

5th Draft CP Slovenia – Croatia 2014-2020 was opened for public consultation from 3rd March to 13th March 2015. Link to publication: http://www.si-hr.eu/start_en/. Eleven comments were received within the set period. The response is provided in the table below. All positive answers were considered in the 7th draft final CP programme.

No	Organisation name	Date of submission	Section of the CP	Comments (summary)	Response
1	ZRS Bistra Ptuj, Slovenia Dr. Lidija Tušek	4.3.2015	Section 1	Promotion of entrepreneurship, provision of SME support services and innovations are not considered within the CP. As there is more than 90% of SMEs in the SI-HR programme area as well as in EU, we believe this is an important field which shall not be left aside of the CP SI-HR. The public investments into services for SMEs increasing their competences and support ecosystem are proved to generate positive effects. It is proposed to include again entrepreneurship an innovation promotion as one of priority investment fields.	No. SMEs are relevant for the programme area, however CBC cooperation between SMEs was limited in the previous period and focused on entrepreneurial culture. In addition, the subject is well covered by national ESI fund programmes linked to smart specialization, both in Slovenia and Croatia. EU centralised programmes such as Horizon 2020 and COSME provides additional option for transnational SME co-operation. On the other hand, limited funds if allocated to TO 1 or TO 3 would not make a significant impact on the programme area. Nevertheless, entrepreneurship and innovation has potential to be partly addressed in the TO 6 through mobilisation of cultural and natural heritage for tourism development. Participation of SMEs as project partners will be open within PA 2, Specific objective 2.1. - Mobilisation of cultural and natural heritage for tourism development.
2	City of Novalja, Croatia Antonio Datković, Senior Associate for EU integration	6.3.2015	Section 1 Programme Area	Priorities are well selected however the programme eligible area is too narrow as it does not include Ličko-Senjska and Koprivničko-Križevačka County for Croatian side. Due to high tourism, economic and business linkages these two counties shall have the possibility to co-operate with SI-HR programme. Furthermore, there is a traditionally good co-operation established between City of Novalja (town twinning with City of Maribor, cooperation between and several co-operatives, past joint events, ...).	No. The Cooperation Programme Slovenia-Croatia 2014-2020 already comprises 17 NUTS 3 regions - statistical regions in Slovenia and counties in Croatia and it represents a coherent and balanced border territory. In total it covers almost 3.3. mio population and 31,728 km ² , of which 46.6 % lies in Slovenia and 53.4% in Croatia. Therefore further extension of the programme area is not justified.
3	City Municipality of Koper/	6.3.2015	Section 1 Programme Area	CP is well prepared however we do have the following concerns:	No. Zagrebačka county is directly bordering to Slovenia and it has always been an integral part of the programme area.

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	Capodistria, Slovenia Ivana Štrkalj, Project Office			<ul style="list-style-type: none"> - Full participation of Osrednjeslovenska region, City of Zagreb and Zagorbačka County without any restrictions in terms of their maximum share of financial allocation seems inappropriate. These areas might be eligible for PA1 only whereas these regions seem to be alienated from real border problems and the programme tends to centralisation. 	Osrednjeslovenska and City of Zagreb were included as adjacent regions also in the cooperation period 2007-2013 for their close vicinity and concentration of the economic, research, development and educational capacities that could significantly contribute to the development of the entire cross border area. In order to reduce the risk of "centralisation" the CP SI-HR 2014-2020 strategy sets a clear focus on specific border territories while considering the potentials and weaknesses of the rural peripheral areas and exploiting advantages of knowledge base of urban centres.
			Section 2 Priority Axis 1	<ul style="list-style-type: none"> - We propose to add river Rižana as one of target river basins in PA 1 although it is not located at the very border. Rižana is designated of a high flood risk while it represent a source of water for large area of Slovene Istra. The floods on Rižana cause high damage to local population, fish farms as well as port Luka Koper located at its river mouth. - The target area of river Dragonja shall include also all of its tributaries and torrents (e.g. Rokava). These areas face high risk of landslides therefore we recommend to add rehabilitation of landslides as additional activity of PA 1. In this case it is recommended to increase budget allocation for this PA at this stage of programming. 	<p>No. Due to limited funds it is unfortunately not possible to extend the target river areas outside the proposed border river basins or to add new topic such as landslides.</p> <p>Yes, already considered. The whole river basin of Dragonja is considered as a target area, including its tributaries.</p>
			Section 2 Priority Axis 3	<ul style="list-style-type: none"> - Demonstration actions shall be excluded from PA 3 as it is not possible to achieve investments by all project partners. We suggest to support few good projects as several smaller projects with soft activities only. 	Misunderstanding. Within PA 3 demonstration action are not understood as major investments but as practical testing of newly developed or improved services within the cooperation structures (e.g. innovative organisation models for service provision, organisational structures for provision of mobile services, diversification of the channels for service delivery, strengthening organisational and technical capacities for specific service delivery, adjustment of time tables and integration of public transports across the border, ...). Clarification added in the CP.

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4	Municipality of Šmarješke Toplice, Slovenia Bernardka Krnc, Mayor	9.3.2015	Section 2 Priority Axis 2	<p>To our opinion the PA 2, SO 1 Protecting and restoring biodiversity and ecosystem services does not promote socio-economic development as it is written as a principle in the introduction chapter. We suggest to add "sustainable socio-economic development" as additional focus of SO 2 at pg. 40 In order to preserve these high natural values, this SO is primarily focused on the conservation and restoration of biodiversity for future generations and raising awareness of the role that nature plays in the wellbeing of people "AND IN SUSTAINABLE SOCIO-ECONOMIC DEVELOPMENT", and in long-term risk prevention.</p> <p>In addition we suggest to add "solutions for sustainable development" among indicative activities as follows: the Guide tourism and recreation flows (traffic/visitors) in order to ensure nature protection (e.g. elaboration and implementation of visitor management plans, visitor monitoring and channelling,) and establish quiet zones AND PROVIDE SOLUTIONS FOR SUSTAINABLE TOURISM DEVELOPMENT (E.G. PROTECTED WALKING TRAILS, SUSTAINABLE TOURISM ITINERARIES etc.).</p>	<p>Yes, already considered in CP.</p> <p>Priority Axis 2 encompasses two specific objectives: SO 2.1. Mobilizing natural and cultural heritage for sustainable tourism development and SO 2.2. Protecting and restoring biodiversity and promoting ecosystem services. While specific objective SO 2.1. strongly supports activation and utilization of natural and cultural heritage for sustainable development, the SO 2.2. targets to preservation of nature. Your proposal is therefore already considered within indicative activities under SO 2.1 where actions such as nature trails, sustainable tourism itineraries and products are foreseen.</p>
5	Municipality of Straše, Slovenia Stanka Vobič, Head of Municipal Administration	11.3.2015	Section 9	Section 9 lists partners which were involved in the preparation of the programme. If this means that only this institutions will be eligible for the programme, please add Municipality of Straše on the list.	Misunderstanding. All municipalities located in the programme area, including Municipality of Straše, will be eligible to participate under equal terms within the programme. The list in section 9 represents only institutions that were present at the workshops organised during the programming period.
			Section 2 Priority Axis 1	Transboundary flood risk management shall include the whole Drava rive (from Maribor to Varaždin), not just the small stretch from Ormož to Varaždin.	No. The target area of SI/HR transboundary river basin Drava has been changed to area between Markovci and Varaždin which is considered as most critical in terms of necessity for cross-border coordination of flood risk measures. On the

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					other hand, flood risk prevention measures on Drava river in the area of Spodnji Dupek – Ptuj will be addressed also by mainstream ESI Fund programme in Slovenia (OP European Cohesion policy 2014-2020 in Slovenia).
			Section 2 Priority Axis 2	The CP gives priority to national nature and (landscape) parks however it is important to include also smaller parks such as Nature park Drava (Krajinski park Drava) in the programme. These parks represent important potential for development of tourism, cultural heritage as well as preservation of biodiversity.	Misunderstanding. All nature protected areas will be eligible under equal terms. No priority is given to national or regional nature parks.
6	Municipality of Krško, Slovenia Rafael Jurečič	12.3.2015	Section 2 Priority Axis 1	The areas of Sava and Krka which are under flood risks are not considered as target border river areas within CP SI-HR 2014-2020. We propose to add river Sava and Krka as target areas for transboundary flood risk management.	No. Due to limited funds it is unfortunately not possible to extend the target river areas outside the proposed border river basins where the need for cross-border coordination of measures and interventions is a pre-requisite. The CB coordination of measures on Sava river is comparing to other border rivers most advanced and facilitated also by Sava International Commission.
7	NaturAvantur d.o.o., Petrovče, Slovenia Aleš Krivec	12.3.2015	Section 2 Priority Axis 2	As a company promoting sustainable river based tourism products (traditional rafts, services and events) they recommend that SMEs shall be eligible beneficiary of CP SI-HR 2014-2020. In addition the comment describes a potential project idea.	Yes, already considered in CP. SMEs are foreseen as eligible beneficiaries under PA 2, SO 2.1. Proposed potential project idea which falls under SO 2.2. but cannot be commented at the stage of programming.
8	Uprava za zaščito in reševanje/ Administration for Civil protection and disaster relief, Slovenia Lucija Jereb	12.3. 2015	Section 1 Section 2, Priority Axis 3	Proposal for minor amendment of terminology and data in Section 1 (page 14, 15, 26) and in Section 2 pages 49-50. No implication on the content.	Yes.
9	Harpha Sea, d.o.o. Koper, Slovenia	12.3.2015	Section 2 Priority Axis 2	The comment presents a potential project activity related to mapping and modelling of underwater sea habitats which fall under SO 2.2, partly SO 2.1.	No concrete proposal for CP document as the comment describes a potential project idea which partly falls under SO 2.1. but cannot be commented at the stage of programming.

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10	Ministry of Foreign Affairs, Department for neighbouring countries Slovenia Mag. Živa Mejač	13.3.2015	Section 1	Pg. 9 Add Koper as part of Pan-European Corridor V	Yes.
			Section 2 Priority Axis 2	Pg. 35: Why not include other stretched of Drava (in particular from Ormož to nearby Zavrč) river as this is considered as area of high flood risk?	Yes, already considered in CP. Target area of SI/HR transboundary river basin Drava has been changed to area from Markovci to Varaždin, which includes also the stretch from Ormož to Zavrč.
				Pg. 35: Is river Čabranka considered as part of Kolpa river basin?	Yes, all tributaries of Kolpa are already considered in CP, including Čabranka.
11	Hrvatski poljoprivredni zadružni savez, Croatia Branko Žalec, Advisor - consultant	13.3.2015	General	Their institution, Croatian Agriculture Cooperatives Assosiation was involved in preparation of Local development plan for micro-region Žumberak where several models of cross-border co-operation with Slovenia, in particular Posavje and Gorjanci were proposed. Their primary interest is rural development.	No concrete proposal for CP document. Rural development as a generic process is not in the focus of the programme, however the SO 2.1. is looking for actions developing and promoting concrete sustainable tourism products/destinations mobilising natural or cultural heritage of the rural areas.