

THE WRITTEN SUMMARY OF THE STRATEGIC ENVIRONMENTAL IMPACT ASSESSMENT OF

INTERREG SOUTH BALTIC CROSS-BORDER COOPERATION PROGRAMME 2021 – 2027

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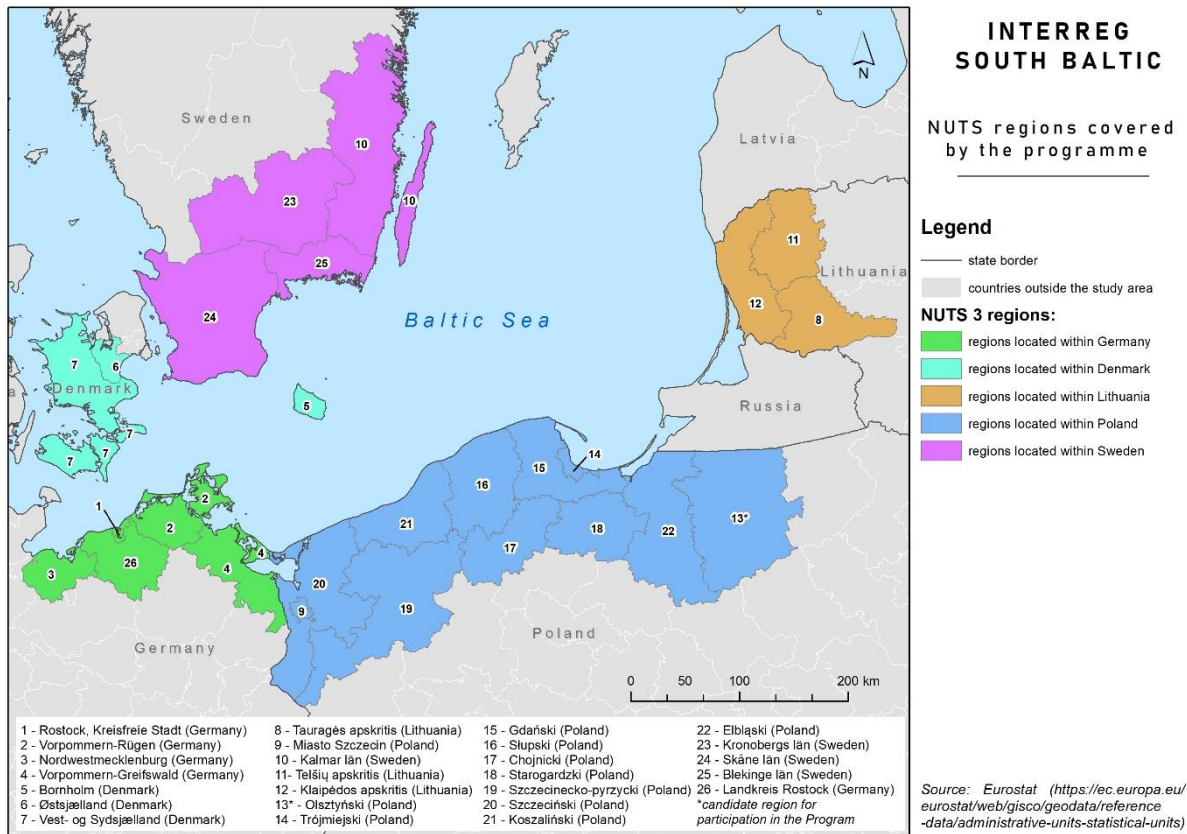
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1 Introduction

The Interreg South Baltic Programme 2021-2027 in question is being developed by five countries of the South Baltic area: Denmark, Germany, Lithuania, Sweden and Poland, the latter coordinating and managing the ongoing work. The Programme currently covers 25 coastal areas of the region with an area of approx. 118,000 km², inhabited by approx. 8.9 million people. The Olsztyn area is also a candidate for inclusion in the Programme.



The main objective of the document is to develop cross-border cooperation in order to achieve the vision outlined in the Programme, which is: 'United by the Sea into action for a blue and green future. Innovative, Sustainable, Attractive and Active South Baltic. The Programme provides for support for international projects within the defined area, which will be in line with the priorities and activities described below. It does not therefore define specific investment projects that may have a direct impact on the environment, but it does set out a framework of possible support for such projects.

The overall Programme budget allocation will remain at a level similar to the 2014-2020 amount, i.e. approx. EUR 83 million from the European Regional Development Fund (ERDF).

In the course of preliminary agreements between the countries it was assumed that the Programme would be developed on the basis of Polish regulations and administrative procedures, taking into account EU requirements. According to them, the Programme qualifies for a Strategic Environmental Impact Assessment (SEA). It has been assumed that the assessment will be carried out on the basis of Polish regulations, the so-called The EIA [Environmental Impact Assessment] Act, which takes into account the provisions of the so-called of the SEA Directive, which guarantees full compliance with EU regulations and requirements.

The overarching aim of strategic assessment is to support sustainable development by analyzing and assessing potential environmental impacts at the earliest possible stage of designing activities within programme documents at each level of strategic planning.

2 Findings of the SEA Report

2.1 Summary of the SEA Report

The Environmental Impact Assessment Report prepared under the requirements of the EIA Act is the equivalent of the environmental report referred to in the EIA Directive. The Report was carried out for the June 2021 version of the Programme. In the course of the analysis, a model of assessment was adopted in which the most important role is played by the identification of the objectives of the document itself and the effects of its implementation, as well as the assessment whether the environmental issues have been appropriately covered therein, and whether they are consistent with the principles of sustainable development and the environmental objectives set out in higher ranked documents. In this model, more emphasis is placed on the decision-making process resulting from the implementation of the evaluated document, and recommendations are addressed primarily to the institutions responsible for programme implementation. These are the Managing Authority and National Coordinators of other Member States. Moreover, the team of authors focused on those elements of the environment on which both the assessed document and the resulting project support may have an actual impact (either negative or positive). Such an element in the case of the analyzed Programme, apart from the land area, is undoubtedly the Baltic Sea, which requires a specific approach and highlighting the issues related to it. The result of this approach was the identification of key environmental problems of the South Baltic Area and the differentiation of their severity within particular States and the Baltic Sea.

The assessment carried out in the context of the first of the mentioned aspects, i.e. compliance with the principles of sustainable development, indicates that the Programme does not provide for interventions which could be contrary to any of the 17 main objectives of sustainable development, which are defined in the UN document "Agenda 2030". Furthermore, a more or less positive contribution to the achievement of the objectives set out in the renewed European Sustainable Development Strategy, especially on the regional scale, is expected in the case of all priorities and measures proposed within the Programme.

The analyses of the next aspect, i.e. compliance with the environmental protection objectives set at the EU and national level, showed that the planning of the assessed document was carried out taking into account all the key policies and strategies in this field with particular emphasis on the

environmental protection objectives. There were no inconsistencies between the evaluated Programme and the documents defining the objectives of environmental protection. Nevertheless, the positive contribution of the Programme to their realization may be increased at the stage of its implementation through an appropriate selection of criteria for support project selection.

The assessment of the Programme objectives from the perspective of impacts on particular elements of the environment is presented in the summary table below. The scale of assessments takes into account both positive and negative impacts differentiated in terms of intensity, ranging from 0 (no impact), through 1 (impacts of insignificant scale, whose possible effects on the environment will be insignificant), then 2 (impacts of moderately significant scale, whose possible effects on the environment may be significant), to 3 (impacts of significant scale, whose possible effects on the environment will be significant). The scale also makes it possible to assess these impacts:

PRIORITY	MEASURE	Biodiversity (marine areas)	Biodiversity (costal areas)	People and material goods	Inland waters	Marine waters	Air quality	Landscape	Monuments	Adaptation to climate change	Land area and natural resources
I	1.1	1	1	2	1	1	1	1	1	1	0
	1.2	0	0	1	1	1	1	0	0	0	
II	2.1	-1	-1	2	-1	0	2	-1	1	2	1
	2.2	1	1	2	3	1	0	1	1	1	1
	2.3	1	1	1	2	1	1	1	0	1	2
III	3.1	-1	-1	2	1	-1	1	-1	1	1	0
IV	4.1	0	1	1	0	0	0	0	1	1	0

The most important conclusion of the assessment is that no significantly negative impacts have been identified, including significant impacts on the status and integrity of the protected areas network, including Natura 2000.

In the assessments of nature and significance, positive impacts predominate, with varying degrees of intensity, while the identified impacts of potentially negative nature are limited to threats of insignificant, local and most often potential scale, which may be eliminated or significantly mitigated by means of clarification and explanation of the Programme provisions and appropriate formulation of criteria being the basis for the assessment of the applications for the calls for proposals for the project co-financing.

The balance of impacts carried out at the individual (component) level indicates that only positive effects of the Programme are to be expected, while the most significant of them should be experienced by the region's inhabitants, which is in line with the objectives adopted during the strategic planning process.

Among the remaining components, positive impacts are to be expected in the field of inland water quality, air quality and adaptation to climate change.

The balance of impacts carried out at the level of measures also identifies only positive impacts, with the most favorable being in the case of the following measures:

- 1.1: Digitizing the region
- 2.2: Promoting sustainable use of water
- 2.3: Supporting a circular and more resource efficient development

In case of two measures:

- 2.1: Supporting transition towards green energy
- 3.1 Development of sustainable, resilient and innovative tourism

the risk of occurrence of negligible local negative impacts was identified.

For measure 2.1 this is the risk of impact of investments related to renewable energy sources, notably offshore wind farms and hydropower facilities, which may be directly supported by the Programme, or result from the development of joint energy programmes or strategies within it, on the marine environment or surface waters and associated ecosystems and landscape.

On the other hand, in the case of measure 3.1 focused on the development of tourism, a threat of the emergence or intensification of pressure on local ecosystems and landscape as a result of excessive tourist traffic and the development of tourist infrastructure was identified.

For this reason, as a result of the conducted assessments and analyses, recommendations were presented that will allow the minimization or complete elimination of the indicated threats.

Within the framework of the prepared recommendations, on the one hand it was proposed to modify some provisions of the Programme document clarifying or specifying the introduced terms and definitions in order to avoid discrepancies in their understanding by the Programme recipients. On the other hand, the introduction of additional rules and criteria to ensure the safeguarding of environmental interests and to reinforce the positive effects

of project implementation, particularly in the context of the environmental and climate objectives of the European Union.

In the first case, it was suggested to:

- modifying the description of the exemplary measure in point 2.3.2. in a way that would exclude the implementation of energy projects, which may have a negative impact on the environment, within protected areas and their protection zones as well as within ecological corridors;
- clarify the meaning of the introduced term "sustainable tourism" as taking into account the principles and objectives defined by UNEP and WTO in the a Guide for Policy Makers titled "MAKING TOURISM MORE SUSTAINABLE and which will exclude support for projects that contradict the principles of sustainable tourism, and thus potentially reinforce the negative impact of tourism on the environment;
- clarify the rules and method of including protected areas in networks and chains of tourist offers in the description of the exemplary measure under point 2.6.2, aiming at avoiding the risk of negative impacts related to the introduction of tourist pressure within the network of protected areas, where it has not occurred so far.

In the second case, the most important recommendation is the proposal to introduce the horizontal principle of financing only projects that do not cause serious harm, i.e. those complying with the so-called DNSH or "Do No Significant Harm" principle . Furthermore, it is proposed to give preference to projects having a positive impact on environmental and climate issues, i.e. making a significant contribution to the achievement of environmental objectives set out at the EU level and projects which will result in minimizing identified pressures in the area of tourism.

This approach will ensure that environmental objectives are consistently met within the Programme and that the projects funded do not pose a threat to any of them. This can be achieved by requiring beneficiaries to declare during the application process that the proposed project complies with the DNS principle within the meaning of Article 17 of the so-called the Taxonomy Regulation (EU Regulation 2020/852). The requirement to submit a declaration should be verified at the stage of formal assessment and apply to all investments financed by the Programme.

Furthermore, as part of the application process, it is additionally suggested to reward projects that make a significant contribution to one of the six environmental objectives set out in the aforementioned regulation. The idea of a bonus at the stage of project evaluation refers to the introduction of

additional points for projects that significantly contribute to the achievement of environmental goals important for the community or minimize the existing pressure on the environment. Additional points may be awarded for projects that meet the conditions set out in Articles 10-15 of the Regulation. These may be additional criteria for the evaluation of projects submitted for financing included in the rules of calls for proposals. The assessment of a significant contribution to the environmental objectives may also apply to non-investment projects if they make it possible to achieve the environmental objectives in other areas of activity (e.g. in areas directly linked to the implementation of the project).

Due to the threats related to tourist pressure identified in the diagnosis and the impact assessment of Priority III, it was also suggested to include criteria specific to Priority III of the Programme, i.e. to award projects which minimize the identified pressures in the area of tourism. It is suggested that the regulations of project calls for proposals provide for bonuses for applications aimed at reducing the negative impact of travel and tourism on the environment.

The introduction of the above recommendations to the final version of the document and the construction of the criteria for project selection at the stage of its implementation on the basis of the proposed principles will, in the opinion of the authors, make it possible to avoid the risk of negative environmental impacts, while maximizing the positive contribution of the Programme to the achievement of the EU environmental and climate objectives.

2.2 The way of taking into account the findings of the SEA Report

All changes resulting from specific recommendations proposed in chapter 5.1 of the SEA Report have been introduced to the text of the Programme in the manner indicated in red in the table below:

Recommendation	Explanation
<p><i>Programme measure 2.1: Supporting transition towards green energy</i></p> <p>The description should precisely indicate locations for RES installations that will be preferred for the support.</p> <p>Proposal of modification of the</p>	<p>It is suggested to determine criteria, that enable financing of RES installations in developed, industrial areas, excluding or limiting building them in the protected areas and their protected zones as well as within the ecological corridors.</p>

Recommendation	Explanation
<p>description of exemplary action in p. 2.3.2:</p> <ul style="list-style-type: none"> developing, demonstrating and implementing green energy solutions in production, distribution and storage of energy from renewable sources (e.g. wave, solar energy, biomass (also for fuel, heating and biogas), geothermal energy, etc.), while finding a balance with the requirements of environmental protection, especially according to the network of protected areas and ecological corridors, as well as other laws (e.g. MSFD). 	
<p>Programme measure 3.1 Development of sustainable, resilient and innovative tourism</p> <p>Precise description of significance of the term “sustainable tourism” in consideration of the principles and goals determined by UNEP and WTO in: „MAKING TOURISM MORE SUSTAINABLE - A Guide for Policy Makers”</p> <p>Proposal for modification of p. 2.6.2:</p> <p>In this measure the emphasis on sustainable tourism development that should be understood considering the rules and goals as determined by UNEP and WTO in: „MAKING TOURISM MORE SUSTAINABLE - A Guide for Policy Makers, so mainly:</p> <ul style="list-style-type: none"> reducing the negative impact of travel and tourism on the natural environment with conducting projects aimed at preserving biodiversity, protecting the area’s rich and diverse natural (as well as cultural) offers, and a sustainable use of resources such as energy and water, meeting the needs of potential tourists without compromising the 	<p>Increase in tourist traffic can contribute to depending of the pressure on SBA area. Thus, in the action 3.1. Precise description of significance of the term “sustainable tourism” is suggested in consideration of the principles and goals determined by UNEP and WTO in: „MAKING TOURISM MORE SUSTAINABLE - A Guide for Policy Makers”.</p> <p>In the referred development in 3 areas the following goals for sustainable tourism were defined:</p> <p>The aims of sustainable tourism of UNWTO in protection of natural environment and landscape</p> <p>Physical integrity - it is necessary to maintain and protect the quality of landscapes, urban and rural, avoid physical and visual degradation of the environment.</p> <p>Biological diversity - it is necessary to support protection of natural precious areas, habitats and species and minimize negative impact on nature.</p> <p>Effectiveness in use of natural resources - it is necessary to minimize the use of rare and non-renewable resources, both in development and current operation of tourist</p>

Recommendation	Explanation
<p>needs of the citizens.</p>	<p>infrastructure and services.</p> <p>Environment cleanliness - it is necessary to minimize pollution of air, waters, soil and waste production by tourism enterprises and visitors.</p> <p>The aims of UNWTO sustainable tourism in protection of local cultures and social structures and visitor satisfaction.</p> <p>Visitor satisfaction - it is necessary to provide safe and satisfactory experience to the visitors regardless of age, race, sex, disability etc.</p> <p>Local control - it is necessary to involve and reinforce local communities in planning and decision making regarding management and development of tourism in their place of residence, in consultation with other parties concerned.</p> <p>Cultural richness - it is necessary to respect and protect historic heritage, authenticity of local culture, traditions and differences of home communities.</p> <p>Community well-being - it is necessary to maintain or improve the quality of life of accepting communities according to social structure resource availability, facilities and ecological systems supporting life with avoidance of any forms of social degradation and exploration.</p> <p>The UNWTO sustainable tourism goals in supporting the local economic development</p> <p>Economic realism - it is necessary to provide competitiveness of tourism enterprises to provide durability of their operation in the market and long-term profitability.</p> <p>Local prosperity - it is necessary to increase the share of tourism in prosperity of tourist reception, including expenditures that visitors bear locally.</p> <p>Employment quality - it is necessary to reinforce the number and quality of work</p>

Recommendation	Explanation
	<p>places in tourism, including the level of wages, working conditions and availability to all, regardless of sex, race, disability, etc.</p> <p>Social equality - it is necessary to search for a new distribution of benefits from tourism within local communities, in consideration of possibilities, income and services for the poorest members thereof.</p>
<p><i>Programme measure 3.1 Development of sustainable, resilient and innovative tourism</i></p> <p>More precise rules and manner of inclusion of protected areas in the network and chain of tourist offer -</p> <p>Proposal of modification of the description of exemplary action in p. 2.6.2:</p> <ul style="list-style-type: none"> • inclusion of cultural heritage sites and protected areas already available to tourists in the networks and chains of eco-tourism, 	<p>In the action 3.1, it is necessary to clarify the manner of inclusion of protected areas in the network and chains of tourist offer. Does it have to be one promotion or tourist information on protected areas already available or making available new ones, through e.g. Construction of new infrastructure and tourist back-office.</p> <p>The second case may lead to negative impact and would require proper provisions to secure the interest of environment and nature protection in these areas. In case of development of networks and chains of tourism, especially in protected areas, it should be considered that the scale effect may lead to faster degradation thereof.</p>

Moreover, in line with the other recommendations in section 1.2 of the Programme, a horizontal principle of financing only projects that do not cause serious harm, i.e. in line with the so-called DNSH principle "Do No Significant Harm" in the form of adding a paragraph:

Moreover, it was decided that the actions implemented under the Programme could not be contrary to the objectives of the European green deal objectives. In that context the Programme will support only activities that respect the climate and environmental standards and that would do no significant harm to environmental objectives within the meaning of Article 17 of Regulation (EU) 2020/852 of the European Parliament and of the Council.

The remaining recommendations for awarding bonuses to projects having a positive impact on environmental and climate issues will be included in the Programme implementation documents and will be applied at the stage of applying for Programme funds.

3 The Information on the course of public consultations conducted during the strategic environmental impact assessment process

Public consultations as part of the strategic environmental impact assessment process of the Program were conducted on the basis of the requirements of the EIA Act.

Public consultations in all countries covered by the Programs area took place in the period from 8 September to 15 October. The information about the consultations conducted in Poland was made public by publishing the Invitation on the website:

<https://www.ewt.gov.pl/strony/wiadomosci/publiczne-konsultacje-projektu-prognozy-oddziaływania-na-srodowisko-programu-interreg-poludniowy-baltyk-2021-2027/>

and in the regional press, covering the Program support area, i.e. “Dziennik Bałtycki” on 06/09/2021, “Głos Pomorza” on 06/09/2021, “Dziennik Elbląski” on 03/09/2021 and “Gazeta Olsztyńska” on 03/09/2021.

Information regarding the public consultations in all partner countries was made public by the national contact points of the Programme:

- Denmark - Danish Business Authority Vejløvej 29 DK-8600 Silkeborg
- Sweden - Ministry of Enterprise and Innovation Mäster Samuelsgatan 70 10333 Stockholm
- Lithuania - Ministry of the Interior of the Republic of Lithuania
- Germany - Ministry of Economics, Employment and Health Johannes-Stelling Str. 1419053 Schwerin,

as well as by the joint Program secretariat:

<https://southbaltic.eu/-/have-your-say-in-the-future-programme-2021-2027-public-consultations>

As part of the consultations, a series of several on-line meetings was held in all partner countries, during which both the draft of the Program as well as conclusions and recommendations resulting from the SEA Report were presented:

<https://southbaltic.eu/events>

The Polish side organized 2 regional meetings:

- September 23, 2021, which was organized by the Pomorskie and Zachodniopomorskie voivodeships,
- October 8, 2021, which was organized by the Warmińsko-Masurkie Voivodeship.

Pursuant to the requirements of the EIA Act, comments and motions to draft documents published on the Ministry's website could be submitted:

- in writing, using the form available on the Program website and via e-mail: KonsultacjePB@mfi.pr.gov.pl,
- orally during on-line consultation meetings,
- in writing, by post on the address of the Ministry of Funds and Regional Policy, Department of Territorial Cooperation, Wspólna St. 2/4, 00-926 Warsaw,
- orally for the record, i.e. it was possible to report them in person by making an appointment in the Ministry.

Moreover, the draft of the SEA Report along with the draft of the Programme have been made available in the Ministry of Funds and Regional Policy, Department of Territorial Cooperation (2/4 Wspólna Street, room no. 1079, 00-926 Warsaw).

3.1 Opinions of the competent authorities referred to in Art. 57 and 58 of the EIA Act

On September 8, 2021, the drafts of the Programme and the SEA Report were submitted for opinions to the following authorities:

- General Director of Environmental Protection
- Chief Sanitary Inspector
- the Director of the Maritime Office in Gdynia
- the Director of the Maritime Office in Szczecin

In response, the opinions of the General Director for Environmental Protection (no: DOOŚ-TSOOŚ.410.13.2021.aba of October 11, 2021), the Chief Sanitary Inspector (no: HŚ.NS.530.18.2021.WK of October 14, 2021) and the Director of the Maritime Office in Szczecin (letter no .: OW.52000.4.21.AZ (2) of 09.21.2021) were obtained. The Director of the Maritime Office in Gdynia did not issued requested opinion.

All received opinions are positive. The Director of the Maritime Office in Szczecin gave his opinion on the submitted documents without any comments, while the General Director for Environmental Protection and the Chief Sanitary Inspector expressed a number of comments in their opinions, primarily to the SEA Report of the Programme.

Among the 12 comments of the General Director for Environmental Protection, there were both technical and substantive issues. After their analysis, 7 comments were accepted and necessary changes were introduced to the text of the Report, while 5 comments required clarification.

The Chief Sanitary Inspector in his opinion included 3 comments, one of which was approved, the other two required explanation. A detailed analysis of the comments submitted during the opinion-making process is included in Annex 1 to the Summary.

3.2 Reported remarks and motions

In the course of public consultations and inter-ministerial opinions as well as competent authorities, in total 92 comments were submitted to the documents, 23 of which were related to the SEA Report, and the remaining 69 to the Programme.

Regarding the comments to the SEA Report, 13 were directly approved by introducing the necessary modifications to the text of the document, while the remaining 10 required explanations, which were presented in the Appendix of the Summary.

In the case of the analyzed Program, out of 69 comments, whole or partly accepted and included in the document were 51, the remaining 18 were rejected with the preparation of appropriate justifications. The table in the Appendix presents the analysis of all comments and remarks submitted in the consultation process, with the justification for accepting or rejecting it.

4 The results of the procedure concerning the transboundary impact on the environment, if carried out

The goals and priorities indicated in the Programme are strictly related to creation of innovative, sustainable, attractive and active region, that respects the interest of environment and society (citizens and tourists).

Assumptions of the Programme include reinforcement of cross-border cooperation. Possible and desired is occurrence of cross-border impact on environment, however, according to detailed evaluation from SEA Report for particular components, also in holistic evaluation of particular priorities, these will be positive impacts. Small and insignificant potential negative impact may be related to pilot projects related to energy and improvement in terms of access to tourist infrastructure, however they will be of only local nature. Moreover, they will be carried out in consideration of requirements of environment protection which guarantees that performance thereof will be done with care for natural resources.

In light of the foregoing, it is possible to exclude the risk of occurrence of significant negative cross-border impact on any component of the environment, that would require proceedings on cross-border impact on environment within the meaning of Art. 113 of the EIA Act.

Therefore, as part of the SEA process, no proceedings were conducted regarding the transboundary impact on the environment.

5 Proposals regarding the manner of monitoring of impact on environment resulting from performance of the Programme objectives

One of recommendations resulting from this document is adaptation of obligatory rule that the Programme will not support undertakings that may significantly harm environmental goals under art. 17 of the Regulation (EU) 2020/852. At the same time, according to the environmental and climate in all financial instruments from EU funds, effort should be made so that some of Union funds are directed at performance of environmental and climate goals¹. Thus, the catalog of indicators monitored on the level of the entire program, inclusion of the following indicators is proposed:

Item	Indicator	Indicator description	Meas. unit	Direct value [2024]	Target value [2029]
1.	Number of financed projects compliant with the DNSH rule under art. 17 of the Regulation (EU) 2020/852.	To the indicator value added are all projects supported under the Program, that meet the “do not significantly harm” rule Under art. 17 of the Regulation (EU) 2020/852.	pcs.	It should correspond to the analogical values adopted for the indicator regarding number of projects to be funded under the Program.	
2.	The percentage of funds directly for performance of projects, that significantly contribute to performance of environmental goals as determined under art. 9 of the regulation (EU)	To the value of the indicator, calculated should be the share of EU funds spent under the Program, for performance of projects that significantly contribute to performance of the environmental goals as determined in art. 9 of the Regulation (EU) 2002/852, namely they meet the requirements under art. 10-15 of this Regulation with	%		

¹ Such approach results from the provisions of the European Green Deal

Item	Indicator	Indicator description	Meas. unit	Direct value [2024]	Target value [2029]
	2020/852	respect to funds for performance of all projects under the Program			
3.	The percentage of funds directly for performance of projects, that minimize current pressures resulting from development of tourism in the South Baltic area.	To the value of the indicator calculated should be the share of EU funds under the Program, for performance of projects, that assume minimization of current pressures resulting from the development of tourism and obtained points under the adopted additional criteria referred to in chapter 5.2.	%		

Inclusion of the first indicated will guarantee that no projects will be funded under the Programme that may significantly harm, and at the same time, will not be a threat to performance of environmental goals under art. 17 of the Regulation (EU) 2020/852. In case of adoption of the horizontal rule that specifies that under the programme only projects compliant with DNSH rule will be funded, there will be no need to monitor the indicator on the Programme level. This indicator should be monitored in relation to all projects supported under the Program.

Another indicator will enable monitoring of contribution of the Programme in performance of the goals related to environment protection and climate. Controlling this indicator will enable reacting, when performance of the assumed indicator level will be threatened. Considering ambitious goals of the Community, as indicated in the EGD, efforts should be made to maximize this indicator (e.g. Through proper selection of weight for horizontal criteria referring to contribution of project to performance of environmental and climate goals). This indicator should be monitored in relation to all projects selected through competition.

The third indicator makes it possible to conduct ongoing monitoring of contribution of the Programme to minimization of pressures resulting from tourism development in the area.

Efforts should be made to improve programmes funded from EU funds in terms of limitation of risk of negative impact on environment as well as maximization of positive impact on environment and performance of

environmental and climate goals. Moreover, due to proposed rule of awarding projects that may significantly contribute to performance of at least one of environmental goals as determined in art. 9 under art. 10-16 of the Regulation (EU) 202/852, it is recommended to monitor their share of projects. Due to the foregoing, the catalog of indicators monitored at the stage of programme implementation (e.g. Indicators monitored on the level of detailed description of priorities) should be extended by the following indicators:

Item	Indicator	Indicator description	Measuring units
	Number of project that significantly contribute to performance of environmental goals.	To the value of the indicator, calculated should be projects supported under the Program, that significant contribute to performance of environmental goals as determined in art. 9 of the Regulation (EU) 2020/852, namely they fulfill at least one condition under art. 10-15 of the regulation, which means additional points under at least one horizontal criterium regarding significant contribution to performance of environmental goals.	pcs.
	Number of projects that minimize current pressures resulting from development of tourism in the South Baltic area.	To the indicator value, calculated should be all project supported under the Program, that minimize the existing pressures resulting from the development of tourism in the area and obtained points from the adopted additional criteria.	pcs.

Implementation of the proposed system should be based on assigning, in the IT system, proper indicators to these project, for which the applicants declared significant contribution to performance of environmental goals, namely these that gained additional points under the environmental criterium proposed above. Selection of the indicator would mean awarding additional points under proper criterium regarding significant contribution in performance of environmental goals. Mentioned indicators should be monitored evenly in all projects selected under the competition.

Implementation of the proposed **system may bring many additional benefits.** Assigning indicators to projects that contribute to performance of environmental goals enabling gaining information (on the basis of data monitored in the IT system_ regarding e.g. value of EU funds for performance

of undertakings contributing significantly to performance of environmental and climate goals as a result of performance of this type of project.

Proposed indicators will make it possible to constantly monitor the results of the Program, and also to make a detailed evaluation of impact of the Programme on performance of environmental and climate goals of the Community at the stage of periodic and final evaluation of the Program.

It is additionally recommended to test the proposed indicators and their potential correction after first selections. It is necessary also to prepare the handbook for beneficiaries and people that evaluate projects, that will determine the manner of verification of the DNSH rule and will include the synthesis of appendices to the Regulation (EU) 2020/852, optimally adjusted to the specifics of types of financial undertakings from Programme funds.

6 Justification for the choice of the variant of the final version of the document

The analyzes and assessments carried out as part of the SEA Report have shown that the activities planned within the Interreg South Baltic Cross-Border Cooperation Programme 2021-2027 will not lead to significant negative impacts on any of the environmental components, including the Natura 2000 areas within the meaning of Art. 55 sec. 2 of the EIA Act. Whereas, in the case of potential impacts of small scale and significance, a number of adequate provisions were proposed and included in the Programme to ensure their minimization.

Moreover, the conducted assessments indicated that the Programme as a whole will be characterized by a broadly understood, overwhelmingly positive impact on the natural and cultural environment of the region.

In addition, the recommendations from the SEA Report developed in the course of the strategic assessment, introduced to the final version of the document as alternative variants, allowed to increase inclusion of aspects important from the environmental protection point of view, in particular within the key issues for the South Baltic Area, such as nature and landscape protection or tourism. On the other hand, taking into account the DNSH principle as a horizontal for the Program and rewarding projects that significantly contribute to the environmental objectives defined in the regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 is an important element ensuring that the Programme implements the environmental priorities set at the EU level.

The above clearly excludes the possibility of significant negative impacts resulting from the implementation of the Programme. It also means that its acceptance is possible without an analysis of the conditions and authorization referred to in Art. 34 sec. 1 of the Nature Conservation Act.

Therefore, it should be considered that all the requirements of the EIA Act have been met and the document may be accepted in its final form, resulting from the comments, conclusions, opinions and recommendations included in the process for strategic environmental impact assessment.

7 Appendix - Detailed analysis of comments, conclusions and opinions from the SEA process

No	Institution	Document	Remark	Justification	Response to the received remark and decision
1	Ministry of Finance of the Republic of Poland - Audit Authority	draft SB Programme 2021-2027	EDITORIAL REMARKS (a) in Chapter 7.1 and many other places "legal bases" are cited - art./sec./let. is indicated but no specific legal act is indicated; this should be complemented with the information on legal act; b) the spelling of the names of the institutions is inconsistent (Managing authority/Managing Authority, Audit Authority, Monitoring Committee, joint secretariat and Joint Secretariat, etc.), as is the use of abbreviations (only "JS" for Joint Secretariat); this should be standardised; (c) in Table 7 on page 74, the columns 'Total' and 'ERDF' are identical (values); please consider whether there is a need for the column 'Total' when there is only the column 'ERDF' - so the values given there cannot be added up with anything.	none	Remark partly accepted a) The Programme has been drawn up on the basis of the model form published by the EC, constituting an Annex to Regulation No. 2021/1059 of 24 June 2021; modifications of the model form are not possible; the form does not indicate the number of the Regulation next to each chapter - remark not taken into account b) the spelling has been corrected (c) the model of Table 7 is set out in the model programme form annexed to Regulation No 2021/1059 of 24 June 2021; modifications of the model form are not possible; remark not included
2	DANISH BUSINESS AUTHORITY	draft SB Programme 2021-2027	The Danish member of the South Baltic Programme GoA is Svend Holger Welleberg, Danish Business Authority. Please delete Fatima Krag, DBA from the list of GoA-members	personal changes	Remark accepted
3	Marshal's Office of Zachodniopomorskie Voivodship	draft SB Programme 2021-2027	Zachodniopomorskie Voivodeship in the years 2007-2013 and 2014-2020 was a direct beneficiary of the South Baltic Programme. Thanks to the activity of institutions, NGOs and others who were partners and project leaders, many tangible and exemplary results of cross-border	none	Remark accepted The opinion of the Zachodniopomorskie Voivodeship does not provide any additional comments to incorporate to the content of the programme or requiring an amendment to the programme.

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			<p>cooperation with partners in our region were achieved. Currently, work on the shape of the new programming period for the South Baltic has been going on continuously since 2020. Thanks to direct involvement and work of the Zachodniopomorskie Voivodeship representatives in the programme bodies (Working Groups, Joint Programming Committee) the shape of the document, which is an annex to the current procedure, was worked out. Hence, the Zachodniopomorskie Voivodeship expresses its deep hope for further fruitful cooperation of all regions of the South Baltic programme for increasing the quality of life and activity of the entire South Baltic area residents and all visitors, as well as for increasing the region's competitiveness on external markets.</p>		
4	Mazovian Office of Regional Planning in Warsaw - MBPR	draft SB Programme 2021-2027	<p>The term "region", in the translation of the draft document into Polish, is used interchangeably - for the entire programme area and in relation to individual NUTS 3 units located in the programme area. It is proposed that in relation to NUTS 3 units, the name "sub-region" should be used consistently, in line with the NUTS classification in force since 1 January 2018.</p>	<p>The term used is inconsistent with the term in the new NUTS 2016 classification in force from 01.01.2018, introduced by Commission Regulation (EU) 2016/2066 of 21.11.2016.</p>	<p>Remark accepted We will use the word "sub-region" when referring to NUTS-3 units</p>
5	Mazovian Office of Regional Planning in Warsaw - MBPR	draft SB Programme 2021-2027	<p>The draft document refers several dozen times to provisions referring to Article 17(3) and Article 17(9) as follows: "Legal basis: Article 17(3)((...), Article 17(9)((...)".</p>	<p>We suggest specifying the relevant legislation from which the quoted articles are taken. Otherwise the provisions included in the draft document are incomprehensible.</p>	<p>Remark dismissed We would like to clarify that the draft programme has been prepared in accordance with the form set out in an annex to <i>Regulation No. 2021/1059 of 24 June 2021 on specific provisions concerning the "European territorial cooperation" objective (Interreg) supported by the European Regional Development Fund and external financing instruments</i> - the legal bases</p>

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			However, there is no information as to which legal act(s) the citation comes from.		referred to (e.g. "Article 17(3)", etc.) are the provisions from this Regulation ("Interreg Regulation"). Modifications to the form are not possible, while it does not indicate the number and name of the Regulation next to each chapter.
6	Mazovian Office of Regional Planning in Warsaw - MBPR	draft SB Programme 2021-2027	It is proposed to indicate sources of information (e.g. in the form of a footnote) for quoted data. For example, it would be reasonable to indicate the source of population data for the following information: "the area is inhabited by approximately 8.9 million people (2019), half of which live in Polish coastal regions" (s. 3).	The proposed additions will improve the readability of the document. They will also be valuable sources of information for broadening knowledge about the South Baltic region.	Remark dismissed The programme template, as defined by the Interreg Regulation, provides for a limited number of characters in particular fields. There is no possibility to insert footnotes, as it is filled in and sent to the EC in the IT system provided by the Commission (SFC2021). On the other hand, footnotes in the text itself would unnecessarily expand the content of the document and would exhaust the number of characters necessary to describe substantive issues. Data sources can be found in separate documents e.g. Socio-Economic Analysis for the South Baltic area available at: http://southbaltic.eu/interreg-south-baltic-2021-2027 Hence, data sources are not cited. Information from the socio-economic analysis could be used to extend information about the South Baltic area. However, the purpose of the document (which is the Operational Programme) is to be used for negotiations and approval by the European Commission.
7	Mazovian Office of Regional Planning in Warsaw - MBPR	draft SB Programme 2021-2027	1. Joint Programme Strategy: The main development challenges and policy responses (pp. 1-16) One of the more important challenges for the South Baltic area and the Baltic Sea itself, which is posed by - agriculture, which using numerous chemical substances in production, is not sufficiently or clearly addressed. These substances, washed away by the rains and discharged by rivers into the sea, are causing the death of life at the bottom of the Baltic Sea. Dead zones already account for more than 20% of the Baltic Sea's bottom waters.	It would be appropriate to draw attention, in the joint strategy for the programme, to the harmful activities of agriculture (the excessive use of chemicals in agricultural crops) and to the need for solutions aimed at measures to restore biodiversity and reduce pollution of the sea. Otherwise, a mistaken belief may arise that this problem has already been solved in previous years. Actions taken in this respect should unite all Programme partners.	Remark dismissed The South Baltic Programme covers sub-regions mainly along the coastline of the Baltic Sea in as many as 5 Member States and has limited, relatively small financial resources. The joint strategy therefore presents the most important challenges to be considered in the implementation of the programme. According to the current rules governing Interreg programmes, all projects must have a cross-border dimension and element, with partners from different countries. At the same time, the issue of chemicals run-off, including substances from fields (from agriculture, e.g. fertilisers and other chemicals) is, in our opinion, already covered by the programme, taking into account the expectations of the Member States involved in the programme in the description of Measure 2.2 (linked to ERDF Specific Objective 2.5), where it is stated that: <i>"Taking into account that water is the most important resource of the Area, the actions under this measure aim to support broadly effective and sustainable water management, especially in the field of reducing the discharge of nutrients and hazardous substances into river basins and subsequently into the Baltic Sea, in order to combat eutrophication and the introduction of hazardous substances and thus improve water quality."</i> This includes the discharge of substances used in agriculture. Examples of actions include <i>"- elaboration and testing common cross-border standards (...) in cooperation with (...) companies and cooperatives of farmers and residents"</i> , with landowners also among the examples of target groups. In addition, harmful agricultural activities are a topic for large-scale implementation through other, larger financial instruments, national programmes, etc.
8	Mazovian Office of Regional Planning in Warsaw - MBPR	draft SB Programme 2021-2027	1. Joint programme strategy: main development challenges and policy actions (p.30) It is proposed to extend the provision "the geographical	The growing popularity of health and wellness tourism in Poland is mentioned in the Strategy for Responsible Development. The proposed provision is also	Remark accepted Types of tourism activities will be added to the justification of PA3 in Section 1.3 of the Programme. This is under the assumption, that they will meet the requirements of sustainable tourism.

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			and climatic situation of the South Baltic Area makes it necessary to emphasize the development of tourist offers such as historical tourism, religious tourism (...)" with health and wellness tourism	coherent with the content of PA 3 priority, in particular in terms of geographical and climatic location of the South Baltic Area.	
9	Mazovian Office of Regional Planning in Warsaw - MBPR	draft SB Programme 2021-2027	<p>2. Priorities (p. 32-73) Please verify the correctness of numbering in part 2. Priorities. The assigned numbering is not correct, e.g. p. 32: PA 1 Innovative South Baltic - increasing the level of innovation and internationalisation of local actors</p> <p>2.1.1. Specific objective 1.2 Reaping the benefits of digitisation (...)</p> <p>2.1.2. Related types of actions and their expected contribution to these specific objectives (...)</p> <p>p. 38: 2.2.1. Specific objective 1.3 Enhancing sustainable growth (...)</p> <p>2.2.2. Related types of actions and their expected contribution to these specific objectives (...)</p> <p>etc.</p>	The layout of the assigned measures makes it difficult to read the document correctly.	<p>Remark dismissed</p> <p>The numbering is correct and follows from the programme template. The programme has been drawn up according to the form (programme template) set out in an annex to <i>Regulation No. 2021/1059 of 24 June 2021</i>; modifications of the programme template are not possible.</p> <p>We would also like to clarify that the numbering of the chapter/subchapter of the document (in accordance with the template) is one thing, and the numbering of a Measure or a Specific Objective is another.</p>
10	Mazovian Office of Regional Planning in Warsaw - MBPR	draft SB Programme 2021-2027	<p>5. Approach to communication of Interreg programme and its visibility (objectives, target groups, communication channels including use of social media where appropriate, planned budget and relevant monitoring and evaluation indicators)</p> <p>It is proposed to supplement the catalogue of activities regarding communication channels - in the entry regarding "trainings and</p>	Seminars and conferences are valuable forms of knowledge and information exchange, also appreciated by beneficiaries and potential beneficiaries.	<p>Remark accepted</p> <p>Catalogue of activities is being complemented with seminars and conferences</p>

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			workshops" - with seminars and conferences.		
11	Mazovian Office of Regional Planning in Warsaw - MBPR	Draft SEA Report	The draft document uses abbreviations that are not explained in the text (e.g. JCW, IUCN, EEA or SWOT) .	It is proposed to include abbreviations in the index with appropriate definitions.	Remark accepted
12	Mazovian Office of Regional Planning in Warsaw - MBPR	Draft SEA Report	The text describes sub-regions, using the word "region" incorrectly - e.g. the Tricity region.	According to the new NUTS 2016 classification in force since 01.01.2018, introduced by Commission Regulation (EU) 2016/2066 of 21.11.2016, NUTS 3 units refer to sub-regions and not - as indicated in the draft document - to regions. We make a suggestion to adjust the nomenclature, in line with the current list.	Remark accepted
13	Mazovian Office of Regional Planning in Warsaw - MBPR	Draft SEA Report	3.1 Biotic elements of the environment (biodiversity, plants, animals, protected areas) Figure 3.7 National protected areas Figure 3.7 is unreadable due to lack of explanation in the legend of the IUCN site category.	The figure requires the legend to be completed by including the IUCN (i.e. International Union for Conservation of Nature) site category.	Remark accepted
14	Mazovian Office of Regional Planning in Warsaw - MBPR	Draft SEA Report	3.7 Monuments The draft Prognosis included a partially outdated provision: "In Poland the rules of protection of monuments are defined by the Act of 23 July 2003 on protection and care of monuments (Journal of Laws 2021, item 710)". It is reasonable to add: "as amended", which will allow taking into account the amendment of the Act, which was published in Journal of Laws 2021, item 954.	The entry needs to be updated.	Remark accepted
15	Mazovian Office of Regional Planning in Warsaw - MBPR	Draft SEA Report	3.7. Monuments When citing the forms of protection of historical monuments applicable in Poland, the provision of the legal act was omitted in the text of the Prognosis: "the determination of protection in	The provision concerning the forms of protection of monuments in Poland needs to be supplemented.	Remark accepted It will be introduced to the final version of the SEA Prognosis.

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			the local spatial development plan or in the decision on the location of a public purpose investment, the decision on the conditions of development, the decision on the permission to carry out a road investment, the decision on the location of a railway line or the decision on the permission to carry out an investment in a public use airport".		
16	Ministry of Culture, National Heritage and Sports of the Republic of Poland /Intellectual Property and Media Department	draft SB Programme 2021-2027	Priority 3 PA 3 Attractive South Baltic - activation of the tourism and cultural potential of the South Baltic area (p.61) The programme text should be supplemented as follows (proposed changes are highlighted in red): "The blue and green character of the region together with the common cultural heritage are some of the key advantages in terms of tourism sector development. Due to demographic changes and urbanisation, sectors such as cultural and creative industries, leisure services and other types of tourism jobs have become even more important in rural or peripheral areas. As one of the key sectors in the South Baltic Area, tourism is a source of employment and income for local communities as well as a driving wheel for the development of innovative, creative products."	The proposed amendments aim at: - developing the description of actions by including issues concerning activities supporting the development of creative sectors, - more detailed provisions, which have been formulated in the output document as "creative sector". The detailed specification aims at emphasizing the importance of creative sectors for the development of modern, innovative and attractive forms of the region's promotion, as well as sectors generating a new offer attracting tourists (e.g. new cultural and art objects, innovations in designing cultural and natural space).	Remark accepted "as well as a driving force for the development of innovative, creative products" was added.
17	Ministry of Culture, National Heritage and Sports of the Republic of Poland /Intellectual Property	draft SB Programme 2021-2027	Priority 3 PA 3 Attractive South Baltic - activation of the tourism and cultural potential of the South Baltic area	The proposed amendments aim at: - developing the description of actions by including issues concerning activities supporting the development of creative	Remark accepted "using the potential of cultural and creative sectors and natural resources as a means of strengthening the tourist attractiveness of the Programme area" was added.

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	and Media Department		(p.63) The content of the programme should be completed as follows: "The main interventions that can receive funding are: preserving the region's cultural heritage and natural environment as major tourist attractions; developing cultural, creative and natural resources and potentials as a means of strengthening the tourist attractiveness of regions; developing tourism network products and services, building cooperation between regions and countries to strengthen offers for tourists; holding joint events that meet the expectations and needs of both tourists and citizens. In addition, it will also be possible to implement cross-sectoral actions and support the development of a circular economy."	sectors, - more detailed provisions, which have been formulated in the output document as "creative sector". The detailed specification aims at emphasizing the importance of creative sectors for the development of modern, innovative and attractive forms of the region's promotion, as well as sectors generating a new offer attracting tourists (e.g. new cultural and art objects, innovations in designing cultural and natural space).	
18	Ministry of Culture, National Heritage and Sports of the Republic of Poland /Intellectual Property and Media Department	draft SB Programme 2021-2027	Priority 3 PA 3 Attractive South Baltic - activation of the tourism and cultural potential of the South Baltic area (p.63) The following should be added to the catalogue of exemplary activities: • - projects aimed at enhancing the potentials and developing the resources of the cultural, creative and tourism sectors (e.g. producing new resources, corresponding to modern trends and ways of spending time by citizens and tourists);	The proposed amendments aim at: - developing the description of actions by including issues concerning activities supporting the development of creative sectors, - more detailed provisions, which have been formulated in the output document as "creative sector". The detailed specification aims at emphasizing the importance of creative sectors for the development of modern, innovative and attractive forms of the region's promotion, as well as sectors generating a new offer attracting tourists (e.g. new cultural and art objects, innovations in designing cultural and natural space).	Remark accepted The proposed addition was included in the exemplary activities. However, keeping also in mind it has to be understood in the context of the specificity of SO 4.6 - sustainable tourism and culture contributing to economic development, social innovation and social inclusion as well as cross-border character of these activities.
19	Ministry of Culture, National	draft SB Programme	Priority 3 PA 3 Attractive South Baltic -	The proposed amendments aim at: - developing the description of	Remark partly accepted The proposed level of detail is justified, but will be applied at the level of

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	Heritage and Sports of the Republic of Poland /Intellectual Property and Media Department	e 2021-2027	activation of the tourism and cultural potential of the South Baltic area (p.64) Action 5 should be completed in the catalogue of sample actions as follows (as highlighted in red): • Developing and testing tools, joint solutions and training for the tourism and, cultural and creative sectors in order to meet e.g. the demand for future skills (e.g. digital skills), health standards (e.g. in tourist facilities and when developing new offers), creating elements of new cultural, natural, tourism resources (e.g. new cultural and creative spaces, new areas of natural interest, innovations in natural, ecological, cultural tourism offers).	actions by including issues concerning activities supporting the development of creative sectors, - more detailed provisions, which have been formulated in the output document as "creative sector". The detailed specification aims at emphasizing the importance of creative sectors for the development of modern, innovative and attractive forms of the region's promotion, as well as sectors generating a new offer attracting tourists (e.g. new cultural and art objects, innovations in designing cultural and natural space).	elaboration of the programme implementation documents, e.g. Programme Manual. Creative sector is being mentioned in this bulletpoint, without the proposed further details.
20	Ministry of Culture, National Heritage and Sports of the Republic of Poland /Intellectual Property and Media Department	draft SB Programme 2021-2027	Priority 3 PA 3 Attractive South Baltic - activation of the tourism and cultural potential of the South Baltic area (p.64) Action 13 should be completed in the catalogue of sample actions as follows: • actions aiming at developing and promoting creative industries linked to the regional heritage (e.g. handicrafts, innovative crafts, design, new technologies),	The proposed amendments aim at: - developing the description of actions by including issues concerning activities supporting the development of creative sectors, - more detailed provisions, which have been formulated in the output document as "creative sector". The detailed specification aims at emphasizing the importance of creative sectors for the development of modern, innovative and attractive forms of the region's promotion, as well as sectors generating a new offer attracting tourists (e.g. new cultural and art objects, innovations in designing cultural and natural space).	Remark accepted
21	Ministry of Climate and Environment of the Republic of Poland	draft SB Programme 2021-2027	Please unify the vocabulary of "climate change" vs "climate changes" - to the term "climate change".	According to Polish strategic documents concerning climate change and adaptation to it, in particular to the SPA 2020	Remark accepted

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				document, and also according to IPCC reports, the term "climate changes" should be used (plural) and not "climate change" (singular).	
22	Ministry of Climate and Environment of the Republic of Poland	draft SB Programme 2021-2027	PA2 Sustainable South Baltic - promoting sustainable development and blue and green economy (p.44) A reasonable solution would be to indicate directly in Priority 2 Sustainable South Baltic - promoting sustainable development and blue and green economy, low and zero emission <u>hydrogen</u> as a key energy carrier in the EU transformation process, in addition to the already mentioned renewable energy sources.	By considering this remark, it will be possible to take hydrogen actions and initiatives, based on the measures resulting from this Programme.	Remark partly accepted The proposed formulations include the possibility of taking actions involving also hydrogen as a carrier of renewable energy. Additional mentioning in text of the draft Programme was not deemed necessary. Additional examples or details in this respect, if needed, may be provided e.g. in the Programme Manual.
23	Ministry of Climate and Environment of the Republic of Poland	draft SB Programme 2021-2027	Inconsistency of the working translation of the document with the official version.	The working translation of the draft programme Interreg South Baltic 2021-2027 submitted for opinion is inconsistent with the official draft document and therefore should not be used for inter-ministerial consultations.	Remark partly accepted The translation of the programme (into Polish) was revised before it was sent for inter-ministerial agreement. The text will be reviewed again and compared with the English version. We would like to clarify that the Polish version is used only as an auxiliary, non-binding, unofficial working translation. The document submitted to the EC for approval will be the English-language version.
24	Ministry of Climate and Environment of the Republic of Poland	draft SB Programme 2021-2027	Priority: 2.2. PA 2 Sustainable South Baltic - promoting sustainable development and blue and green economy Policy Objective: Promoting renewable energy in accordance with Renewable Energy Directive (EU) 2018/2001, including the sustainability criteria set out therein Measure: 2.1: Supporting transition towards green energy (s.32) In the official English-language version of the document on page 32 in bullet two in the enumeration of examples, wind energy should also be added, i.e: developing, demonstrating and implementing green energy	The comment is intended to include offshore wind energy as well.	Remark dismissed The whole example was modified in order not to mention any type of renewable energy, i.e. "• developing, demonstrating and implementing joint solutions in production and utilisation (e.g. distribution and storage) of energy from renewable sources while the requirements of environmental protection, especially regarding the network of protected areas and ecological corridors, as well as other laws (e.g. MSFD) should be respected"

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			solutions in production, distribution and storage of energy from renewable sources (e.g. <i>wind</i> , wave, solar energy, biomass (also for fuel, heating and biogas), geothermal energy, etc.), while finding a balance with the requirements of environmental protection and laws (e.g. MSFD),		
25	Ministry of Climate and Environment of the Republic of Poland/Chief Inspectorate for Environmental Protection	draft SB Programme 2021-2027	1. Joint programme strategy: key development challenges and policy actions. (p.10) In the draft, in the part concerning the assessment of the state of waters of the Baltic Sea, the authors do not specify the source of information on the assessment of the state of marine waters. Below is the passage to which the comment refers: "Indeed, most of the Baltic Sea has been assessed as "Moderate" or "Poor" in terms of biodiversity and has therefore been classified as a problem area. At the same time, the Baltic Sea is in a critical situation in terms of eutrophication and pollution levels. The eutrophication level is 87%, the highest eutrophication level among European seas found in 2019".	When developing a joint strategy for the Programme including, but not limited to, the identification of environmental challenges, it is useful to indicate from what data/information/sources the key problems of the region have been identified. Due to the fact that the Programme covers regions that are part of the territories of five Baltic countries: Denmark, Germany, Lithuania, Poland and Sweden, which are EU Member States, it seems reasonable to refer to the assessment carried out in accordance with Article 8 of Directive 2008/56/EC of the European Parliament and of the Council of 17 June 2008 establishing a Community framework for marine environmental policy and Commission Directive (EU) 2017/845 of 17 May 2017 amending Directive 2008/56/EC of the European Parliament and of the Council as regards illustrative lists of elements to be taken into account in the development of marine strategies.	Remark partly accepted The programme template, as defined by the Regulation, provides for a limited number of characters in particular fields. There is no possibility to insert footnotes, as it is filled in and sent to the EC in the IT system provided by the Commission (SFC2021). On the other hand, footnotes in the text itself would unnecessarily expand the content of the document and would exhaust the number of characters necessary to describe substantive issues. Sources of data can be found in separate documents, e.g. socio-economic analysis for the South Baltic area, available at: http://southbaltic.eu/interreg-south-baltic-2021-2027 Hence, we do not provide data sources in the English language version of the document, which will be submitted for EC approval. The sources will be provided in the Polish version (unofficial, non-binding, working translation) of the programme (reader's friendly version).
26	Ministry of Climate and Environment of the Republic of Poland/Chief Inspectorate for Environmental Protection	draft SB Programme 2021-2027	1. Joint Programme Strategy: main development challenges and policy actions (PA 2 Sustainable South Baltic - promoting sustainable development and blue and green economy). (p.28)	The comment refers to the discharge of hazardous substances from the river basin area. It is incomprehensible how reducing the discharge of hazardous substances from the river basin area would affect the control of various hazardous substances (such as	Remark partly accepted The sentence is amended as below, in order to make clear the intention of the programme (as it is already reflected by exemplary types of actions under SO 2.5). It is not the discharge of hazardous substances from the river basins that would affect the control of various hazardous substances such as dumped chemical weapons in the marine environment, but here we rather mention that the development of solutions to combatting eutrophication and hazardous substances in the aquatic environment is among the goals of the

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			We request the deletion of "or dumped chemical weapons" from the passage quoting: "It will support the development of cross-border solutions for the efficient and sustainable land use and water management, especially in the field of reducing the outlets of nutrients and hazardous substances into river-basins, and subsequently into the Baltic Sea, in order to combat eutrophication and various hazardous substances (such as plastics or dumped chemical munitions) in the aquatic environment including the marine environment and thus enhance the water quality."	dumped chemical weapons) in the marine environment.	programme. The " <i>dumped chemical weapons</i> " are not deleted from the sentence, but the sentence is slightly reformulated: "It will support the development of cross-border solutions: - for the efficient and sustainable land use and water management, especially in the field of reducing the outlets of nutrients and hazardous substances into river-basins, and subsequently into the Baltic Sea, - to combat eutrophication and various hazardous substances (such as plastics or dumped chemical munitions) in the aquatic environment including the marine environment and thus enhance the water quality."
27	Ministry of Climate and Environment of the Republic of Poland/Chief Inspectorate for Environmental Protection	draft SB Programme 2021-2027	2.3.2. Related types of actions and their expected contribution to these specific objectives and, where appropriate, macro-regional and sea basin strategies. (p.49) We request that the translation of the following passage be verified: "One of the reasons why the temperature of the Baltic Sea is rising three times faster than the average temperature of other seas and oceans is water pollution."	Water pollution does not cause the temperature to rise except in the case of discharges from cooling installations. The increase in water temperature can exacerbate the effects of pollution.	Remark dismissed The statement in the draft Programme is substantively correct, as water pollution affects the rate at which water heats up. This is determined by several factors. According to the analyses, aerosols have a significant impact on water temperature changes. One of the sources of aerosols in the sea is biological activity, which in turn is increased due to eutrophication (EC, 2012). Other studies also show that micro plastics present on the sea surface can interfere with fundamental biological processes. In particular, the presence of plastic particles can lead to an intensification of the decomposition of organic matter in water and disturb the flow of oxygen and carbon dioxide between the sea and the atmosphere, which in turn affects the ability of seawater to absorb CO2 (O'Sullivan, 2019). Moreover, water transparency (or the lack thereof) significantly affects surface heating. Sources: EC (2012): Aerosols strongly influence sea surface temperature. https://ec.europa.eu/environment/integration/research/newsalert/pdf/291na3_en.pdf O'Sullivan K. (2019): Plastic eaten by plankton may impair oceans' ability to trap CO2. https://www.irishtimes.com/news/environment/plastic-eaten-by-plankton-may-impair-oceans-ability-to-trap-co2-1.3875434 See also remark no. 36.
28	Ministry of Climate and Environment of the Republic of Poland/Chief Inspectorate for Environmental Protection	draft SB Programme 2021-2027	2.4.2. Related types of actions and their expected contribution to these specific objectives and, where appropriate, macro-regional and sea basin strategies. (p.51) We request the deletion of "or	The comment refers to the discharge of hazardous substances from the river basin area. It is incomprehensible how reducing the discharge of hazardous substances from the river basin area would affect the control of various hazardous substances (such as	Remark partly accepted (as in Remark no. 26) - Accordingly to changes presented in Remark no 26, the sentence is being formulated as follows: "This Measure will support the Specific Objective 2.5 <i>Promoting access to water and sustainable water management</i> . The goals are aimed at broad support of efficient and sustainable land use and water management, especially in the field of: - reducing the outlets of nutrients and hazardous substances into river-

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			dumped chemical weapons" quote: "This Measure will support the Specific Objective 2.5 Promoting access to water and sustainable water management. The goals are aimed at broad support of efficient and sustainable land use and water management, especially in the field of reducing the outlets of nutrients and hazardous substances into river-basins, and subsequently into the Baltic Sea, in order to combat eutrophication and various hazardous substances (such as plastics or dumped chemical munitions) in the aquatic environment including the marine environment and thus enhance the water quality.	dumped chemical weapons) in the marine environment.	basins, and subsequently into the Baltic Sea, - to combat eutrophication and various hazardous substances (such as plastics or dumped chemical munitions) in the aquatic environment including the marine environment and thus enhance the water quality.
29	Ministry of Climate and Environment of the Republic of Poland/Chief Inspectorate for Environmental Protection	draft SB Programme 2021-2027	4. Actions taken to involve relevant programme partners in the preparation of the Interreg programme and the role of these programme partners in implementation, monitoring and evaluation. (p.80) Incorrect name of institution: "regional fund for environmental protection and water management".	We request that this be changed to 'voivodship fund for environmental protection and water management'.	Remark accepted
30	Ministry of Infrastructure of the Republic of Poland - Polish Water Management Polish Waters/National Management Authority	draft SB Programme 2021-2027	The wording 'has a clear blue-green character' needs clarification. The proposed wording 'has a clear blue (maritime sector) - green (natural resources sector) character, '.	The proposed wording will improve the readability of this part of the document.	Remark accepted The proposed wording was inserted.
31	Ministry of Infrastructure of the Republic of Poland - Polish Water Management Polish Waters/National Management Authority	draft SB Programme 2021-2027	The statement " <i>Furthermore, every ten years the average water temperature in the Baltic Sea rises by about 0.40°C on average, threatening biodiversity.</i> " raises substantive questions. The passage in question needs to be substantively amended, or	According to the source "Project KLIMADA 2.0 IQS PIB and Climate change in the Baltic Sea Area HELCOM thematic assessment in 2013", 2013. Baltic Sea Environment Proceedings No. 137, Helsinki Commission Baltic Marine Environment Protection Commission, Helsinki.	Remark accepted Indeed there was a mistake in this phrase; it is being corrected.

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			alternatively the source from which the values in question for the increase in temperature in the Baltic Sea catchment area over a decade are taken should be given.	https://helcom.fi/wp-content/uploads/2019/10/BSEP137.pdf the temperature increase in the Baltic Sea catchment area is 0.08°C/decade and is higher than the Earth-wide average increase estimated at 0.05°C.	
32	Ministry of Infrastructure of the Republic of Poland - Polish Water Management Polish Waters/National Management Authority	draft SB Programme 2021-2027	The classification used in the passage is questionable: "Indeed, most of the Baltic Sea has been assessed as 'Moderate' or 'Poor' in terms of biodiversity and is therefore classified as a problem area".	The ecological status of the Baltic Sea waters under the Marine Strategy Framework Directive (MSFD) is described as GES or sub-GES and the classification used in the document is derived from the Water Framework Directive (WFD).	Remark accepted WFD and WFDM assessments are interdependent, so a clarification is being added in the text that the WFD <i>Moderate</i> and <i>Weak</i> level is a <i>subGES</i> under the MSFD.
33	Ministry of Infrastructure of the Republic of Poland - Polish Water Management Polish Waters/National Management Authority	draft SB Programme 2021-2027	In the paragraph beginning "Although various sources of renewable production are exploited in the eligible area, it is worth noting the region's considerable potential to develop sectors producing (i) wind energy, (ii) bioenergy and (iii) solar energy" it is suggested to add information on the possibilities of using water energy to a greater extent.	In the hydropower sector the reserves are in new locations of hydroelectric power plants on rivers, e.g. Pomerania, restoration of old, closed dams and modernization of already existing hydroelectric power plants.	Remark dismissed This part of the programme document describes the outcome of the socio-economic analysis, where water was not mentioned therefore proposal was dismissed.
34	Ministry of Infrastructure of the Republic of Poland - Polish Water Management Polish Waters/National Management Authority	draft SB Programme 2021-2027	In Programme Measure 2.1: Supporting the transition to green energy, it is proposed to include more use of water energy, in particular by adding sample actions on page 45 on this issue.	In the hydropower sector the reserves are in new locations of hydroelectric power plants on rivers, e.g. Pomerania, restoration of old, closed dams and modernization of already existing hydroelectric power plants.	Remark dismissed It was decided that different types of renewable energy would not be mentioned in the text.
35	Ministry of Infrastructure of the Republic of Poland - Polish Water Management Polish Waters/National Management Authority	draft SB Programme 2021-2027	Under 2.5 Promoting access to water and sustainable water management there is no reference to counteracting the effects of drought, e.g. through small-scale retention. On page 50, under "Exemplary actions", I propose to add actions taken from the draft Plan for Prevention of Effects of Drought (PPSS), such as - protection and restoration of biodiversity, e.g. through increasing the area of forests and renaturalisation of water	none	Remark dismissed The South Baltic Programme covers sub-regions mainly along the coastline of the Baltic Sea in as many as 5 Member States and has limited, relatively small financial resources. The joint strategy therefore presents the most important challenges to be considered in the implementation of the programme. According to the current rules governing Interreg programmes, all projects must have a cross-border dimension and element, with partners from different countries. The proposed issues go well beyond the capacity of the programme and seem to be a topic suitable for large-scale implementation through other, larger financial instruments, national programmes, etc.

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			<p>and water-dependent ecosystems and wetlands;</p> <ul style="list-style-type: none"> - implementation of the principle of sustainable planning and design of urban areas (the so-called smart city, introduction of blue-green infrastructure elements); - slowing down or stopping the run-off of surface water from small drainage basins on agriculturally used areas through appropriate agrotechnical measures (increasing soil water retention), improving soil structure and decreasing its evaporation, as well as through limiting water erosion by: use of ploughless cultivation systems, maintenance of all-year-round vegetation cover, permanent sodding or afforestation on steep slopes, and on less sloping slopes - carrying out cultivation measures in a direction transverse to the slope inclination. 		
36	Ministry of Infrastructure of the Republic of Poland - Polish Water Management Polish Waters/National Management Authority	draft SB Programme 2021-2027	<p>The wording 'One of the reasons why the temperature of the Baltic Sea is rising three times faster than the average temperature of other seas and oceans is water pollution' requires clarification. It is proposed that the passage be made more precise by indicating the specific pollutants which cause the phenomenon of the rise in the temperature of the Baltic Sea in particular.</p>	<p>Not all pollutants have an impact on the increase in the temperature of the Baltic Sea.</p>	<p>Remark dismissed</p> <p>The statement in the draft Programme is substantively correct, as water pollution affects the rate at which water heats up. This is determined by several factors. According to the analyses, aerosols have a significant impact on water temperature changes. One of the sources of aerosols in the sea is biological activity, which in turn is increased due to eutrophication (EC, 2012). Other studies also show that micro plastics present on the sea surface can interfere with fundamental biological processes. In particular, the presence of plastic particles can lead to an intensification of the decomposition of organic matter in water and disturb the flow of oxygen and carbon dioxide between the sea and the atmosphere, which in turn affects the ability of seawater to absorb CO₂ (O'Sullivan, 2019). Moreover, water transparency (or the lack thereof) significantly affects surface heating.</p> <p>Sources:</p> <p>EC (2012): <i>Aerosols strongly influence sea surface temperature.</i> https://ec.europa.eu/environment/integration/research/newsalert/pdf/291na3_en.pdf</p> <p>O'Sullivan K. (2019): <i>Plastic eaten by plankton may impair oceans' ability to trap CO₂.</i> https://www.irishtimes.com/news/environment/plastic-eaten-by-plankton-may-impair-oceans-ability-to-trap-co2-1.3875434</p>

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					See also Remark no. 27.
37	Ministry of Infrastructure of the Republic of Poland - Polish Water Management Polish Waters/National Management Authority	draft SB Programme 2021-2027	Change: "Although pollutants are primarily discharged into the sea from the shore " into: "Although pollutants are primarily discharged into the sea from the land "	none	Remark accepted
38	Ministry of Infrastructure of the Republic of Poland - Polish Water Management Polish Waters/National Management Authority	draft SB Programme 2021-2027	Change: "Sea level and flooding are not only threats to environmental safety in the region" into: " Rising sea levels and flooding are not only threats to environmental safety in the region"	none	Remark accepted
39	Ministry of Infrastructure of the Republic of Poland - Polish Water Management Polish Waters/National Management Authority	draft SB Programme 2021-2027	Section 1.2 Joint Programme Strategy, paragraph on "Environmental and Infrastructural area Key challenges" change: "While diverse sources of renewable production are exploited across the eligible area (...)" into: "While diverse sources of renewable energy are exploited across the eligible area (...)"	none	Remark accepted
40	Ministry of Infrastructure of the Republic of Poland - Polish Water Management Polish Waters/National Management Authority	draft SB Programme 2021-2027	change: "to help the EU meet its climate neutrality target for 2050" into: "to help the EU meet its climate neutrality target until 2050"	none	Remark accepted
41	Ministry of Infrastructure of the Republic of Poland - Polish Water Management Polish Waters/National Management Authority	draft SB Programme 2021-2027	change: "The Interreg South Baltic 2021-2027 Operational Programme shall be in synergy with the revised Strategy and play an active role in its implementation" into:	none	Remark dismissed The adjective "active" is describing properly the role of the South Baltic Programme and its projects in the implementation of the EUSBSR.

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			"The Interreg South Baltic 2021-2027 Operational Programme shall be in synergy with the revised Strategy and play an important role in its implementation"		
42	Ministry of Infrastructure of the Republic of Poland - Polish Water Management Polish Waters/National Management Authority	draft SB Programme 2021-2027	Please change: "The South Baltic area is facing a number of pressing challenges such as soil and water contamination by microplastics," into: "The South Baltic area is facing a number of pressing challenges such as soil and water pollution by microplastics,"	none	remark accepted
43	Ministry of Infrastructure of the Republic of Poland - Polish Water Management Polish Waters/National Management Authority	draft SB Programme 2021-2027	change: "Unsustainable practices have threatened the environment and the region's rich natural heritage" into: " Inappropriate practices have threatened the environment and the region's rich natural heritage"	none	Remark accepted
44	Ministry of Infrastructure of the Republic of Poland - Polish Water Management Polish Waters/National Management Authority	draft SB Programme 2021-2027	In addition, the resources of the Baltic Sea are being exploited in an unsustainable way - and that includes the exploitation of natural resources.	The sentence is a bit unclear because what else than natural resources can be overexploited? We propose the clause: Furthermore, the natural resources of the Baltic Sea are overexploited in an unsustainable manner.	Remark accepted
45	Ministry of Infrastructure of the Republic of Poland - Polish Water Management Polish Waters/National Management Authority	draft SB Programme 2021-2027	Section 1.3, justification for the selection of SO 4.6: Change: "The SBA has both tourist-oriented resort infrastructure" into: "The area has both tourism infrastructure"	none	Remark accepted
46	Ministry of Infrastructure of the Republic of Poland - Polish Water Management Polish Waters/National Management Authority	draft SB Programme 2021-2027	Change: "developing, demonstrating and implementing green energy solutions" into: "developing, presenting and implementing green energy"	none	Remark accepted (Pertains to Polish working translation of the draft Programme)

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			solutions in production"		
47	Ministry of Infrastructure of the Republic of Poland - Polish Water Management Polish Waters/National Management Authority	draft SB Programme 2021-2027	while balancing environmental and regulatory requirements (e.g. DRSM)	Probably should be RDSM if Marine Strategy Framework Directive is referred to here.	Remark accepted
48	Ministry of Infrastructure of the Republic of Poland - Polish Water Management Polish Waters/National Management Authority	draft SB Programme 2021-2027	Change: "developing, demonstrating and implementing green technology solutions for water management" into: "developing, presenting and implementing green technology solutions for water management"		Remark accepted (The remark is relevant to Polish working translation of the draft Programme)
49	Ministry of Infrastructure of the Republic of Poland - Polish Water Management Polish Waters/National Management Authority	draft SB Programme 2021-2027	Change: "developing, demonstrating and implementing solutions in order to reduce pollution of the Baltic Sea" into: "developing, presenting and implementing solutions aiming at reducing pollution of the Baltic Sea"		Remark accepted (The remark is relevant to Polish working translation of the draft Programme)
50	Ministry of Infrastructure of the Republic of Poland - Polish Water Management Polish Waters/National Management Authority	draft SB Programme 2021-2027	remarks made in the text of the programme proposal regarding TEN-T development and electromobility	none	Remark dismissed The South Baltic Programme covers sub-regions mainly along the coastline of the Baltic Sea in as many as 5 Member States and has limited, relatively small financial resources. The joint strategy therefore presents the most important challenges to be considered in the implementation of the programme. According to the current rules governing Interreg programmes, all projects must have a cross-border dimension and element, with partners from different countries. The proposed issues are definitely beyond the capacity of the programme and seem to be a topic suitable for large-scale implementation through other, larger financial instruments, national programmes, etc. At the same time, we would like to note on the issue of electromobility, that the issues of digitalisation of public services in Measure 1.1 already include e.g. new electronic services in the field of transport. Under Measure 2.1, projects are foreseen to promote the use of renewable energy and green fuels as well as to support the creation of new markets.
51	Maritime Office in Szczecin	draft SB Programme 2021-2027 and draft EIA forecast	The submitted draft "South Baltic Cross-Border Cooperation Programme 2021 - 2027", hereinafter referred to as "the Programme", including a draft Environmental Impact Assessment, hereinafter referred to as "the EIA forecast", receives a positive opinion.	none	Remark accepted The opinion of the Maritime Office in Szczecin does not raise any comments to the content of the programme or the draft EIA report.
52	Ministry of Funds and	draft SB	Financial plan; Total funding	the whole document should be	Remark accepted

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	Regional Development/Department of Innovation and Development Programmes	Programme 2021-2027	by fund and national co-financing (p.75) Left untranslated: „Total eligible cost“.	translated into Polish	(Remark relevant to the Polish working translation of the draft Programme)
53	Ministry of Funds and Regional Development/Department of Coordination of Implementation of EU Funds	draft SB Programme 2021-2027	Our department has no substantive comments on the programme in question, but I note that on page 11 of the EN version the term "operational programme" appears instead of "programme".	none	Remark accepted
54	Ministry of Funds and Regional Development/Department of ESF	draft SB Programme 2021-2027	<p>PA 2 Sustainable South Baltic - Promoting sustainable development and the blue and green economy, Programme Measure 2.3 Supporting 'closed loop' and more resource efficient development (p.56)</p> <p>The nature of one of the exemplary actions is unclear, i.e. "joint innovative inclusive actions and pilot projects targeting inhabitants on building awareness on the need to introduce waste management processes in households".</p> <p>It is not clear which innovative inclusive actions are referred to here? Is it closely related to the thematic scope of the pilot projects (waste management) also mentioned in this measure? Or is the scope of common innovative inclusive actions much broader?</p> <p>Innovative social actions, including those supporting social inclusion, are areas supported in FERS. Please reword the provisions on examples of activities where "joint innovative inclusive actions" are closely related to the thematic scope of the pilot projects. In the case of a broader planned scope of</p>	<p>Innovative social action is one of the areas, including in particular for disadvantaged people, that can be implemented in programmes funded by the European Social Fund. And as such they have been assigned by EU regulations exclusively to this fund. Moreover, according to the draft Partnership Agreement, innovative social measures, including those in favour of social inclusion, can only be financed in the FERS (Polish ESF+) national programme.</p>	<p>Remark accepted</p> <p>We hereby clarify that the issue of social inclusion is exclusively related to the thematic scope of the pilot projects and this Measure. Furthermore, the definition of social innovation in the draft Interreg South Baltic 2021-2027 programme is not the same as the national FERS (ESF+) programme. Within the South Baltic Programme, by social innovation we mean new solutions that will emerge as a result of public consultation and dialogue with project stakeholders, so that with their participation products/services will be created that are better suited to the needs of the target groups. Furthermore, the essence of the South Baltic Programme is the cross-border and multilateral cross-border partnership in the project. This means that the project must respond to a defined, specified common need in the South Baltic area.</p>

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			these activities, please remove the provisions on inclusive innovation. This will avoid duplication of the scope of support in Interreg and FERS and ensure a clear and consistent message with EU regulations in the context of understanding innovative social action.		
55	Ministry of Funds and Regional Development/Department of ESF	draft SB Programme 2021-2027	Technological area Key challenges (p.8) The challenges refer to training in digital competences of employees of enterprises ("Hence, there is a need, in addition to training of new ICT specialists, to create an extensive training programme for currently employed employees and to increase their digital competences."). Will complementarity of this support with ESF+ intervention be ensured?	At regional level, extensive training support is planned from ESF+ for employees and adults who want to train on their own initiative (in a demand system - including in the area of digital competences). If support from Interreg South Baltic 2021-2027 is to reach the same target group, it should be ensured that there is no duplication with ESF+ intervention.	Remark accepted The scope of intervention of the programme will not duplicate with ESF+ intervention. The lack of overlap with ESF+ intervention will be verified at the project appraisal stage [subject to the agreement of five Member States participating in the programme to this solution]. No change to the proposed programme content is required.
56	Department of Common Agricultural Policy, Ministry of Agriculture and Rural Development of the Republic of Poland	draft SB Programme 2021-2027	Priorities, SO 1.2 Reaping the benefits of digitisation for citizens, enterprises, research organisations and public institutions, p. 33. In the second paragraph, third line after "connectivity" add "implementing the principles of economy 4.0"	In the new financial perspective, the EC places great emphasis on system integration and networking. Economy 4.0 emphasises the integration of people and controlled digital machines and their integration with the Internet and information technologies, which gives a big advantage in global competition.	Remark dismissed The South Baltic Programme covers sub-regions mainly along the coastline of the Baltic Sea in as many as 5 Member States and has limited, relatively small financial resources. The joint strategy therefore presents the most important challenges to be considered in the implementation of the programme. According to the current rules governing Interreg programmes, all projects must have a cross-border dimension and element, with partners from different countries. The proposed issues go well beyond the capacity of the programme and seem to be a topic suitable for large-scale implementation through other, larger financial instruments, national programmes, etc.
	Department of Common Agricultural Policy, Ministry of Agriculture and Rural Development of the Republic of Poland	draft SB Programme 2021-2027	Priorities, SO 1.2 Reaping the benefits of digitisation for citizens, enterprises, research organisations and public institutions, p. 33. In the fourth paragraph in the fifth bullet, after "digital solutions" add "and the principles of economy 4.0". In brackets before "etc." add "and pilot demonstration projects to implement the principles of economy 4.0"	as above	Remark dismissed The South Baltic Programme covers sub-regions mainly along the coastline of the Baltic Sea in as many as 5 Member States and has limited, relatively small financial resources. The joint strategy therefore presents the most important challenges to be considered in the implementation of the programme. According to the current rules governing Interreg programmes, all projects must have a cross-border dimension and element, with partners from different countries. The proposed issues go well beyond the capacity of the programme and seem to be a topic suitable for large-scale implementation through other, larger financial instruments, national programmes, etc.
58	Department of	draft SB	SO 2.2 Promoting renewable	One of the important sources of	Remark accepted

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	Common Agricultural Policy, Ministry of Agriculture and Rural Development of the Republic of Poland	Programme 2021-2027	energy in accordance with Directive (EU) 2018/2001, including the sustainability criteria set out therein, p. 48 In the sixth bulletpoint, after "forest management institutions" please add: "and agricultural sector institutions"	energy from RES is biomass of agricultural origin, the proper management of which should be promoted under the programme in order to obtain energy and reduce the level of pollutants emitted.	In the examples of types of beneficiaries under Measure 2.1 agricultural sector institutions are being added.
59	Department of Climate and Environment, Ministry of Agriculture and Rural Development of the Republic of Poland	draft SB Programme 2021-2027	SO 2.2 Promotion of renewable energy in line with Directive (EU) 2018/2001, including the sustainability criteria set out therein 2.3.2 Related types of actions and their expected contribution to these specific objectives and, where relevant, macro-regional and sea basin strategies To be added: - Creation and promotion of energy communities, including energy cooperatives, for local generation and use of RES in municipal areas.	This activity is part of the implementation of Specific Objective 2.2 Promoting renewable energy in accordance with the Renewable Energy Directive (EU) 2018/2001. It aims at facilitating and popularising the local use of renewable energy sources.	Remark partly accepted Regarding the promotion of the creation of energy communities, including energy cooperatives, for the local generation and use of RES in municipal areas, such activities fall within the already given example types of activities. In our opinion no amendment and no further supplement of the text here is needed. As far as the creation of financing for the establishment of energy communities is concerned, the scope goes beyond the possibilities of the programme. The South Baltic Programme covers sub-regions mainly along the coastline of the Baltic Sea in as many as 5 Member States and has limited, relatively small financial resources. The joint strategy therefore presents the most important challenges to be considered in the implementation of the programme. According to the current rules governing Interreg programmes, all projects must have a cross-border dimension and element, with partners from different countries. The proposed issues go well beyond the capacity of the programme and seem to be a topic suitable for large-scale implementation through other, larger financial instruments, national programmes, etc.
60	General Director for Environmental Protection of the Republic of Poland	draft SB Programme 2021-2027	The document is under development and may be modified, which may result in the necessity to repeat the elements of strategic environmental impact assessment in the case of its modification or making it more detailed	none	Remark accepted In the case of changes or more detailed elements of the document necessitating the repetition of the SEA elements, the assessment will be supplemented accordingly
61	General Director for Environmental Protection of the Republic of Poland	draft SB Programme 2021-2027	In the draft Programme in chapter 1. Joint Programme Strategy, in the fragment: "Legal basis: Article 17(3)(a), Article 17(9)(a)", the name of the legal act from which the quoted provisions come was not provided. Omission of this kind also occurs in a number of other places. It would be appropriate to specify which legal basis has been used and	none	Remark dismissed At the same time, we clarify that the programme has been prepared in accordance with the form annexed to Regulation No. 2021/1059 of 24 June 2021 on specific provisions concerning the "European territorial cooperation" objective (Interreg) supported by the European Regional Development Fund and external financing instruments - the legal bases cited (e.g. "Article 17(3)(a), Article 17(9)(a)", etc.) are provisions from the aforementioned Regulation. Modifications to the form are not possible and it does not indicate the number and name of the Regulation next to each chapter.

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			cite it where appropriate.		
62	General Director for Environmental Protection of the Republic of Poland	Draft SEA Report	Remarks on the prognosis: It is not clear whether the content of the prognosis can be considered complete. On page 6 of the study it is stated that "due to the specificity of the Programme and its transboundary character Member States have agreed on the need to prepare a separate scoping report as part of the SEA procedure. This report will be agreed with the National Co-ordinators of Member States". It is not known whether these arrangements have been made and to what extent they will influence or have influenced the presented contents of the prognosis.	none	<p>Remark dismissed</p> <p>The reference to the place where the remarks from the consultation of the scoping report had been taken into account is in the same chapter (1.1) in Table 1.1 on page 9 - "PLACE WHERE THE SPECIFIC REQUIREMENTS OF THE INTERESTED MEMBER STATES EXPRESSED BY THE NATIONAL COORDINATORS OF DENMARK, SWEDEN, LITHUANIA AND GERMANY WERE TAKEN INTO ACCOUNT". Thus, it can be identified that these arrangements were made and to what extent they influenced the content of the Prognosis.</p>
63	General Director for Environmental Protection of the Republic of Poland	Draft SEA Report	One of the methodological assumptions is that "the limited scale of investment activities means that for specific projects and their pilot actions, actual environmental impacts can only reasonably be expected at a local level". For this reason: "the assessment in the environmental components is focused on identifying the relevance and potential for impact of the Project on a given component, in the context of the problems identified at the sub-regional (NUTS-3) level in a given area. Such an approach will make it possible to avoid writing about irrelevant issues from the point of view of the assessment of a given document, and to focus on important problems". (p. 18 of the Assessment). It should be noted that an impact of local character may be a significant impact, therefore the assumption made is incorrect.		<p>Remark dismissed</p> <p>The quoted statement from page 18 of the Prognosis does not exclude the possibility indicated in the remark, i.e. that the local impact may be of significant character. It only indicates that the investment activities which may result from the implementation of the Programme will occur on a local scale only and the potential impacts should be expected on such a scale. What is more, taking into account the risk of such impacts, the authors proposed in Chapter 5 a number of recommendations aimed at excluding or limiting the risk of such local impacts of significant nature, which may result from projects supported under Measures 2.1 and 3.1.</p>
64	General Director for Environmental Protection of the Republic of Poland	Draft SEA Report	A summary of definitions of assessments in terms of "importance of impacts" (pol. "istotność wpływu") was prepared for the purpose of the Assessment. (p. 19-20 of the prognosis). The summary is valuable for understanding the conclusion of the authors, but from a legal point of view the important issue is whether the impact is "significant" (pol. "znaczący"). The approach to qualifying possible impacts as significant should be discussed	none	<p>Remark accepted</p> <p>The authors assumed that "important" impacts are "significant" impacts and the terms were used interchangeably in the Report. The terminology is being made more consistent and clearer to eliminate potential doubts in the reader's mind.</p>

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			in the methodological part and applied explicitly in the assessment.		
65	General Director for Environmental Protection of the Republic of Poland	Draft SEA Report	The Assessment contains a very extensive diagnostic part, which also includes descriptions of environmental impacts of various types of activities. The assessment part presents general information on possible impacts connected with implementation of individual components of the Programme, without developing a more detailed assessment for pilot and investment activities. In the opinion of the local authority it is not possible to agree with the statement that "exemplary joint investment activities (...) will be mainly of pilot and demonstration character, thus excluding a significant scale of negative environmental impacts". (p.122 of the Assessment). The nature of pilot and demonstration actions was not defined in detail in the draft programme, so there are no grounds for the exclusion of impacts.	none	<p>Remark dismissed</p> <p>The quoted piece of text concerns the horizontal evaluation of Measure 2.1 - Support of the transition to green energy. The sentence was taken out of the context, as the statement concerning the lack of negative impacts concerned a supra-local scale, in the context of actions at the level of countries and the EU as a whole, and such impacts, due to the local scale of the supported projects, can be explicitly excluded. The definition of exemplary actions that can be supported under the Programme is provided in the section that follows, and the component assessments have identified the potential for local impacts, for which mitigation measures have been proposed in Chapter 5. Moreover, in accordance with the precaution principle, two obligatory rules related to environmental protection were proposed for adoption at the Programme level. The first one is the principle of financing only those projects, which do not cause serious harm in the meaning of Article 17 of the Regulation 2020/852 of the European Parliament and of the Council of the EU on the establishment of a framework to facilitate sustainable investments ['Do No Significant Harm']. The second is the principle of maximising the positive impact of the Programme on the achievement of the environmental and climate objectives of the European Union as set out in the European Green Deal document by awarding projects which make a significant positive contribution to any of the six environmental objectives set out in Regulation 2020/852.</p>
66	General Director for Environmental Protection of the Republic of Poland	Draft SEA Report	In spite of the general character of the document and, as indicated above, essentially corresponding forecast, the forecast should be verified in terms of detailing the information in the assessment part, for example, there is a recommendation "one should take into account hazards during construction of the farms, resulting from possible local threats to the environment from substances released from corroded containers with chemical	none	<p>Remark dismissed</p> <p>In the assessment part of the Prognosis, risks were identified at a general level of detail, however, adapted to the detail level of the Programme. At this stage it is not technically possible to more provide in even more detail the types of projects which could be financed under the Programme. However, due to the identified potential threats it was proposed to adopt an obligatory principle of financing only those projects which do not cause significant harm in the meaning of Article 17 of the Regulation 2020/852 of the European Parliament and of the Council of the EU on the establishment of a framework to facilitate sustainable investment ['Do No Significant Harm']. The application of this principle ensures that the financed activity:</p> <ul style="list-style-type: none"> - will not harm the good status or, the good ecological potential of homogenous parts of waters, including surface water and groundwater; - will not adversely affect the good environmental status of marine waters; - will not lead to a significant increase in emissions of pollutants into air, water or land compared to the situation before the commencement of the activity;

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			weapons, stored on the seabed of the Baltic Sea". If specific prevention and minimisation measures are known for a certain type of activity, a catalogue of such measures should be presented.		<ul style="list-style-type: none"> - in the area of protection and restoration of biodiversity and ecosystems, if the activity - will not be detrimental to the good state and resilience of ecosystems; or - will not be detrimental to the state of conservation of habitats and species, including habitats and species of interest of the EU.
67	General Director for Environmental Protection of the Republic of Poland	Draft SEA Report	<p>The EIA report needs to be thoroughly checked for errors and editorial gaps, as well as for updated information, including:</p> <ul style="list-style-type: none"> - it is necessary to verify the quoted legal basis, for example in chapter 1.1 Introduction, on page 6 it is written: „(i.e. Journal of Laws of 2021, item 247), hereinafter referred to as the EIA Act." The cited Act has been amended since it came into force. This should be taken into account by providing the current publication; 	none	<p>Remark accepted</p> <p>The validity of all legal acts referred to in the Prognosis has been verified</p>
68	General Director for Environmental Protection of the Republic of Poland	Draft SEA Report	<ul style="list-style-type: none"> - it is necessary to check the editing and correctness of the provided information, for example, in chapter 3.2 People, material goods (including human health, living standards), on page 60 it is given: „(...) in the Elbląg (10.9%) and Elbląg region"; the text on page 63 indicates that the SARS-CoV-2 virus affected socio-economic elements for several years; 	none	<p>Remark accepted</p> <p>The indicated elements have been verified and corrected.</p>
69	General Director for Environmental Protection of the Republic of Poland	Draft SEA Report	<ul style="list-style-type: none"> - missing information needs to be supplemented, for example, on page 161 of the prognosis, in the table presenting monitoring indicators there is an incomplete sentence "The value of the indicator should include all projects supported by the Programme which minimise the existing pressures ... (complete)" 	none	<p>Remark accepted</p> <p>The missing part is the result of the accidental rejection of a section of text in "track changes mode" before final approval of the changes. The part whose original wording was: "The value of the indicator should include all projects supported by the Programme which minimise existing pressures resulting from tourism development and have been scored under the adopted additional criteria referred to in chapter 5.2."</p>

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70	General Director for Environmental Protection of the Republic of Poland	Draft SEA Report	<p>It is particularly important, due to the purpose of the study, to thoroughly check and correct errors, occurring in the scope of environmental information, including names of species.</p> <p>For example:</p> <ul style="list-style-type: none"> - in chapter 3.1 Biotic elements of the environment (biodiversity, plants, animals, protected areas), on page 45 it is written: "Over the past few decades, the abundance of some species has declined (e.g. yellow-backed gull, eider), while others have increased (guillemot, razorbill and arctic tern)." The species "yellow-backed gull" and "razorbill" are probably mistranslations from English. It is also recommended that Latin species names be given in addition to national names. 	none	<p>Remark accepted</p> <p>The indicated elements have been verified and corrected.</p>
71	General Director for Environmental Protection of the Republic of Poland	Draft SEA Report	<p>The information presented is sometimes unclear or inconsistent, for example:</p> <ul style="list-style-type: none"> - in chapter 4.2.1 Programme Action, 2.1: Supporting the transition to green energy, in the subsection Biodiversity, on page 123 and 124, incomprehensibly describes the planned activities. As the Programme envisages the implementation of pilot projects in the field of RES, the forecast should at least contain a catalogue of impacts that may occur during the implementation of such projects in the respective fields for which it is envisaged, and an adequate catalogue of measures to prevent and limit the impacts. 	none	<p>Remark dismissed</p> <p>The creation at this stage of a catalogue of impacts, which may occur during the implementation of projects from particular fields, in a situation where it is very difficult or even impossible to specify more concrete projects, is unjustified, and may generate significant omissions or identify impacts which will never occur.</p> <p>Therefore, the creation at this stage of an adequate catalogue of measures preventing and limiting the impacts should be considered unjustified.</p> <p>The contractor for the SEA Prognosis identified the impacts and therefore gave two recommendations which effectively minimise them.</p> <p>The first one is the adoption, as a mandatory, of a principle of financing only those projects that do not cause serious harm within the meaning of Article 17 of Regulation 2020/852 of the European Parliament and of the Council of the EU on the establishment of a framework to facilitate sustainable investment ["Do No Significant Harm"].</p> <p>The other one is to horizontally maximise the positive impact of the Programme on the achievement of the environmental and climate objectives of the European Union as set out in the European Green Deal, by giving during the assessment, the preference to projects which make a significant positive contribution to any of the six environmental objectives set out in Regulation 2020/852.</p>
72	General Director for Environmental	Draft SEA Report	- in chapter 3.4 Maritime waters, in the subchapter	none	<p>Remark accepted</p> <p>The map paragraph above indicates that the data was obtained from the 2017</p>

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	Protection of the Republic of Poland		Maritime Transport, on page 75 a graph was presented from which it is not clear what is the time interval of the traffic density in the Baltic Sea; without this knowledge the graph has no informative value.		report, which included the year 2016, while the map itself indicates the year covered by the density analysis: "Vessel traffic density according to AIS system- 2016"
73	General Director for Environmental Protection of the Republic of Poland	Draft SEA Report	- in Chapter 3.4 Maritime waters, in the subchapter Maritime transport, on page 73 and 74 it is stated that the location of shipping routes is limited, among others, by "icy waters". Are these obstructions caused by the freezing of the water or only by its significant cooling.	none	Remark accepted The obstructions mentioned there refer to the freezing of water. The piece of text was amended.
74	Chief Sanitary Inspector of the Republic of Poland	Draft SEA Report	It should be noted that the Programme does not exclude investment projects (e.g. in the scope of creating a tourist offer or renewable energy) and allows the implementation of measures of a construction investment nature, such as the development of infrastructure for the needs of cross-border tourism. Moreover, the balance of impacts carried out for the measures: 2.1: Supporting the transition to green energy and 3.1: Development of sustainable, resilient and innovative tourism, does not exclude the risk of negative local impacts. Therefore, in the opinion of the Chief Sanitary Inspector, the Prognosis should refer to the possible methods of effective elimination or maximum reduction of negative impacts in the context of human health.	none	Remark dismissed In the context of the above mentioned balance of impacts, it should be noted that none of the identified local impacts of potentially negative character refers to the aspect of human health and life. What is more, most of the impacts of a significantly positive nature were found in this context. Taking into account the general character of the Programme, creating at this stage a catalogue of impacts, which could occur during implementation of projects from particular fields, in a situation, where it is very difficult or even impossible to specify any parameters of those projects, is unjustified and may generate significant omissions or identify impacts, which will never occur. Therefore, creating at this stage an adequate catalogue of measures preventing and limiting the impacts should be considered unjustified. The authors of the Assessment proposed two horizontal recommendations, adequate to the level of detail of the document, which will effectively minimise the potential environmental impact, including the impact on humans: The first one is the adoption of an obligatory rule of financing only projects which do not cause serious damage within the meaning of Article 17 of Regulation 2020/852 of the European Parliament and of the Council of the EU on the establishment of a framework to facilitate sustainable investment ['Do No Significant Harm']. The other one is to horizontally maximise the positive impact of the Programme on the European Union's environmental and climate change objectives as set out in the European Green Deal by giving, within the assessment, preference to projects that make a significant positive contribution to any of the six environmental objectives set out in Regulation 2020/852.
75	Chief Sanitary Inspector of the Republic of Poland	Draft SEA Report	In the opinion of Chief Sanitary Inspector, the SEA Prognosis should refer to the possible methods of effective elimination or maximal	none	Remark dismissed On the basis of general provisions of the assessed Programme, which do not define specific undertakings, it is not possible to carry out any rational and reliable assessment of the impact of planned measures on human health in terms of exposure to noise, vibration, air pollution or threat to intakes and

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			limitation of negative impact in the context of humans' health. Also, taking into consideration all planned activities, it is desired that the SEA Prognosis took into account a sound assessment of the impact of those activities on human health, in terms of exposure to noise, vibration and air pollution, the risk to water intakes and sources of water for human consumption, and to parts of surface waters used for recreational purposes.		sources of water intended for consumption or recreation. Such impacts can only be assessed in the context of local conditions and specific projects with already known location and technical characteristics, which is not the case here. Only such an assessment, in case the risk of occurrence of impacts within the scope indicated in the note is identified, may be a basis for indicating more detailed mitigation measures, including specific technical solutions. These issues are discussed and argued in detail in the chapter describing the methodological approach of the Assessment.
76	Chief Sanitary Inspector of the Republic of Poland	Draft SEA Report	Additionally, according to the wording of art. 3, section 2 of <i>Act on access to information on the environment and its protection and environmental impact assessments</i> , whenever it is said in the act about impact on the assessment, it is also understood as impact on people health.	none	Remark accepted The remark was taken into account in analyses of part 3.2. and 4 of EIA report according to the requirement described by the Chief Sanitary Inspector in the letter HŚ.NS.530.11.2021.WK from 12.07.2021 (Table 1.1)
77	Gdynia Seaport Authority	draft SB Programme 2021-2027	2.1.1 Related types of action, and their expected contribution to those specific objectives and to macro-regional strategies and sea-basis strategies - we suggest to enlarge the spectrum of activities to: "In PA Transport can allow to develop solutions regarding digitalization of mobility services and integrated management system and optimization of sea and traffic and road-railway traffic in transport nodes, especially in seaports and urban nodes."	It is important to emphasise that digitalisation and the transition to sustainable and intelligent mobility is the direction of the European Green Deal (point 2.1.5.), where it is indicated that "Alongside intelligent traffic management systems, made possible by digitalisation, an automated and network-based multimodal mobility will be playing an increasing role. The EU transport system and infrastructure will be adapted to support new sustainable mobility services with the potential to reduce communicative obstructions and pollution (...)." The benefits of a high performance of seaport access infrastructure from the sea will not be used if the access infrastructure on the land side will be the bottleneck. The creation of new investments, i.e.	Remark partly accepted The text in the section relating to Measure 1.1, regarding its contribution to the EUSBSR is supplemented as follows: "In PA Transport can allow to develop solutions regarding digitalization of mobility services and integrated management system and optimization of sea and road-railway traffic in transport nodes, especially in seaports. " The part "and urban nodes" is not being included at the end of the sentence, as this does not seem to be within thematic scope of the Programme.

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				<p>the External Port in the Port of Gdynia and the Logistics Valley in its immediate vicinity, will have a significant positive impact on the development of local economies. At the same time, the increase in feeder traffic of heavy vehicles to/from the port will result in the need to balance heavy and urban traffic, as well as care for the quality of life of residents and the natural environment. An important measure will be the use of ITS tools, i.e. an intelligent and coordinated traffic management system.</p> <p>Furthermore, one of the priorities for the development of TEN-T Motorways of the Sea (Detailed Implementation Plan by EU Coordinator Kurt Bodewig - European Maritime Space, 2020), including in the Baltic Sea Basin, is the use of new technologies and the digitalisation of processes to ensure the competitiveness of short sea shipping and the shift towards a more sustainable maritime sector.</p>	
78	Gdynia Seaport Authority	draft SB Programme 2021-2027	<p>Measure 1.2 (SO1.3) Related types of action, and their expected contribution to those specific objectives and to macro-regional strategies and sea-basis strategies It is suggested to clarify and repeat the name of the type of potential beneficiaries Change from: „maritime institutions and seaports authorities” into: „maritime institutions (incl. ports managers and port authorities)”</p>	<p>The indicated change may allow potential stakeholders to apply for EU funding for the implementation of conceptual projects concerning optimal solutions for the implementation of multimodality and offshore projects in the context of strengthening the value chain of the Baltic Sea industries, especially in the blue and green sectors.</p> <p>It is worth mentioning that the Council of Ministers of the Republic of Poland, implementing the objectives of the "Energy Policy of Poland until 2040", and also acting to ensure energy security (Resolution No. 102/2021 of the Council of Ministers of 30 July 2021 on the installation terminal</p>	<p>Remark accepted Wording changed to be identical as in Measure 1.1.</p>

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				<p>for offshore wind farms) constituting an important element of the state's public security, and expressing the will to ensure conditions for the emergence and development of a new economic sector, namely offshore wind energy, has adopted the following resolution: The Council of Ministers, having regard to the location and technical conditions, recognizes the Port of Gdynia, maritime port, as the location of an installation terminal, intended for the organization of the process of construction and operation of offshore wind farms in the Baltic, hereinafter referred to as the "installation terminal". The Council of Ministers obliges the minister in charge of maritime economy to take all legally required actions for the efficient construction and equipping of the installation terminal and selection of its operator by the end of the 3rd quarter of 2024.</p>	
79	Olsztyn Poviat Administration	draft SB Programme 2021-2027	The programme should cover the Olsztyński, Lidzbarski and Bartoszycki counties.	<p>The programme should cover the Olsztyński, Lidzbarski and Bartoszycki counties along the River Łyna (approx. 200 km long in Poland and about approx. 64 km long in Russia), which is one of the main rivers in the Warmińsko-Mazurskie Voivodship and which is a tributary to the River Ława and then to the River Pregoła, which flows into the Baltic Sea. The River Łyna has a distinct blue-green character encompassing the Baltic Sea basin. The cross-border character of the South Baltic is strictly defined by the Baltic Sea located centrally within the Programme eligible area. This unique geographical character of the region defines the special conditions for cooperation. On the one hand, the Baltic Sea provides a</p>	<p>Remark dismissed The Joint Programming Committee for the South Baltic 2021-2027 programme took a decision to apply to the European Commission for an incorporation of Olsztyński sub-region to the Programme area (which was included in the programme description). The notion, containing an ample argumentation, was submitted to the EC. The final decision regarding the Programme area shall be made by the Commission, through a Delegated Act. Meanwhile, an additional paragraph is being added in the section on programme area, stressing the openness of the programme intervention also for joint projects strengthening and developing functional links and networks, with a strong focus on collaboration with partners from areas with important cooperation potentials and complementarity such as e.g. Olsztyński sub-region, having many common features, which are complementary to the character of the South Baltic region and which may contribute to its benefit.</p>

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				<p>natural platform for cooperation, and on the other hand, cooperation within the region has a long tradition dating back to the Middle Ages. The area around the River Łyna of the "Hanseatic League" was the prototype for the South Baltic. The infrastructural use of this river and the impact of tourism on environmental protection also have an impact on the purity of the natural waters of the Baltic Sea. The programme should therefore encompass the above mentioned counties and develop ecotourism around the river, develop regional cooperation, stimulate the local economy and influence economic innovations.</p>	
80	Olsztyn Powiat Administration	draft SB Programme 2021-2027	<p>Innovation will constitute the basis and competitive advantage of the South Baltic regions and will support cross-border cooperation and growth of the area's most important sectors, including energy, construction, transport, agriculture and forestry, food production and processing as well as tourism and culture, and other branches. In order for the region's economy to be competitive and take advantage of innovation, it is necessary to strive to strengthen sustainable growth and competitiveness of SMEs and job creation in SMEs, including through productive investment by increasing the competitiveness of SMEs and increasing the level of internationalisation of the regional economy. And here appears the need of cooperation with other similar regions of Europe e.g. the Adriatic Sea region, which in many aspects can be a base for exchange of experience in the</p>	none	<p>Remark partly accepted</p> <p>In accordance with the Interreg regulation for the new perspective 2021-2027, there is a possibility of cooperation within the programme with entities from outside the programme area, provided that the cooperation will be beneficial for the cross-border area. Therefore, there is no need to define a framework for cooperation of potential beneficiaries with partners from outside the programme area. Please see also information above on the insertion of additional paragraph in Section 1.1. At the same time, the internationalisation of entities from the programme area has been taken into account in the substantive scope of the programme.</p>

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			sphere of economic development of the coastal areas. The Olsztyn district has advanced talks on cooperation with the region around the Croatian city of Rijeka. Both their economic potential and their many-year long experience in the fields of economic development, energy, tourism and ecology provide a basis for good cooperation between the two regions. INTERREG South Baltic should also provide for such a situation, so that not only exchange takes place within the region, but also with other similar regions.		
81	Olsztyn Poviát Administration	draft SB Programme 2021-2027	The South Baltic area lacks a common approach towards building a sustainable and innovative tourism sector which would allow to more fully exploit the tourism potential. Therefore it is important to focus the Programme on creating in the future a tool based on public institutions enabling systemic building of tourism sector in the whole South Baltic area.	none	Remark accepted In accordance with the proposed intervention logic of the programme, public institutions may receive support within the framework of the programme and strengthen their competencies in the field of cross-border co-operation among others in Priority 4 Active South Baltic - improvement of cooperation management. Also, in Priority 3 it is foreseen e.g. to support strategies for enhancement of tourism potential of the South Baltic area or establishment of common networks in the field of tourism and culture. However, there is no need to amend the text of the draft programme.
82	Baltic Energy Innovation Centre	draft SB Programme 2021-2027	Decarbonisation of the transportation sector could be more pronounced. Activities aiming at harmonisation of regulations/procedures/incentives related to cross border trading of renewable methane (gas quality issues, guarantees of origin, gas registries etc.) are implicitly included in 2.1 Supporting transition towards green energy but it could be expressed more explicitly."	Our institution has several ideas that could fit under this measure or measure 2.3. 1) Production of green heat and power from landfill gas with low methane content. Due to the ban of landfilling organic material the methane content will go down and conventional gas engines need a methane content of ~40%. We are investigating cost-efficient technologies that can use landfill gas with a methane content down to 10%. 2) Syngas fermentation for biomethane production in order to take advantage of thermochemical conversion of woody biomass but	Remark dismissed Decarbonisation is already covered by the term green energy used in the exemplary actions as well as the promotion of green fuels

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				without the costly gas cleaning and catalytic methanation. The syngas is fermented using anaerobic digesters. The main problem is the low gas-liquid mass transfer and here we have new ideas. 3) Removal of heavy metals from maritime biomass to be used as substrate in anaerobic digestion and the digestate as an organic fertiliser. 4) Combining advanced material from algae with production of biogas and organic fertiliser."	
83	Danish Cycling Tourism	draft SB Programme 2021-2027	Simplify the application process, so that the vision and the targets of the project is in focus and not all the activities - in order to make the project implementation more agile. Aligning the rules, the reporting system etc. between the interreg programmes. Don't bother so much about numbers in the indicators (number of trainings etc.) but impact.	none	Remark dismissed The remark is too general in nature and does not refer to the subject of consultation, which is a draft programme document. Implementation rules – to which the comment refers to - will be elaborated in the future and included in the Programme Manual. Possible simplifications will be considered.
84	Energikontor Sydost (the Energy Agency for Southeast Sweden)	draft SB Programme 2021-2027	Under SO 1.1 Digitizing the region: Monitoring of energy efficiency in buildings to reduce energy demand is an important factor for a innovative and strong region. Under PO 2 A greener, low carbon Europe: Only about renewable energy - the important energy efficiency angle is missing. Reducing the need for energy is just as important as shifting to RES as I	none	Remark partly accepted Remark accepted with clarification. Energy efficiency issues are already tackled under SO 2.2. (Measure 2.1 Supporting transition towards green energy). There was no will to supplement more the Programme with this topic at this stage.
85	Region Kalmar län	Draft SEA Report	The Taxonomy is not yet completed. The technical criteria are specified in specific files and these are not decided yet	The European Commission has been clear that the Taxonomy is voluntary and that the purpose is to identify the projects that are particularly sustainable. This does not mean that other investments are not important for the transition or unsustainable, just that they are not the best. It is	Remark dismissed Introducing the principle of financing interventions which do not cause serious harm within the meaning of the Art. 17 is reflected in the Regulations of the European Parliament and of the Council (EU) on EU funds, adopted on June 24, 2021: - Regulation (EU) 2021/1058 of the European Parliament and of the Council of 24 June 2021 on the European Regional Development Fund and the Cohesion Fund in the preamble, point 6, indicates that the objectives of the ERDF and the Cohesion Fund should be achieved in a sustainable manner. development

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				<p>difficult to see what consequences the application of the Taxonomy will bring the projects. Even in cases where a project is OK according to the taxonomy, it is difficult to understand the amount of proof, including administration, that the organizations that apply for funding in the South Baltic will have to manage.</p>	<p>and in line with the objective of preserving, protecting and improving the quality of the environment promoted by the Union (...), Both funds should support activities that respect the climate and environmental standards and priorities of the Union and do no significant harm to the environmental objectives within the meaning of Article 17 of Regulation (EU) 2020/852 of the European Parliament and of the Council and that ensure the transition towards a low-carbon economy in the pathway to achieve climate neutrality by 2050.</p> <p>- Regulation (EU) 2021/1060 of the European Parliament and of the Council of 24 June 2021 laying down common provisions on the Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, the Just Transition Fund and the European Maritime, Fisheries and Aquaculture Fund, and also the financial provisions for these funds and for the Asylum, Migration and Integration Fund, the Internal Security Fund and the Financial Support Facility for Border Management and Visa Policy in point 10 of the preamble indicate that the Funds should support activities that would be carried out in compliance with the standards and the priorities of the Union in the field of climate and environment and which would not seriously harm the environmental objectives within the meaning of Art. 17 of Regulation (EU) 2020/852 of the European Parliament and of the Council. In addition, in Article 9, it indicates that the objectives of the funds are implemented in accordance with the objective of supporting sustainable development, as defined in Art. 11 TFEU, and taking into account the United Nations Sustainable Development Goals, as well as the Paris Agreement and the "do not do serious harm" principle.</p> <p>- Regulation (EU) 2021/1059 of the European Parliament and of the Council of 24 June 2021 on specific provisions for the European territorial cooperation goal (Interreg) supported by the European Regional Development Fund and external financing instruments direct reference to Art. 17 of Regulation (EU) 2020/852 was introduced to point 5 of the preamble: "Reflecting the importance of tackling climate change in line with the Union's commitments to implement the Paris Agreement adopted under the United Nations Framework Convention on Climate Change and to achieve the United Nations Sustainable Development Goals, the Funds will contribute to mainstream climate actions and to the achievement of an overall target of 30 % of Union budget expenditure supporting climate objectives. In that context the Funds should support activities that respect the climate and environmental standards and that would do no significant harm to environmental objectives within the meaning of Article 17 of Regulation (EU) 2020/852 of the European Parliament and of the Council "</p> <p>Thus, taking into account the content of the above-mentioned regulations, it is certain that in the financial perspective 2021-2027 the application of the DNSH principle within the meaning of Art. 17 of the Taxonomy Regulation will be a mandatory requirement for projects financed under the INTERREG Programs in the 2021-2027 perspective. The proposed recommendation is a step ahead of the requirements, ensuring already at this stage compliance with future requirements for the implementation of specific projects. At the same time, the adoption of this principle guarantees the implementation of projects that will not be associated with the possibility of environmental</p>

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					<p>damage (within the objectives set out in the taxonomy regulation) In terms of establishing technical eligibility criteria, this regulation clearly defines when they will be developed. Moreover, in the SEA Report, we emphasize that in order to simplify the application process, it is advisable to develop auxiliary materials for beneficiaries, which will enable the submission of a declaration without the need to refer to specific details. technical criteria for Regulation (EU) 2020/852.</p>
86	Region Kalmar län	draft SB Programme 2021-2027	<p>1. We are missing a stronger integration of the social dimension in the whole document, from background and socio-economic analysis to strategic orientation and proposed priorities. 2. We have positive experience from dialogue and cooperation with the programme contact points and see the necessity to talk to someone in your own regional context knowing about the programme being your first way in. Also good experience from centralised FLC in Sweden. We are in favour of simplified cost options. At the same time we would like to stress the need for flexibility since it sometimes can be important to budget and report actual costs</p>	<p>When describing the (socioeconomic) situation, instead of writing e.g. "residents of the programme area" please write "women and men and girls and boys of the programme area". Important keywords to be found in the strategic description of the programme regarding horizontal principles - LGBT, gender equality, child rights, minorities. At the moment they are missing. Please clarify how the programme contribute to better rights for children, women, minorities, disabled persons, and other socially excluded groups. Important to evaluate how funds are allocated on women and men as part of projects target groups, preferably each year, in order to be able to take measures for improvement (for equal allocation of funds). Important for implementation of the programme and projects receiving funding to have plans for social inclusion in day-to-day operations</p>	<p>Remark partly accepted Interreg South Baltic should not be treated as social-oriented programme like ESF+; and it is neither possible to address all horizontal principles in a sufficient manner in the programme document. The Programme represents common needs of 5 different Member States with different regulations and optics, therefore only on a level of generality we are able to reconcile all their interests. Non-discrimination approach regardless of any physical or mental feature is already mentioned in the programme document and will be specified, if needed, in the implementing documents such as the Programme Manual. Proposed formulation "women and men and girls and boys of the programme area" does not fully reflect all genders in the programme area therefore previous proposal, which is wider, could remain or it might be changed into "inhabitants of the programme area", if needed. No amendment in this respect is introduced now.</p>
87	Region Kronoberg	draft SB Programme 2021-2027	<p>1. Over all, we find that the programme captures challenges and relevant priorities for the South Baltic Area rather good. But the description of social challenges is lacking a description of equality. Moreover, we find that these challenges should be mirrored for the corresponding priority. The Remarks on the Covid-19 pandemic is only mentioning the positive effects, but we find that there should also be</p>	<p>2. We suggest you add indicators relevant to the ERDF specific objective, that can demonstrate goal achievement. 3. Though we see a need of flexibility of choosing between actual costs and simplified cost options. The support from regional Contact Points are important for local and regional actors, and in turn important for the programme's implementation</p>	<p>Remark partly accepted Interreg South Baltic should not be treated as social-oriented programme, like ESF+ ; and it is neither possible to address all horizontal principles in a sufficient manner in the programme document. Thr Programme represents common needs of 5 different Member States with different regulations and optics, therefore only on a level of generality we are able to reconcile all their interests. Non-discrimination approach regardless of any physical or mental feature are already mentioned in the programme document and will be specified, if needed, in the implementing documents such as the Programme Manual. In case of Covid-19 impact both sides are shown, however the description is being adjusted within the foreseen number of characters. For the solutions on reporting system and the use of simplified costs options, detailed proposals will be included and specified in implementing documents such as the Programme Manual. Additional indicators,</p>

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			<p>a description of the negative ones, such as segregation between groups regarding equality, education and not to forget, the digital exclusion.</p> <p>2. The chosen indicators do not correlate to the chosen measure, or its possible actions.</p> <p>3. The project reporting system needs to be more user friendly. The use of simplified cost options are very positive.</p>		relevant for the ERDF, were inserted.
88	Region Kronoberg	Draft SEA Report	The Taxonomy is not yet completed. The technical criteria is specified in specific files and these are not decided yet.	The European Commission has been clear that the Taxonomy is voluntary and that the purpose is to identify the projects that are particularly sustainable. This does not mean that other investments are not important for the transition or unsustainable, just that they are not the best. It is difficult to see what consequences the application of the Taxonomy will bring the projects. Even in cases where a project is OK according to the taxonomy, it is difficult to understand the amount of proof, including administration, that the organizations that apply for funding in the South Baltic will have to manage.	Remark dismissed justification as above (see Remark no 85)
89	Region Skåne	Draft SEA Report	The Taxonomy is not yet completed. The technical criteria is specified in specific files and these are not decided yet.	The European Commission has been clear that the Taxonomy is voluntary and that the purpose is to identify the projects that are particularly sustainable. This does not mean that other investments are not important for the transition or unsustainable, just that they are not the best.- It is difficult to see what consequences the application of the Taxonomy will bring the projects. Even in cases where a project is OK according to the taxonomy, it is difficult to understand the amount of proof, including administration, that the organizations that apply for funding in the South Baltic will	Remark dismissed justification as above (see Remark no 85)

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				have to manage.	
90	Region Skåne	draft SB Programme 2021-2027	Generally, good priorities and measures. Regarding Digitizing the region: Addresses relevant challenges (competence provision, training). Measures are good for example adaptation, access to data and digital infrastructure	none	Remark accepted
91	Pomerania Development Agency	draft SB Programme 2021-2027	Recommendation for Programme Measure 2.3: Supporting a circular and more resource efficient development, We recommend extending the list of Exemplary types of beneficiaries with the following type of institutions: „chambers of commerce, business development agencies, business incubators, technology parks and other business support organizations”	Our experience so far, also gained during the implementation of projects related to the circular economy in the South Baltic Region, shows the important role of companies in the transition from a linear economy to an economy based on the circular economy concept. One of the important needs in this area is to target specific educational and advisory activities dedicated to the SMEs sector. These companies often lack human, financial, and time resources, to gain new knowledge and acquire skills related to better resources management, energy efficiency, as well as sustainable development strategies. As a result, they are often not ready to take concrete actions to implement circular solutions to their business models and practices on their own. An important role in supporting companies in this area can be played by Business Support Institutions, which, working daily with companies from the SME sector, are well-versed in the needs and capabilities of these types of companies, and have a good understanding of business conditions as well. At the same time, they have the knowledge and organizational potential allowing for a successful implementation of projects of this type. Cooperation with international partners, exchange of good practices and experiences will translate into concrete actions supporting the	Remark accepted The list of exemplary types of beneficiaries for Programme Measure 2.3: Supporting a circular and more resource efficient development is being supplemented with the following types of institutions: „chambers of commerce, business development agencies, business incubators, technology parks and other business support organizations”.

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				implementation of Programme Measure 2.3. at a regional and cross-border level.	
92	Contact Point Sweden	draft SB Programme 2021-2027 / draft SEA Report	<p>1. Clarify the possibilities to work on tackling the problem of and decreasing outlets of hazardous substances in the river basins and consequently the Baltic Sea.</p> <p>2. When describing the (socioeconomic) situation, instead of writing e.g. "residents of the programme area" please write "women and men and girls and boys of the programme area".</p> <p>3. Important keywords to be found in the strategic description of the programme regarding horizontal principles - LBGT, gender equality, child rights, minorities.</p> <p>4. Please clarify how the programme contribute to better rights for children, women, minorities, disabled persons, and other socially excluded groups.</p> <p>5. Important to evaluate how funds are allocated on women and men as part of projects target groups, preferably each year, in order to be able to take measures for improvement (for equal allocation of funds). Important for implementation of the programme and projects receiving funding to have plans for social inclusion in day-to-day operations.</p> <p>6. The description of main social challenges is lacking a description of equality in the area.</p> <p>7. The Remarks on the Covid-19 pandemic is only mentioning the positive effects, but we find that there should also be a description of</p>	none	<p>Remark partly accepted</p> <p>Interreg South Baltic should not be treated as social-oriented programme, like ESF+ ; and it is neither possible to address all horizontal principles in a sufficient manner in the programme document. Thr Programme represents common needs of 5 different Member States with different regulations and optics, therefore only on a level of generality we are able to reconcile all their interests. Non-discrimination approach regardless of any physical or mental feature are already mentioned in the programme document and will be specified, if needed, in the implementing documents such as the Programme Manual.</p> <p>In case of Covid-19 impact both sides are shown, however the description is being adjusted within the foreseen number of characters.</p> <p>For the solutions on reporting system and the use of simplified costs options, detailed proposals will be included and specified in implementing documents such as the Programme Manual. Additional indicators, relevant to ERDF, were inserted.</p>

No	Institution	Document	Remark	Justification	Response to the received remark and decision
			<p>the negative ones, such as segregation between groups regarding equality, education, and not to forget; digital exclusion.</p> <p>8. We believe that the name of the measure 1.1 should be changed to "digitalizing the region".</p> <p>9. The chosen indicators for the measures 1.1, 1.2, 2.1, 2.2, 2.3 and 3.1 do not correlate to the description of the goals, or its possible actions. We suggest you add indicators relevant to the ERDF specific objective, that can demonstrate goal achievement.</p> <p>10. Measure 1.2; Internationalization often means increased export/import and production of products, which could affect the environment and climate. There should be a remark regarding this.</p> <p>11. Measure 3.1; By defining sustainability as narrow as it is done under this measure, the measure becomes very narrow itself. We suggest you expand the definitions (in line with the three principles of sustainability) or use what is proposed by the SEA report.</p> <p>12. Generally, good priorities and measures.</p> <p>13. Regarding Digitizing the region: Addresses relevant challenges (competence provision, training). Measures are good for example adaptation, access to data and digital infrastructure.</p> <p>14. Also positive remarks on the SEA findings when presented during our open online consultation sessions 1 and 8 October.</p>		

