under Interreg IVC, but is not subject to consultation under this Operational Programme. How do we find out more about URBACT II (and ESPON and INTERACT for that matter)?</p>	URBACT is not funded by INTERREG IVC. Please refer the respective website to get more information (http://urbact.eu/ , http://www.espon.eu/ and http://www.interact-eu.net/)
	179	<p>p.53: Monitoring Committee representation – the East of England would support there being three places (including a regional representative) on this committee per member state.</p>	Clause is included that allow in duly justified cases that a third representative can be admitted.
	180	<p>p.57: para 6.1.7 – as there are to be only four information points, yet 29 countries participating in the programme, then the setting up of contact points should be obligatory and financed through technical assistance.</p>	The set-up of national contact point is strongly recommended.

Annex 1 to Summarising Statement on Public Consultation in accordance with Article 9 Directive 2001/42/EC

Country/ Organization	#	Comments on the Operational Programme (OP)	Response
	181	p.58: para 1 – the proposed two-step option for project application and selection appears overly bureaucratic and would have implications for the N+2 rule. We would favour a one-step process for all.	It will be up to the Monitoring Committee to decide on this issue.
	182	Para 6.2.2, please refer to the comments on p.37 above. Will the Commission propose and lead networks, or not?	Para 4.2 is updated, further information will be provided in a Programme Manual.
	183	p.63: Financial Provision – there is no indication how or if funding will be split between Type 1 and Type 2 activity.	There is no fixed allocation of funds between the two types of intervention foreseen.
	184	p.65: The last paragraph under 7.3 is a repetition of the first.	Last paragraph has been deleted. Thanks.
	185	p.66: Maximum co-financing rates are described as 85% and 75%, will these be fixed at those rates or flexible and decided on a project by project basis? If the latter is the case this may have N+2 implications towards the end of the programme.	It will be up to the Monitoring Committee to decide on this issue.
	186	p.67: paras 8.1.1 (Complementarity with the strand “interregional cooperation” developed under some Convergence/Competitiveness & Employment programmes) We are concerned that there will be very limited complementarity between ERDF programmes. The document refers to (in 8.1.1) “regular exchanges of information between both interregional cooperation dimensions”. How will this be ensured? Whose responsibility is this? Will it be the responsibility of the Managing Authority of the (in our case) Competitiveness & Employment programme or of the Interreg IVC network partner / lead partner? How will the linkages between these authorities be made in the first place? A proposal of how this could arise is through a “joint project database”. Whose responsibility would this be? Would it be the Interreg IVC Managing Authority’s responsibility? Putting together such a database would be very much welcomed, however it would require a huge amount of work to collate project details on a region by region basis across the EU.	Further decisions will be taken by the Monitoring Committee on this issues.
	187	Under 8.1.2 (Complementarity with cross-border and transnational programme) There is no explanation as to how complementarity between cross-border, transnational and interregional programmes will be brought about. The document states only that “The interregional cooperation programme will encourage cooperation among cross-border and transnational programme areas in order to enable an exchange of experience / a transfer of best practices...” But not <u>how</u> this will be achieved. Further work is necessary here.	Further decisions will be taken by the Monitoring Committee on this issues. Also INTERACT will play an vital role.

Annex 1 to Summarising Statement on Public Consultation in accordance with Article 9 Directive 2001/42/EC

Country/ Organization	#	Comments on the Operational Programme (OP)	Response
	188	Furthermore, paras 8.1.2 and 8.1.3 refer to INTERACT, ESPON and URBACT. If these are to be funded through Interreg IVC strand of Territorial Cooperation, why are they not subject to consultation through this operational programme? How can we find out more about them?	INTERACT, ESPON and URBACT are not funded by INTERREG IVC. Please refer the respective website to get more information (http://urbact.eu/ , http://www.espon.eu/ and http://www.interact-eu.net/)
	189	p.68: Reference to the programme's contribution to equal opportunities and environmental sustainability appears to be arbitrary.	Para 8.3 has been amended.
	190	p. 69 , para 2: There are now 27 members of the European Union. Under "Chairmanship and Secretariat" this needs updating, with references to 2007.	Will be corrected, Thanks.
	191	p.70: How were the pools of experts chosen? Was there a public tendering process?	Further decisions will be taken by the Monitoring Committee.
	192	<u>Annex 2</u> 1.1: We should aim to draw down 100% of the available funds and not at 5% decommitment as described. 1.2: Rather than 24 lead applicant seminars, why not plan for 27 – one per member state? And 54, not 50, lead partner seminars – two per member state. 1.3: Nine dissemination events and 20 press releases seem a low limit for a programme which is focusing so much on dissemination and the promotion of the findings of this Interreg IVC programme(s).	1.1: Member States preferred to put in realistic figures. 1.2: LP seminars will be organised after approval rounds and for other implementation related matters. To the seminars partners from a certain region or from all over Europe will be invited. 1.3 Figures are updated.
	193	p.72 , para 2.1.4 – 10% seems low for equal opportunities.	As the main programme focus is not directly related to equal opportunities, the figure seems to be realistic.
	194	p.72: The document refers to the number of good practices "transferred" into Convergence and Competitiveness programmes– how will this be achieved when most Convergence and Competitiveness programme are currently undergoing consultation / have already been signed off by the Commission? How will the number of good practices identified and made available to other regional and local authorities be measured (2,400) – will this be through the proposed annual conference? There is a reference to the number of staff members with increased capacity – again, how will this be measured?	Operations will be asked in their progress report to indicate the figures mentioned. Reporting on indicators is already well working in INTERREG IIIC. The same system will also be used for INTERREG IVC.

Annex 1 to Summarising Statement on Public Consultation in accordance with Article 9 Directive 2001/42/EC

Country/ Organization	#	Comments on the Operational Programme (OP)	Response
	195	<u>Annex 4</u> p.79, para 3: There is very little mention of equal opportunities at all, except in passing under p.68, para 8.3.	The main programme focus is not directly related to equal opportunities.
	196	<u>Annex 5</u> Information sources should be alphabetised and more detail added.	Will be updated. Thanks.
OTHER/ STRATCULT INTERREG IIIC consortium	197	We propose therefore the integration of the following into the final version of the Interregional Cooperation OP: 1. Natural and cultural heritage are important issues for the sustainable development of the European regions. We propose to clarify in the Interregional Cooperation Programme that cultural heritage is meant in the broadest sense including current cultural and artistic achievements which constitute the cultural heritage of future generations including its economic development potential (e. g. cultural economy, cultural industry).	Examples concerning cultural heritage given in chapter 5.3.4 given sufficient evidence on the scope to projects expected.
	198	4. We propose to integrate the following amendments into the list of supported activities, chapter 5: "Development and exchange of common strategies and tools in the fields related to the protection, enhancement <u>and creative development of cultural heritage</u> and landscapes."; "Exchange of know-how among territorial authorities on good practice in tourism development <u>and/or cultural regional development</u> with a particular focus on integrating sustainability aspects."; "Development and exchange of common strategies for the promotion of cultural assets as potential for the economic development of the regions, notably for sustainable tourism. "	Chapter 5.3.2, objective 6 includes already cultural heritage.
	199	5. Last but not least, we propose the integration of at least one theme in the field of cultural regional development into the list of potential Fast Track Action networks: "Culture, heritage and identity constitute the basic input for a region's competitiveness and in the same time the glue that keeps the society together (compare ESPON project 1.3.3, page 5). Territorial authorities working on this theme will aim to fully integrating all cultural development potentials into the Lisbon and Gothenburg agendas of the European Union. Specific focus will be given to the related regional and rural development policies in the framework of EU Structural Funds."	Annex 3 is a copy of the respective annex of the Region for Economic Change document publish by the EC.
	200	6. Integration of the topic culture/cultural heritage in the first thematic call for regional initiatives.	No proposal for amendment