

Elaboration of Strategic Environmental Assessment of the
Interreg Programme for the programming period of
2021–2027, concerning the programming area of
Hungary, Slovakia, Romania and Ukraine

Final environmental statement

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July 2022

Final environmental statement of the SEA process prepared for the
Hungary-Slovakia-Romania-Ukraine Interreg A NEXT Programme 2021-
2027

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Table of content

1	Introduction.....	2
2	(Interreg VI-A) NEXT Hungary Slovakia Romania Ukraine Programme	2
3	Steps of the elaboration of the Strategic Environmental Assessment procedure of the (Interreg VI-A) NEXT Hungary Slovakia Romania Ukraine 2021-2027 Programme.....	3
4	Stakeholders' list.....	5
5	Consultation procedure.....	7
5.1	Results of the Scoping procedure	9
5.2	Results of the consultation activities of the Environmental Report	9
	(How were the environmental considerations and recommendations of the environmental report incorporated into IP document?)	9
6	Results of the SEA assessment.....	10
6.1	Potential effects of the programme on the interrelationship and cumulative effect of threats	10
7	Protective measures	13
8	Monitoring provisions.....	14
9	Bibliography	15

1 Introduction

Széchenyi Programme Office Nonprofit LLC. as the hosting body of the Joint Technical Secretariat of the (Interreg VI-A) NEXT Hungary Slovakia Romania Ukraine 2021-2027 Programme (hereinafter: (Interreg VI-A) NEXT Hungary Slovakia Romania Ukraine) launched a procurement for the preparation of the Strategic Environmental Assessment (hereinafter: SEA). The tender was won by Ex Ante Ltd. and the contract entered into force 3 March 2021.

The SEA procedure of the (Interreg VI-A) NEXT Hungary Slovakia Romania Ukraine had to be carried out in line with:

- the Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment,
- Government Decree 2/2005 (I.11.) on the assessment of the effects of certain plans and programmes on the environment and Government Decree 100/2014 (III.25.), which modified Government Decree 2/2005 (I.11.) in Hungary.

The SEA process and the environmental assessment have been carried out by a joint expert team, involving consultants from each Member State. Methodologically the two main reports delivered within the SEA process are the Scoping Report (Annex to the Inception Report) and the Environmental Report, each as joint reports for the four Participating Countries.

According to Directive 2001/42/EC (Article 9) and Government Decree 2/2005 (I.11.) §11 b) – part of the Information on the decision – preparing a summary statement is required after the plan/program has been adopted, which:

- summarizes the approval of the plan or program, the reasons for the adoption,
- explains why this option was chosen over the other reasonable plan or program variants examined,
- takes into account environmental aspects, environmental assessment, the received opinions and comments,
- and on the monitoring measures pursuant to § 12;

This document is the summarising statement of the environmental assessment of the (Interreg VI-A) NEXT Hungary Slovakia Romania Ukraine Programme in accordance with the regulations.

2 (Interreg VI-A) NEXT Hungary Slovakia Romania Ukraine Programme

The subject of the assessment was the (Interreg VI-A) NEXT Hungary Slovakia Romania Ukraine Programme 2021–2027.

The EU's earmarked contribution for this programme is 66.092.505 EUR and the total programme budget (including national contributions) is 73.436.119 EUR.

The programme aims to tackle common challenges identified in the cross-border region and to strengthen cooperation in selected priorities that are linked to the EU objectives.

In compliance with the selected Policy objectives / Interreg specific objectives, the Programme focuses on the following priorities:

- Priority 1 (PO2): A resilient and green border region by promoting climate change adaptation and disaster risk prevention and resilience, protecting and preserving nature and biodiversity and green infrastructure, including in urban areas, and reducing all forms of pollution (45% of the programme budget)
- Priority 2 (PO4): A healthy and attractive border region by ensuring equal access to health care and fostering resilience of health systems including primary care, and promoting the transition from institutional to family-based and community-based care as well as enhancing the role of culture and sustainable tourism in economic development, social inclusion and social innovation (45% of the programme budget)
- Priority 3 (ISO1): A cooperating border region enhancing efficient public administration by promoting legal and administrative cooperation and cooperation between citizens, civil society actors and institutions, in particular with a view to resolving legal and other obstacles in border regions (10% of the programme budget).

3 Steps of the elaboration of the Strategic Environmental Assessment procedure of the (Interreg VI-A) NEXT Hungary Slovakia Romania Ukraine 2021-2027 Programme

In accordance with the regulations referred to in chapter 1, the necessary steps under the SEA procedure and their current status in case of the (Interreg VI-A) NEXT Hungary Slovakia Romania Ukraine Programme were the following:

1. The elaboration of the scope of the assessment (Government Decree 2/2005 (I.11.) §1, §4 and Annex 2 and 4): from 3 March 2021 to 17 March 2021.

- The Scoping Report was an Annex to the Inception Report.
- The content of the Scoping Report has been elaborated in line with the requirements under Government Decree 2/2005 (I.11.) §7 (2) and the Directive 2001/42 EC:
 - the main areas of intervention,
 - determination of the current state of the environment and the objectives to be achieved,
 - summarize the relevant regulatory background and the methodology planned,

- determination of the likely significance of the environmental effects,
- likely transboundary impacts.

2. Consultation on the Scoping Report with the relevant environmental authorities in Hungary (Government Decree 2/2005 (I.11.) §7): from 10 April 2021 to 25 May 2021.

3. Consultation on the Scoping Report with the relevant Slovak, Romanian and Ukrainian environmental authorities from 8 April 2021 to 21 May 2021.

4. Drafting the Environmental Report based on the accepted Scoping Report (Government Decree 2/2005 (I.11.) §8 and Annex 4): from 4 May 2021 to 31 May 2021.

- One joint single Environmental Report has been drafted for all countries. The first draft of the Environmental Report was submitted to Contracting Authority on 31 May 2021.

5. Consultation on the Environmental Report with the relevant Hungarian environmental authorities and the public (Government Decree 2/2005 (I.11.) §8): from 22 October 2021 to 25 November 2021.

- According to Art. 6 of the Directive 2001/42 EC and the Government Decree 2/2005 (I.11.) (1) the public has to be consulted in relation to the Environmental Report and (2) in Hungary the consultation period given to the authorities and the consultation period given to the public is the same period, the authorities and the public is consulted simultaneously.

6. Consultation on the Environmental Report with the relevant Slovak, Romanian and Ukrainian environmental authorities and the public: from 25 October 2021 to 7 January 2022 according to their national legislation.

- Since the SEA process is different in each participating country, therefore, in accordance with the decision of the Programming bodies, the Hungarian SEA contact point used 'one channel communication' to reach other SEA contact points of each country to coordinate proceedings according to their national legislation.

7. Consultation on the transboundary effects of the programme with third countries if necessary according to Art. 7 of the Directive 2001/42 EC and (Government Decree 2/2005 (I.11.) §9)

- Due to the location of the cross-border region, consultation on the likely transboundary¹ effects of the program is not required.

8. Adoption of the Programme and the Strategic Environmental Assessment by the competent authority (Government Decree 2/2005 (I.11.) §10)

¹ at the borders of a country outside of the territorial scope of the program

- The Cooperation Programme document is to be approved by the Governments of Hungary, Slovakia, Romania and Ukraine, having the annexes of the Scoping Report and the Report for the Strategic Environmental Assessment.
- Government of Hungary approved the Programme on 28.03.2022 (Decree No. 1185/2022)
- Government of the Slovak Republic approved the Programme on 30.03.2022 (Decree No. 240/2022)
- Government of Romania approved the Programme ([Government Memorandum no. 20/12319/M.N./02.05.2022](#)) on 17.05.2022
- Government of Ukraine approved the Programme on 29.06.2022 ([Official letter No. 12524/0/2-22 dated on 29.06.2022](#))

9. Adoption of the Programme and the Strategic Environmental Assessment by the European Commission (yet to be adopted)

10. Information on the decision according to Art. 9 of the Directive 2001/42 EC and (Government Decree 2/2005 (I.11.) §11): necessary documents are being prepared.

- Planned after the adoption of the Programme and the Strategic Environmental Assessment.

4 Stakeholders' list

The chapter describes, by participating countries, the list of National Environmental Authorities and conservation managers responsible for the scoping and later to be involved in the public consultation process as relevant stakeholders in the SEA process.

List of Slovakian, Romanian and Ukrainian authorities involved in consultation acts in the SEA process:

Slovakia	Legislative basis: Act no. 24/2006 Coll. on environmental impact assessment and on amendments and supplements to certain acts
	Ministry of Environment; Ministry of Investments, Regional Development and Informatization; Office of the Košice Self-Governing Region; Prešov Self-governing Region, Department of Regional Development
Romania	Legislative basis: Governmental Decision no.1076 of 8.07.2004 for setting up the environmental assessment procedure of certain plans and programmes (Of.J.no.707 of 5.08.2004)
	Ministry of Environment, Waters and Forests (MEWF); National Environmental Protection Agency (when delegated by the ministry); Local Environmental Protection Agencies
Ukraine	Legislative basis: LAW OF UKRAINE "About strategic ecological assessment" Number № 2354-VIII in force since 12.10.2018
	Ministry of Ecology and Natural Resources; Environmental Department of a regional state

List of Hungarian authorities involved in consultation acts in the SEA process:

The list of authorities involved in consultation activities, related to the Scoping Report and related to the Environmental Report is based on the Annex 3 of Government Decree 2/2005 (I.11.) on the SEA.

According to the Annex 3, the legislative advisory powers involved in the SEA process in case of plans prepared by a body without national competence are:

II.1. Always participates:	
II.1.a) in case of environmental protection matters, the following environmental authorities	Borsod-Abaúj-Zemplén County Government Office Department of Environment and Nature Conservation
	Szabolcs-Szatmár-Bereg County Government Office Department of Environment and Nature Conservation
II.1.b) in the fields of nature and landscape protection, the following National Park Directorates and Nature Conservation Authorities listed above	Aggtelek National Park Directorate
	Bükk National Park Directorate
	Hortobágy National Park Directorate
II.1.c) in terms of environmental- and local public health, Budapest and county level government offices competent in public health	Public Health and Epidemiology Department of the Department-General for Public Health of Borsod-Abaúj-Zemplén County Government Office
	Public Health Division of Public Health Department, Government Office of Szabolcs-Szatmár-Bereg County
II.1.d) in the fields of quantitative and qualitative water protection of surface- and groundwater-bodies the following water protection and management authorities	Ministry of Interior National Directorate-General for Disaster Management
II.2. Participates in case of involvement	
II.2.b) in case of the protection of the built environment the following government offices acting under the authority of the state chief architect	State Chief Architect's Office – Government Office of Borsod-Abaúj-Zemplén County
	State Chief Architect's Office – Government Office of Szabolcs-Szatmár-Bereg County
II.2.c) in terms of forest protection the following county government offices acting in the field of forestry	Forestry Department of Department-General for Agriculture Borsod-Abaúj-Zemplén County Government Office
II.2.d) in terms of soil protection the following county government offices competent in the field of soil protection	Plant and Soil Protection Department of Department-General for Agriculture Borsod-Abaúj-Zemplén County Government Office
	Plant and Soil Protection Department of Department-General for Agriculture Szabolcs-Szatmár-Bereg County Government Office
II.2.h) Government Office of Budapest competent in the field of cultural heritage protection (monument protection, archaeology), and the Minister responsible for the protection of cultural heritage in the circumstance of exclusion	Deputy State Secretary for Architecture, Construction and Heritage Protection

5 Consultation procedure

According to the legislation, consultation activities have been carried out several times during the Programme planning and environmental assessment, the results of which are summarized in this chapter.

Consultation activities on the Scoping Report:

The first consultation during the environmental assessment process took place in the spring 2021, when the relevant environmental authorities were consulted on the Scoping Report (Art. 3 of the Directive 2001/42 EC and Government Decree 2/2005 (I.11.) §7). According to paragraph, the authorities responsible for the protection of the environment must be consulted in order to determine the specific content and detail of the environmental assessment.

The Hungarian authorities were provided with an official letter – inviting them to participate in the SEA process – sent by an electronic system ([e-Papír \(gov.hu\)](mailto:gov.hu)), the Scoping Report in Hungarian and the Territorial Analysis for the (Interreg VI-A) NEXT Hungary Slovakia Romania Ukraine Programme in English.

National authorities of Slovakia, Romania and Ukraine were reached through the National Contact Point to the UNECE PROTOCOL on SEA, Hungarian Ministry of Agriculture, Department of Agriculture. The Scoping report has been sent to the respective countries' National Contact Points on 15 April 2021 and invited through them their respective national authorities to take part and comment the prepared documents. National Contact points sent their collected comments to the Hungarian SEA Contact Point until 25 May 2021, which were finally built in the draft Environmental report.

Consultation activities on the draft version of the Interreg Programme document and of the Environmental Report:

Four online stakeholder workshops per thematic fields were held on 27-28 September 2022 to provide an opportunity for participants to contribute to the elaboration of the programme, by commenting and discussing the actual draft of the programme document and by presenting their views and ideas

Following the workshops, stakeholders could send their written comments and opinions on the draft programme document by e-mail till 04 October 2022 to the expert team for consideration.

The general public of all the participating countries were invited in all languages of the participating countries online - through the present Programme's website – for commenting the draft Interreg Programme document ([Public consultation regarding the Interreg A Next Programme between Hungary, Slovakia, Romania and Ukraine for the period 2021-2027 I HUSKROUA ENI CBC \(huskroua-cbc.eu\)](#)). Information and links of public consultation procedure was sent out in a Newsletter by the present Programme, distributed in social media platforms as

well. All comments and recommendations of TESIM, the relevant stakeholders and of the general public and the description on how those were taken into consideration in the revision of the Interreg Programme document are summarized in Annex 3.

The second consultation during the environmental assessment process was targeted both to the relevant stakeholders and to the public. According to the Article 6 of Directive 2001/42/EC and the §8 of Government Decree 2/2005 (I.11.) the draft plan or programme and the environmental report shall be made available to the environmental authorities and to the public.

The respective stakeholders in Hungary were informed by the hosting body of the Joint Technical Secretariat in an official letter – inviting them to participate in the SEA process – sent by an electronic system ([Ügyfélkapu \(ugyfelkapu.hu\)](http://ugyfelkapu.hu)), the draft Environmental Report and the draft Interreg Programme document were provided in English and in Hungarian.

In parallel, the general public of Hungary was invited to participate in the SEA process ([Public participation in the SEA process for the Hungarian public regarding the HUSKROUA Interreg A NEXT Programme | HUSKROUA ENI CBC \(huskroua-cbc.eu\)](#)) in national language, relating documents available in English and in Hungarian.

The general public and the respective national authorities of Slovakia, Romania and Ukraine were reached through National Contact Point to the UNECE PROTOCOL on SEA, Hungarian Ministry of Agriculture, Department of Agriculture. The draft HUSKROUA INTERREG NEXT Programme 2021-2027 has been sent and the draft Environmental report to the respective countries' National Contact Points on 25 October 2021 and invited them to make the necessary process according to their legislation. To assure sufficient time for the comments (since the time requirement for the comments is minimum 30 days), extra two weeks to the calendar month for the comments was provided, to ensure this requirement was met. The Slovak and Romanian partner countries responded by 13 December; their comments were built in the Final Environmental report. The Ukrainian partners did not send comments. During the consultation, documents were also available online ([Documents available for Slovakia, Romania and Ukraine regarding the SEA process of Interreg A NEXT Programme between Hungary, Slovakia, Romania and Ukraine for the period 2021-2027 | HUSKROUA ENI CBC \(huskroua-cbc.eu\)](#)) to the environmental authorities and the public for commenting:

- the draft Interreg Programme document in English and in the national language of the participating countries,
- the draft Environmental Report of the Strategic Environmental Assessment (SEA) in English and in the national language of the participating countries.

5.1 Results of the Scoping procedure

Basically, the main conclusions are that the (Interreg VI-A) NEXT Hungary Slovakia Romania Ukraine Programme has a significant effect on the environment, during the implementation, the national legal background has to be fulfilled, and consultations are required. The authorities involved in the consultation did not take exception to the structure of the Environmental Assessment. They indicated their agreement with the Scoping Report.

The comments received during the Scoping procedure can be grouped into three types:

- Some of the stakeholders declared they agree with the Scoping Report, and did not send any other comments
- Many authorities involved in the consultation sent comments, which are in line with the content of the Scoping Report, and which are comments corresponding to the Scoping Report.
- Several stakeholders sent suggestions related to the Environmental report that are directly related to the content of the Cooperation Programme.

Annex 1 describes the detailed comments received on the Scoping Report and the responses to the comments².

5.2 Results of the consultation activities of the Environmental Report (How were the environmental considerations and recommendations of the environmental report incorporated into IP document?)

The main conclusion is that the Environmental Report prepared by (Interreg VI-A) NEXT Hungary Slovakia Romania Ukraine Programme has been accepted by the authorities involved in the consultation. They agreed with the content of the Report. It was supplemented with professional comments by some of the stakeholders.

The comments in general received during the Environmental Report's consultation are:

- Some of the stakeholders have stated that they agree with the content of the Environmental Report and accept it.
- Many authorities involved in the consultation sent comments that are in line with, clarify and supplement the content of the report.
- Several stakeholders provided detailed information in their field of expertise on the areas that need to be monitored in the context of the environmental assessment and then the implementation of the Cooperation Programme.

² The experts' answers given to the comment of the authorities were available at the Hungarian organization – Széchenyi Programme Office Nonprofit LLC – responsible for the development of the SEA during the SEA process and were provided to the Programming Committee members.

All comments and recommendations of the relevant national authorities that modified the Environmental Report and the programme document were taken into consideration in elaborating the final version of the Environmental report.

There were not any comments received from the public on the draft Environmental report.

Annex 2 concludes the detailed comments received from the relevant authorities on the draft documents and the responses to those, also summarising how the environmental considerations have been taken into account in the finalization of the programme document and of the SEA Report³.

An additional specific assessment on the “do no significant harm” principle (DNSH assessment) was also conducted and added to the environmental report, in accordance with the EU Taxonomy Regulation (EU) 2020/852, and following the requirements stated in the Commission explanatory note on the application of the principle under Cohesion Policy which was issued on 27 September 2021.

6 Results of the SEA assessment

The evolution of the Programme in close cooperation of the programming and SEA experts was continuously monitored by the Programming Committee. Some of the proposed activities in the draft Programme document were revised for the proposals of SEA experts to prevent and minimize any significant negative environmental impact and to enhance the Programme’s positive contribution to the environment.

The final version of the Programme document submitted to the European Commission represents the best possible alternative.

6.1 Potential effects of the programme on the interrelationship and cumulative effect of threats

Summary table of the potential effects on environmental and socio-economic factors of the CBC region

³ The experts’ answers given to the comment of the authorities were available at the Hungarian organization – Széchenyi Programme Office Nonprofit LLC – responsible for the development of the SEA during the SEA process and were provided to the Programming Committee members

	Effects on soil	Effects on air	Effects on water and ground waters	Effects on biodiversity, flora, and fauna	Effects on Natura 2000 territories and equivalent protected areas in case of Ukraine	Effects on climate	Effects on built environment, settlement surroundings, and cultural heritage	Effects on human health and lifestyle	Effects on environment consciousness	Effects on emerging/escalating environmental conflicts and problems
PO2 iv)	strong positive effect(s)	strong positive effect(s)	strong positive effect(s)	strong positive effect(s)	strong positive effect(s)	strong positive effect(s)	strong positive effect(s)	strong positive effect(s)	strong positive effect(s)	strong positive effect(s)
PO2 vii)	strong positive effect(s)	strong positive effect(s)	strong positive effect(s)	strong positive effect(s)	strong positive effect(s)	strong positive effect(s)	strong positive effect(s)	strong positive effect(s)	strong positive effect(s)	neutral effect(s)
PO4 v)	neutral effect(s)	strong positive effect(s)	strong positive effect(s)	neutral effect(s)	neutral effect(s)	strong positive effect(s)	strong positive effect(s)	strong positive effect(s)	neutral effect(s)	neutral effect(s)
PO4 vi)	neutral effect(s)	neutral effect(s)	neutral effect(s)	neutral effect(s)	neutral effect(s)	neutral effect(s)	neutral effect(s)	strong positive effect(s)	strong positive effect(s)	strong positive effect(s)
ISO1 b)	neutral effect(s)	neutral effect(s)	neutral effect(s)	neutral effect(s)	neutral effect(s)	neutral effect(s)	neutral effect(s)	neutral effect(s)	strong positive effect(s)	strong positive effect(s)

Legend:

strong negative effect(s)	weak negative effect(s)	neutral effect(s)	weak positive effect(s)	strong positive effect(s)
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The Programme identifies some intervention areas and sets boundary conditions. In the Environmental Report the potential impacts of each selected SO was analysed in detail, on different environmental elements and categories. The summary of the evaluation is presented in the table above. If the elements and categories of environmental impacts potentially affected by the 5 selected areas of intervention are analysed by simple mathematical methods (substituting positive and negative impacts with +1 and +2 and -1 and -2, respectively, taking the mixed impacts as zero, and averaging across different categories), we can read informative aggregate results from the diversified correlation system of the multi-element environmental impact assessment:

- 3 SOs have an impact on all 10 assessed environmental elements: Nature protection interventions of PO2 vii) and climate change measures of PO2 iv) have generally positive effects, while sustainable tourism interventions of PO4 vi) have mixed/negative impacts. Health care interventions of PO4 v) have neutral or mixed effects on half of the assessed categories, but positive impacts on the other half. Cooperation measures under ISO b) affect the lowest number of environmental areas (only 2).
- The vast majority of assessed environmental elements are affected by 4 out of 5 SOs, and only 3 of them (soil, biodiversity and protected areas) are affected by less elements (3 each).
- Considering the average impact on environmental elements, the mostly negative effect is realised by sustainable tourism measures of PO4 vi): apart from the effects on human health and environment consciousness, it has potentially negative impact on all environmental elements.
- The most positive overall impact is expected in case of nature protection and climate change interventions (both under PO2). Cooperation measures of ISO1 b) also have positive overall impact, but they are irrelevant for most environmental elements.
- The environmental elements gaining the most positive effects from the planned interventions are human health and environment consciousness.

If the effects of the intervention areas are averaged, the following ranking is obtained:

- PO2 vii) Nature protection: 1,6
- ISO1 b) Cooperation: 1,5
- PO2 iv) Climate change: 1,4
- PO4 v) Health care: 1,2
- PO4 vi) Sustainable tourism: -0,7

From the above data, it can be seen that it is the area of sustainable tourism where a potential intervention can most probably violate or jeopardize an environmental aspect. All other SO areas have generally positive impacts.

A specific aspect of environmental assessment is the analysis of effects on emerging environmental conflicts and existing or potential problems, presented in chapter 6.10 and

summarised in the last column of the table above. Selected SOs show mixed contributions to environmental conflicts:

- Cooperation activities (ISO1 b) generally contribute to solving emerging conflicts and problems.
- Climate change interventions (PO2 iv) provide a rather complex contribution in their thematic area, including limited infrastructure development projects, policy development, as well as awareness and attitude forming, both in case of natural and human induced disasters.
- Healthcare measures (PO4 v) target a major challenge of the programme area (access to quality healthcare services) but cannot deliver complex solutions adequately securing the coverage of most vulnerable social groups or protection against future health crisis situations.
- Nature protection interventions (PO2 vii) will improve the situation of many natural habitats, but will not affect several key areas, like the pollution of rivers and groundwater or the revitalization of industrial and mining sites.
- Increased tourism activity (PO4 vi) and the protection of the environment are generally contradictory priorities, and the high level of risk of overutilizing the natural environment must be properly counter-balanced by the application of sustainability criteria in funding decisions.

7 Protective measures

The following chapter – summarizing Chapter 7 of the Environmental Report – briefly describes every measure envisaged to prevent, reduce and offset - as fully as possible - any significant adverse, unfavourable effects on the environment by the implementation of the Programme:

- Enhancing the tourism activity of the area, protecting and preserving natural values are generally conflicting priorities. In order to effectively prevent the damage to the natural environment related to sustainable tourism, it is recommended to develop joint actions, strategies that focus on the implementation of practices which aim to distribute the environmental pressures on the area in space and time.
- It would be vital to take measures (e.g. joint sanctions) across the countries to ensure that air quality standards are kept - so critical air pollutants are below the air pollution limit.
- It is suggested to include more ambitious joint actions to harmonize national regulations and standards in the four countries in relation to watercourse management and the discharge of waste and wastewater.
- It is suggested to pay special attention to map and find joint cooperation activities and linkages between nature conservation sites (Natura 2000 territories and equivalent protected areas in case of the Ukraine), and sustainable tourism and recreation activities.
- It is recommended that green infrastructure development of urban areas be more prominent and specific in the Programme.

- Considerations for the built environment are generally missing from the program, so it is recommended that the program be complemented by joint interventions to identify buildings and their environments that are particularly vulnerable to extreme weather events and disasters in the region.
- It is recommended to implement joint interventions that aim the renovation and design of buildings in settlements that incorporate nature-based solutions, energy efficient and renewable energy technologies and make use of green infrastructure.
- The integration of health services could be addressed more directly in the Program, allowing institutions in neighboring countries to develop combined services for cross-border audiences based on their complementary strengths and capacities.
- Service development should be focused on areas and local communities with the weakest accessibility to quality healthcare services.
- It is recommended to implement targeted cross-border communication campaigns / educational actions that address the local population and tourists coming to the area about the importance of protecting the environment (air pollution, water use, waste collection).
- It is suggested to support the implementation of specific joint education and awareness-raising programs on the effects of climate change on the environment and the health of the population (both locally and globally).

8 Monitoring provisions

Output and result indicators are selected from the common output and result indicators for the ERDF and the Cohesion Fund, listed in the annex of the ERDF Regulation. Baseline and target values, as well as data sources are provided for each indicator. These indicators account for the number of direct outputs (built green infrastructure, pilot actions, jointly developed solutions, organisations cooperating across borders, etc.) either during programme implementation (listed as output indicators) or after the completion of funded projects (listed as result indicators, to measure the multiplication, upscaling or roll-out results). The chosen result indicators selected help monitor also the indirect effects on the environmental status or socioeconomic characteristics of the programme area.

Though the list of activities is coherent and allow for a proper measurement of progress and performance, the monitoring and evaluation system should be supplemented along the following principles: Monitoring measures have been developed in line with Article 10 of the SEA Directive⁴, fulfilling the following key criteria:

- Significant environmental effects of the implementation must be detected, realizing any unforeseen adverse effects in time to undertake appropriate remedial action.

⁴ DIRECTIVE 2001/42/EC

- Existing monitoring systems may also be used if appropriate, to avoid duplication.

As a result of the programming procedure and after receiving the Commission observations on the cooperation programme submitted on 01/04/2022 the output and result indicators have been selected from the common output and result indicators for the ERDF and the Cohesion Fund. Baseline and target values, as well as data sources are provided for each indicator.

The intervention logic is clearly linked to output and result indicators differentiated along SOs and actions, with at least one output and one result indicator assigned to each action. No milestones have been set for 2024 but that is acceptable as it is unrealistic to expect closed projects by then.

Monitoring indicators are complying with specific suggestions of the Commission observations:

- The use of RCO84 and RCO116 output indicators are avoided, and replaced by ERDF common indicators as relevant to the SOs concerned, to ensure measurability of the outputs and results of investments.
- RCO81 or RCO115 output indicators will be used for SOs building on cross-border events (2.4, 2.7, 4.5 and 4.6).
- Training related actions under SO 4.6 will be measured via training related output and result indicators (RCO85 and RCR81).

9 Bibliography

Inception Report – Elaboration of Strategic Environmental Assessment of the Interreg Programme for the programming period of 2021–2027, concerning the programming area of Hungary, Slovakia, Romania and Ukraine, EX ANTE Tanácsadó Iroda Kft., 17 March 2021, Budapest

Environmental Report – Elaboration of Strategic Environmental Assessment of the Interreg Programme for the programming period of 2021–2027, concerning the programming area of Hungary, Slovakia, Romania and Ukraine (2021), EX ANTE Tanácsadó Iroda Kft., 31 May 2021, Budapest

Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment ([EUR-Lex - 32001L0042 - EN \(europa.eu\)](#); [EUR-Lex - 32001L0042 - HU \(europa.eu\)](#))

Government Decree 2/2005 (I.11.) on the assessment of the effects of certain plans and programmes on the environment ([2/2005. \(I. 11.\) Korm. rendelet egyes tervek, illetve programok környezeti vizsgálatáról - Hatályos Jogszabályok Gyűjteménye \(jogtar.hu\)](#))

Annex 1

Comments of participating countries related to the Scoping Report

Comments from the stakeholders in the framework of the Scoping report	Response to the comment
Romania (Romanian Ministry of Environment, Waters and Forests)	
<p>Having regard to the Chapter 3 Main objective of the Programme, please consider the aspect relating to surface waters on the potential activities: "monitoring of the transboundary groundwater bodies and surface waters". Also, to the mentioned chapter, please include thematic fields such as: climate change, as well as soils.</p>	<p>During the elaboration of the programme, the target system described in Chapter 3 of the Scoping Report was reduced to three programme priorities. However, the types of activities affected by the remaining priorities include the mentioned thematic fields and potential activities.</p>
<p>Regarding the chapter 4 Cohesion and consistency of documents, subchapter 4.1. Relationship with other relevant plans, programmes, please include the following Romanian strategic national document: Sustainable development operational program (SDOP) 2021-2027; General Transport Master Plan (GTMP) 2014-2030; Territorial Development Strategy of Romania (TDSR) polycentric Romania 2035· territorial cohesion and competitiveness, development and equal chances for people; National Strategy for Romanian' s Durable Development Horizons 2010-2020-2030; Large Infr astructure Operational Program 2014-2020; National Plan in the Field of Energy and Climate Change (NIPFECC) 2021-2023; Energetic Strategy of Romania (ESR) for the period 2020-2030 with a perspective on year 2050; National Action Plan for Energetic efficiency (NAPEE); National Strategy and action plan for the preservation of Biodiversity 2014-2020; Cul tur e and National Heritage Strategy 2016-2022; National Terri tory Management Plan (NTMP); National Tourism Development Strategy 2019-2030.</p>	<p>The list of documents has been supplemented by the requested strategies. The document entitled 'National Territory Management Plan' is not available online.</p>
<p>To the Chapter 5. Environmental characteristics of the CBC I andscape, should be reformulated in order to include aspects concerning the human health: "The relevant aspects of the current state of the environment, <u>including health</u>, and the likely evolution thereof without implementati on of the Programm e, with special regard to the cross-border landscape and environmental systems, including their advantages, disadvantages given by their cross- border location according to the SEA Directive" . This chapter has to bee n carried out taken into consideration the aspect referring to: health as well as reports on the environmental condition. In the same manner, the sub chapter 5.1 has to be completed also with human heal th aspects.</p>	<p>Human health was principally analyzed in subchapter 5.1. ("The socio-economic characteristics of the areas which are likely to be affected by the programme objectives). The given subchapter was not included in the theme. The subchapter no. 5.1 át has been renumbered to 5.2. Subchapter 5.2 describes the environmental characteristics of the CBC region, therefore human health was not particularly examined.</p>

Comments from the stakeholders in the framework of the Scoping report	Response to the comment
<p>The subchapter 5.3 should be reworded, such as: "The environmental protection, <u>including health</u>, objective established at international, Community or Member State level, relevant to the Programme and the way those objectives and environmental considerations have been taken into account during its preparation".</p>	<p>The subchapter has been given a new number of 5.4. Due to the nature of the document, in this subchapter environmental objectives were examined in particular.</p>
<p>At the chapter 6 Potential environmental effects of programme implementation, please add <u>landscape and natural site</u> (to build environment, settlement surrounding, and cultural heritage), the systems which refers to material assets as well as the interaction among all factors.</p>	<p>According to our interpretation, „settlement surrounding” includes the natural environment surrounding the municipalities and the landscape.</p>
<p>With respect to the section 7 - Protective measures, it would be appropriate to be included the mitigate measures: " If there are any measures envisaged to prevent, reduce <u>or mitigate</u> and as fully as possible offset any significant adverse, unfavorable effects on the environment of implementing the Programme, those shall be listed here" .</p>	<p>Among the measures taken to avoid adverse effects, proposals made to reduce and mitigate them are also included in Chapter 7.</p>
<p>Furthermore, we should consider a new chapter that covers the likely/potential significant transboundary environmental, including health, effects.</p>	<p>Transboundary environmental impacts are discussed in Chapter 6, detailed by environmental systems. We will not highlight them in a separate chapter.</p>
Slovakia (Ministry of Environment of the Slovak Republic)	
<p>Chapter 3 Main objectives of the programme, TO6-P1 Environment, Potential activities, Joint environmental actions.</p> <p>The HUSKROUA INTERREG NEXT Programme should complement the already existing long-term international co-operation in the field of water protection and management (bilateral cooperations on transboundary waters, the International Commission for the Protection of the Danube River – ICPDR, EU Strategy for the Danube Region). We propose that the proposals for co-operation are subject to consultations with members of the working groups of the bilateral transboundary commissions, as well as ICPDR Secretariat expert within the preparation of the Environmental report.</p>	<p>We were not able to involve experts from all organizations in the screening of the Scoping Report. We promote the involvement of relevant organizations in the subsequent screening procedure.</p>
<p>Chapter 3 Main objectives of the programme, TO6-P1 Environment, Thematic fields</p> <p>We propose to include following thematic fields relevant to the context of the environmental impacts in the trans-regional scale:</p> <p>Renewable energy sources (with respect to different types of renewable energy sources in terms of their effectivity and variable character of positive and negative impacts on the environment), potential overview of relevant national strategies on renewable energy strategies;</p>	<p>During the elaboration of the programme, the target system described in Chapter 3 of the Scoping Report was reduced to three programme priorities. However, the types of activities affected by the remaining priorities include the mentioned thematic fields.</p>

Comments from the stakeholders in the framework of the Scoping report	Response to the comment
Cumulative and synergistic impacts on the environment in the context of sustainable development including regional and trans-regional point of view.	
Chapter 4 Cohesion and consistency of documents, EU Level strategies EU Strategy for the Danube Region should be listed among EU Level strategies.	The requested strategy was added to the list of documents.
Ukraine (Ministry of Environmental Protection and Natural Resources of Ukraine)	
The Ukrainian Party has no additional comments or questions on the scope and the level of detail of the assessment.	Thank you for your comment, no further action is required.
After this the Ukrainian Party is interested in participating in the second round of transboundary consultations with the relevant environmental authorities and the public concerned on the environmental report.	The Ukrainian authorities will be involved in the subsequent screening procedure.

Comments of Hungarian authorities related to the Scoping Report

Comments from the stakeholders in the framework of the Scoping report	Response to the comment
Borsod-Abaúj-Zemplén County Government Office Department of Environment and Nature Conservation	
<p>The Directorate in accordance with Government Decree 2/2005 (I. 11.) Article 1 (2) (ba) and Annex 3, Section II/1.b) had no objection to the HUSKROUA Interreg NEXT strategic environmental assessment process-documentation in terms of environmental protection and natural conservation.</p> <p>The table of contents of the environmental assessment is recommended for adoption, it is not necessary to supplement due to the overall nature of the programme and the detailedness described in the current development phase.</p>	Thank you for your comment, no further action is required.

Comments from the stakeholders in the framework of the Scoping report	Response to the comment
<p>The five themes covered by the programme (environmental and nature protection, environmental disasters, transport, health, cultural heritage) are well outlined both in depth and horizontally in light of the current phase. The terms "poisoning/pollution" listed in Chapter 3 under TO8-P1-environmental disasters of the environmental assessment is ambiguous, and the wording "environmental pressure" in Chapter 5.1 is not detailed, therefore we recommend both to be clarified.</p>	<p>During the development of the Programme, objectives listed in Chapter 3 of the SEA were reduced to 3 priority areas. The topics described in the thematic structure have been clarified. Under "environmental pressure" described in Chapter 5.1, environmental conflicts were depicted.</p>
<p>The environmental assessment documentation to be prepared is easily comprehensible and is in line with the provisions of Government Decree 2/2005 (I. 11).</p>	<p>Thank you for your comment, no further action is required.</p>
<p>Szabolcs-Szatmár-Bereg County Government Office Department of Environment and Nature Conservation</p>	<p>No remarks were received.</p>
<p>Aggtelek National Park Directorate</p>	<p>No remarks were received.</p>
<p>Bükk National Park Directorate</p>	
<p>In view of the above, we recommend that natural values and their protection to be emphasized and explained in during further planning and project priorities processes.</p>	<p>Directorate of Bükk National Park has given a detailed opinion on SEA. The Directorate has no comment on the structure of the SEA. Directorates of other National Park have been involved in the comment-assessment process as suggested. Chapter 6 of the SEA incorporates a detailed analysis of the programme's effects on the environment, including natural values.</p>
<p>Hortobágy National Park Directorate</p>	
<p>The Hortobágy National Park Directorate agrees with the programme: the identified objectives have benefits in terms of natural conservation, the tools listed for achieving these goals are relevant, consultation at this stage of the planning is to be welcomed.</p>	<p>-</p>
<p>In chapter 4.1. (Relationship with other relevant plans, programmes) of the SEA is to be supplemented with the EU Biodiversity Strategy for 2030 and Water Framework Directive, and the National Nature Protection Plan V (proposal).</p>	<p>Cohesion and consistency analysis under chapter 4 has been supplemented with the requested documents.</p>
<p>In addition in Chapter 6 (Potential environmental effects of programme implementation) the Directorate proposes the wording "protected areas equivalent to Natura 2000 sites" (currently ambiguous), since Ukraine is not an EU member state there are no so-called Natura 2000 territories.</p>	<p>The phrasing of the subject matter was incorrect. In the SEA analysis of environmental impacts were carried out for Natura 2000 areas, and for territories equivalent to the Natura 2000 classification in case of Ukraine.</p>

Comments from the stakeholders in the framework of the Scoping report	Response to the comment
Public Health and Epidemiology Department of the Department-General for Public Health of Borsod-Abaúj-Zemplén County Government Office	
The sent documents (situation analysis of the HUSKROUA Interreg NEXT program in English and the Scoping Report) were reviewed. As the ultimate impact of the environment is on human health and with regards to the field of public health, the Division agrees with the main objectives of the HUSKROUA Interreg NEXT programme together with the proposed content of the environmental report.	Thank you for your comment, no further action is required.
With regard to the objectives of the five main priority areas identified by the HUSKROUA Interreg NEXT programme relevant to the environment and urban health, the Division made some comments.	The comments made by the authority have been taken into account and do not concern the subject matter.
Department-General for Public Health of Szabolcs-Szatmár-Bereg County Government Office	
The Department accepts the proposed scope of the Strategic Environmental Assessment. In terms of the provisions of Annex 4 of the Regulation, the Department has no a specific proposals for any of it's professional fields.	Thank you for your comment, no further action is required.
Borsod-Abaúj-Zemplén County Disaster Management Directorate	No remarks were received.
Szabolcs-Szatmár-Bereg County Disaster Management Directorate	
The Ministry of Interior's National Directorate-General for Disaster Management holds legal competence in the subject matter.	Thank you for your comment, no further action is required.
Ministry of Interior National Directorate-General for Disaster Management	
With regard to the protection of surface and groundwater waters:	
The Directorate-General suggests to include Government Decision No 1155/2016. (III. 31.) on Hungary's revised River Basin Management Plan 2015 (VGT2) in the relevant plans and programmes.	Cohesion and consistency analysis under Chapter 4 has been supplemented with the requested document.

Comments from the stakeholders in the framework of the Scoping report	Response to the comment
<p>It is strategically important to protect groundwaters both quantitatively and qualitatively. In order to develop the infrastructure that promotes climate change adoption and coordinates modern systems including stormwater drainage in the settlements, storage and recovery systems in the regions concerned, increasing the rate of recovery after the by modernising wastewater treatment and post-purification processes. Cross-border cooperation is needed to protect the quality of surface waters through pollution reduction and the promotion of water-efficient industrial and agricultural usage of resources.</p>	<p>The remarks made by the authority have been taken into account.</p>
<p>In the territory of Borsod-Abaúj-Zemplén county there are waterworks with a water base that extends through Hungary and the common border of Slovakia: Jósvalfő, Babot-kút; Komjáti, Pasnyag-forrás; Sátoraljaújhely I. and II. waterworks. Each of the above supplies several settlements, while Sátoraljaújhely I. and II. waterworks have a regional purpose. Based on the protection area delimitations, the surface resupply area of all the mentioned water bases for the next 50 years is partly located in Slovakia. The cross-border involvement of some water bases is even more direct: according to the calculations, several production wells of the Pasnyag Spring and the Sátoraljaújhely I. waterwork can receive surface replenishment beyond the borders of the Hungary within 20 days. The regional water base, which is significantly exposed to the quantitative and qualitative effects of the waters coming from Slovakia, is the Hernádnémeti, Eastern Peak Waterworks (North Hungary Regional WaterWorks Zrt. plant X.), in which case there is cross-border effect through the Hernád River originating in Slovakia, which provides a significant part of the replenishment of the coast-filtered water base. Taking into account the above, it is recommended to consider common protection options for cross-border drinking water bases in the environmental assessment. In case of Sátoraljaújhely I. waterworks (or. to a lesser extent, the Sátoraljaújhely II. waterworks) the possibility of the joint use of water bases by two countries may also arise, which is suggested for consideration in the environmental assessment.</p>	<p>Chapter 6 of the SKV focuses primarily on the environmental impact of the programme, including its effects on "water- and groundwater-bodies". Joint actions for potential protective measures of cross-border drinking water bases are analysed during the environmental assessment.</p>
<p>With regard to the prevention of serious accidents:</p>	
<p>In assessing the current environmental situation, presenting existing environmental conflicts and assessing the expected environmental impacts, particular attention should be paid to Act CXXVIII. 2011 on disaster management and the amendment of certain related laws (hereinafter referred to as 'Kat.'), and 219/2011 (X.20) Government Decree on the control of serious accidents related to dangerous substances (hereinafter referred to</p>	<p>Investments under the interventions planned under the HUSKROUA INTERREG NEXT programme shall not fall under the legislation referred to in the comment. Activities involving hazardous substances shall not be eligible under the programme.</p>

Comments from the stakeholders in the framework of the Scoping report	Response to the comment
<p>as 'R2') to take into account the dangerous effects of facilities dealing with dangerous substances.</p>	
<p>In the vicinity of facilities handling hazardous materials, the disaster management authority has designated a danger zone in order to reduce the possible consequences of serious accidents. When planning investments based on the environment report related to the strategy, an adequate distance between buildings containing hazardous materials and other structures should be ensured, investment planning should take into account the requirements of Annex 7 point 2 of R2 regarding urban planning.</p>	<p>When planning specific interventions, legislative compliance falls under the responsibilities of the beneficiaries, and this should be emphasized during each Call.</p>
<p>In view of the above, it is proposed to include the documents Directive 2012/18/EU on the management of the risk of serious accidents involving Cat., R2 and dangerous substances and amending and subsequently repealing Council Directive 96/82/EC. In addition, it is proposed to consider protective measures of serious accidents involving dangerous substances in case of planned developments in the danger zone around facilities handling hazardous materials.</p>	<p>In light of the replies above, the list of documents in Chapter 4 will not be supplemented with the requested documents, as they are of negligible relevance to the programme.</p>
<p>State Chief Architect's Office (László Kiser, Chief Architect of the State) (Borsod-Abaúj-Zemplén County Government Office)</p>	
<p>According to chapter 6 of the Scoping Report, the environmental assessment will cover the examination of the built environment. The Scoping complies with the general content requirements of the environmental assessment referred to in Annex 4 of Government Decree 2/2005 (I.11.), and with the criteria related to built environment.</p>	<p>Thank you for your comment, no further action is required.</p>
<p>The situation analysis of the HUSKROUA Interreg NEXT programme was sent in English. Article H (1) of the Fundamental Law (constitution) states that "In Hungary the official language is Hungarian" together with Act. 150 Article 20. paragraph 1. 2016 on Hungarian and general administrative maintenance stating "The official language of administrative power is Hungarian". Based on these provisions, it is not possible to review the submitted document in English on behalf of our office.</p>	<p>The official language of the HUSKROUA INTERREG program is English, therefore documents are prepared in English. The document sent besides the Scoping report translated into Hungarian was the Situation Analysis of the Program, which did not affect the official procedure in terms of the comment assessment.</p>
<p>State Chief Architect's Office (Csaba Kótai, State Chief Architect) (Szabolcs-Szatmár-Bereg County Government Office)</p>	

Comments from the stakeholders in the framework of the Scoping report	Response to the comment
<p>The Scoping of the environmental assessment sent is professionally acceptable, but the SEA should be developed in accordance with the full content of Annex 4 to the Regulation. In terms of preserving the built environment, it is asked that the chapters related to this topic are to be sufficiently detailed and professional.</p>	<p>Chapter 6 of the SEA focuses on the environmental impact of the programme on different elements, including its impact on "built environment, urban environment and cultural heritage". The Strategic Environmental Assessment shall be carried out with the content set out in Annex 4 of Government Decree No 2/2005 with a minimal deviation in order to ensure compliance with the SEA Directive (Directive 2001/42/EC).</p>
<p>Forestry Department of Department-General for Agriculture Borsod-Abaúj-Zemplén County Government Office</p>	
<p>The sent attachment (Scoping) is generally correct. In case of an investment which directly affects forests or is expected to have a significant impact, it is suggested that under Chapter 6. examining the expected environmental impacts of the implementation of the programme the effects on the forests should be paid special attention to in form of a separate point.</p>	<p>Chapter 6 of the SEA focuses on the environmental impact of the programme on different elements, including its impact on "biodiversity, flora and fauna", as well as on 'protected areas'. The protection of forests in the programme area is a priority, therefore the chapter will also focus on the impact on forests.</p>
<p>Plant and Soil Protection Department of Department-General for Agriculture Borsod-Abaúj-Zemplén County Government Office</p>	
<p>Having examined the compliance with Act CXXIX of 2007 on the protection of land in through an official procedure in terms of investment activities affecting the soil , the Department has no objections to the documentation of "Interreg NEXT Hungary-Slovakia-Romania-Ukraine Cross-Border Cooperation Programme 2021-2027".</p>	<p>Thank you for your comment, no further action is required.</p>
<p>Plant and Soil Protection Department of Department-General for Agriculture Szabolcs-Szatmár-Bereg County Government Office</p>	
<p>For Szabolcs-Szatmár-Bereg county, it is not necessary to carry out an environmental assessment in terms of soil protection, since on the basis of the objectives of the programme it can be concluded that the changes do not harm soil protection interests, they are not objectionable from the point of view of soil protection.</p>	<p>Thank you for your comment, no further action is required.</p>

Comments from the stakeholders in the framework of the Scoping report	Response to the comment
<p>At the same time, investments directly or indirectly affecting arable land must comply with the provisions of Act CXXIX. tv. of 2007 (on the protection of arable land) Paragraph 43. Requirements of Section 1, the conditions of soil protection management in the affected and adjacent arable lands may not deteriorate, the arable land shall not be contaminated with foreign substances. Foreign or hazardous substances may not be stored on arable land, not even temporarily. Prior to the commencement of the construction of buildings, the licensee is obliged (within the depth of the planned incision) to ensure that the top humus layer of the soil is saved and utilised in accordance with the requirements of the soil protection plan! During the establishment and development of livestock farms, it must be taken into account that the arable land must not be contaminated with slurry, sewage and other hazardous and non-hazardous waste outside the permitted or notified areas. Decree No. 59/2008. (IV. 29.) of the Ministry of Agriculture and Rural Development (on the detailed rules of the action program for the protection of waters against nitrate pollution of agricultural origin, and on the procedure for data provision and registration) Paragraph 10 Section 1 and 2, and Paragraph 1 section b) has obligation of record keeping and of data reporting for animal keepers! In the case of a greenfield investment, arable land, meadow pasture, reeds, afforested land must be excluded from production (permanent utilisation of arable land for other purposes). The procedure must be initiated with the competent Land Department.</p>	<p>Thank you for your comment. During the planning of specific interventions, it is the responsibility of the Beneficiaries to comply with the legislation, and this should be brought to their attention within the framework of the specific calls to be announced within the framework of the Program.</p>
<p>Budapest Capital' Government Office of Department-General of Construction and Heritage Protection of the Department for Construction and Heritage Coordination</p>	<p>No remarks were received.</p>
<p>Deputy State Secretary for Architecture, Construction and Heritage Protection</p>	<p>No remarks were received.</p>

Annex 2

Comments received from relevant stakeholders participating in the SEA process and follow up

Comments and remarks	Feedback on how the comments and remarks have been taken into consideration
ROMANIA (Romanian Ministry of Environment, Waters and Forests)	
<p>Having analysed the Environmental Report for the Programme, the proposed protection measures are too general (e.g. specific joint programmes, joint interventions, etc.) and in this respect we would like to recommend to the consultant to include more specific/tinted prevention, reduction or compensation measures (such as: no project/tourist site will be approved if it would adversely affect water quality due to lack of sewage system or due to unrepresented decision on treatment or disposal of generated wastewater; the planning of new tourism projects must include measures to limit negative impacts on water quality and take into account the need to develop a system for collecting, processing and directing the resulting wastewater flows and implementing a waste management system, etc.).</p>	<p>More specific proposals and measures have been added to the Chapter 6. Specific environmental regulations and proposals can be provided in detail in each call of the Program. We made recommendations for more specific prevention measures.</p>
<p>Supplementary, in the content of the monitoring Programme we would like to be provided some indicators for monitoring environmental effects as well as the relevant actors involved in monitoring environmental effects and factors (e.g. the final beneficiaries of projects financed under the Programme, the Joint Secretariat, the National Authority and the Managing Authority of the Programme, etc.). Monitoring indicators will be used to monitor environmental effects, depending on the characteristics of the projects selected for funding.</p>	<p>The system of indicators has been supplemented and clarified since the development of the draft SEA report. The Environmental report is finalised based on the final Programming documents.</p>
<p>As regards, the section on the relationship of the Programme with other relevant plans and programmes, please update the name of Romania's Energy Strategy, thus: "The Romanian Energy Strategy 2020-2030, with perspectives for 2050".</p>	<p>The name of the document has been updated.</p>
<p>In the light of the above, the Romanian Party kindly asks the relevant authorities of Hungary to provide us the final Environmental Report for the Programme.</p>	<p>The final environmental report of the program will be sent to the Romanian Party by the relevant Hungarian authority.</p>
SLOVAKIA (Ministry of Environment of the Slovak Republic)	
<p>Railways of the Slovak Republic, General Directorate, Department of Strategy and Foreign Cooperation</p>	

Comments and remarks	Feedback on how the comments and remarks have been taken into consideration
<p>In the context of this document, they request to harmonize and take into consideration the specific comments / proposals set out in their opinion (summarized in attached statement) concerning railway lines in the territory of the Slovak Republic.</p> <p>“1. In the case of design / support for the planting of protective and insulating greenery near railway lines, to respect the law on railways no. 513/2009 Coll. as amended, pursuant to which according to § 4 in the perimeter of the track it is forbidden to plant trees and shrubs and according to § 6 Owners and users property managers and administrators of watercourses and exposed groundwater in the protection zone railways (OPD) are obliged to maintain land and trees and shelters on them, landfills, structures, bridge piers and other structures and overhead lines in such a condition and use them in such a way as not to endanger them operation of the track and its components, nor did they restrict the safety and fluidity of traffic on the track. Plant and to grow trees and shrubs with a height exceeding three meters is possible in OPD only if it is ensured that they cannot damage track components in the event of a fall.</p> <p>2. Ensuring the serviceability of individual railway lines or emergency operation lines with the use of bypass lines mainly for the purposes of the Ministry of Defense of the Slovak Republic.”</p>	<p>The text of the SEA has been completed with a call of attention within the Protective measures chapter, that the protection of green surfaces must be taken care of with respect of the national legislation of all participating countries.</p>
<p>Public Health Office of the Slovak Republic</p>	
<p>Request to incorporate following requirements:</p> <ol style="list-style-type: none"> 1. add provisions on planned monitoring activities – identify measurable output and result indicators for each of the selected specific objectives, 2 specify a complete monitoring system – including hazard identification and risk management in the implementation of the document in practice, 3. in the field of tourism, it is necessary to focus mainly on objectives and activities with positive effect on public health (eg. improving the infrastructure of bicycle paths and sidewalks, etc.) 	<p>The protective measurements are supplemented to support healthy activities. However, we do not agree with limiting tourism funding to cycling and pedestrian tourism.</p>
<p>The Ministry of Foreign Affairs and European Affairs of the Slovak Republic</p>	
<p>cit.: „Based on the information of the Section of Economic and Development Cooperation of the Ministry of Foreign Affairs of the Slovak Republic, we request the deletion of the outdated text: „Ministry of Foreign Affairs and European Affairs of the Slovak Republic</p>	<p>On page 49 the reference for Business Centre Department of MFA has been deleted, however, we kept the reference for the MFA as institution in general. Furthermore, the second</p>

Comments and remarks	Feedback on how the comments and remarks have been taken into consideration
<p>(Economic Cooperation Section; Headquarters Department)” p. 49 and p. 51 of the programming document as follows: Page 49: Zo Slovenska: Ministerstvo financií, regionálneho rozvoja a informatizácie Slovenskej republiky (ako vnútroštátny orgán pre program HUSKROUA) a ako centrálny koordinacny orgán (sekcia centrálného koordinacného orgánu (CKO)); Ministerstvo zahraničných vecí a európskych záležitostí Slovenskej republiky (sekcia hospodárskej spolupráce, odbor obchodného ústredia), Presovský samosprávny kraj (odbor strategického rozvoja a projektového manažmentu), Kosický samosprávny kraj (odbor regionálneho rozvoja, územného plánovania a životného prostredia).</p> <p>Page 51: Zodpovednosť za plánovanie a vykonávanie na Slovensku nesie Ministerstvo investícií, regionálneho rozvoja a informatizácie Slovenskej republiky, Ministerstvo zahraničných vecí a európskych záležitostí Slovenskej republiky (sekcia hospodárskej spolupráce, odbor obchodného ústredia), sekcia centrálného koordinacného orgánu (CKO) Ministerstva investícií, regionálneho rozvoja a informatizácie Slovenskej republiky.</p>	<p>remark of MFA on page 51 has been accepted and we kept only MIRRI SR (NA) listed as an authority responsible for planning and implementation of the Interreg programmes. Both the Interreg Programme document and the Slovak translation has been modified accordingly.</p>
<p>State nature protection of the Slovak Republic</p>	
<ul style="list-style-type: none"> - to carry out a thorough environmental impact assessment for individual proposed activities 	<p>At this stage of the programming procedure, it is impossible to implement thorough environmental impact assessment for the individual proposed ideas. It is recommended that this request is stated within the call for proposals where necessary.</p>
<p>Railways of the Slovak Republic, Strategic Project Management Department</p>	
<ul style="list-style-type: none"> - sets out proposals for addition: <ul style="list-style-type: none"> • add to activities the construction of car parks at railway stations in areas with the potential for tourism development. • add to activities the provision on interconnection of railway transport and cycle transportation (connection of cycle paths to railway stations, storage places for bicycles at railway stations, modification of railway wagons for the transport of bicycles, etc.). 	<p>The Interreg programme document already includes the financing of joint service packages of different networks (types of action 4.2.). The call for proposal might be further aligned with those specificities according to monitoring committee decision, of course with the aim of having the CBC impact and character.</p>

Comments and remarks	Feedback on how the comments and remarks have been taken into consideration
<ul style="list-style-type: none"> • add to activities the operation of train connections during the tourist seasons. 	
UKRAINE (Ministry of Environmental Protection and Natural Resources of Ukraine)	No comments were received.
HUNGARY	
Environmental Protection and Nature Conservation Department of Borsod-Abaúj-Zemplén County Government Office	
The prepared material is well structured, with form and content forming an integral whole. We make the following notes on the report:	Thank you for the note, no further action is required.
The designation “A resilient and green border region” in chapter 1.2 of the environmental report does not in itself provide sufficient representativeness of the content. We think that the wording “A Green Border Region” would be a more fitting and direct form.	During the planning of the Programme, the partner countries considered it a priority to make the border region resilient to negative environmental impacts (climate change impacts, extreme weather events), and therefore the use of the word “resilient” in the designation is considered important and relevant. The name of the priority will not be changed.
For the sake of consistency, we propose to use the wording “Cooperating border region” instead of “Cooperating region”.	We accept this note. The name of the Priority is changed throughout the Interreg Programme document as follows: „A cooperating border region”.
We propose to correct the first sentence of Chapter 1.3, as the National Park Directorates mentioned there are not public authorities, but nature conservation management agencies. But their inclusion is important and relevant.	We have added the note to the document. (Page 4 of the SEA Report)
The National Environment Programme is not mentioned in Chapter 4 as one of the bases for the planned P1 developments, and it is recommended that this be taken into account to broaden the scope of compliance.	The analysis of the requested document has been added to this chapter.
In the Chapter “Significant environmental problems” mentioned in Chapter 5.3, it is proposed to present the actual/real and expected conflicts arising from the core programmes in the border region, as well as the actors involved in the conflicts.	The chapter summarises the relevant environmental conflicts and problems of the HUSKROUA cross-border cooperation area based on the situation analysis. The related Territorial analysis describes in detail the actual/real and expected conflicts in the border region and the actors involved. We do not consider supplementing this Chapter as justified.
From a technical point of view, the impact assessment referred to in Chapter 6 is rightly broken down into environmental elements. It is proposed to add a set of criteria describing the nature, magnitude and frequency of impacts.	At the very end of Chapter 6, there is a summary table and a ranking of the environmental elements, which include the requested presentation. A more precise/detailed impact

Comments and remarks	Feedback on how the comments and remarks have been taken into consideration
	assessment is not possible in this programme before the calls for proposals are launched, in particular given that the planned actions are not expected to have significant negative environmental impacts.
Among the measures identified in the “Air” chapter, it is proposed to “limit the use of fossil fuel vehicles in cultural and natural sites through the use of electric cars, buses and better public transport”.	We have added the note to the document. (Page 55 of the SEA Report)
It is proposed to make the content more tangible, expanding it by specifying “common incentives” and “more ambitious common actions”.	More specific proposals and measures have been added to this chapter. It is, however, important to underline that, in our view, specific environmental requirements and proposals will need to be specified in detail in the individual calls.
In our opinion, the design of the monitoring system is largely—or at least decisively— Influenced by the availability, existence and timeliness of the objective, primary and non-derived data currently available and expected to be available in the next seven years. It is proposed to base the monitoring system of the Programme on simple, non-technical and publicly accessible data, not excluding the possibility of eventually defining specific programme indicators.	The monitoring and indicator system of the Programme has been improved since the draft version of the environmental report. The revised environmental report took into account the revised indicator system.
The environmental assessment report related to the development of the HUSKROUA INTERREG A NEXT Programme is considered to be appropriate and elaborated from the environmental, nature conservation and waste management point of view based on the provisions of Point (ba) of Paragraph (2) of Section 1 and Point 11/1. (b) of Annex 3 of Government Decree 2/2005. (I. 11.) on the environmental analysis of certain plans and programmes.	Thank you for the note, no further action is required.
Environmental Protection and Nature Conservation Department of Szabolcs-Szatmár-Bereg County Government Office	
According to Annex 4 to the request (Notes and opinions of the authorities consulted on the SEA topic), no comments were received from the Department. Please be informed that in response to your request No. NT/3-415/2021, the Department reviewed and made notes on the topics of the environmental assessment in its Letter No. 4590-1/2021 dated 19 August 2021. Please find attached the referenced letter.	Based on Letter No. 4590-1/2021 of 19 August 2021, the Department made comments and notes on the Strategic Environmental Assessment of the Slovakia-Hungary Cross-border Cooperation Programme 2021–2027. To the best of our knowledge, the Strategic Environmental Assessment of the HUSKROUA Cross-border Cooperation

Comments and remarks	Feedback on how the comments and remarks have been taken into consideration
	Programme 2021–2027 has not been commented on by the Department and we have not received any notes on it.
The aspects considered important by the Department (e.g. the achievement of the environmental objectives related to the Programme; the sustainable use of the natural potential for tourism, taking into account the carrying capacity; the development and coordination of public transport; the improvement of the conditions for other environmentally friendly modes of transport) are included in the environmental assessment report.	Thank you for the note, no further action is required.
The Department agrees in principle with the protection measures to prevent, reduce and counteract significant adverse and negative impacts on the environment (Chapter 7 Protection Measures), and recommends their enforcement and implementation.	Thank you for the note, no further action is required.
According to Chapter 8, a complete monitoring system should be defined in the future entire Programme document to be developed, to be operated as part of the Programme management by the implementing bodies of the Programme (Managing Authority, National Authorities, Joint Secretariat), involving the responsible territorial environmental authorities and the ministries responsible for environmental issues in all countries participating in the Programme.	Chapter 8 of the present document (Assessment of the monitoring system) was completed and clarified after the final elaboration of Chapter 4 (Monitoring) of the Programme Document.
As a water protection measure, the involvement of local networks and cross-border communities (residents, civil society) is proposed, in addition to regional institutions involved in monitoring activities, in order to monitor surface water and groundwater quality, especially in areas where the risk of water pollution is high. For the assessment, comparability and credibility of the test results and data, the Department considers it appropriate to carry out accredited sampling and testing, with possible additional monitoring activities of the proposed local public participation.	We agree with the note, and the relevant chapter has been added. (Page 55)
Aggtelek National Park Directorate	No comments were received.
Bükk National Park Directorate	
In view of the above, it is recommended that the natural values and their protection aspects should be emphasized and explained in further planning and project prioritization.	The evaluation criteria of the call for proposals to be launched under the priority “A resilient and green border region” will focus on natural assets and their protection.

Comments and remarks	Feedback on how the comments and remarks have been taken into consideration
<p>We make the following comments on the environmental assessment report: We agree with the key findings and conclusions of the environmental assessment report in relation to landscape and nature conservation.</p>	<p>Thank you for the note, no further action is required.</p>
<p>Our additional comments on the Hungarian translation: As for the selected individual objectives, for PO4 v) we would recommend writing “az egészségügyi ellátáshoz való egyenlő hozzáférés biztosítása, és az egészségügyi rendszerek ellenállóképességének növelése – ideértve az alapellátást is –, valamint az intézményesített ellátásról a családi alapú és a közösségi alapú ellátásra való átállás” instead of “az egészségügyi ellátáshoz való egyelő hozzáférés biztosítása, és az egészségügyi rendszerek ellenállóképességének növelése – ideértve az alapellátást is –, valamint az intézményesített ellátásról a családi alapú és a közösségi alapú ellátásra való átáll” in the entire document.</p>	<p>The official version of the document is in English, the official language of the cross-border cooperation programmes. In the English version, the PO4 v) specific objective is correctly named. In the Hungarian version, the name of the specific objective has been misspelled in several places (it is called “átáll” instead of “átállás”). Legitimate notes made in the context of the conciliation procedure will only be reflected in the English version. The legitimate note made in the context of the conciliation procedure has been reflected in the Hungarian translation.</p>
<p>We would recommend using “Európai Táj Egyezmény”, which is established in the Hungarian landscape protection literature and also adopted in Act CXI of 2007 on the promulgation of the European Landscape Convention, signed in Florence on 20 October 2000, instead of “Európai Tájvédelmi Egyezmény”.</p>	<p>The official version of the document is in English, the official language of the cross-border cooperation programmes. The English version is called the European Landscape Convention, which is the official name of the Convention. In the Hungarian version, the name of the convention has been mistranslated. The legitimate note made in the context of the conciliation procedure has been reflected in the Hungarian translation.</p>
<p>It is proposed to clarify the value 11.33 in “The population density of the Programme area is relatively low, without major territorial differences: the highest values are 118.46 and 11.33 inhabitants per square kms (Košický and Chernivetska Regions), the lowest are 83.08 and 87.99 (Maramureş and Satu- Mare counties).”</p>	<p>There is a typo in the document. The population density of the Chernivetska Region is 111.33 persons/km². We have corrected the typo in the document. (Page 30 of the SEA Report)</p>
<p>In Chapter 6.5 “Potential effects of the programme on Natura 2000 territories and protected areas in case of Ukraine”, it is proposed to extend the analysis to protected natural areas in Hungary (and possibly in other partner countries), as these do not always overlap fully with Natura 2000 sites.</p>	<p>The title of the chapter has been changed: “6.5 Potential effects of the programme on Natura 2000 territories and other conservation areas” (“6.5 Potential effects of the programme on Natura 2000 territories and other conservation areas”) (Page 44 of the SEA Report)</p>
<p>In Chapter 6.4 “Potential effects of the programme on biodiversity, flora, and fauna”, objectives PO4 v) (“...igazán relevánsak a biológiai sokféleség szempontjából.”) and ISO1 b) (“...igazán relevánsak a biológiai sokféleség szempontjából.”) [truly relevant for biodiversity]</p>	<p>The relevant chapters have been reviewed and any inconsistencies have been resolved.</p>

Comments and remarks	Feedback on how the comments and remarks have been taken into consideration
<p>are given as relevant, while in Chapter 6.11 “Potential effects of the programme on the interrelationship and cumulative effect of threats to the above factors”, they are indicated as neutral in the table summarising the potential impacts on the environmental and socio-economic factors of the cooperation area.</p>	<p>This discrepancy is due to incorrect translation. In the original English analysis, points PO4 v) and ISO1 b) of Chapter 6.4 are listed as irrelevant, not relevant. This is why it is listed in the summary table under the colour code “neutral”. We have resolved this discrepancy by correcting the Hungarian translation.</p>
<p>We have found a similar discrepancy between the presentation of PO4 v) and ISO1 b) objectives in Chapter 6.5 and the presentation of ISO1 b) test results in Chapters 6.6 and 6.7. We propose to resolve the contradictions.</p>	<p>The relevant chapters have been reviewed and any inconsistencies have been resolved. This discrepancy is due to incorrect translation. In the original English analysis, points PO4 v) and ISO1 b) of Chapter 6.5 are listed as irrelevant, not relevant. This is why it is listed in the summary table under the colour code “neutral”. We have resolved this discrepancy by correcting the Hungarian translation.</p>
<p>We think that the title of the table (“Összefoglaló táblázat a határokon együttműködési terület környezeti és társadalmi-gazdasági tényezőire gyakorolt lehetséges hatásokról”) in Chapter 6.11 “Potential effects of the programme on the interrelationship and cumulative effect of threats to the above factors” requires clarification.</p>	<p>The official version of the document is in English, the official language of the cross-border cooperation programmes. The Hungarian translation does not include the word “átnyúló” (cross-border), we added it: „Összefoglaló táblázat a határokon ÁTNYÚLÓ együttműködési terület környezeti és társadalmi-gazdasági tényezőire gyakorolt lehetséges hatásokról”</p>
<p>Among the interpretations given in the table for the characterisation of impacts, the category “neutral or contrary effect(s)” needs, in our opinion, to be clarified, because an impact cannot be both neutral and contrary.</p>	<p>By contrary effects, we meant opposing but overall offsetting effects, but the part that was objected to was ambiguous. The name of the corresponding column in the table has been changed to “neutral” in response to this note.</p>
<p>As shown in the table in Chapter 6.11 and as described in Chapter 9 of the Non-technical Summary (“Considering the average impact of the planned interventions on environmental elements, the most negative effect could be realized by tourism measures: apart from the positive effects on human health and environment consciousness, it can have a potential negative impact on the assessed environmental elements.”), tourism measures have the most negative impacts. Of the 10 factors examined, 7 show “slightly negative effect(s)”, 1 shows “strongly negative effect(s)” and only 2 show “slightly positive effect(s)” for tourism</p>	<p>The inclusion in the Programme of specific objective PO4 vi) “enhancing the role of culture and sustainable tourism in economic development, social inclusion and social innovation” is a priority area for all partners, based on the territorial analysis and the discussions with partner country representatives.</p>

Comments and remarks	Feedback on how the comments and remarks have been taken into consideration
<p>measures. We therefore propose that the development and adoption of measures under Objective PO4 vi) should be preceded by very detailed analyses of the environmental elements where negative impacts may occur, in order to ensure that negative impacts are avoided or negligible, and we may propose to reconsider, reformulate or consider the exclusion of Objective PO4 vi) from the objectives.</p>	<p>The interventions related to the specific objective expected to be implemented under the Programme are aimed at enhancing sustainable tourism and their impact can be considered negative relative to the other objectives. At the same time, it is clear that any tourism developments that may be implemented could have the greatest negative impact on the Programme area if they are not implemented in a sustainable manner. Support for interventions under specific objective PO4 vi) is justified where the Feasibility Studies submitted with the application provide a detailed analysis of the specific impacts on environmental elements.</p>
<p>Hortobágy National Park Directorate</p>	<p>No comments were received.</p>
<p>Division of Public Health and Epidemiology of the Public Health Department of the Borsod-Abaúj-Zemplén County Government Office</p>	
<p>I have reviewed the comments on the Hungarian version of the HUSKROUA Interreg A NEXT Programme situation analysis and the environmental assessment report related to the development of the Programme, made available to me. In terms of public health, with the ultimate stakeholder of the environment, the human being, human health, as the primary consideration, I agree with the basic objectives of the HUSKROUA Interreg A NEXT Programme, and the contents of the environmental assessment report, subject to the following notes.</p>	<p>Thank you for the note, no further action is required.</p>
<p>As regards the preparation of the environmental assessment report for the development of the HUSKROUA Interreg A NEXT Programme, I have proposed to adopt the table of contents of the environmental assessment, which I did not consider necessary to complete due to the comprehensive nature of the Programme. I have given my notes and suggestions from the point of view of environmental and urban health and health/epidemiological care organization and health promotion in my professional opinion given under document No. BO/NEF/1360-2/2021.</p>	<p>Thank you for the note, no further action is required.</p>

Comments and remarks	Feedback on how the comments and remarks have been taken into consideration
<p>I would like to make the following note on the Environmental Report on the Elaboration of the HUSKROUA Interreg A NEXT Programme’s Strategic Environmental Assessment and its Annex:</p>	
<p>Within Section 1.2 “Joint Programming Strategy”, the <i>Functional areas in the sense of economic cohesion</i>, and Section 1.3 “Justification of the choice of policy objectives and Interreg-specific objectives, addressing the related priorities, specific objectives and forms of support, where appropriate, the missing links in cross-border infrastructure”, and, for the specific objective PO4 v, with respect to the detailed elaboration of the feasibility and action plan for telemedicine and telemedicine service sites and cooperation network and cross-border ambulance, the opinion and contribution of the health institution system operator (in Hungary, the National Hospital Directorate General, National Ambulance Service) shall be sought in addition to the organizations identified in the document.</p>	<p>Thank you for your note. It is proposed to incorporate these notes and guidelines in each Call for Proposals under the Programme.</p>
<p>I have made the following notes and recommendations with regard to the development activities of the HUSKROUA Interreg A NEXT Programme, based on my professional opinion given in document No. BO/NEF/1360-2/2021:</p>	
<p>Within the priorities, special attention shall be paid to activities, interventions and measures aimed at the protection, conservation and improvement of long-term water resources, surface and groundwater, used directly or indirectly for the extraction of drinking water. Within the framework of the Cross-Border Cooperation Programme, priority and special attention has been given to the water quality of the rivers crossing the border, the establishment of water quality monitoring systems, the protection of water resources and the harmonization of relevant regulations. The drinking water production plants (Borsodszirák Waterworks with groundwater enrichment technology using the Bódva water, Keleti Csúcscsvízmű at Gesztély with wells dug into the terraced gravel deposits of the Hernád, and Sátoraljaújhely Waterworks I. and II. with wells dug into the terraced gravel deposits of the Ronyva) are waterworks of high importance, which provide drinking water for a significant population. There are a number of karstic water production units in the karstic areas of the county, which are particularly sensitive to surface influences, of which the Aggtelek karst is part of the Gömör-Tornai karst, a geographical unit shared with Slovakia. The protection of water sources, karst water systems and surface waters used for drinking water production, the sustainable use of water is of paramount importance for the reduction and prevention of human health risks and the provision of drinking water, which, in view of</p>	<p>Thank you for your note. It is proposed to incorporate these notes and guidelines in each Call for Proposals under the Programme.</p>

Comments and remarks	Feedback on how the comments and remarks have been taken into consideration
<p>the geographical homogeneity and interconnections, requires joint activities and interventions based on cooperation in order to be effective.</p>	
<p>A large group of stresses and impacts on the geological medium, surface water and groundwater bodies are point and/or diffuse discharges of pollutants to surface water and groundwater from urban, industrial and agricultural activities, which can pose a significant risk to humans through the waters used for the extraction of drinking water.</p>	<p>Thank you for your note. It is proposed to incorporate these notes and guidelines in each Call for Proposals under the Programme.</p>
<p>To improve the comfort and quality of life of the population, to protect groundwater quality and to achieve sustainable development and environmental objectives, the development of municipal infrastructure systems and the promotion of connections to municipal systems should be considered. The proper elimination of domestic sewage collectors and septic tanks that pollute soil and groundwater is also particularly important to protect groundwater quality.</p>	<p>Thank you for your note. It is proposed to incorporate these notes and guidelines in each Call for Proposals under the Programme.</p>
<p>The development of municipal infrastructure is a priority tool for improving certain environmental factors, as it is an environmentally conscious measure that contributes to improving the quality of services and the living standards of the population concerned. A healthier environment creates better living conditions and improves the health and quality of life of the population by reducing environmental risks.</p>	<p>Thank you for your note. It is proposed to incorporate these notes and guidelines in each Call for Proposals under the Programme.</p>
<p>I also think it is important to put in place measures to ensure that levels of critical air pollutants are below the air quality limit values. In order to control aero-allergenic plants, weed control on public and private land is a priority, with strong use of the available official tools and sanctions. Preventing the proliferation of allergenic weeds and regular weed control can help to reduce the amount of allergenic spores. In green space management, it is recommended to avoid planting highly allergenic tree species such as birch, alder, ash, plane and willow. Preserving green spaces is a priority for air quality protection.</p>	<p>Thank you for your note. It is proposed to incorporate these notes and guidelines in each Call for Proposals under the Programme.</p>
<p>I also support the eradication of polluting illegal landfills, cross-border joint activities and interventions to change public attitudes, and the promotion of selective waste collection and recycling. The eradication of illegal landfills is essential because, as well as polluting the environment, they also damage the image of the area.</p>	<p>Thank you for your note. It is proposed to incorporate these notes and guidelines in each Call for Proposals under the Programme.</p>
<p>Supporting solutions to environmental damage caused by waste water and waste requires cross-border cooperation. The areas to focus on are river valleys crossing the borders, which are at risk of pollution.</p>	<p>Thank you for your note. It is proposed to incorporate these notes and guidelines in each Call for Proposals under the Programme.</p>

Comments and remarks	Feedback on how the comments and remarks have been taken into consideration
<p>Taking into account the topography, I encourage joint efforts to use renewable energy sources in order to improve the environmental condition, environmental safety and the quality of the municipal environment.</p>	<p>Thank you for your note. It is proposed to incorporate these notes and guidelines in each Call for Proposals under the Programme.</p>
<p>Joint actions need to be supported to stop natural and man-made disasters, and in case of emergencies. There is also a need to develop the technical background, strategies and cooperation platforms to prevent natural or man-made disasters that threaten the inhabitants of the regions.</p>	<p>Thank you for your note. It is proposed to incorporate these notes and guidelines in each Call for Proposals under the Programme.</p>
<p>For the priority areas, it is important to raise awareness and build knowledge and capacity to develop regional strategies to halt and reduce the impacts of global climate change.</p>	<p>Thank you for your note. It is proposed to incorporate these notes and guidelines in each Call for Proposals under the Programme.</p>
<p>In implementing the Programme's communication strategy, it is important to define the target populations for each target group, and it is also necessary to develop different strategies and methods. Priority should be given to 6-10, 11-14, and 15-18 year olds. To encourage optimal public participation, it is recommended to build working relationships between relevant authorities, organizations and municipalities, as well as health promotion institutions, social organizations and the media, which can shape local public opinion.</p>	<p>Thank you for your note. It is proposed to incorporate these notes and guidelines in each Call for Proposals under the Programme.</p>
<p>In addition to the body responsible for public health, the Health Promotion Institutes and the community of practice in the area concerned can be the professional coordinating and implementing organizations.</p>	<p>Thank you for your note. The suggestion is proposed for consideration in the finalisation of the Programme.</p>
<p>The current programme documentation did not include provisions for the planned monitoring activities. As regards the design of monitoring systems to be defined in the future, I make the following proposals:</p>	<p>The monitoring and indicator system of the Programme has been improved since the draft version of the environmental report. We have taken it into account when completing and clarifying the chapter on the assessment of the monitoring system.</p>
<p>In my area of expertise, I attach importance to strategic and technical planning and the development of joint pollution monitoring systems (air, water, soil). I recommend further support for the development of IT and technical capabilities for linking existing official monitoring systems and monitoring systems operated by utility companies in individual countries, and for the development of notification systems for cross-border pollution, especially for the protection of surface and groundwater and drinking water sources.</p>	<p>Some measures of the Programme include such elements (e.g. PO2 SO v), PO2 SO vii), so it is expected that there will be projects supported under the Programme to further develop and interconnect existing systems. These activities, however, go beyond the monitoring activities of the Programme (discussed in Chapter 8 "Assessment of the monitoring system").</p>
<p>The health education activities needed to develop and increase the health awareness of the population should raise awareness of the risk factors that threaten health, the ways to avoid</p>	<p>Some measures of the Programme include such elements (e.g. PO2 SO iv) which has been added during bringing</p>

Comments and remarks	Feedback on how the comments and remarks have been taken into consideration
<p>them and the importance of participating in targeted screening. Through organized health communication, information and education should be provided to the widest possible range of society in order to promote healthy lifestyles and the acquisition of skills and habits that preserve and protect health. The professional implementation of health improvement goals and programmes requires the cooperation and participation of health and public health professionals.</p>	<p>society on board), so it is expected that there will be projects supported under the Programme to develop health awareness and encourage participation in screening programmes, with the involvement of health and public health institutions.</p>
<p>It is necessary to develop common preventive programmes and coordination tasks and to define the organizations involved, on the basis of which it will manage, organize and coordinate public health work aimed at maintaining and improving the health of the population concerned and at preventing and detecting diseases at an early stage.</p>	<p>See the previous point.</p>
<p>Improving knowledge on the prevention of non-communicable diseases related to environmental hazards: continuing education, conferences for public health professionals, primary care and specialized care providers, including the provision and maintenance of a common web-based information database.</p>	<p>See the previous point.</p>
<p>The availability of good quality human services (healthcare, social care, education, public administration) is an important prerequisite for the quality of life of the region's population. In line with demographic trends, particular attention should be paid to the development of care facilities for the elderly. It is important that as many health and social services as possible are available locally, and it is also important to improve the quality of these services so that they can adapt to the changing needs of the population in the area.</p>	<p>The financial means of the Programme are limited, so it cannot realistically undertake the infrastructure development of primary services. At the same time, less investment-intensive interventions (e.g. common epidemiological and first-aid services, digital healthcare solutions) are included in the areas to be supported.</p>
<p>In order to improve the health of the population, it is a public health requirement to assess and reduce health risks from environmental factors, develop healthcare and social care infrastructures, and increase the population's opportunities for recreation, health maintenance and health promotion.</p>	<p>See the previous point.</p>
<p>From the viewpoint of my field, I support the planned priority areas of the HUSKROUA Interreg A NEXT Programme, which have positive environmental health effects, improve the living conditions of the population concerned and reduce their health risks. I support the Programme's objectives aiming at creating a more livable municipal environment free from environmental stresses, promoting sport and leisure activities and raising environmental awareness.</p>	<p>Thank you for the note, no further action is required.</p>
<p>I have no other notes to make from a public health and environmental health point of view on the peer review of the Strategic Environmental Assessment Report of the Interreg Programme for the programming period 2021-2027 for the programming areas of Hungary,</p>	<p>Thank you for the note, no further action is required.</p>

Comments and remarks	Feedback on how the comments and remarks have been taken into consideration
Slovakia, Romania and Ukraine. I support projects related to the development activities of the HUSKROUA Interreg A NEXT Programme for the next seven years.	
Division of Public Health of the Public Health Department of the Szabolcs-Szatmár-Bereg County Government Office	
The general findings and assessments contained in the Strategic Environmental Assessment related to the Programme are appropriate from a public health and environmental health point of view, and the document is recommended for adoption.	Thank you for the note, no further action is required.
Disaster Management Directorate of Borsod-Abaúj-Zemplén County	
Pursuant to Point I.1.d) of Annex 3 of Government Decree No. 2/2005. (I. 11.), the National Directorate General for Disaster Management of the Ministry of Interior participates for “water protection”, and pursuant to Point I.2.f) of the same Decree, it participates for the “prevention of serious industrial accidents”. In the case at hand, our earlier opinion given at the request of EX-ANTE Tanácsadó Iroda Kft. has been incorporated.	Thank you for the note, no further action is required.
Disaster Management Directorate of Szabolcs-Szatmár-Bereg County	
The Directorate for Disaster Management agrees with the objectives and priorities set out in the consultation version of the Environmental Assessment Report for the HUSKROUA INTERREG A Next Programme 2021–2027.	Thank you for the note, no further action is required.
Ministry of Interior, National Directorate General for Disaster Management	No comments were received.
Office of the Master Architect (László Kiser, Master Architect) (Borsod-Abaúj-Zemplén County Government Office)	
After reviewing point 6.7, it can be concluded that the Environmental Report covers the protection of the built environment. In my opinion, the scope is small. The tasks, objectives and possible solutions focusing on the protection of the built environment need to be described in more detail.	More specific proposals and measures focusing on the protection of the built environment have been added to this Chapter. It is important to underline, however, that the limited financial means of the Programme would not allow it to realistically undertake building reconstruction interventions. In addition, in our view, specific requirements and proposals will need to

Comments and remarks	Feedback on how the comments and remarks have been taken into consideration
	be set out in detail in the individual Calls for Proposals to be launched under the Programme.
Office of the Master Architect (Csaba Kódai, Master Architect) (Szabolcs-Szatmár-Bereg County Government Office)	
From the point of view of the built environment, the environmental impact assessment submitted is adequate.	Thank you for the note, no further action is required.
Pursuant to Section 11 of Government Decree No. 2/2005. (I. 11.), please send information on the decision to our office.	After the adoption of the Programme, the bodies responsible for the protection of the environment involved in the environmental assessment will be informed of the adoption of the Programme pursuant to Section 11 of Government Decree No. 2/2005. (I. 11.).
Division of Forestry of the Department of Agriculture of the Borsod-Abaúj-Zemplén County Government Office	
On the basis of the information available, it is not possible to determine whether the Programme will result in investments directly affecting forests or likely to have a significant impact on forests. Presumably, in the absence of this information, the preparers of the environmental impact assessment did not specifically assess the impacts on the forest, as I stated in my prior consultation opinion No. BO/34/2159-4/2021.	At this stage of the Programme, it is not possible to know whether investments directly affecting forests or likely to have a significant impact on forests will be carried out under the Programme, and therefore impacts specifically on forests have not been specifically assessed. Chapter 6 of the document, however, examines nature in a number of aspects (soil, water, especially air and biodiversity).
When preparing the environmental report, please take into account that according to Paragraph (2) of Section 78 of Act XXXVLI of 2009 on forests, on the protection and management of forests (hereinafter: Forestry Act), the use of forests requires prior permission from the forestry authority. Pursuant to Paragraph (1) of Section 78 of the Forestry Act, forest may be used only in exceptional cases, in accordance with the public interest. To ensure that the legal exceptions are respected, specific investments should seek to minimise the use of forests and should consider the possibility of being carried out outside forests.	Thank you for your note. It is the responsibility of the Beneficiaries to comply with the law when designing specific interventions, and this should be drawn to their attention in the specific Calls for Proposals to be launched under the Programme.

Comments and remarks	Feedback on how the comments and remarks have been taken into consideration
Division for Plant and Soil Protection of the Department of Agriculture of the Borsod-Abaúj-Zemplén County Government Office	
The document entitled “Development of the Strategic Environmental Assessment of the INTERREG Programme for the programming period 2021–2027 for the programming areas of Hungary, Slovakia, Romania and Ukraine - Environmental Report” is acceptable from the point of view of soil protection.	Thank you for the note, no further action is required.
Division for Plant and Soil Protection of the Department of Agriculture of the Szabolcs-Szatmár-Bereg County Government Office	
No environmental assessment is required for Szabolcs-Szatmár-Bereg county, from a soil protection point of view, as the objectives of the Programme indicate that the changes do not harm soil protection interests and are not objectionable from a soil protection point of view.	Thank you for the note, no further action is required.
However, investments directly or indirectly affecting agricultural land must comply with the provisions of Paragraph (1) of Section 43 of Act CXXIX of 2007, according to which the conditions of soil protection management on the affected and adjacent farmland must not deteriorate, and the farmland must not be contaminated with non-soil substances. Non-soil or hazardous substances cannot be stored on land, even temporarily.	Thank you for your note. It is the responsibility of the Beneficiaries to comply with the law when designing specific interventions, and this should be drawn to their attention in the specific Calls for Proposals to be launched under the Programme.
Before starting the construction of buildings, the permit applicant is obliged to ensure (within the depth of the planned excavation) the salvage and utilization of the humus top layer of the soil in accordance with the requirements of the soil protection plan.	
When establishing or developing livestock farms, it must be taken into account that the land must not be contaminated with slurry, sewage or other hazardous or non-hazardous waste outside the authorized or notified areas.	
Paragraphs (1) and (2) of Section 10 of Decree No. 59/2008. (IV. 29.) of the Minister of Agriculture and Rural Development (on the detailed rules of the action programme necessary for the protection of waters against nitrate pollution of agricultural origin, and on the procedure for data provision and registration) stipulate the obligation to keep and provide data for livestock farmers according to Point (b) of Section 1 of the same Decree.	
In the case of greenfield investments, areas cultivated as arable land, grassland, reed beds and wooded areas must be taken out of production (permanent conversion of arable land to other uses). The procedure must be initiated at the Land Registry having jurisdiction.	

Comments and remarks	Feedback on how the comments and remarks have been taken into consideration
Division of Construction and Heritage Protection Coordination of the Department for Construction and Heritage Protection of the Budapest-Capital Government Office	
I hereby refer the request of the Széchenyi Programme Office (No. NT/4-506/2021 Reg.) concerning the “Environmental Assessment for the development of the HUSKROUA INTERREG A NEXT Programme for the programming period 2021–2027” to the minister responsible for the protection of cultural heritage (protection of monuments, archaeology).	We have taken note of the official decision and accept it.
Deputy State Secretariat for Architecture, Construction and Heritage	No comments were received.

Annex 3

Comments received from TESIM and follow up

No	TESIM Comments	Relevant part of IP/modification needed (Y/N)	Responsible	Feedback on how the comments and opinions have been taken into consideration
1.	I missed a mention to the bilateral NDICI funds in Ukraine, as well as to the Interreg Transnational programmes (PBU, Danube and Central Europe). I think that the LIFE+ programme should also be included, considering the importance of PO2 (Ukraine expressed its interest to participate in it). A last detail: the text mentions Horizon 2020 instead of Horizon Europe.	Chapter 1.2.4	Experts	DONE! Modification has been made in chapter 1 by CESCO (see IP with track changes under 1.2.3 synergies with macro-regional strategies and 1.2.4. synergies with other funding programmes and instruments.
2.	You include the "population of the programme" as target group for several specific objectives. In my opinion, the population should be considered as a final beneficiary and not mentioned in the programme document as a target group	2.1. Target groups	Experts	DONE! Comment accepted, as „population“ is too general, does not properly identifies any particular target groups. Commented text has been deleted in the description of all SOs.
3.	In the first paragraph of page 49 you mention only civil society organisations and local authorities as consulted stakeholders. Other type of institutions of the list stipulated in article 6 of CPR, such as social actors, EGTC, should have been consulted. I would make the same type of generic mention to article 6 that you include later on in the same page	Chapter 4-Section Partners and their roles in the preparation of the Programme <i>„In order to ensure satisfactory level of territorial ownership and in line with the principle of inclusive partnership, the relevant stakeholders of partner countries, including civil society organisations and local authorities, were duly consulted.“</i>	JS/MA	DONE! The text has been reformulated as follows on page 50. <i>„In order to ensure satisfactory level of territorial ownership and in line with the principle of inclusive partnership according to Article 6 of CPR, the relevant stakeholders and partners have been duly consulted.“</i>

		The modification is necessary.		
4.	In page 49 (section on partners and their roles in the implementation of the programme) there are several mentions to "partner countries" which seem incorrect. Maybe the text should state "participating countries".	Chapter 4 –Section Partners and their roles in the preparation of the Programme Not necessary	JS/MA	The modification is not necessary, the reason is the following: EC Regulation 2021/1059 Art (2) defines: <i>'partner country' means...a country or territory covered by any geographic area under NDICI, and which receives support from the external financing instruments of the Union.</i> Even EC Regulation 2021/947 on the establishment of NDICI says in Art 2 Definitions: <i>'partner country' means a country or territory that may benefit from Union support under the Instrument pursuant to Article 4</i>
5.	the first sentence of the second paragraph is difficult to understand for me.	Chapter 4 - Section Partners and their roles in the preparation of the Programme The reference is not clear Referred sentence: <i>„The partner countries intend to ensure close cooperation between partners in participating countries and with the private and other sectors.“</i>		DONE! This sentence has been deleted, since it is a duplication of the sentence below referring to partnership principle.

6.	<p>Institutional coordination mechanism: The first paragraph seems inspired from a mainstream programme, as the Partnership Agreement applies to that type of funds.</p> <p>I would also revise the second paragraph, as: I do not see how the programme partners will be used as a “permanent coordination mechanism”. Why NDICI funds are mentioned here? I would also give the same level of detail for the institutional set of the four countries. The details for Hungary and Slovakia are much longer.</p>	<p>Chapter 4 Partners and their roles in the preparation of the Programme- Section Institutional coordination mechanism</p> <p><i>„The Partnership Agreement among other important elements will describe the mechanism of the coordination, demarcation and complementarities between the Funds and coordination between national and regional programmes as well as complementarities between the Funds and other Union instruments.“</i></p> <p>Refinement are needed.</p> <p><i>„The Programme partners supported by the work of Monitoring Committee, Joint Secretariat (with one or more branch offices in the partner countries), Controllers and other Programme Bodies will be used as a permanent coordination mechanisms, ensuring overall coordination and monitoring of implementation NDICI funds and other Union and relevant national funding instruments.“</i></p>	JS/MA	<p>DONE!</p> <p>Additional text and refinement has been made on page 48-49 by adding more details on coordination options and different connections and platforms.</p> <p>DONE!</p> <p>Additional text and refinement has been made on page 48-49.</p> <p>NOT TAKEN ON BOARD:</p> <p>As regards the level of details for the institutional set of the four countries: We do not fully agree with the proposal since the set up may differ in the countries also in relation with the coordination mechanism of Funds and the responsible organizations.</p>
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		Refinements are needed.		
7.	In page 51, the first bullet point mentions the "difference between the NDICI programme and other funding instruments"; which NDICI programme? Does it refer to Interreg NEXT HUSKROUA?	Chapter 5- Approach to communication and visibility for the Interreg programme- Section Communication objectives <i>...- "... difference between NDICI Programme and other funding instrument is recognized"</i> Refinement is needed.	JS/MA	DONE! It has been reformulated on page 51 as follows: Programme and the specificities of the CBC NDICI programmes are well-known; therelevant actors are widely reached in the cross-border area: Programme is widely publicised towards the target groups; information about funding opportunities and programme and project results are easily available;
8.	In page 53, who will appoint the Interreg programme communication officer? Will this person be in JTS staff?	Chapter 5- Approach to communication and visibility for the Interreg programme Needs amendment.	JS/MA	DONE! Page 53 has been reformulated as follows: Based on the entrustment of the managing authority in line with Regulation 2021/1059 Article 36 (1), the implementation of the communication activities will be ensured within the JS capacity, by the communication manager by contributing to the programme level communication duties.
9.	Chapter 6 Insufficiently described. TESIM event on 24 November is advisory.	Chapter 6- Indication of support to small-scale projects, including small projects within small project funds	JS/MA	DONE! TESIM have seen the IP draft version including only one paragraph.

		Needs to be filled-in and discussed with PC members.		Chapter 6 has been elaborated with detailed information.
10.	The section should not replicate the content of article 52, as you do in the beginning of this section. The rest of the section contains some strange elements, as a mention to a Certifying Authority (which does not exist any more in Interreg and never existed in ENI CBC) or a mention of the Member State in singular. The section may also deserve a revision.	Chapter 7.3- Apportionment of liabilities among participating Member States and where applicable, the third countries and OCTs, in the event of financial corrections imposed by the managing authority or the Commission Needs revision.	JS/MA	DONE! Revision has been made throughout the entire chapter 7.3.

Comments received in public consultation and follow up

E-mail	Name	Institution	Comments to the draft Interreg Programme of INTERREG A NEXT HUSKROUA 2021-2027	Feedback on how the comments and opinions have been taken into consideration
filep.reka@mfu.hu	Filep Réka	BORA 94 Borsod-Abaúj-Zemplén County Development Agency Nonprofit LLC	<p>Section 2.2.2 Enhancing the role of culture and sustainable tourism in economic development, social inclusion and social innovation (from page 36)</p> <p>Types of actions: we suggest to re-structure the type of actions in order to have clearer objectives and avoid overlapping of actions. We recommend the following structure:</p> <p>1. Action 1: Capacity development: we suggest to divide this action into 2 separate actions (Action 1.a, 1.b), since the target group, potential applicants and the aims are very different.</p> <p>a. Data collection:</p> <ul style="list-style-type: none"> collection of primary data, including development of methods of data harmonisation and creation of joint databases; preparation and establishment of joint systems of visitor- and asset monitoring. <p>b. Knowledge sharing, trainings and studies:</p> <ul style="list-style-type: none"> joint learning and knowledge-sharing actions to increase organisational knowledge of relevant national and cross-border organisations, local and regional governments and civil organisations (NGOs) trainings for stakeholders of the tourism sector on topics associated with environmental, social and financial sustainability, quality standards, healthcare regulations and general cooperative approaches in tourism studies, applied research and strategic and action planning with regard to the ways and potentials to exploit the region's natural and cultural heritage assets by sustainable tourism 	<p>COMMENT PARTIALLY TAKEN ON BOARD.</p> <p>Commented section (Types of Actions) has been amended according to detailed comments, including: reference on built heritage (that includes industrial sites) and more emphasis on environmental sustainability of tourism. Comment on healthcare regulation has been partially accepted, reference on „local” regulations and practices has been inserted.</p> <p>Comments related to the structure of Types of Actions have not taken on board, for maintaining clearer and simpler structure of the IP. Neither proposal on selecting only one project for data collection has been agreed with, as compilation of a project with such a wide scope does not seem realistic.</p> <p>Comments on resource allocation has been agreed, taken on board in the process of calculating indicator values, otherwise it's indicative for the implementation phase, similarly to proposal on the simplified management of small projects.</p>

			<p>2. Action 2: Development of tourism products, including cross-border networks and routes. This action includes:</p> <ul style="list-style-type: none"> • preparation of joint tourism products and jointly provided services (service packages), including preparation of cross-border thematic routes and networks of attractions and services • development of tourism products based on local resources • investment in infrastructure necessary for the quality tourism services • investment in infrastructure to improve accessibility of new or existing touristic sites of cultural or natural heritage, including the provision of a barrier-free access to sites, provision of making digital guides, tutorials, exhibits or other digital means of information available, including multilingual services on sites and in networks or making soft mobility offers available, such as "solutions for the last mile", mobility on demand, or improving public transport and connections of attractions by bike • facilitating the networking and connection of the cultural and natural heritage sites • establishment of joint platforms for sales and marketing (including placement of offers, booking system, etc.) of attractions, networks, services, local products. <p>3. Action 3: Promotion of local and regional cooperation in culture and arts: The aim of this type of action is to preserve and enrich the shared cultural traditions and to encourage the creation of new joint cultural and artistic products</p> <ul style="list-style-type: none"> • organisation or creation of joint cultural and artistic events or products, including ones built on the basis of preserving and developing local cultural traditions • trainings, workshops and other cooperative learning events to promote cultural cooperation and intercultural dialogue • investment in public cultural infrastructure • investment in infrastructure to restore, upgrade or 	
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		<p>transform built elements of the cultural heritage -including industrial heritage sites- appropriate for a contemporary use as cultural venues or tourist attraction sites</p> <p>4. Action 4: Small scale cooperation projects</p> <ul style="list-style-type: none"> integrated small projects with components of (e.g.) awareness raising, skills development, organisation of events, research and studies, minor development of local built infrastructure and procurement of small-scale equipment <p>Other remarks on the types of actions:</p> <ul style="list-style-type: none"> We recommend dedicating the majority of resources to Action 2 (Development of tourism products, including cross-border networks and routes) and Action 3 (Promotion of local and regional cooperation in culture and arts) since those contribute most to the achievement of programme objectives and those initiatives are most utilized in the practice and sustainable in the long run. In case of Action 1 (Capacity development) – especially in case of data collection and creation of joint databases – only one project should be selected with the involvement of the most relevant actors, namely the statistical offices. Action 4 (Pilot actions to boost social innovation and the inclusion of vulnerable groups of the society in cultural activities, tourism services and projects) should be merged into other actions. We generally agree with the concept of small-scale cooperation projects (Action 5), but the application and project implementation should be simplified compared to large-scale projects. Although the EU Specific Objective 2.2.2. PO4. (v) enhancing the role of culture and sustainable tourism, but the environmental type of sustainability issue is not stressed enough in Action 2. 3 and 4. Tourism actors and service providers can play a key role in raising awareness of tourists and visitors through their own examples, services, activities, so the type of actions they plan must reflect a very conscious attitude towards environmental sustainability as well, when 	
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			<p>they plan any new developments.</p> <ul style="list-style-type: none"> • The issue of facilitating the establishment of healthcare regulations and processes for tourism securing the health of every involved actor in epidemic situations is outside the scope of a single project. It is regulated by the national governments through regulations. Specific measures are determined centrally. Activities developed in the frame of a single project cannot handle this issue efficiently and flexibly enough. 	
primarias eini@yahoo.com	Tulbure Gabriela Florica	Seini City	<p>Seini City suggests taking into account financing actions which promote health from a different perspective: investing in the community's mental and physical wellbeing by promoting sports. The infrastructure dedicated to sport activities (stadiums, sport fields, sport halls) is very poor both in Romanian and Ukrainian towns and cities. It is important to educate children and adults towards a healthier lifestyle, by practicing sports. For this purpose, campaigns, field trips and workshops, crossborder competitions and trainings can be organized as well, in parallel with the improvement of the relevant infrastructure on both sides of the borders. Health is crucial and therefore we would like to promote the "better to prevent than treat" approach.</p>	<p>COMMENT PARTIALLY TAKEN ON BOARD.</p> <p>Sport, as type of cultural activity has been referred to in the description of Priority „Tourism and Culture“. While sports clearly relate to health, according to our understanding sport cannot be financed under the selected specific objective „ensuring equal access to health care and fostering resilience of health systems, including primary care, and promoting the transition from institutional to family- and community-based care“.</p> <p>Under „culture and tourism“ small scale investment and projects “to educate children and adults towards a healthier lifestyle, by practicing sports. For this purpose, campaigns, field trips and workshops, cross-border competitions and training” are possible, however, exclusively to improve conditions of public, community-level sports (non-professional) activities and without substantial physical investment component, so that building or renovating “stadiums, sport fields, sport halls” is not realistic, due to neither the budgetary constraints of the programme, nor the expected limited cross-border impact of such investments.</p>
granturi @igpf.ro	Baltatu Andrei	General Inspectorate	Proposal Version RO Page 9 paragraph ISO2:	COMMENT PARTIALLY TAKEN ON BOARD.

		of Border Police	<p>The harmonisation of procedures for border control and the improvement of the information capacity on the evolution of the current pandemic and other crisis/emergency situations.</p> <p>The cooperation between the authorities-institutions carrying out specific border control activities, according to their own competences, in order to improve the services offered to persons crossing the border and to reduce waiting times at border crossing points (improving the technical conditions by equipment adapted to the institutional needs, training/exchanges of experience in order to increase the training capacity of border guards and customs officers)/complementary activities for the implementation of the Entry-Exit System (EES).</p> <p>Improving the cooperation of the institutions/authorities at border crossing points, involved in border control formalities and implementation of new systems/technologies that can allow the increase of the border police capacity to monitor the border, in order to prevent and address illegal migration and cross-border crime.</p>	<p>Cooperation of border authorities for faster and better border crossing is possible under the current proposal, under SO „ISO“. Some textual changes have been made to make it more visible in the text. Purchase of equipment, can be financed only if it is absolutely necessary. However, shall not be a major part of any projects under „ISO“, focus shall rather be put on trainings, exchanges of experiences and joint elaboration and implementation of new cooperation protocols.</p>
eszter.sebok@hia.hu	Eszter Sebók	Hungarian Interchurch Aid	<p>According to our opinion, some important element of social cohesion is missing, therefore we propose to add the following:</p> <p>1) Early development, focusing on early childhood, developing family support services. It is a complex intervention package where the programme helps the mother prepare for the birth of the child and to perform the duties of a parent for the first 3 years, on the other hand, the programme pays attention to the circumstances in which the child is born. In frame of the programme, families can receive more intensive help from professionals who provide support to parents with their actual difficulties. (It is a particularly important intervention point, as the usual network of nurses in Hungary does not work in Ukraine, thus the professional counselling for children aged 0-3 and their parents is not provided.)</p>	<p>DONE!</p> <p>Additional information has been added in chapter 1.2.1 Summary of main joint challenges as follows: <i>„These challenges to social cohesion within the border region are further aggravated by focusing on the needs of marginalised groups to help access newly developed or improved services, especially with telemedicine solutions.“</i></p> <p>In Chapter 2, SOME ELEMENTS OF THE COMMENT TAKEN ON BOARD</p> <p>Bulk of the activities on the proposed intervention field do not fit to the selected Specific Objectives of the programme. In Priority „Health“, however, reference has been made to focusing on the needs of marginalised</p>

			<p>2) Supporting families in crisis and victims of domestic violence by setting up a crisis center and providing its operating conditions, thus helping to protect the health and lives of victims of domestic violence. Transfer of good practices and experiences. Incorporate European methodological experience in providing complex assistance to victims of domestic violence. (An outstanding example of this is the Crisis Center in Kherson (Ukraine), which was renovated and started its operation in spring 2020 in international cooperation, with the participation of the Interchurch Aid. The safe temporary stay of victims of domestic violence can be established with these crisis centers, and the development and operation of a system of cooperation between organizations working in the field of prevention and treatment of domestic violence is facilitated.)</p> <p>3) Creating community spaces where disadvantaged families can wash, spend their free time usefully, listen to lectures together, thus strengthening the sense of community and social cohesion. In addition, quality services can be brought to the community spaces, which can contribute to the development of children, the integration of parents into the labour market, and the promotion of self-supplying.</p> <p>4) Facilitating the fight against digital poverty, which, on the one hand, assesses the digital divide in the given settlements and, on the other hand, launches catch-up programs for the people living in the settlements. It focuses on children, as further learning and entering the labour market become impossible without the right basic digital skills. Internet access, rental and transfer of digital devices may also be considered.</p>	<p>groups to help access newly developed or improved services, especially the telemedicine solutions.</p> <p>The expectation of the European Commission is to focus on less thematic fields to be financed for the future for the sake of concentration of funds and tangible results. Unfortunately not all topic can be covered within an Interreg programme with limited financial sources.</p>
Gabor.ginter@nski.gov.hu	Ginter Gábor	Research Institute for National Strategy, Hungary:	Experts from the Research Institute for National Strategy (NSKI) have reviewed the draft Programme document submitted for public consultation. It is our common view that it covers the development potential of the economy (eg. support to entrepreneurs, knowledge transfer, tourism) and related infrastructure (border crossings, transport), society (culture, public administration, health, etc.) in the area, as well	<p>TAKEN ON BOARD BUT NO MODIFICATION NEEDED</p> <p>Under health care, infra and soft component are eligible, action 3.2.1. mentions the cross-border context which is more important than highlighting the „nagyterség” development need. Connecting every development</p>

		<p>as it allows to provide answers to the challenges of environmental protection and disaster management. Doing it in a rather general way, leaving the room for territorial and sectoral specifications at the preparation of calls for proposals later. The task of the NSKI is primarily to reflect the Hungarian national strategic aspects in the Programme, which, being a cross-border Programme of four countries, has limited possibilities. Measures to support staying in place (eg. mutual language learning programs, multilingual services, digital manuals, guides) and support for ethnic co-operations (cultural relations) are to be welcomed.</p> <p>Increasing the number of border crossing points and eliminating capacity shortages is necessary primarily in the direction of Ukraine in order to maintain and intensify closer cohesion and economic-social relations. The development of border crossing points have to take into account interventions to meet 21st century expectations, e.g. adequate IT system (traffic monitoring, forecasting, road X-ray), adequate power supply (eg. from renewable sources) to prevent power outages, adequate hygiene infrastructure, parking facilities around border crossings, etc.</p> <p>The possibility of cross-border large-scale development of health infrastructure should be further emphasized in the Programme, given the different infrastructural endowments of the regions and the different magnitudes of the challenges in time and in space arising from the COVID situation. It would be important to support the exchange of experience between health professionals and to emphasize the importance of joint measures to address capacity gaps.</p> <p>Environmental and disaster protection are also priorities of the Programme, although, in addition to the sources devoted to the development of joint action plans and strategies, interventions aimed at river clean-up should be emphasized (either applying clean-up methods or soft interventions such as changing of attitude, training, awareness raising). Supporting the co-operation of regional disaster management</p>	<p>needs in a bigger network, would need more funds than Interreg provides.</p> <p>We agree with covid related measures, it is already written in the programme by mentioning the epidemic cooperation and emergency response, which gives us a broader scope. Also other topics are mentioned, like training, exchanges</p> <p>Under climate change, the water cleaning is eligible, it fits under improvement of the chemical status of transboundary waters, and also monitoring and prevention can be financed.</p> <p>Due to limited financial sources, the capacity shortages can be handled through training, exchange of experience and especially by use of e-health solutions, like telemedicine. Those are included in the programme.</p>
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			organizations (joint trainings, exchange of experience) can also be a very important part of the Programme. In our opinion, these above specific proposals are acceptable to all the countries concerned, can be adjusted to the development plans of the other countries and can promote European integration not only for the participating EU member states, but also for Ukraine.	
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Comments received on the stakeholder workshops and follow up

Name and institution	Comment (only Chapter 2)		Feedback on how the comments and opinions have been taken into consideration
	summary of the content	Priority/SO/Action referred	
BORA 94 Borsod-Abaúj-Zemplén County Development Agency Nonprofit LLC	to restructure the type of actions in order to have clearer objectives and avoid overlapping of actions – separate „Data collection“ and „Knowledge sharing, trainings and studies“	Tourism and Culture, Action 1.	NOT TAKEN ON BOARD in order to keep the programme structure as simple as possible. It gives a flexible framework for implementation.
	to include specific reference on industrial heritage sites	Tourism and Culture, Action 1.	TAKEN ON BOARD reference on built heritage added (includes industrial heritage sites)
	county or regional development agencies could be added to List of potential Beneficiaries	Tourism and Culture	TAKEN ON BOARD county or regional development agencies added
	recommend dedicating the majority of resources to Action 2 (Development of tourism products, including cross-border networks and routes) and Action 3 (Promotion of local and regional cooperation in culture and arts)	Tourism and Culture	PARTIALLY TAKEN ON BOARD no need for changes in Ch2 text. Proposed resource allocation is reflected in calculation of indicator values
	in case of data collection and creation of joint databases – only one project should be selected with the involvement of the most relevant actors, namely the statistical offices.	Tourism and Culture	PARTIALLY TAKEN ON BOARD More projects could have components of data collection, so that no restriction is recommended. Involvement of the national statistical offices can be added to the list of beneficiaries.
	Action 4 (Pilot actions to boost social innovation and the inclusion of vulnerable groups of the society in cultural activities, tourism services and projects) should be merged into other actions	Tourism and Culture	NOT TAKEN ON BOARD Possible merging can make the programme simpler, however, distract the focus from this type of action in the same time.
	small-scale cooperation projects (Action 5) are needed, but the application and project implementation should be simplified compared to large-scale projects	Tourism and Culture	no changes required in the text, yes that is the aim during the implementation

	environmental type of sustainability issue is not stressed enough in Action 2. 3 and 4.	Tourism and Culture	TAKEN ON BOARD wording amended
	establishment of healthcare regulations and processes for tourism.... is regulated by the national governments through regulations. a single project cannot handle this issue	Tourism and Culture	PARTIALLY TAKEN ON BOARD wording amended to refer more clearly on local issues and procedures
The Main Department of the State Emergency Service of Ukraine in Ivano-Frankivsk region	adding the following type of action: - increasing the capacity of regional rescue services in the program area to monitor, prevent and respond to emergencies related to floods and forest fires;	Climate Change, Type of Actions 1.1.	TAKEN ON BOARD wording amended to make clearer reference.
	adding the following type of action: - development of a joint instruction on cooperation in response to emergencies related to floods and forest fires between the rescue services of all countries participating in the program.	Climate Change, Type of Actions 1.3.	TAKEN ON BOARD included the proposed action ("joint instruction" is meant as "joint protocol") in description of types of actions
Szabolcs-Szatmár-Bereg County, Hospitals and University Hospital	eligible expenses should be: Procurement of diagnostic imaging equipment, CT, Doppler which helps to enhance the use of telemedicine Procurement of ultrasound, digital X-ray equipment Establish effective inventory and tracking system, based on the European unique identity code, users can also track the data Digitalization of the medical documents and their storage in filing system. Create and develop a modern automatic clinical data warehouse for medical records and documents Screening program and screening buses with the aim of prevention that can be accessible for remote areas along the borders Possibility to provide higher grant amount as the equipment/tools/purchasing in the medicine and healthcare area are very expensive, which can sometime lead to compromise on the technical features Review the possibility to increase the maximum hourly rate of the project management team members (especially if	Health	NOT TAKEN ON BOARD in programming but considered during implementation: Proposal rather refers to details to be set in the implementation phase. Requested purchases and activities can be implemented in the framework of the current proposal provided that are linked to the objectives – better access to services and/or telemedicine solutions, screenings.

	Beneficiaries involve a colleague from a lower salary area for the same task, for example). Maximizing the hourly rate and linking it to the base salary is disadvantageous among employees with lower base salaries. Especially in their case, the tasks and responsibilities related to the project are not in line with the benefits. Possibility to purchase IT tools and equipment establishment/development of online/offline training and multimedia rooms regular training and education		
Tisza EGTC	strengthening training and education as well as awareness-raising, especially in the area of digital transformation and environmental consciousness	all priorities	NOT TAKEN ON BOARD but already included. No changes in the text of the programme are needed, it is already understood in the programme document.
National Healthcare Service Center (Országos Kórházi Főigazgatóság)	Agrees with the proposed actions	Health	No changes in the text of the programme.
Heritage Springs Inc.	Question on the possibility of submitting application to multiple SOs	n.a.	NOT TAKEN ON BOARD in programming but considered during implementation: No changes in the text of the programme are needed, it relates to implementation.
Slovenská Asociácia Cystickej Fibrózy	maintain project financing in the form of advance payments	all priorities	NOT TAKEN ON BOARD in programming but considered during implementation: No changes in the text of the programme are needed, it relates to implementation.
	include the promotion of treatment of rare diseases as eligible actions/projects	Health	TAKEN ON BOARD included the joint promotion of treatment of rare diseases in type of actions as examples

Hungarian Mining and Geological Service (coordinator of the "Sustainable Energy" priority area of the EU Strategy for the Danube Region)	energy is very important for this region, so relevant topics should be part of the call.	n.a.	NOT TAKEN ON BOARD energy is not selected as priority action so that no changes in the text of the programme are needed. Unfortunately, due to the obligation on orientation to only some topic and the limited financial sources unfortunately not all topic can be adopted into the programme.
Vasyl Stefanyk Precarpathian National University	Prevention and prophylactics of human diseases like overweight, obeisant diabetes	Health	TAKEN ON BOARD included the diseases proposed, as examples
	investigate resources medicinal plants in four countries, evaluate their biological activities, propagate clones with maximum biological activities and grow at farms located in mountains	Health / Environment	NOT TAKEN ON BOARD idea not relevant to the programme, no changes in the text of the programme are needed
	promote growing fruit trees... resistant to number of diseases due to which it is possible to produce pesticide free (organic) fruits	Health / Environment	NOT TAKEN ON BOARD idea not relevant to the programme, no changes in the text of the programme are needed
Lesya Loyko, Head of NGO FORZA, Agency for sustainable development of the Carpathian region	<p>proposal on more focus on mitigation</p> <p>textual proposals regarding more focus on avoiding and protection of forest fires and forest management issues (like protection of forest genetic resources, forest inventory)</p> <p>textual proposals on a more accurate reference on certain age groups (like seniors, youth)</p> <p>proposal of inclusion of new potential beneficiaries: state administrative units outside the region and forestry enterprises</p>	Climate Change and Protection and preservation of nature (Type of Actions)	<p>PARTIALLY TAKEN ON BOARD:</p> <p>more emphasis on mitigation: not taken on board as current text is in line with objectives of the selected SO</p> <p>textual proposals on forest issues and age groups: taken on board, new pieces of text inserted in description</p> <p>new beneficiaries: not taken on board as programme concentrates on public entities and on institutions present in the region and did not intend to open to for-profit companies.</p>