

Interreg IPA Cross-border Cooperation Programme Croatia - Bosnia and Herzegovina - Montenegro 2014-2020

Annex 6: Response sheet for comments within SEA process

This document provides an overview of how were the outcomes of SEA report and of comments obtained through consultations on the SEA Report taken into account during finalising of the Cooperation Programme and before its adoption.

The first table below summarizes recommendations made within the SEA report (left-hand and central column) and explanations how these were taken into account during finalising of the Cooperation Programme and before its adoption (see right-hand column with responses by the Managing Authority).

The second table presents comments obtained through consultations with environmental authorities and the public on the SEA study. The table presents comments that were received by the Managing Authority for the Cooperation Programme during this process of consultations that was conducted from 20 October 2014 to 19 November 2014 in Croatia, from 21 October 2014 to 21 November 2014 in Montenegro and from 25 February 2015 to 24 March 2015 in Bosnia and Herzegovina. All the documents were published on these web sites:

Croatia: <http://www.mrrfeu.hr/default.aspx?id=4316>

Bosnia and Herzegovina: http://www.dei.gov.ba/dei/media_servis/vijesti/default.aspx?id=14792&langTag=hr-HR

Montenegro: <http://www.mvpei.gov.me/rubrike/GD-za-koordinaciju-programa-pomoci-EU/Aktuelno/142830/Poziv-na-online-konsultacije-zainteresovane-javnosti-povodom-postupka-strate-ke-procjene-uticaja-na-ivotnu-sredinu-IPA-programa.html>

The documents published were the following: non-technical summary in national languages and English language, SEA Study in English language and draft Cooperation Programme in English language. The comments were received from the Croatian Ministry of Environmental and Nature Protection, Ministry of Agriculture, Ministry of Health, Ministry of Culture, Bosnian and Herzegovinian Ministry of Foreign Trade and Economic Relation and Montenegrin NGO Green Home. The following Croatian institutions provided their positive opinions: Ministry of Entrepreneurship and Crafts, Ministry of Health and Ministry of Science, Education and Sports. During the consultation period, no comments were received from the public, neither in writing nor during the public consultation meetings held in Zagreb on 12 November 2014 and in Podgorica on 14 November 2014.

It is to be noted that, following the closure of the public hearing within SEA consultation process, all relevant comments were taken into account. Therefore, SEA Study and the non-technical summary were amended with additional information and published at the MA page on 1 June 2015 (<http://www.arr.hr/eu-programi-2014-2020/ipa-program-prekogranicne-suradnje-hrvatska-bosna-i-hercegovina-crna-gora>), on the webpage of Directorate for European Integration on 11 June 2015 (http://www.dei.gov.ba/dei/media_servis/vijesti/default.aspx?id=15320&langTag=bs-BA) and on webpage of Ministry of Foreign Affairs and European Integration (<http://www.eu.me/mn/press/saopstenja/saopstenja-ipa/item/1159-interreg-ipa-program-prekogranicne-saradnje-hrvatska-bosna-i-hercegovina-crna-gora>) on 18 June 2015. In addition, revised versions of the relevant documents (final version of SEA Study,

including non-technical summaries in national languages, final version of Cooperation Programme and a summary (this Annex 6) of relevant comments received and the method of their implementation into SEA Study and Cooperation Programme) were submitted to the relevant environmental authorities, Ministry of Environmental and Nature Protection in Croatia (1 June 2015), Ministry of Foreign Trade and Economic Relations of Bosnia and Herzegovina (8 June 2015) and Ministry of Sustainable Development and Tourism in Montenegro (18 June 2015).

In the second table, two left-hand columns present authors of the comments and translated summaries of the comments. The two right-hand columns present how were the comments for final adjustments of conclusions made within the SEA Report (responses by the SEA team) and taken into account during finalising of the Cooperation Programme and before its adoption (responses by the Managing Authority).

Response sheet for comments raised within the SEA report

Recommendations made in the SEA Report related to Specific Objective 1.1		
Type of measure	Recommendation	Response by the Managing Authority
General (for all activities under this Specific Objective)	<p>Supported facilities for health and social services should be located in flood-safe areas and should be easily accessible in emergency situations (e.g. not be cut-off by floods).</p> <p>Development or modernization of buildings must meet all applicable environmental requirements and should ideally demonstrate good environmental building practices - e.g. easy accessibility for public transport, accessibility for people with disabilities, energy efficiency, sound waste collection, etc.</p>	<p>Accepted.</p> <p>Both requirements are reflected and considered under Section 6.1 Sustainable development.</p>
Recommendations made in the SEA Report related to Specific Objective 2.1.		
Type of measure	Recommendation	Response by the Managing Authority
General (for all activities under this Specific Objective)	Supported infrastructural projects must be subject to applicable environmental standards and be subject - as and when needed - to applicable environmental impacts assessments, assessments of impacts on Natura 2000 network and possibly consultations on trans-boundary impacts (if such impacts are expected).	<p>Accepted.</p> <p>Calls for proposals related documentation will clearly specify that projects that require environmental impacts assessments and assessments of impacts on Natura 2000 network</p>

		(or Emerald network) must prove that they fully meet conditions stipulated within these processes.
Specific - for actions related to joint environmental management initiatives	Consider adding 'monitoring and management of large carnivore populations and their habitats', 'protection and restoration of coastal wetland areas and karst fields' and 'joint initiatives on trans-boundary marine protected areas' amongst examples of eligible activities.	Accepted. Recommendation was integrated into the Cooperation Programme as eligible activity under Specific Objective 2.1.
	The eligible activities may also include those related to trans-boundary air pollution, especially air pollution in Slavonski Brod and Brodsko-posavska County which is caused by industry "Rafinerija nafte Brod" from the Bosnia and Herzegovina, as well as pollution from other potential sources that could be significant in trans boundary terms.	Accepted. Recommendation related to trans-boundary pollution was integrated into the Cooperation Programme as eligible activity under Specific Objective 2.1.
	Potential applications for environmental monitoring systems should be cross-verified with the relevant national authorities (e.g. State Institute for Nature Protection, Croatian Waters, etc.) in order to maximise potential synergies with higher-level monitoring systems on national or international levels. Monitoring parameters, periods, data collection methods, frequency and information formats should ideally allow the various monitoring systems to build on one another and fill in the priority information gaps. The data obtained should be shared with any interested institutions and made publicly available to allow their wider use.	Accepted. The first recommendation was implemented as a recommendation related to the list of eligible actions of S.O. 2.1 whereas the second recommendation was integrated into Section 6.1 Sustainable development.
	If suitable applications arrive, prioritize trans-boundary cooperation related to protection of Sava River Basin Floodplains and connecting National Park Sutjeska in Bosnia and Herzegovina with National Park Durmitor and the planned Regional Park Maglic, Bioc and Volujak in Montenegro.	Partially accepted. The cross-border cooperation as regards to protection of Sava River Basin Floodplain is already enlisted as one of the eligible activities

		under SO 2.1. The programme cannot specify cooperation between specific parks as these choices will be left to project applicants.
Specific - for actions related to emergency preparedness and risk prevention systems	As part of emergency preparedness and risk prevention systems consider also adding mapping of various water pollution hazards in the flood zones in accordance with the EU Floods Directive as part of a single disaster risk prevention and management system.	Accepted. Note that the issues related to water pollution and flood risks in relation to emergency preparedness are already taken on board within the list of eligible actions under SO 2.1.
	All supported activities on flood protection should promote a long-term flood protection and retention approach and maintenance of the traditional land use systems that respect the ecological keystone processes. Flood prevention and drought protection projects should be planned on locations where they will not have a negative impact on the Ecological Network target features or integrity.	Accepted. Recommendation was integrated into Section 6.1 Sustainable development.
	Should suitable application arise, a priority attention should be given to: <ul style="list-style-type: none"> • protection of flood plains in Central Posavina as key flood retention basin that needs to be saved from further developments • emergency preparedness and measures to address water pollution hazards in Neretva river and Mali Ston Bay, Una river, Krka river and Cetina river where trans-boundary management can be achieved only through cross-border cooperation. 	Partially accepted. Note that the measures concerning protection of flood plains and emergency preparedness are already taken on board within the set of eligible actions under SO 2.1. Prioritising some of the geographical areas over other within the programme area would not be in line with the principle of fair competition and transparency. It will be up to potential applicants to propose specific operations

		within the eligible actions under relevant SOs.
Specific - for actions related to measures and small/scale investments for reducing or mitigating environmental problems and risks	<p>Supported measures must not restrict natural retention of flood plains - ideally should expand natural retention by e.g. promoting the 'room for river' approach that allows flooding during periods of high discharge.</p> <p>In case of support to irrigation, preference shall be given to irrigation systems that do not require reservoir construction (especially not on the rivers) for their water source and that are not planned or already located within or in the vicinity of Ecological Network areas.</p>	<p>Accepted.</p> <p>All recommendations were integrated into the Cooperation Programme, Section 6.1 Sustainable development.</p>
Recommendations made in the SEA Report related to Specific Objective 2.2.		
Type of measure	Recommendation	Response by the Managing Authority
General (for all activities under this Specific Objective)	<p>Priority support should be given to:</p> <ul style="list-style-type: none"> energy efficiency measures in public buildings (such as hospitals, schools - where possible synergies with interventions under Thematic Priority 1 Employment, Social Inclusion, Health and Social services exist) use of agricultural waste for energy production, demonstration projects for solar power on roofs or build surfaces as long as they do not have adverse visual impacts on the amenity of landscape and cultural heritage. <p>Supported projects must be subject to applicable environmental and health protection standards and be subject (when needed) to: environmental impacts assessments, assessments of impacts on Natura 2000 network and consultations on trans-boundary impacts (if such impacts would be expected).</p>	<p>Accepted</p> <p>Energy efficiency measures in public buildings are already inserted in CP as a priority under SO 2.2.</p> <p>Use of agricultural waste for energy production and demonstration projects for solar power on roofs or build surfaces (as long as they do not have adverse visual impacts on the amenity of landscape and cultural heritage) can be implemented in line with the set of eligible actions under Specific Objective 2.2.</p>

		Calls for proposals will also clearly specify that projects that require environmental impacts assessments and assessments of impacts on Natura 2000 network (or Emerald network) must prove that they fully meet conditions stipulated within these processes.
Specific - for actions related to joint studies and incentives to support the utilization of renewable energy resources and energy efficiency	Any larger-scale promotion of biomass farming should be permitted only if it can be proved that it will not lead to the deterioration of already achieved state of any water body surface and groundwater (which is e.g. a fourth objective of Croatian River Basin Management Plan). Biomass farming should not be supported on vulnerable areas under Nitrate Directive, unless such project applications prove that the choice of crops and farming practice will not increase fertilizers and pesticides loads.	Accepted. The recommendation was integrated into Section 6.1 Sustainable development.
Specific - for actions related to joint pilot projects on innovative technologies in the field of renewable energy and joint investing in public infrastructure on sustainable energy production and energy efficiency.	<p>Wind turbines and large solar parks should not be planned within areas important for bird preservation (Special Protection Areas, SPA).</p> <p>Wind turbines and solar parks should not be located on very valuable agricultural soil (P1) and valuable agricultural soil (P2).</p> <p>Large solar parks and hydropower plants should not be planned within areas important for preservation of species and habitat types (Special Areas of Conservation, SAC)</p> <p>It is recommended to finance smaller-scale solar power projects (use of several panels, rather than large parks). Solar parks should be limited to already built urban areas.</p>	<p>Partially accepted.</p> <p>Please note that large infrastructure projects (e.g. hydropower plants) are not envisaged to be financed within this Programme. However, all applicable recommendations were integrated into Section 6.1 Sustainable development.</p>
Recommendations made in the SEA Report related to Specific Objective 3.1.		
Type of measure	Recommendation	Response by the Managing Authority

General (for all activities under this Specific Objective)	Consider prioritizing eco/agro-tourism activities that contribute to sustainable development in protected areas.	Accepted. Note that the sustainability is highlighted as horizontal principle in PA2. Furthermore, proposed action can be implemented under existing set of eligible actions under SO 3.1.
Specific - for actions within strategic project 'Adriatic Hinteland'	<p>Ensure, in the project preparatory phase, that no important and protected habitats and species (target features) are endangered by the planned infrastructure and activities.</p> <p>Consider needs related to waste management and also waste-water treatment (using e.g. cheap decentralized options that can well cope with short-term pollution peaks during summer periods) as part of preparation of projects in the destination that will be prioritized for targeted promotion.</p> <p>The project should at the end prioritize activities that have been prepared in cooperation with nature protection and culture protection authorities and adhere to the principles of EU Agenda for a sustainable and competitive European tourism such as: taking a holistic, integrated approach; planning for the long term; involving all stakeholders; recognizing, minimising and monitoring risks.</p>	<p>Partially accepted.</p> <p>Note that large infrastructure projects in the areas of transport and waste water treatment are not eligible for implementation under this Programme.</p> <p>The first and the last recommendations were integrated into Section 6.1 Sustainable development.</p>
Recommendations made in the SEA Report related to Specific Objective 3.2.		
Type of measure	Recommendation	Response by the Managing Authority
General (for all activities under this Specific Objective)	Ensure in the project preparatory phase, that no important and protected habitats and species (target features) are endangered by the planned infrastructure and activities.	Recommendation was integrated into Section 6.1 Sustainable development.
Specific - for actions related preserving, restoring and reviving cultural,	<p>The supported projects must meet all applicable national rules for cultural heritage protection.</p> <p>It is also recommended to inform prospective applicants about the following principles that should guide their planning of interventions for sustainable use of cultural and natural</p>	Recommendations were integrated into Section 6.1 Sustainable development.

historical and natural heritage, including improving access to them; and small scale infrastructure related to cultural and natural heritage.	<p>heritage:</p> <ul style="list-style-type: none"> • Conservation plans must contribute to the authenticity and integrity of the sites and monuments and their tangible and intangible elements. • Conservation plans must address all relevant factors necessary for adequate long-term safeguarding and sustainable use of the heritage site or monument. • The principal objectives of the conservation plans should be clearly stated. The proposals in the conservation plan must be articulated in a realistic fashion, from the legislative, financial and economic point of view, as well as with regard to the required standards and restrictions. • The conservation plans should aim at ensuring a harmonious relationship between the heritage sites and monuments and the surrounding environment as a whole. Wherever necessary for the proper protection of the property, an adequate buffer zone should be provided. • New functions and activities should be compatible with the character of the heritage sites and monuments. Proponents must ensure that such changes do not impact adversely on the outstanding value of the heritage site or monument. • Before any intervention, existing conditions in the area should be thoroughly documented. • Conservation planning should therefore encourage the active participation of the communities and stakeholders concerned with the property as necessary conditions to its sustainable protection, conservation, management and presentation. 	
Recommendations made in the SEA Report related to Specific Objective 4.1.		
Type of measure	Recommendation	Response by the Managing Authority
General (for all activities under this Specific Objective)	<p>Consider potential support to business clusters that address opportunities arising from:</p> <ul style="list-style-type: none"> • organic agriculture products, • sustainable farming and collection of organic aromatic herbs and their promotion on international markets. 	Not accepted since the SO 4.1. provides generic support to business support organisations, including clusters, but especially related to implementing ICT, innovation and new technologies.

		Note that prioritising only certain specific areas of cooperation in this way would not be in line with the principles of fair competition and transparency.
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Response sheet for comments raised through consultations on the SEA study and draft Cooperation Programme

Institution	Comment	Response by the SEA team	Response by the Managing authority
Ministry of Environmental and Nature Protection (Klasa: 351-03/14-06/04; Urbroj: 517-06-2-1-2-14-4; 25.11.2014)	On the page 7 states that there is no impact on air quality, however it should be stated there is impact.	Accepted and incorporated. The table on page 7 was updated to: i) reflect the fact activities under specific objective 2.1 can include joint air quality monitoring and ii) activities under objective 2.2. may have either positive or adverse impacts on air quality – which are however not considered significant given the scale and focus of the envisaged activities.	Noted.
	Sentence “ <i>Flood prevention and drought protection projects should not be planned on locations where they will not have a negative impact on the Ecological Network target features or integrity</i> ” under titles “Findings regarding Specific Objective 2.1.” (page 9) and “Recommendations for implementation of activities within programme Specific Objective 2.1.” (page 86) should be reformulated.	Accepted and incorporated. Double negation was removed.	Noted.
	On the page 21 the impact on air quality from SO 2.2. is recognized as “Potential impacts expected,	Noted but not incorporated. It is true that energy efficiency as well as most renewable energy measures may have indirect positive effects on air quality. However,	Noted.

	impacts can be either positive or negative". Energy efficiency should result with positive impact on air quality.	possible measures for renewable energy based on combustion of biomass as well as use of agricultural waste may have possible adverse impacts on air quality. We retain statement about potential positive or adverse impacts.	
	On the page 55 it should be emphasized that Croatia has made great effort with the aim of finding the solution of solving trans boundary pollutions caused by industry from the neighboring country (air pollution in Slavonski Brod as consequence of pollution from Rafinerija nafte Brod in Brod)	Accepted and incorporated.	Accepted. The section 1.1:1. notes on the page 9 importance of implementation of UNECE Convention on Long-range Transboundary Air Pollution and of efforts to solve transboundary pollutions caused by industry from the neighboring countries.
	On the page 59 decreasing of air pollution should be one of the priorities.	Accepted and incorporated. A new text on relevance of the objectives of the UNECE Convention on Long-range Transboundary Air Pollution has been added to the end of the chapter 4 and it was noted that the Specific Objective 2.1 of the proposed Cooperation Programme has a potential to include activities related to cross-border cooperation on transboundary air pollution.	Accepted. Possible actions on transboundary air and water pollution were included amongst examples of eligible actions under Specific Objective 2.1.
	On the page 65 impact on air quality is well explained and it is pointed out that, under the programme,	Not accepted. We believe that the impacts are sufficiently described – especially	Noted.

	<p>limited scale of funding is allocated to interventions under SO 2.2. as well that air quality can be safely managed through EIAs and/or standard environmental permitting processes.</p> <p>However, since other environmental components are described in more details, they need to point out that air quality is not adequately explained.</p>	<p>considering the fact that they are not deemed significant.</p>	
	<p>On the page 65, under the title "Soil" floods are stressed out more than pollution caused by industry which is directly connected with air quality and issuing environmental permit. It is important to say there is a need of soil remediation on "<i>hot spot</i>" areas.</p>	<p>Noted and clarified.</p> <p>The text already refers to 'past environmental liabilities' which is an equivalent term for 'hot spots'. The text has been revised to include both of these interchangeable terms.</p>	Noted.
	<p>On the page 81/82 possible impacts on air should be mentioned.</p>	<p>Accepted and incorporated.</p> <p>New text added to mention that combustion of biomass – if inappropriate approaches are used - can cause air pollution which may indirectly adversely impact biodiversity and status of ecological network.</p>	Noted.
	<p>On the page 90 in the chapter 7.4. Recommendations for implementation of activities within programme Specific Objective 2.2. it should be mentioned that positive impact is expected due to activities implementation.</p>	<p>Not accepted.</p> <p>This chapter summarizes proposed mitigation measures. Impacts are described in the preceding chapters.</p>	Noted.

	<p>On the page 88 in the chapter 7. Recommended mitigation and enhancement measures, the purpose of the recommendation <i>“Lastly, the Managing Authority for this programme can refuse recommendations on the basis of overriding economic concerns or if the proposed measures cannot be addressed within programme implementation modalities”</i> is not clear given that aim of recommendations is to prevent and mitigate possible impacts. Therefore, the purpose of that recommendation should be explained.</p>	<p>Accepted and incorporated.</p> <p>The explanation is derived from the Article 8 of the SEA Directive and Article 11 of the SEA Protocol which both require that SEA study/report, the opinions or relevant authorities and the public and the results of any transboundary must be taken into account during the preparation of the plan or programme and before its adoption. Neither of these provisions however implies that each and every of these inputs to the proposed plan or programme must be accepted as such requirement could not be always met. An obvious example is, for instance, if the comments obtained cannot be addressed within modalities of the proposed plan or programme implementation.</p> <p>In order not to confuse readers, these explanatory notes have been deleted.</p>	<p>Noted.</p> <p>Almost all recommendations generated within the SEA process were anyway accepted and will be used during the implementation of the proposed Cooperation Programme.</p>
	<p>Finally, Sector for Protection of Soil, Air and Sea would like to emphasize that it is important to elaborate trans-boundary air pollution, especially air pollution in Slavonski Brod and Brodsko- posavska County which is caused by industry “Rafinerija nafte Brod” from the Bosnia and Herzegovina, as well as pollution from other potential sources that could be significant in trans boundary terms.</p>	<p>Accepted and incorporated.</p> <p>Chapter 7.3 with recommendations for implementation of activities within programme Specific Objective 2.1 has been expanded and it recommends that the mentioned actions are included amongst activities eligible funding within the proposed Cooperation programme.</p>	<p>Accepted.</p> <p>Possible actions on trans boundary air and water pollution were included amongst examples of eligible actions under Specific Objective 2.1.</p>
Ministry of Agriculture (klasa: 303-	<p>In the matrix of interactions between proposed Specific Objectives for each of the Priority</p>	<p>Accepted and incorporated.</p>	<p>Noted.</p>

03/14-01/160; Urbroj: 525- 06/1317-14-3; 18.11.2014)	Axes and their environmental implications the impact on soil and agriculture for SO 2.1. should be marked as <i>“Potential impacts expected, impacts can be either positive or negative”</i> (light blue color).		
	In the chapter “Findings regarding Specific Objective 2.2.”, point e. should be amended by exception of locating wind turbines and solar parks on very valuable agricultural soil (P1) and valuable agricultural soil (P2).	Accepted and incorporated.	Noted.
	In the chapter “Findings regarding Specific Objective 2.2.”, points b. and h. are in collision (in point b. priority is given to use of agricultural waste for energy production, which is in collision with statement of the possibility of large-scale promotion of biomass in the point h.)	Not accepted. Large-scale promotion of biomass farming and its potential use for energy production (e.g. combustion processes to generate heat or electricity) may have much more severe adverse impacts than energy production from agricultural waste (e.g. anaerobic digestion of manure and agricultural residues in biogas stations).	Noted.
	In the chapter “Findings regarding Specific Objective 2.2.”, point h. states: <i>“Biomass farming should not be supported on vulnerable areas under Nitrate Directive, unless the such project applications prove that the choice of crops and framing practice will not increase fertilizers and pesticides loads.”</i> It is not needed to appoint which	Not accepted. The Cooperation Programme covers Bosnia and Herzegovina and Montenegro where the Croatian Action Program for the protection of waters against pollution caused by nitrates from agricultural sources does not apply. The recommendation provided within SEA suggests a generally applicable principle for the whole territory of the programme area.	Noted.

	type of agricultural production is recommended on vulnerable areas due to the facts it is already prescribed by objective 1 of The Action Program for the protection of waters against pollution caused by nitrates from agricultural sources.		
	On the page 25 following changes should be made: <i>"2. Directorate for forestry, hunting and wood production industry requested that..."</i>	Accepted and incorporated.	Noted.
	On the page 41 following changes should be made: <i>"Forest areas in Croatia in last three decades have constant increase. Total forest area in Croatia in 1986. was 2.061.509 ha, in 1996. it was 2.078.289 ha and in 2006. it was 2.402.782 ha (FRA 2010- Country Report, Croatia). increased dramatically since 1991 when only approximately 33% of the territory was covered with forests. Nowadays, forest coverage amounts roughly 45%, which is to a great extent the Increment in forest area is result of war casualties, mine fields which cover a large portion of the country and also constant demographic changes in terms of the abandonment of rural areas</i>	Accepted and incorporated.	Noted.

	<i>which is the main reason for natural succession of forests over former agricultural lots, and also as result of afforestation."</i>		
	On the page 41 following changes should be made: <i>"State-owned forests are managed by the state-owned company "Hrvatske šume Ltd.", while private forests are managed by their owners, which are greatly aided by the Extension Advisory Service, ..."</i>	Accepted and incorporated.	Noted.
Ministry of health (Klasa: 351-03/14-01/191 Urbroj: 534-09-1-1-2/3-14-3; 17.11.2014) and email from Puljiz Anđić, 25.11.2014	On the page 3 following changes should be made: <i>"This SEA recommends that the following measures can be taken in order to enhance positive environmental impacts of the proposed interventions: a. Supported facilities for health and social services should be located in flood-safe areas and should be easily accessible in emergency situations (e.g. not be cut-off by floods). b. Development or modernization of buildings must meet all applicable environmental requirements and should ideally demonstrate good environmental building practices - e.g. easy accessibility for public transport, accessibility for people with disabilities, energy efficiency,</i>	Accepted and incorporated.	Noted.

	<i>sound waste collection, etc.</i>		
Ministry of culture (Klasa: 910-01/14-01/0159; Urbroj: 523-03-03-01/1-14-04; 19.11.2014)	In the chapter 3.9. Cultural heritage, following changes should be made in the sentence: <i>"Through the institution and special planning work are defined categories: protected, securely protected, proposed for protection, proposed for protection of local character and category of recognized cultural heritage."</i> : terms <i>"protected, securely protected, proposed for protection, proposed for protection of local character and category of recognized cultural heritage."</i> should be replaced with the following: <i>"protected and inscribed in the Register on the List of Protected Cultural Goods, preventatively protected inscribed in the Register on the List of Preventatively Protected Goods, cultural goods protected by the representative bodies of a county, a city or a municipality if it is located on their territory and identified cultural goods"</i> .	Accepted and incorporated.	Noted.
NGO Green Home November 19, 2014	In order to prevent any material faults we suggest that for documents/studies from last 2 years or it should be contacted relevant State Institutions.	Noted. We agree with this general principle. The SEA Report uses the latest available data that were provided to the SEA team.	Noted.

	Except compliance with EU legislation, we believe that it is important that the planned projects are consistent with national laws and recommendations.	Agreed.	Agreed. Recommendation was integrated into Section 6.1 Sustainable development.
	We suggest that in the section Measures SEA should give recommendation for using environment friendly transport in the frame of Project proposals for IPA Cross Cooperation Programme. In this way it will have positive impact on decreasing GHG emissions and climate change.	Not accepted. The focus of the proposed Cooperation Programme and the resources provided for it do not allow working on transport systems.	Noted.
	We think that in the frame of Program there should be a guide or questionnaire for the assessment of impacts of the proposed project on the environment. We believe that of questionnaire/guide should be sent together with the invitation to write a project proposal. We believe that this could be one of the measures proposed within the SEA.	Agreed.	Noted. Calls for project applications will outline key requirements and recommendations related environmental matters pertaining to the project design and implementation.
Bosnia and Herzegovina - Ministry of Foreign Trade	As an important fact, we would like to stress that Republic of Srpska has adopted the Spatial Plan of the Republika Srpska until 2025. This	Noted. There appears to be a basic misunderstanding about the nature of the proposed Cooperation Programme and its accompanying SEA report.	Noted.

<p>and Economic Relations Letter no. 06- 3-511-715 Dated: 7 April 2015, received on 27 April 2015</p>	<p>plan contains a variety of information regarding ecological risks and possible interventions for mitigation of the same. We encourage the SEA team to use this document to the highest possible extent. Having a look into the mentioned document, SEA team would have accurate view of the state of the environment with clearly defined goals and priorities in terms of intervention and strengthening of the social economic and territorial development of the Republika Srpska as well as in a transboundary context, to define the priority objectives of the subject IPA CBC program Croatia- Bosnia and Herzegovina - Montenegro 2014 - 2020.</p>	<p>The SEA has been undertaken for the programme area designed for cross-border cooperation. On the side of Bosnia and Herzegovina, the programme area covers District Brčko and 109 municipalities and is not strictly defined in terms of internal administrative divisions and planning responsibilities.</p> <p>The main aim of EU-funded cross-border cooperation programmes is to reduce the negative effects of borders as administrative, legal and physical barriers, tackle common problems and exploit untapped potential. CBC programmes do not relate to spatial plans of any of the participating countries – they are cooperation mechanisms which do not directly influence any national, regional or local spatial plans in the respective programme area. Through joint management of programmes and projects, mutual trust and understanding are strengthened and the cooperation between participating countries is enhanced.</p> <p>The proposed CP has no relationship to land-use plans. Furthermore, implementation of the proposed cooperation activities will not - in vast majority of cases involve any physical infrastructure or changes in the land-use.</p>	
	<p>After reviewing the document, we've find out that the source of information is unknown, i.e. that relevant data were not used, since they are opposing the current spatial development documentation of the Federation of BiH. I.e., our opinion is that the data presented are not harmonized with sectorial strategies and spatial development</p>		<p>Noted.</p>

	goals of the Federation of BiH.		
	SEA for the Spatial Plan of the Federation of BiH was conducted and provides the information on relevant planning activities and services, same cannot be stated for this SEA since we believe that it had to follow the principles of harmonization and continuation in its preparation.		Noted.
	It is unacceptable to define the territory of BiH as an entity which consists of 110 municipalities, where some municipalities are omitted - three municipalities of the Bosansko-podrinjski canton: Goražde, Foča-Ustikolina and Prača. Since these are frontier municipalities, they suffer from transboundary pollution from the Pljevlja mines and Piva hydroelectric plant. Goražde is supplied with potable water from rivers Drina and Čehotina which are both polluted in Montenegro. Also, several other municipalities were omitted: Visoko, Breza, Olovo and Vareš, regarding the fact that all these municipalities have highly developed mining industry which is an	Noted. Again, there appears to be some confusion. Information about the programme area is taken directly from the proposed CP. Programme area of Bosnia and Herzegovina was not defined as an entity which consists of 110 municipalities – this number refers to District Brčko and 109 municipalities that make programme area of Bosnia and Herzegovina within this trilateral Cooperation Programme.	Noted. Also, please note that the programme area was proposed by the European Commission and agreed between the participating countries at the Task Force (working group in charge of programming).

	important source of pollution and may cause significant transboundary impacts on water/air. Again, we suspect that the data used in the SEA report are not relevant (!) and that values stated in the spatial planning documentation of the Federation of BiH were not recognized and acknowledged.		
	Coastal area of BiH was not sufficiently acknowledged in the SEA. Numerical information regarding the town of Neum are incomplete, inaccurate and incorrect. On Klek peninsula there is a number of important projects planned: fast road, tourism capacities, hotels and the infrastructure for the international maritime waterway - all these activities bear significant environmental transboundary impact and should have been adequately addressed within the SEA. When talking about the Neretva river, its tributaries (Krupa, Trebižat, Bregava and Buna) were not addressed at all. These tributaries are natural phenomena and are situated in the area of the Federation planned for protection. River Trebišnjica and Vjetrenica cave	<p>Noted</p> <p>The data used come from peer-reviewed World Bank Report: Adriatic Sea Environment Program Rapid Assessment of Pollution Hotspots for the Adriatic Sea (October 2011). This report notes that Neum may become environmental hotspot – which the comment provided appears to endorse.</p> <p>The proposed Cooperation Programme however does not deal with any of the development mentioned in the comment. It does not deal directly with international Adriatic - Ionic transport corridor, it does not support developments of the fast road, tourism capacities, hotels and the infrastructure for the international maritime waterway on Klek peninsula and it does not suggest any specific tributaries of Neretva river (Krupa, Trebižat, Bregava and Buna).</p> <p>The Cooperation Programme suggests general interventions for facilitation of cross-border cooperation in the areas deriving from the needs and challenges as defined in the programming documents. The programme will be implemented through specific calls for corporation activities. If there is interest, authorities in Bosnia and Herzegovina can initiate joint cross-border projects on management of transboundary environmental issues such as those mentioned in the</p>	Noted.

	in Popovo polje were also not mentioned, and the international Adriatic - Ionic transport corridor treads over them. Since there is a number of natural and national monuments designated in the area, the impacts are inevitable.	submitted comment. But the Cooperation Programme itself cannot prescribe them in the proposed way, taking into account the principles of fair competition and transparency.	
	Forestry as activity is currently not regulated by law on the territory of Federation of BiH, so the statements mentioned on p. 42 are unjustified. We suggest to erase the two following sentences: "In the Federation of BiH, the federal minister transferred the jurisdiction over forest management to cantonal ministries. Cantonal Directorates, as integrative part of the Federal Forestry Directorate, also have jurisdiction over management and administrative supervision of private forests", and replace them with the following: "In accordance with the FBiH Constitution, jurisdiction over forests is divided between cantons and the FBiH. Pursuant to the general forestry planning development act, forests are considered as areas of general public interest of FBiH".	Accepted. SEA report was revised to incorporate this comment.	Noted.
	We encountered some unacceptable data in tables regarding the	Noted.	Noted.

	protected nature sites of the FBiH. There is a number of protected nature sites which were omitted from this table, so we assume that the data source was not relevant.	SEA report was revised and the list of protected areas has been amended according to publically available documents, such as spatial plans. All sources of data are also enlisted in SEA Study as well. The list of protected areas shows currently protected areas of national importance. Furthermore, it is stated in the SEA Study that there are numerous other sites planned for protection, including sites of local importance, however all of these have not been enlisted in SEA Study by name since the list would then be too excessive for the level of the cooperation programme and of the related strategic assessment.	
	Cultural-historical heritage is protected via planning documents and besides the Federal Ministry of Culture and Sport, the Federal Ministry of Spatial Planning is also in charge, especially regarding the approval of restauration works and protection of national monuments and drafting of the protection documents of these areas as important areas for the FBiH.	Accepted. SEA report was revised to incorporate this comment.	Noted.
	In part of the text which deals with air and water polluters, besides the stated six, we think that the inevitable polluters in Zenica and Maglaj should also be mentioned, as well as the Pljevlje mine and the hydropower electricity plant on the river Piva in Montenegro - this issues should be addressed accordingly.	Accepted. SEA report was revised to incorporate this comment.	Noted.
	The analysis of positive and negative impacts on rivers Čehotina and	Not accepted.	Noted.

	Drina are missing, as well as for the tributaries of Neretva, Trebižat, Krka, Bregava and Buna as protected important natural resources.	The Programme suggests generic cross-border cooperation measures that are not localized. It is impossible to assess impacts of the interventions proposed on specific rivers.	
	Results of the Natura 2000 project regarding BiH which we have and which were used in the drafting of the SEA for that project were not mentioned. The SEA was drafted for the Spatial Basis of the FBiH Spatial Plan for the period 2008 - 2028.	Accepted. The SEA report was revised to incorporate reference to ongoing activities related to Natura 2000 network in BiH. We agree that outcomes of such projects provide good basis for future transboundary cooperation on establishment and management of protected areas, including Natura 2000 sites.	Noted.
	We think that principles and obligations pursuant to the SEA Directive (2001/42/EC) regarding the area of FBiH were not followed, since relevant sectorial strategies, programmes and plans were not stated and used in the SEA report, thus important transboundary impacts could not have been analysed properly. We base such negative opinion on the fact that inappropriate data on existing and planned areas and activities on the territory of FBiH were used.	Not accepted. This SEA was prepared for generic interventions for facilitation of cross-border cooperation outlined in the Cooperation Programme. This SEA report does not cover all planning interventions in Bosnia and Herzegovina. Impacts of the sectorial strategies prepared in Bosnia and Herzegovina should be addressed in their respective SEAs – not in this SEA. Again, this SEA focuses on the general cross-border cooperation interventions contained in the proposed Cooperation Programme. Also, please take note that SEA consultations were launched in Bosnia and Herzegovina from 24 February to 24 March 2015. The relevant documents were made available for the public and interested institutions for commenting at Directorate for European Integration's webpage: http://www.dei.gov.ba/dei/media_servis/vijesti/default.aspx?id=14792&langTag=hr-HR . In that respect, the obligations deriving from SEA Directive (2001/42/EC) were respected.	Noted.
	Within the chapter 2.2. "To promote	Not accepted.	Noted.

	utilization of renewable energy resources and energy efficiency" it is stated that potential impacts on air quality could be both negative and positive, while essentially the increase in energy efficiency should only bear positive impacts.	The proposed intervention – as correctly stated in the comment aims to promote utilization of renewable energy resources and energy efficiency. Whereas energy efficiency would normally not cause any significant effects (unless such shift was accompanied with uptake of more polluting operations), the renewable energy may have significant impacts on air quality if e.g. biomass is inappropriately used for energy generation.	
	Under "Air Quality" the justification for the impact on air quality was given, but it was also stated that due to the limited project's budget this issue was not sufficiently addressed and that it will be dealt with through the issuance of environmental permits. We think that this issue should have been analysed more adequately.	Not accepted. Again, there appears to be some confusion. SEA did not find any proposed intervention in the CP which may have adverse impacts on air quality. Even in the worst case scenario it assumed that – given the limited funding for the CP – no major facilities that could have significant impacts on air quality would be developed with the CP support. Hence our conclusion that potential impacts of any activity which may have impacts on air pollution could be properly addressed within the applicable environmental permitting.	Noted.
	On page 37/38 under "Programme common and specific output indicators" air should be stated as one of the indicators. Number of people living in areas with air pollution or the surface covered with air pollution should be used as objective, measurable indicators.	Noted.	Partially accepted. Note that "Air quality measures" have been included as Category of intervention within Priority Axis 2.
	In the annex we have attached the institutions' comments on the Non-technical summary which was translated and delivered to the MVTEO BiH. Due to too short a time, it was easier for these institutions to	Accepted. All comments were fully accepted and regarded as helpful. We thank their authors for providing constructive feedback.	Noted.

	<p>comment on the summary instead on the very SEA report. All comments can be delivered in the electronic form upon your request. We highly encourage the Programme Team to consider and acknowledge these comments.</p>		
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