



Slovenia – Croatia

Agreed to change in the IP SI-HR 2021-2027

Disagreed to change in the IP SI-HR 2021-2027

Organisation	General impression of the draft Interreg Programme Slovenia-Croatia 2021-2027 programme:	Please propose specific changes to the draft Interreg Programme Slovenia-Croatia 2021-2027:	Explanation
Civil society (archeology), SI	Good	No changes	No changes needed.
SME (tourism), HR	It is very important to strengthen cross-border cooperation between the two countries, and through the draft program I note that it is very meaningful.	The document does not need to be changed.	No changes needed.
SME (EU funds), HR	Has a lot of potential	H2 technology	During the preparation of the Interreg programme SI-HR 2021-2027, the specific objective (ii) Promoting renewable energy in accordance with Directive (EU) 2018/2001 has not been chosen for financing. This decision is based on public consultations, territorial and socio-economic analysis that was developed during the programming process and due to limited financial funds allocated to the programme.
Civil society (youth), SI	The program responds to the needs of the two countries and responds well to the current challenges facing the EU as a whole. There is a lot of emphasis on cooperation processes, which is why the definition of the non-governmental sector, which often implements	1) "However, the local stakeholders are aware of the advantages of sustainable and inclusive development that can be promoted by territorial multisectoral strategies and establishment of EGTCs. On the local level, Local Action Groups (LAGs) could be the initiators of potential projects within the Interreg Programme SI-HR."	<p>1) Accepted (page 15). The sentence "On the local level, Local Action Groups (LAGs) could be the initiators of potential projects within the Interreg Programme SI-HR" is deleted.</p> <p>Before:</p>

	<p>such processes in practice, and this is worrying.</p>	<p><i>This is a direct indication and priority of the potential applicant. At local and regional level, there are different cross-sectoral structures and networks on both sides of the border that can coordinate and link the development and implementation of multisectoral strategies and policies.</i></p> <p>2) Among the results of specific objective 2, the objectives related to information, awareness raising and potential behavior change are missing. These are objectives that are clearly stated on the first pages of the draft program.</p> <p>3) The target group is defined as "Interest groups including NGOs and citizens' associations (e.g., public relief organizations, civil protection bodies and emergency services units)". Given the importance of participatory processes, "good governance" activities, the role of civil society organizations (including NGOs) is potentially exceptional. We propose to define this group as "civil society including non-governmental organizations (NGOs) and citizen's associations", in accordance with e.g. Norwegian Financial Mechanism.</p> <p>4) Small-scale projects will have a smaller budget and short duration. Their activities will contribute to the</p>	<p>However, the local stakeholders are aware of the advantages of sustainable and inclusive development that can be promoted by territorial multisectoral strategies and establishment of EGTCs. On the local level, Local Action Groups (LAGs) could be the initiators of potential projects within the Interreg Programme SI-HR.</p> <p>After:</p> <p>However, the local stakeholders are aware of the advantages of sustainable and inclusive development that can be promoted by territorial multisectoral strategies and establishment of EGTCs.</p> <p>2) Accepted (page 27). Another result reflecting awareness raising is added: Increased knowledge and capacity of inhabitants and relevant stakeholders for behavioural change towards nature and resource preservation.</p> <p>Before:</p> <ul style="list-style-type: none"> • Increased knowledge and application of nature-based solutions for delivery of multipurpose effects. <p>After:</p>
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		<p>programme output indicators and result indicators specified in Interreg Specific Objective (ISO 1) 3.2. The programme plans to earmark an indicative 2% of the funds for small-scale projects of this kind. <i>This is an excellent initiative, but the budget is too low, and it is especially important to provide lump sums for such small-scale projects (according to the new Erasmus + system - Small scale partnerships). It is also not clear from the Draft Program how much funding will be allocated to each SC.</i></p>	<ul style="list-style-type: none"> • Increased knowledge and application of nature-based solutions for delivery of multipurpose effects, • Increased knowledge and capacity of inhabitants and relevant stakeholders for behavioural change towards nature and resource preservation. <p>3) Partially accepted: According to suggestion "Interest groups including NGOs and citizens' associations shoud be replaced by "civil society including nongovernmental organisations (NGOs) and citizen's associations". "Civil society can be understood as a third sector in addition to the state and the economy, which in developed democracies cares about the interests of citizens.«. Therefore, we conclude that the word interest groups includes all the elements of the civil society that are relevant for this programme.</p> <p>Before:</p> <ul style="list-style-type: none"> • Interest groups including NGOs and citizens' associations.
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			<p>After:</p> <ul style="list-style-type: none"> • NGOs, associations, and other interest groups. <p>4) Small-scale projects will have a smaller budget – max 30.000 EUR per project. Allocation for SO 3.2. is 2% of the Programme budget which is 900.692,76 EUR. It is expected that the Programme will support at least 30 projects.</p>
Regional development agency, SI	Too little information to get an overall impression	/	No changes needed.
Ministry (environment and spatial planning), SI	Nicely prepared program.	<p>We propose to add an indent below the specific objective 1.1 in terms of continuing the work from the period 2014-2020:</p> <p>- development and implementation of construction and non-construction flood protection projects.</p>	<p>Non-infrastructure investments against floods are already envisaged in the SO 1.1. Types of action 2 (bullet 5) and SO 1.2 Types of action 1. Due to the lack of Programme funds, big scale construction works and grey infrastructure (e.g. dams, seawalls, roads, pipes, etc.) could not be supported. Nature-based approaches to help people adapt to climate change (sustainable urban drainage, small water retention) and introducing the concept of green infrastructure measures to enhance sustainable water management (natural systems including the revival of water ponds) are envisioned under SO 1.1 and SO 1.2.</p>
Civil society (culture), SI	As before, the program is aimed for too wide range of beneficiaries. residents, organizations that live, operate directly along the border, find it difficult to compete with	If it is not possible to limit the area, additional points should be awarded to organizations coming from the 10 km strip along the border - it can be defined by municipalities, e.g.	<p>Strategic approach for a stronger involvement of peripheral and rural areas was applied in the programming process, mainly with designing the content suitable for peripheral rural areas near</p>

	projects and programs prepared by "rich" agencies and organizations from big cities. The program will not have an impact on the border area.	The criteria should require that the direct positive impact of the project on life at the border be demonstrated. I have a hard time imagining the impact that a project prepared by two agencies from LJ and ZG, for example, could have some impact on the border area.	border. Specific recommendations will be further developed at the later stage of the programme implementation process.
Civil society (development of rural areas), SI	Similar orientations and contents as in the previous program 2014-2020.	The heterogeneity of areas along the state border and the Law on the Promotion of Harmonious Regional Development (ZSRR) should be taken into account, because the contents from border problem areas does not receive financial support for the implementation of activities because they are not competitive in the tender. As a result, the residents living along the border have practically no access and positive concrete benefits from the Interreg program SLO-HR. This increases the disparities within the border region.	See the answer above.
Local energy agency, SI	Good	I don't have.	No changes needed.
Organisation	Chapter	Proposed change	Explanation
Ministry (culture), SI	Chapter 1.2: A summary of main joint challenges	The field of culture and cultural heritage is underrepresented.	Culture is mentioned in the part Main challenges and is explained in detail further on in this chapter.
	Chapter 1.2: A summary of main joint challenges	The definition for green infrastructure does not only refer to natural areas, but also includes cultural heritage units such as garden architectural heritage, historical gardens and parks and cultural landscapes.	The official definition from the EU strategy of green infrastructure is used further on in the document: The aim of the specific objective is to enhance, develop, or introduce green infrastructure as strategically planned network of natural and semi-natural areas with other environmental features designed and

		<p style="color: red;">managed to deliver a wide range of ecosystem services, particularly addressing the biodiversity loss as a key environmental threat in the programme area.</p> <p>Gardens (etc) are not specifically mentioned in the definition.</p>
Chapter 1.2: A summary of main joint challenges	Add culture (cultural heritage) in relation to nature-based tourism in sentence »Since sustainable tourism is a fast-growing trend, it is expected that the interest of tourists for nature-based tourism will increase in the future which will contribute to better resilience and creating businesses and jobs in tourism.«.	<p style="color: green;">Agreed.</p> <p style="color: green;">...for nature-based and cultural tourism...</p> <p>Before: Since sustainable tourism is a fast-growing trend, it is expected that the interest of tourists for nature-based tourism will increase in the future...</p> <p>After: Since sustainable tourism is a fast-growing trend, it is expected that the interest of tourists for nature-based and cultural tourism will increase in the future...</p>
Chapter 1.2: A summary of main joint challenges	The specific objective Enhancing the role of culture and sustainable tourism in economic development, social inclusion, and social innovation is constantly misunderstood: the role of culture for economic development, not just for tourism development!	<p style="color: red;">Already included – in the term “development”.</p> <p style="color: green;">Partially agreed</p> <p>Before: The proposed specific objective (“Enhancing the role of culture and sustainable tourism in economic development, social inclusion, and social innovation”) in the Interreg programme Slovenia-Croatia is aiming for behaviour change for enhancing the sustainability of tourism and development, and upgrading joint tourism products and services.</p>

			After: The proposed specific objective ("Enhancing the role of culture and sustainable tourism in economic development, social inclusion, and social innovation") in the Interreg programme Slovenia-Croatia is aiming for behaviour change for enhancing the sustainability of tourism and culture as part of the social and economic development, and upgrading joint tourism and cultural products and services.
	Chapter 1.2: A summary of main joint challenges 1.2.11. Programme vision, mission, and horizontal principles	The field of culture and cultural heritage is underrepresented in the vision: The Interreg Programme Slovenia-Croatia aims at achieving a preserved, resilient, and connected cross-border region where sustainable development is recognised and used as a main tool in reaching economic viability, safety, biodiversity protections, and social well-being of all inhabitants.	The vision was designed within the long process of programming activities and it is in line with the chosen policy objectives and specific objectives. It is consulted and agreed with wide range of stakeholders. The "sustainable development" and "economic viability" already include different thematical fields that will be tackled by the programme. This is a general approach for the vision and will not be changed.
	Chapter 1.3: Justification for the selection of policy objectives and the Interreg-specific objectives	Some special areas of cultural heritage are missing within the sentences: »The awareness on possible climate-related effects and solutions should be improved in the entire cross-border area. The threats in the territory are shared, hence the increased cooperation of municipalities and regions is mandatory.«.	The possibility for addressing the cultural heritage is incorporated into the concept, but it does not need to be specifically mentioned.
	Chapter 1.3 Justification for the selection of policy objectives and the Interreg-specific objectives.	Within the paragraph »Considering the abundance of natural landscapes in the programme area, the polycentric position of small settlements and towns, the	1) This specific objective does not specifically address the cultural landscape.

		<p>connection between urban and rural areas, and the promotion and pilot introduction of green infrastructure can bring additional value to conservation efforts and can lead to multiplied effects on habitats, species, and people«:</p> <ol style="list-style-type: none"> 1) Add cultural to natural landscapes 2) Add landscapes to habitats, species and people 	<p>However, this option is included into the activities.</p> <p>2) Agreed.</p> <p>Before: ...multiplied effects on habitats, species, and people.</p> <p>After: ...multiplied effects on landscapes, habitats, species, and people.</p>
Chapter 2.1 Priority 1 – A green and adaptive region		Add cultural heritage to guiding principle »Enhancing the resilience of people, property, and natural environment to climate change and disasters.«.	Already included in the words “people, property”.
Page 26, Chapter: 2.1 Priority 1 – A green and adaptive region		Add a new activity under indicative list of activities: supporting cross-border capacity building, establishing efficient protection and rescue tools for the cultural heritage objects in the different types of climate-change related and other disasters.	The suggested activities can be carried within the types of action as they are structured in the IP. But they will be added under the examples in the Methodological paper.
Chapter: 2.1 Priority 1 – A green and adaptive region, Specific objective 1.1		Add national institutes for cultural heritage preservation to sectoral agencies under the Main target groups.	<p>Agreed (but not for SO 2.1., but to 2.2.).</p> <p>Before:</p> <ul style="list-style-type: none"> • National, regional, and local public authorities, <p>After:</p> <ul style="list-style-type: none"> • National, regional, and local public authorities and bodies established and governed by national, regional or local public authorities (national, regional and local government, ministries, national agencies, public institutions/agencies for nature and/or cultural heritage protection, etc.)

	<p>Chapter: 2.1 Priority 1 – A green and adaptive region,</p> <p>Specific objective 1.2</p>	Add landscape diversity (cultural landscapes and historical gardens and parks)	Already included. Semi-natural areas are understood as green infrastructure.
	<p>Chapter: 2.1 Priority 1 – A green and adaptive region,</p> <p>Specific objective 1.2</p>	The definition for green infrastructure does not only refer to natural areas, but also includes cultural heritage units such as garden architectural heritage, historical gardens and parks and cultural landscapes.	Definition that we are using in the IP SI-HR 2021-2027 is taken from EU Strategy of green infrastructure. Semi-natural areas are understood as green infrastructure.
	<p>Chapter: 2.1 Priority 1 – A green and adaptive region,</p> <p>Specific objective 1.2</p>	Add landscape characteristics to a first indicative activity under Type of action 2.	Already included, under second indicative activity b of the IP SI-HR 2021-2027: Joint actions for planning and managing of natural landscapes across border.
	<p>Chapter: 2.1 Priority 1 – A green and adaptive region,</p> <p>Specific objective 1.2</p>	Add landscape characteristics to »engagement and education of citizens and local organisations from different sectors« under Type of action 2.	Already included under second activity as the “semi-natural heritage value”.
	<p>Chapter: 2.1 Priority 1 – A green and adaptive region,</p> <p>Specific objective 1.2</p>	Add cultural to natural under second activity under Type of action 2.	The focus of this type of action on natural landscapes is in line with the title of this specific objective (Enhancing protection and preservation of nature, biodiversity, and green infrastructure).
	<p>Chapter: 2.1 Priority 1 – A green and adaptive region,</p> <p>Specific objective 1.2</p>	Add words: culture, landscape characteristics to Expected results.	<p>The result “Identified opportunities and demonstrations of green infrastructure for multipurpose benefits (including natural and semi-natural heritage)” will be amended.</p> <p>Before:</p> <ul style="list-style-type: none"> • Identified opportunities and demonstrations of green infrastructure for multipurpose benefits, <p>After:</p> <ul style="list-style-type: none"> • Identified opportunities and demonstrations of

			green infrastructure for multipurpose benefits (including natural and semi-natural heritage)
Chapter: 2.1 Priority 1 – A green and adaptive region, Specific objective 1.2	Add landscape parks to local population (under the Main target groups)	Landscape parks are part of the nature parks by its definition.	
Chapter: 2.2 Priority 2 – Resilient and sustainable region Specific objective 2.1	<p>Everything is focused on tourism, the development and preservation of culture (wider) and cultural heritage is underrepresented! Add the activities, e.g: - cross-border awareness-raising actions to increase knowledge and responsibility of stakeholders in tourism, tourists and visitors for cultural heritage preservation. Development of joint pilot and demonstration actions to support cultural heritage preservation and presentation</p> <p>Individual corrections:</p> <ol style="list-style-type: none"> 1) add services to supporting cultural tourism under The aim of the specific objective. 2) Add "sustainable utilization and management of cultural and natural heritage, as well as the preservation, restoration and development of cultural and natural heritage sites" to Indicative list of activites. 3) and cultural under Development of joint pilot and demonstration actions 4) and cultural to tourism products and services. 	<p>The suggested activities are already included in the IP SI-HR by the following activities: Cross-border awareness-raising actions to increase environmental and social responsibility of stakeholders in tourism and culture, tourists, and visitors.</p> <p>The following activity is updated.</p> <ul style="list-style-type: none"> - upgrading of joint cross-border tourism products by supporting valorisation, preservation and interpretation of cultural and natural heritage; <p>Before:</p> <ul style="list-style-type: none"> - upgrading of joint cross-border tourism products by supporting valorisation and interpretation of cultural and natural heritage; <p>After:</p> <ul style="list-style-type: none"> - upgrading of joint cross-border tourism products by supporting valorisation, preservation and interpretation of cultural and natural heritage; <p>Stand alone comments:</p> <p>1) Agreed.</p>	

			<p>Before:</p> <p>... products, and supporting cultural tourism entrepreneurship and innovation.</p> <p>After:</p> <p>... products and services, and supporting cultural tourism entrepreneurship and innovation.</p> <ul style="list-style-type: none"> 2) Already included in the upper written activity 3) We don't understand what is meant by that. 4) We can correct this sentence: of tourism and cultural products and service; <p>Before:</p> <ul style="list-style-type: none"> • development of new or "greening" of existing cross-border products, services, or solutions that contribute to the sustainability and accessibility of tourism products and service; <p>After:</p> <ul style="list-style-type: none"> • development of new or "greening" of existing cross-border products, services, or solutions that contribute to the sustainability and accessibility of tourism and cultural products and service;
	<p>Chapter: 2.2 Priority 2 – Resilient and sustainable region</p> <p>Specific objective 2.1</p>	<p>Under Types of action 2</p> <ul style="list-style-type: none"> - Add "cultural tourism" - We suggest using a broader term instead of rural communities: most remote and lesser known destinations - Add also an example of a special type of tourism in 	<ul style="list-style-type: none"> - The types of tourism were deleted from IP document and added to Methodological paper and explanatory note. - We can not accept this suggestion because it is

		<p>the field of cultural tourism; joint CB thematic routes with integrated stories and experiences.</p>	<p>not possible to evaluate which destinations are remote and lesser known.</p> <ul style="list-style-type: none"> - It is already included in this indicative activity. It cannot be added it as an examples, because we are limited with word space.
	<p>Chapter: 2.2 Priority 2 – Resilient and sustainable region</p> <p>Specific objective 2.1</p>	<p>Add »more developed knowledge, accessibility and attractiveness and better state of conservation of the natural and cultural heritage« under Results.</p>	<p>We can not include this suggestion as it is not focused on the results of this type of action.</p>
	<p>Chapter: 2.2 Priority 2 – Resilient and sustainable region</p> <p>Specific objective 2.1</p>	<p>Include Output indicator: RCO 77 Number of supported cultural and tourist places and Result indicator: RCR 77 Visitors to supported cultural and tourist places.</p>	<p>We can not accept this proposal. The indicator is too specific to report on the programme level, based on the experiences of the specific indicators in the period 2014-2020.</p>
	<p>Chapter: 2.2 Priority 2 – Resilient and sustainable region</p> <p>Specific objective 2.1</p>	<p>Add national agencies for cultural heritage protection and owners and managers of cultural heritage/units.</p>	<p>The suggested examples of target groups added but adapted to already established target group categorization.</p> <p>Before:</p> <ul style="list-style-type: none"> • National, regional, and local public authorities, <p>After:</p> <ul style="list-style-type: none"> • National, regional, and local public authorities and bodies established and governed by national, regional or local public authorities (national, regional and local government, ministries, national agencies, public institutions/agencies for nature and/or cultural heritage protection, tourist boards, etc), <p>Before:</p> <ul style="list-style-type: none"> • Local residents, visitors, and tourists, which will benefit from improved

			<p>skills and development measures at the cross-border, regional, and local levels.</p> <p>After:</p> <ul style="list-style-type: none"> • Local residents (e.g. farmers, winemakers, owners and managers of cultural heritage units), visitors, and tourists, benefiting from improved skills and development measures at the cross-border, regional, and local levels.
	<p>Chapter: 2.3 ISO1 – An accessible and connected region</p> <p>Specific objective 3.2</p>	<p>Add about cultural and natural heritage to cross-border learning actions.</p>	<p>We added the suggested example.</p> <p>Before:</p> <ul style="list-style-type: none"> • ... cross-border healthy living actions, cross-border learning about traditional food and music); <p>After:</p> <ul style="list-style-type: none"> • ...cross-border healthy living actions, cross-border learning about about cultural and national heritage (e.g. traditional food and music);