

INTERREG EUROPE - Comments and programme responses to

1. Needs and challenges

N°	Organisation name	Country	Comments	Responses
1,01	ecoplus	Austria	Measures for unforeseeable events on regional border lines (flood prevention activities) should be more in focus.	In terms of programme's strategy, these kinds of topics are more typical for cross-border and transnational cooperation programmes.
1,02	Upper Austrian Tourist Board	Austria	The aspects of tourism for regional development are missing. As most tourism stakeholders are SMEs they are facing big challenges as far as research/innovation and therefore competitiveness are concerned.	The programme strategy does not refer to any economic sector in particular. But the tourism sector can be covered under the different programme's thematic objectives.
1,03	ECOLISE	Belgium	We would like to see more support for community-led action, especially in relation to climate change and sustainability. There are a lot of grassroots activities emerging in this area, but this needs to be matched with appropriate policy and funding support.	Community-led actions could be identified as good practices within the INTERREG EUROPE projects and platforms. But INTERREG EUROPE, as an exchange of experience programme, will not directly support community-led actions.
1,04	Provincie Vlaams-Brabant	Belgium	The growth challenges are described without referring to international relations and dependencies.	Remark integrated in section 1 of the programme
1,05	PURPLE - Peri-Urban Regions Platform Europe	Belgium	Regional diversity is mentioned, but there is no real link to the territorial agenda and the challenges posed for example by increasing urbanisation and the environmental and resource pressures this brings. Europe's peri-urban areas around and between cities and towns, where settlement is a complex mix of urban AND rural, are a growing feature of territorial development across Europe and there is a need for new solutions to complex issues and for transfer of experience from more developed areas of the EU to those newer member states which are developing quickly. We feel there is an over emphasis on SMEs/entrepreneurship as such rather than on the underlying policy context in which they might flourish. but we strongly agree with the statement – 'An integrated approach to sustainable regional development, taking into account specific territorial contexts and opportunities can bring improved resource efficiency and new jobs to European regions'	The territorial challenges and characteristics will be taken into consideration as much as possible at the level of the partner regions involved in the projects and platforms.
1,06	Technopolis Group	Belgium	It is well appreciated that the programme clearly addresses Europe 2020 challenges. This is not always the case with other programmes for example.	Remark noted
1,07	Future of Rural Energy in Europe (FREE) initiative	Belgium	The FREE initiative is very pleased to see the inclusion of a paragraph which outlines the need for European regions to invest in the development and use of renewable energy within point 1.1.3. We are also pleased to see that the text of the draft Cooperation Programme mentions that renewable energy offers specific opportunities within the more peripheral regions'. However FREE believes that cleaner energy technologies offer specific opportunities not only in peripheral regions but also in all rural areas (defined as areas without connection to the gas grid). Rural areas are currently disadvantaged with their energy choices and cleaner energy options could transform those areas in energy producers. Local, decentralized energy systems could benefit rural areas offering them security of energy supply. Finally it will provide them benefits related to air quality, which could be achieved by replacing old and inefficient coal and oil boilers with cleaner choices. We would therefore call to include the term 'rural' in the paragraph 1.1.3. next to the mention of peripheral regions (p. 7, para2.). In addition, FREE also believes that climate change will have an impact not only on coastal areas, but also on rural and mountainous areas. The impact would be particularly major for mountainous areas. As pointed out by Euromontana, "between the end of the 19th century and the beginning of the 21st century, the temperature [in the Alps] has increased by two degrees (...). The most visible effects have been glacial melt, a decrease in snow cover, changes in the average flow of rivers and a decrease in water resources in general." This is associated with decreasing levels of production of hydroelectric energy, a leading form of renewable energy for electricity production in Europe.	Remarks integrated in section 1.1.3 of the programme
1,08	ERRIN Network	Belgium	Need to be clearer on how Regions of Knowledge will be integrated into the programme. The evaluation of RoK was positive and so its demise was a disappointment to regions. Need to clarify how the Interreg programme can contribute to the aims of the programmes named and surely we need to mention RIS3 and the EIPs (e.g. smart cities, water, healthy ageing, raw materials as the EIPs rely on other funding programmes to implement their goals and objectives. More emphasis is required for 'smart growth' but Interreg Europe should not be seen as a cohesion programme to help weaker regions but as a programme that targets excellence in projects to help regions implement the full range of their regional growth policies. Inclusive growth may be better served through ESF programmes and more targeted skills development. Agree that managing and communicating the knowledge accumulated within projects is one of the weaknesses of the programme as projects tend to be 'self-contained'. Linguistic and cultural barriers as well as differing competences and motivations of staff engaged in the project also weaken communication. Agree that commitment and support necessary from the Managing Authority but often the Interreg projects come from a bottom-up perspective and sometimes distance between the 'doers' and 'deciders'. Agree that 'learning outcomes need to be more effectively transferred and embedded...' and this is where established European networks play a strong role. European networks can also play a strong role in communication activities. Agree that future Interreg Europe projects should reach out to wider audiences and EU programmes e.g. the EIPs, JTI and PPPs. ERRIN strongly supports the Policy Learning strand of Interreg Europe.	Further details on the integration of the Regions of Knowledge programme will be provided in the programme manual. INTERREG EUROPE remains a programme of EU Cohesion Policy. This does not prevent the programme from targeting excellence. However, INTERREG EUROPE cannot be only dedicated to best practices and excellence. In particular with its new focus on Cohesion Policy, INTERREG EUROPE should contribute to a better implementation of the Structural Funds programmes throughout Europe.
1,09	Federation of Environmental Organizations of Cyprus (NGOs)	Cyprus	Although the challenges are quite relevant to the INTERREG EUROPE programme, it is not clearly stated that they should be archived in the framework of sustainable development and climate mitigation goals (Europe 2020).	This is partly stated in the paragraphs on 'Policy challenges' and 'Sustainable Growth'.
1,10	Ministry of Health	Cyprus	It shall be added the need for "Health for Growth", which encloses the challenges of demographic change and ageing population and their effect on public health.	The challenge of demographic change is mentioned in the paragraph 'Policy challenges'.

INTERREG EUROPE - Comments and programme responses to

1. Needs and challenges

N°	Organisation name	Country	Comments	Responses
1,11	Department of Environment	Cyprus	The Report analyses the current status of the European regions, while providing the relevant figures in order to assess the needs and challenges for the INTERREG EUROPE Programme.	Remark noted
1,12	University of Copenhagen	Denmark	INTERREG is the European programme with the WORST reputation for bureaucracy. A simplification and harmonisation of the present different set of rules for each programme is more than needed. The number of reportings must go down. What is the point of getting a little money for research and then spend most of the time and efforts on red tape. INTERREG needs to shape up. As this is the most important point, and the only reason for entering this questionnaire, you are advised to disregard the remainder of the answers, as they serve only to ensure submission.	INTERREG EUROPE works on a certain number of simplification rules (see section 7 of the programme). It should also be clarified that rules are not created by the programmes themselves but derive from a variety of constraints at EU and national levels.
1,13	INTERACT	EU wide	Ideally, the programme should be supporting capacity building in widest range of thematic objectives, as part of Thematic Objective 11	This idea was initially proposed but the EC refused it.
1,14	Kainuun Etu Oy	Finland	I feel that the link with actions of H2020 is not very explicit and it might help if it were. For example, in H2020 there is provision for innovation vouchers, Should we not link it in one Interreg EUROPE project GPs reflecting Innovation vouchers were identified?	The coordination between funds is tackled in section 6.
1,15	MTT agrifood research Finland	Finland	Leaching of agro-chemicals from fields to water systems and Baltic Sea should be discussed and need to develop novel technologies mentioned	This topic is very specific to a transnational area.
1,16	Lahti Region Development LADEC Ltd	Finland	Transparency collaboration is needed. Strong focus regional development.	Remark noted
1,17	Regional Council of Päijät-Häme	Finland	In policy challenges for European regions supporting the growth-enhancing and job-creating investments are of great importance. Especially due to the diversity of regions going beyond the "one size fits all policies" has to be stressed. In smart growth developing and supporting the use of smart specialization strategies throughout the innovation chain is very important. The role of eco-innovations should be especially stressed as well as the decisive role of the triple helix cooperation on the regional level to guarantee the efficient planning and implementation in co-operation with the relevant stakeholders - "relevant local stakeholders in each partner region need to be more systematically involved from the start of all supported activities" The impact of project results in the region and to the end-users should be better guaranteed.	INTERREG EUROPE would like to improve the impact of project results through the following measures: - the creation of local stakeholder group in partner region - the production of an action plan per participating region - the introduction of a 2nd phase for interregional cooperation projects.
1,18	AViTeM	France	No specific comment. However the objectives stay a bit fuzzy. A more specific reference to European Directives would have been useful. The regional dimension should not hide the fact that cities will also be major actors in the fields covered.	The word 'region' is used in a broad sense for a relevant territory which can be represented by a local, regional or national organisation (depending on the country).
1,19	Political Science Institute Grenoble	France	The high complexity level doesn't combine with a strong capacity of explanation from the regional level.	The programme manual should provide more detailed explanation on the programme intervention logic.
1,20	Chambre de Commerce & d'Industrie Marseille Provence	France	The partnership between public institutions to support traditional SMEs, of which the majority are VSEs, is not sufficiently targeted, whereas they constitute the bulk of the economy of South Europe.	The notion of SMEs as tackled in the 'Sustainable Growth' paragraph includes traditional sector SMEs as well as Very Small Enterprises.
1,21	Lille Métropole	France	One key challenge is missing : raising awareness and mobilizing citizens Mentioning cities and/or local authorities as drivers for EU development	1/ Raising awareness and mobilising citizens is indeed important even if it does not stand as the main challenge of EU Cohesion Policy itself. As far as projects is concerned, the mobilisation of citizens would be possible through the creation of Local Stakeholder Group in each partner region. 2/ Remark integrated in section 1 of the programme where the role of cities and local authorities is better highlighted.
1,22	Energy Cities	France	Energy Cities considers that the integration of different initiatives targeting local and regional authorities is crucial to avoid duplication and ensure good synergies. For instance, the Covenant of Mayors offers a huge platform for dissemination of good practices as well as a reservoir of case studies.	The importance of synergies between different programmes is also tackled in section 6 of the programme.
1,23	Ville de Reims	France	- the 2-step procedure, mentioned in this section, would be a good initiative - to ensure the commitment of managing authorities of regional programmes could be a positive thing to guarantee ERDF funding after the end of the project activities. But it should not be a strict requirement for the approval of the project, since the managing authorities' priorities can be different from the other organizations eligible in Interreg Europe. - Also, if it is clear that all national, regional or local authorities are eligible for funding, the Programme document too often refers only to the regional level (e.g. "exchange of experience between regions", "can assist the regions to strengthen their policies"...) - Since the programme does not support any large scale investments, technical measures or research, the required implementation plans should not be too constraining. Their objectives should be only to provide useful bases for strategic reflection by each partner on how to reinforce the impact of the project after its end.	These comments will be as much as possible taken into consideration into the programme manual. The word 'region' is used in a broad sense for a relevant territory which can be represented by a local, regional or national organisation (depending on the country).
1,24	Technopôle Brest-Iroise	France	Maritime regions have their own specificities and they thus face specific challenges.	This diversity in the regional challenges is reflected in the paragraph 'Policy challenges'.

INTERREG EUROPE - Comments and programme responses to

1. Needs and challenges

N°	Organisation name	Country	Comments	Responses
1,25	Brest métropole océane	France	Considering the number of maritime regions in Europe, it could be interesting to mention that they face specific challenges	The diversity in regional challenges is reflected in the paragraph 'Policy challenges'. It does not seem necessary to make a specific reference to maritime regions there.
1,26	Mission Opérationnelle Transfrontalière	France	Policy challenges: regional diversity is mentioned, thus some territorial specificities could be stressed, as cross-border ones. Interregional cooperation: Capitalization is mentioned as well as the importance to better integrate the territorial dimension, especially important in a cross-border context. Furthermore when citing relevant bodies and stakeholders think also about stakeholder networks (as MOT, CECICN etc.).	The programme strategy does not refer to any particular network in Europe but the relevance of cross-border organisations and networks is mentioned.
1,27	Euromontana	France	Needs and challenges are addressed in a concise way but the short address which focuses on the main elements tends to overlook some important aspects for regional development. Smart growth – Work undertaken by several projects, including ESPON Knowledge Innovation Territory project has demonstrated that there are different ways to address innovation and different reasons why regions can perform well in terms of innovation-induced growth. Some regions create a lot of knowledge because they concentrate research infrastructure but others perform a lot better at turning new knowledge into new products and services and generating GDP and employment. The KIT project also proposes to have 'smart innovation policies'. We may see soon that specialization is not necessarily the smartest way forward for several types of regions. In that respect, we welcome the fact that the programme says that innovation strategies should be tailored to every individual region. On ICT, the programme says that there are 'more differences between countries than between regions in a given country'. While this may be true from a general NUTS 2 approach, we are surprised not to see highlighted there how much differences there are between different types of areas (rural, mountains as opposed to metropolitan areas for example) a point which was very well highlighted in the Digital agenda meeting at the CoR on July 2nd, 2013 and illustrated by ESPON as well (Trends of internet roll-out, 2011). It should be mentioned that the quality of broadband accessible in a place acts as a location factor for businesses and for inhabitants, that ICT have a potential to shrink distances in complement of their role of innovation enabler. As ICT are provided easily by the market in densely populated areas, policy learning should focus on how to bring the latest level of technologies within the areas that are disadvantaged in this sense looking also at infra-regional disparities. Policies should concentrate on rolling-out high speed broadband in rural, mountain and remote areas in priority and as a precondition to the success of other policy intervention in the framework of growth and jobs OPs. As a follow-up to our remark on ICT, we would welcome more emphasis on the impact of flexible/remote working solutions to support smart growth. Sustainable growth – we reject the assertion that climate change will influence mostly coastal areas. Several of the studies used to reach this type of result use aggregated indicators which give priority to impacts of the rise of the sea level over other types of impacts. Climate change will have a major influence on the mountain ranges and impact of climate change on the mountain ranges will extend very far from the mountains into the lowlands. This includes impacts on a variety of ecosystems services, in particular provisioning services (fresh water, timber and energy services and genetic resources) and regulating services such as climate regulation, air quality regulation, erosion control, natural hazards regulation and water flow regulation to which mountains make a key contribution (EEA, 2010). To give two examples, the melting of glaciers will have a very significant impact as well on the capacity of mountain territories to ensure their protective role in case of extreme climatic events (such as floods, see also EEA, 2010). A major focus on mountain areas is required in parts of the programme which address climate change. Otherwise we agree broadly with the challenges presented. We would welcome a specific reference as regards transport and mobility after 'They also need to develop cleaner and more efficient forms of transport', in urban as well as in rural areas. Inclusive growth: There again, the programme mentions low regional disparities and more disparities between states when it comes to level of education. Our INTERREG IVC PADIMA project (2010-2012) has clearly demonstrated that remote areas such as mountain areas suffer from a critical lack of qualified workforce and that the level of education is lower there than in more densely populated areas of the regions. Infra-regional disparities should be addressed at least in one sentence as commonalities between such regions are then a strong motor of cooperation and as policy intervention is required to solve this barrier to employment and growth. We are also surprised to see no reference to poverty under this chapter.	These different aspects for regional development are indeed important but cannot be included as such in the limited text of the INTERREG EUROPE programme. In the policy challenges, the programme recognises the regional diversity in the EU and calls for a place-based approach to ensure the solutions are adapted to each region. Nevertheless, the programme was amended to better reflect the following points: - the cross-cutting role of ICT in INTERREG EUROPE, - the impact of climate change on all territories - the role of transport in the third priority axis. Concerning the last remark, the challenge of poverty was explored in the first scoping of the programme. But later on, in the course of the programme elaboration, it was decided to provide a description of Inclusive Growth which would better reflect how INTERREG EUROPE could contribute to this third pillar of EU2020. This is the reason why the text focuses on employment and education.
1,28	IdE Institut dezentrale Energietechnologien GmbH	Germany	Lack of debt and financial issues	
1,29	Regional Authority FrankfurtRheinMain	Germany	In our opinion several challenges are not mentioned enough in this section. The challenge of demographic change, migration and skills shortage is not faced at all. On the one hand the population in our region is getting older and on the other hand many people are moving into the region Frankfurt/Rhein-Main. In our opinion "Inclusive growth" should not only be about SMEs, entrepreneurship and the development of skills. The aspect of demographic change, migration and the development of a welcome culture should also be highlighted under "inclusive growth". We think these topics are also of high importance for other European regions and migration is a key issue at European level.	The challenges mentioned are certainly important but the text of the programme is also limited. Demographic change challenge is clearly introduced under the paragraph 'Policy challenges' The issue of skills is also tackled under smart growth ('human capital') and inclusive growth. But it is true that the issue of migration is not directly tackled under the programme strategy.
1,30	Internationaler Bund	Germany	It should take more attention related to equalize the education systems	Although important, the relevance of this question in the INTERREG EUROPE strategy is not very clear.
1,31	Kompass Innovation & Incubation Center	Germany	methods of awarding the Projects are not transparent for the applicants	The procedure for project assessment/selection will be depicted in the programme manual.
1,32	VBB Verkehrsverbund Berlin-Brandenburg GmbH	Germany	The very strong focus on capitalisation could hinder new initiatives to evolve. It should be avoided to have a closed shop of actors within the ETC.	This remark is important and is partly at the origin of the platform idea. The aim of the platform is to open the programme to organisations that are usually not involved in projects.
1,33	Technologiepark Heidelberg	Germany	We share the understanding of the needs of the programme	Remark noted

INTERREG EUROPE - Comments and programme responses to

1. Needs and challenges

N°	Organisation name	Country	Comments	Responses
1,34	City of Munich / Dept. of Labor and Economic Development	Germany	There is a need to integrate sustainable land use and management.	Although important, the relevance of this question in the INTERREG EUROPE strategy is not very clear.
1,35	ministry for economic and european affairs state of Brandenburg	Germany	the erdf-content is wrong; interregional work cant be focused on 4 topics; it is completly unclear what and how to deal with the platforms; the role of the JS is a black box for regional authorities; the support for leadpartner from the beginn to come to an access is absolutely unfortunly - we have so much problems with the image of INT Europe; how to come to new player in INT Europe - ther is a INTERREG-industry, they write projects for money - where is the new "generation"???	These points are not covered in the programme strategy but INTERREG EUROPE has been developed in compliance with EU regulations. The experience has also shown that the assistance from the programme is important for the success of the projects. Projects that come for the money without any clear need usually failed at the application stage.
1,36	IUWA Heidelberg	Germany	regional power / finance is very different --> broad bunch of Options needed to tackle different environments	The regional diversity is tackled under the paragraph 'Policy challenges'.
1,37	The Athens Chamber of Small-Medium Industries	Greece	1.1.3 page 6 Sustainable growth To support SMEs as drivers for growth and employment in Europe, several challenges and obstacles need to be addressed in priority. These include the need to encourage entrepreneurship, to give SMEs better access to finance, to improve SME internationalisation, both in the EU internal and global markets. All this calls for better rules, support and facilities for SMEs and this is where regions all over Europe have a role to play. Comments: The Athens Chamber of Small-Medium Industries wishes to see that INTERREG EUROPE will support the development of new policies for empowering aging business owners of competitive firms to transfer the to younger persons, thus, becoming catalysts for sustainable growth. Also, we would like to see INTERREG EUROPE to support the development of new business policies supporting the development of business incubators, business accelerators and business hatcheries as great tools for sustainable entrepreneurship.	These different topics are covered under the Priority Axis 2 of the programme.
1,38	Diadyma SA	Greece	We strongly believe that waste minimization is a challenge that needs to be highlighted even more as it pertains to very fundamental questions on how our society functions.	This issue is covered under the Priority Axis 4 of the programme.
1,39	Managing Authority of Rural Development Plan	Greece	A few points regarding the impacts/ significance from the implementation of the INETREG Europe Programme . a. Sustainable growth (p 6 - 7) The generation of jobs, (generally growth) prejudiced under RES applications and biodiversity conservation. There are other sectors of green economy, more promising and it is proper to be focused. This is the rational use of Energy (building sector), bio-economy (wastes, recycling). b. Regions of knowledge (p 9) Good practices involved can be platform for the INETREG Europe Programme multidimensional learning and capitalization processes. c. More efficient use of water, air, soil, ect" as a target of interregional Programme is limited. The sustainable use, as a way of strategy involves the meaning of efficient use of the environmental issues.	Most of these points seem covered in the programme. Follow-up projects of Regional of Knowledge initiative will be able to apply to INTERREG EUROPE. The platform could also partly build on the Regions of Knowledge results.
1,40	Grants Europe	Hungary	Strategy could be a bit more focused on strenghtening the strong points of a region following also national economic development priorities.	This is reflected in the paragraph 'Policy challenges' highlighting the necessity to adapt to regional characteristics.
1,41	Chamber of Commerce and Industry for Győr-Moson-Sopron County	Hungary	The extra-EU challenges should not be forgotten; the economic processes at other parts of the world highly influence and have a singificant effect on the intra-EU economy.	Remark integrated in section 1 of the programme
1,42	Észak-Alföld Regional Development Agency	Hungary	more focus should be put on social innovation by the inclusive growth part	Social innovation is covered by objective 1b (page 14).
1,43	ASEV - Agenzia per lo Sviluppo Empolese Valdelsa SpA	Italy	- Very clear the needs, not equally the challenges, that remain quite general - Maybe it winks too much to HORIZON while it's an INTERREG programme	Remarks noted
1,44	City of Terni	Italy	There is a need for more concrete application at local scale. Place based approach remains a vague concept.	The concrete application at local scale will be further explained in the programme manual.
1,45	Istituto per le Piante da Legno e l'Ambiente S.p.A.	Italy	They are quite general	No requirement is made to amend the text of the cooperation programme.
1,46	University of l'Aquila	Italy	They are too generic and a repetition of the general aims of the Structural Funds programming	This may be due to the fact that INTERREG EUROPE addresses the whole EU territory.
1,47	Provincia di Genova	Italy	I suggest a bigger consideration of NUTS3 level bodies, because most policies are developed and implemented at this territorial level.	The word 'region' is used in a broad sense for a relevant territory which can be represented by a local, regional or national organisation (depending on the country).
1,48	Vidzeme Planning Region	Latvia	The emphasis on smart growth and the stronger use of implementation-related activities, focus on end-users and integration of the experiences from the RoK, are very important success factors, and should be more strongly emphasized and focused on thorough all the programme, especially in the Section 2., "Description of the priority axes" of the document.	The text of the programme is limited but these remarks will be taken as much as possible into consideration in the programme manual.
1,49	Gemeente Heerlen	Netherlands	I believe it's important to mention SMEs in the Smart Growth section as well. This is needed as they have great importance to innovate and change existing business models into more sustainable ones. The commission is very valuable in making this change as SMEs don't have a strong lobby like many MNO's. Although SMEscan't and probably won't be willing to be a partner that directly receives EU funding. I'm convinced they should be more central to the process.	Remark integrated in section 1.1.3 of the programme

INTERREG EUROPE - Comments and programme responses to

1. Needs and challenges

N°	Organisation name	Country	Comments	Responses
1,50	Bureau PAU	Netherlands	The needs and challenges addressed follow Europe 2020, which is Smart, Sustainable and Inclusive Growth. These are relevant, but not exclusive. Other relevant topics are demographic change, including population decline and migration. Social innovation is also not mentioned, while it is of great importance in the coming decade. The challenges of ageing is mostly covered through EU2020.	Demographic change is mentioned on page 5. Social innovation is covered by objective 1b (page 14).
1,51	Movares	Netherlands	One of the challenges faced by innovative young potentials in technical jobs, is under payment. Young people in technical jobs are being paid less than their peers in commercial or juridical jobs (banking, accountancy, advocacy) And on the other hand the demands of the technical studies (financial and intellectual) are far greater. So the chance of a high paid job is far less. So instead of all the activities to interest young people in science and technology, the simple solution is to increase the starting wages.	This remark is too specific to be mentioned in the cooperation programme but it could be tackled by an interregional cooperation project.
1,52	Subvention BV	Netherlands	more focus on bottom-up approach	Interregional Cooperation Projects will still be submitted by partner regions (bottom-up).
1,53	Landschapsbeheer Nederland	Netherlands	It would be useful to incorporate the importance of regional identity and landscape as a vital source for sustainable growth. Especially regions with poor employment rates offer good potential for further development of this potential in addition to biodiversity alone. Link biodiversity to cultural heritage.	This issue can be covered under the specific objective 4.1 of the programme.
1,54	Delft University of Technology	Netherlands	Sustainability is only related to climate change and the use of (renewable) energy. Main environmental issues which have been on political agendas of the past like environmental pollution (clean air, water, soil) does not seem to be relevant as is resource efficiency.	This remark is true to a certain extent but, as reflected in the specific objective 4.2, environmental pollution is still tackled by the programme.
1,55	Ministry for Infrastructure and Development	Poland	Proposed modification (p. 7) To achieve the target of 20% reduction in CO2 emissions, European regions need to invest in the development and use of renewable energies. They also need to develop cleaner and more efficient forms of transport and innovative mobility patterns, which maximize the use of clean and energy efficient vehicles and non-motorised transport. Transport efficiency should be supported by development of traffic management systems in order to improve cost efficiency and safety of provided transport services, reduce its environmental impact, and to allow greater interoperability between transport modes. Rationale: Among 4 Thematic Objectives (TO) which have been chosen for the Interreg Europe 2014-2020 there is no TO 7 referring to transport and TO 5 referring to adaptation to the climate change. Taking the above mentioned fact into consideration it is important to ensure that already chosen TOs and their investment priorities will also take into account relevant transport projects and initiatives aiming at adaptation of the infrastructure to the climate changes. Transport is one of the most important factors determining the economic development of Europe but it is also one of the main sectors affected by the climate change. Proposed modification (p. 7): Interregional cooperation can support European regions in delivering sustainable growth by enabling them to integrate successful experiences and policies from other regions into their own regional programmes in areas including promoting energy efficiency and the use of sustainable multi-modal mobility options, investing in biodiversity and green infrastructures as a source of eco-system services and improving resource efficiency. Rationale: Expression sustainable multi-modal mobility options is in accordance with the text of Selected IP 4e - Promoting low-carbon strategies for all types of territories, in particular for urban areas, including the promotion of sustainable multi-modal urban mobility and mitigation relevant adaptation measures; (page 14 and 34)	The first proposal is partly integrated in the programme through the addition of 'and innovative mobility patterns'. In order to keep the emphasis on sustainable transport reasonable compared with the other relevant topics for sustainable growth, the rest of the text is not included. Concerning the second proposal, it is true that the Investment Priority 4e refers more particularly to 'multi-modal urban mobility'. But the idea of the programme is to be more open for the regions by referring more generally to 'sustainable mobility options'.
1,56	Iasi Municipality	Romania	cities needs and challenges should be more taken into consideration	The role of cities is certainly important and urban issues will also be covered by the URBACT programme.
1,57	RDA North-East Romania	Romania	There are a number of regions that have to work only with national operational programs, for them it is quite difficult to promote project initiatives that have as consequence the adoption by the OP Managing Authority of revised set-up of call of proposals, new monitoring tool or modification of specific objective of the program). The program looks restrictive from this perspective.	The word 'region' is used in a broad sense for a relevant territory which can be represented by a local, regional or national organisation (depending on the country). It is true that the capacity of the programme to influence structural fund programme will partly depend on the country's organisation.
1,58	Ministry of Regional Development & Public Administration	Romania	I agree that the challenges addressed by INTERREG EUROPE are relevant. However, it is not clear how they will be addressed and how will an INTERREG project look like; how will beneficiaries work together in an exchange platform for policy learning?	Further detailed information will be available in the programme manual.
1,59	Association of lifelong education	Romania	The programs should be focused to the needs of rural families.	Rural development issues will be covered by EAFRD programmes.
1,60	Eudace	Slovenia	The main problem of the draft Programme is that the stated results are not really the results. It means nothing to produce 3.000 Action plans, it's important what result in terms of real development comes out from those Action plans. The goals, as set in the draft Programme are more l'art-pour-l'art-ism. As I'm aware of the difficulty (and time frame) necessary for real evaluation of real results, I propose that all the deliverables of all approved projects should be published on a centralised EU repository, all the deliverables should be made freely available to any citizen (with no author rights, as paid by public means), and a substantial part of the payment (like 30%) linked to the voting, obtained through public peer-review of the results, through the abovementioned centralised repository.	Action plans are indeed only 'intermediary' results. This is the reason why the programme is introducing a phase 2 for the project in order to monitor the results beyond the exchange of experience phase. The idea of centralising the deliverables is interesting and will be taken into consideration as much as possible.

INTERREG EUROPE - Comments and programme responses to

1. Needs and challenges

N°	Organisation name	Country	Comments	Responses
1,61	Avila County Council	Spain	We agree to include the concern of the Interreg Programme about the challenge of Climate Change and Low Carbon Economy at the Sustainable Growth chapter.	Remarks noted
1,62	Girona City Council	Spain	To stress on the importance of creating methodologies for capitalisation (included the governance of capitalisation).	Further details on methodologies will be provided in the programme manual.
1,63	Junta de Castilla y León	Spain	I believe there's a lack of information about capitalization projects. ¿Are they foreseen for this funding period? ¿Or have they been replaced by Policy Learning Platforms?	There will be no capitalisation projects for the 2014-2020 period. Only one type of projects will be supported by the programme.
1,64	EREN	Spain	It is appreciated the cofunding of pilot actions to make strong implementation of policies	Remark noted
1,65	Örebro Regional Development Council	Sweden	Rather than focusing description of differences in Europe, the challenges could also be described as phenomenon and solutions needed for tackling the challenges.	The solution part is mentioned page 10 of the programme.
1,66	Winnet Sweden - Europe	Sweden	We agree that it is important to focus on co-operation, where you also include the civil society organisations, such as a Quadruple Helix perspective, to really involve the EU Citizens in development a prosperous and gender equal society, where women and men have equal rights. It is good with thematic focus, but there is also a need of Gender Equality, as it is a goal for EU, in Lisabon agenda, not only a horisontal principle.	Remark noted
1,67	Regio Basiliensis	Switzerland	labour market and employment should be an own thematic objective	Partner States decided on the selection of the Thematic Objectives. The rationale for the selection is explained in table 1 of the programme. Employment issues could still be partly covered under certain priorities linked to innovation and competitiveness of SMEs.
1,68	Westcountry Rivers Trust	United Kingdom	There needs to be greater emphasis on integrated spatial planning of resources (Soil, water, nutrients, etc.) to ensure social, economic and environmental sustainability whilst achieving growth.	Partner States decided on the selection of the Thematic Objectives. The rationale for the selection is explained in table 1 of the programme. Some of the issues mentioned in the coment are also covered under Objective 4.2 of the programme.
1,69	North of England EU Health Partnership	United Kingdom	Demographic change is rightly identified as a key policy challenge; this issue should therefore receive greater attention under the smart, sustainable and inclusive growth headings, indicating how demographic change can be addressed in relation to these themes.	Demographic change is considered as a cross-cutting challenge that could be for instance be tackled through the innovation priority.
1,70	Eleanor Dearle	United Kingdom	In general I am concerned that the particular situation of the UK may exclude our actors from the programme. There are no regional governance structures and it is far harder to influence government policy in such a highly populated member state. We have local authorities who co-operate at sub-regional (and sometimes wider) level and Local Enterprise partnerships. The wording needs to make clear that regional policies can be inclusive of change by these UK structures. In my responses below I am defining regional in its broadest terms of sub-regions and structures which are regional but not necessarily part of the political governance structure.	The word 'region' is used in a broad sense for a relevant territory which can be represented by a local, regional or national organisation (depending on the country). It is true that the capacity of the programme to influence structural fund programme will partly depend on the country's organisation.
1,71	Marches Local Enterprise Partnership	United Kingdom	We support the proposal to provide investment in innovation and SMEs, energy and low carbon economy, employment and education. We would like to propose the inclusion of health and well-being as one of the priority areas to address the issue of ageing population across Europe. There is a need for technology development in the area of assisted living. Interreg can support businesses to deliver technological and service innovation to support independent living for a growing ageing population.	Partner States decided on the selection of the Thematic Objectives. The rationale for the selection is explained in table 1 of the programme. The issue of ageing population can be tackled for instance under the innovation priority.
1,72	New Economy Manchester	United Kingdom	We broadly agree with the challenges highlighted, we would like to see territorial cooperation focused on addressing the challenges and opportunities emerging from Europe major societal challenges such as a fast growing ageing population and high concentration of under skilled and unemployed, all of which are putting enormous pressure into our public services. It would be interesting to see within the INTERREG EUROPE programme some opportunities to support public sector innovation, new models to help European residents to become more self-resilient, with better health, better jobs, etc	Remark noted
1,73	University of Ulster Centre for Sustainable Technologies	United Kingdom	The call is clear and relevant with its strong links to advising public authorities on the relevance of selected R&D areas that can underpin policies as well as stimulate new sustainable employment. Enhancing the geographical spread of the R&D and its potential also addresses inclusivity across the region.	Remark noted
1,74	Aberdeen City Council	United Kingdom	The needs and challenges have already been outlined in EU policy and strategies so they are already clear and relevant. The role of the programme in addressing these challenges is broadly outlined, but perhaps lacks some focus on the key areas which it aims to address. In order for the programme to be a success it must be clear on the key areas where interventions are invited, otherwise the programme will be too general with little focus and will not address and specific challenges.	The description of the priority axes comes in section 2. Section 1 only sets the broad framework of the INTERREG EUROPE programme.
1,75	Brighton & Hove City Council	United Kingdom	The summary of smart, sustainable and inclusive growth is clearly put, and fits in with the targets of all the structural funds, however I question if all the structural programmes from ERDF and EAFRD at the national level to Interreg IVA at cross border level and IVB at regional level and Interreg Europe at EU level should all have the same areas of focus. In the UK they all chose thematic priorities which are very similar around supporting SMEs for example. Whilst this is a priority I suspect most regions would use their mainstream ERDF to support this in the first instance with Interreg Europe as an afterthought. I would like to see Interreg Europe funding being targeted at best practice on the big picture, providing the conditions in which attract SMEs to start up	Fostering entrepreneurship and business start-up is included in Priority Axis 2 'Competitiveness of Small and Medium-Sized Enterprises'.

INTERREG EUROPE - Comments and programme responses to

1. Needs and challenges

N°	Organisation name	Country	Comments	Responses
1,76	Scottish Government	United Kingdom	A step-change in approach to support those activities that are more strongly linked to Goal 1 Growth & Jobs Programmes at the regional level is welcomed. Our experience is that regional mainstream and territorial cooperation actions have remained largely distinct and separate from each other within the Managing Authority – and sense that other EU regions have had similar experience.	This new approach is indeed at the heart of the INTERREG EUROPE programme.
1,77	RENREN Network	various EU MS	It is appreciated the funding of pilot actions to strong implementation of policies	Remark noted
1,78	BIO-EN-AREA Network	various EU MS	It is appreciated the funding of pilot actions to strong implementation of policies	Remark noted
1,79	RENREN Network	various EU MS	It is appreciated the funding of pilot actions to strong implementation of policies	Remark noted
1,80	WWF Germany	WWF Germany but acting for WWF in Europe	Sustainable growth should not only consider climate challenges but also the overexploitation of natural resources and biodiversity loss, with this resource efficiency and natural capital should be also addressed in the strategy.	Those issues are also mentioned in section 1.1.3 of the programme.

INTERREG EUROPE - Comments and programme responses to

2. Strategy

N°	Organisation name	Country	Comments	Responses
2,01	Future of Rural Energy in Europe (FREE) initiative	Belgium	FREE believes that rural and mountainous regions would greatly benefit from establishing links between rural development policy and overall rural development programmes (not just Goal 1). Stronger focus should be given to research and innovation within the rural development policy. FREE believes that stronger bridges should be built between between research and practice (farmers, businesses, advisory services, NGOs, etc). Furthermore, the Operational Groups created under the the agricultural European Innovation Partnership should be engaged in work which is relevant for rural stakeholders (i.e. tackling issues related to providing cleaner and secure energy in rural and mountainous regions, addressing transportation and ICT issues in rural areas).	Even if no particular emphasis is made on rural areas, they are covered by the programme's strategy. Attention should also be paid on the overlap with the EAFRD.
2,02	ERRIN Network	Belgium	<p>ERRIN suggests that 'exchange of experience and policy learning among actors of regional relevance' requires a reference to 'impact'. The exchange of experience is not enough if there is no intention to learn from the policy exchange. It means that the actors within the project need to be credible, motivated and engaged in influencing local activity.</p> <p>The operational objectives should have a clearer reference to innovation and job creation and not just 'strengthen regional policies'.</p> <p>ERRIN considers that it is more effective to engage clusters and SME intermediary bodies in projects unless the SME can deliver a core objective.</p> <p>ERRIN agrees with the choice of the four Thematic Objectives (TO's) and considers that the ICT TO should be a horizontal input to all of the 4 TOs. ERRIN agrees that the programme should open to a wide range of projects within the TOs and also encourage innovative projects that 'break the mould'.</p>	<p>The issue of the impact of interregional cooperation is tackled under the actions to be supported. In particular for the projects, INTERREG EUROPE would like to improve its impact through the following measures:</p> <ul style="list-style-type: none"> - the creation of local stakeholder group in each partner region - the production of an action plan for each participating region - the introduction of a 2nd phase for the projects to monitor the implementation of the action plan. <p>The relevance of the partners is also carefully checked at the application stage.</p> <p>The participation of cluster organisations and SME intermediaries bodies will be possible in the future programme.</p>
2,03	Federation of Environmental Organizations of Cyprus (NGOs)	Cyprus	Similarly to the previous comment, the strategy of the programme does not refer to sustainable development goal for 2020 nor to the ways to achieve this goal.	This is partly tackled in the paragraphs on 'Policy challenges' and 'Sustainable Growth'.
2,04	MINISTRY OF HEALTH	Cyprus	HEALTH ASPECT IN SUSTAINING JOB-ACTIVE POPULATION	This specific aspect is currently not directly tackled through the Thematic Objective selected by the Partner States.
2,05	Department of Environment	Cyprus	Although the overall objective and the operational ones are well defined, a particular emphasis is given on the programmes under the Investment for Growth and Jobs goal. This may cause context problems while drafting the projects under the thematic objective 4 "Protecting the environment and promoting resource efficiency".	The only specific point about Thematic Objective 4 is that it is not part of the thematic concentration imposed by the regulation. It is however likely that a large number of Structural Funds programme will select this objective in their programme.
2,06	Regional Council of Central Finland	Finland	To exchange experiences is relevant. However, this has been done enough in the past. Actions and concrete outcomes should be emphasized. The pilot projects should be allowed from the very early stage of individual projects.	Actions and concrete outcomes are emphasised from the start since each partner region has to commit itself to the elaboration and the monitoring of an action plan. Pilot actions cannot be financed from the start of the project since they must derive from the lessons learnt from the interregional exchange of experience.

INTERREG EUROPE - Comments and programme responses to

2. Strategy

N°	Organisation name	Country	Comments	Responses
2,07	Regional Council of Häme	Finland	<p>1. Connection to regional policies and strategies</p> <p>Regions in EU are in different positions when thinking of the possibilities to influence to the implementation of National Structural Funds (Investment for Growth and Jobs) programmes through INTERREG EUROPE. The funds in some regions have decreased significantly compared to the previous programming period. Therefore the lessons learned through inter-regional co-operation should be transferred to the regional policies and strategies rather than only to Investment for Growth and Jobs programmes or ETC. These programmes are only tools among others when developing the region and for some regions these are not the most important ones. The connection to regional policies rather than Structural Funds programmes will be particularly important when considering the later stage of the implementation of INTERREG EUROPE when the majority of the funds in Structural Fund programmes have already been used.</p> <p>2. Participation of SMEs and private actors</p> <p>Allowing SMEs and other private actors to be beneficiaries of the programme is very important, especially in Priority Axis 2: Competitiveness of SMEs and also to some extent in Priority Axis 1: Research, Technological Development and Innovation. Considering the objectives in these two PAs it is crucial to allow private actors to participate as beneficiaries in order to guarantee the good quality of results.</p> <p>3. Pilot actions</p> <p>In addition to the exchange of experiences and transfer of best practices, it is very important to support concrete pilot actions. Transferring of best practices from one region to another requires testing and piloting within INTERREG EUROPE. Pilot actions should not be left to be funded from other programmes. Inter-regionality is a key aspect in the transfer and testing phase and the</p>	<p>1. The regulation for the 2014-2020 period is clear. As an instrument of the EU cohesion policy, the interregional cooperation programme should primarily be dedicated to improving Structural Funds programmes. Even if these programmes are tools among others, they represent more than €300 billion that need to be invested throughout Europe. There are of course challenges in influencing Structural Funds programmes and it is true that some regions receive a limited allocation of these funds. In any case It will still be possible in INTERREG EUROPE to address policies that are not Structural Funds programmes.</p> <p>2. The importance of the private sector in certain priorities of the programme is clear. This participation should be ensured through the creation of local stakeholder groups. Nevertheless, it does not seem appropriate that SMEs are direct beneficiaries for the following main reasons: - the programme primarily focuses on policy learning and not on implementation. From that point of view, it is fundamentally different from any other cooperation programme and from ant other EU programme such as COSME and Horizon 2020. - administrative constraints (e.g. first level control, second level control) are not adapted to this target group.</p> <p>3. If justified, pilot actions would be possible under phase 2. However, the idea of INTERREG EUROPE is that the actions described in the action plan are mainly financed by funds at local/regional/national level.</p>
2,08	Regional Council of Päijät-Häme	Finland	<p>The role of the SMEs should be strengthened in the projects (e.g. via intermediary organisations). Regions are very different and they have very different compositions of the SMEs, and due to this the participation for the SMEs should be made attractive and unnecessary barriers for participation should be avoided. The SMEs are the generators for growth and new jobs in the regions. Unfortunately there are still quite high "mental" barriers for SMEs to participate the international projects and cooperation, and e.g. INTERREG EUROPE could be one channel to diminish these barriers.</p>	<p>The importance of the private sector in general and SME in particular is clear. Their participation should be ensured through the creation of local stakeholder groups. Nevertheless, it does not seem appropriate that SMEs are direct beneficiaries for the following main reasons: - the focus of INTERREG EUROPE is primarily on policy learning and not on implementation. From that point of view, it is fundamentally different from any other cooperation programmes and from other EU programmes like COSME, H2020. - the administrative constraints (e.g. first level control, second level control) are not adapted to this target group.</p>

INTERREG EUROPE - Comments and programme responses to

2. Strategy

N°	Organisation name	Country	Comments	Responses
2,09	AViTeM	France	Again the thematic objectives are too wide	For a programme covering the whole EU territory, more focused thematic objectives would prevent a lot of regions from applying to the programme.
2,10	Chambre de Commerce & d'Industrie Marseille Provence	France	1/Objectives related to accompanying SME growth and support are too few, knowing that only VSIs are creating new job opportunities. 2/Exchanges at inter-regional levels, with Chambers of Commerce as well, should be encouraged significantly in terms of Global Innovation (including Technology) and Open Innovation (including Living Labs).	1/ The whole priority axis 2 is dedicated to SME competitiveness. 2/ Global innovation and Open Innovation are certainly important topics but the rationale of the programme should not be forgotten. It is dedicated to the improvement of policy instruments and in particular Structural Funds programmes. Partners applying to the programme would need to demonstrate their policy relevance.
2,11	Lille Métropole	France	Actors of regional relevance: what does exactly mean? Are cities and local authorities concerned? Precising the meaning of "regional relevance" can help to a better understanding of the objectives Programmes for investment for growth and jobs: projects and actions connected to ESF programmes? Culture is missing from the INTERREG EUROPE strategy while it creates wealth, contributes to social inclusion, and promotes innovation. There is a true need to take culture into account in order to achieve European thematic priorities.	The text of the programme was modified to refer more clearly to the target group and beneficiaries under each priority axis. As reflected under these paragraphs, players of regional relevance will vary according to the issue addressed by the project. Under innovation, it may be development agencies, universities, incubators, etc. Cities and local authorities are certainly of relevance within INTERREG IVC in particular if they can demonstrate their link to Structural Funds. The four thematic objectives were selected by the Partner States; the underlying rationale is explained in table 1. Culture as such is not covered but creative industries can be covered under the first two thematic objectives.
2,12	Energy Cities	France	In terms of approach, Energy Cities highly recommends to use the already existing initiatives (e.g. Covenant of Mayors) and partners (specific networks of local and regional authorities) to avoid duplication and fully leverage the already existing potential. In that sense, Energy Cities would welcome that networks of Local Authorities could also benefit from the programme, even though they are not public bodies. Energy Cities welcomes exchanges of experiences, knowledge and knowhow. International cooperation really helps share and disseminate good practices.	Synergies with existing EU networks will certainly be important. One aim of the policy learning platforms is to improve these synergies. In principle networks of local authorities would still be eligible in the future programme.
2,13	Mission Opérationnelle Transfrontalière	France	Main remark; the programme should address more the territorial dimension of the cohesion policy and not only the thematic dimension via its thematic objectives. Especially for cross-border cooperation such a territorial and even integrated approach is important. In general, the text seems too long and repetitive with the previous context presentation. You could more directly link the objectives with related actions.	The territorial dimension will necessarily be addressed at project level. Although the approach has to remain thematic, the way this is relevant is each territory involved in the programme would need to be demonstrated. The repetition of the text is largely due to the template that is imposed for the cooperation programme.

INTERREG EUROPE - Comments and programme responses to

2. Strategy

N°	Organisation name	Country	Comments	Responses
2,14	Euromontana	France	<p>The proposal to focus on supporting the implementation of the programmes for Investment for Growth and Jobs only excludes many different sections of regional policy and it may be a missed opportunity to have a real integrated approach. The territorial dimension risks also being lost as a result. This choice excludes de facto Norway and Switzerland. It will also have a great impact in the choice of partners (focusing more on Managing Authorities within the EU and by consequence having fewer other types of partners and decreasing some other forms of cooperation).</p> <p>For rural and mountain regions, it would be important to be able to develop links with rural development policy and rural development programmes, not just Goal 1 programmes, in coherence with the integrated approach promoted in this new programming period, with the Common strategic framework of ESIF, with the stronger focus on innovation within rural development policy, with the importance of food, timber, fuel based value chains produced from land management and which represent sometimes a crucial dimension of regions innovation and growth potential and an important part of RIS3. In addition, the local operational groups that will soon be created under Rural development programmes should be really relevant local stakeholders groups to involve in the projects, and thus they could become a great added value for the Interreg Europe programme. Greater linkage between LEADER Transnational cooperation initiative is also necessary in coherence with the mainstreaming of LEADER as CLLD across all ESIF. LEADER was the first European programme tackling innovation...</p> <p>So far, concrete ideas on how to establish links between Interreg Europe projects and the improvement in the implementation of Goal 1 programmes have not been developed. More examples from the JTS would be welcome. The sentence on SME involvement would serve a purpose only if the programme said how it expects to see SMEs involved in absence of financial compensation for their time spent on the project.</p>	<p>The regulation for the 2014-2020 period is clear. As an instrument of the EU cohesion policy, the interregional cooperation programme should primarily be dedicated to improving Structural Funds programmes. Even if these programmes are tools among others, they represent more than €300 billion that need to be invested throughout Europe. There are of course challenges in influencing Structural Funds programmes and it will still be possible in INTERREG EUROPE to address policies that are not Structural Funds programmes.</p> <p>The territorial dimension will necessarily be addressed at project level. Although the approach has to remain thematic, the way this is relevant is each territory involved in the programme would need to be demonstrated. Link with rural development policies will also be important but overlap with EAFRD will not be possible.</p> <p>In INTERREG IVC, 22 projects (including the 20 Capitalisation Projects) were focusing on Structural Funds implementation. Further information can be found in the Annual Report to the Commission and on the programme's website (www.interreg4c.eu).</p>
2,15	Regional Authority FrankfurtRheinMain	Germany	<p>As the challenges of demographic change, migration and skills shortage are missing (s. comments 1.1.3) these topics are not considered enough in the proposed strategy of the programme.</p>	<p>The challenges mentioned are certainly important but the text of the programme is also limited. Demographic change challenge is clearly introduced under the paragraph 'Policy challenges' The issue of skills is also tackled under smart growth ('human capital') and inclusive growth. But it is true that the issue of migration is not directly tackled under the programme strategy.</p>
2,16	VBB Verkehrsverbund Berlin-Brandenburg GmbH	Germany	<p>The strong focus on growth should be questioned as growth itself should not be an aim due to limited natural resources. Quality of life would be an indicator more appropriate than growth.</p> <p>Thematic objectives: Sustainable transport development should be a thematic objective of the programme.</p>	<p>The remark is relevant but INTERREG EUROPE has to be in line with the EU2020 strategy that was adopted by the EU.</p> <p>Partner States decided on the selection of the Thematic Objectives. The underlying rationale is explained in table 1 of the programme; the issue of sustainable transport is not directly tackled.</p>

INTERREG EUROPE - Comments and programme responses to

2. Strategy

N°	Organisation name	Country	Comments	Responses
2,17	Technologiepark Heidelberg GmbH	Germany	The defined overall objective does not reflect the lessons learned of previous programmes	The overall objective is based on the experience gained under previous interregional cooperation programmes INTERREG IIC & INTERREG IVC (e.g. reference to policy learning). It is also related to the text of EU regulations.
2,18	VDI Zentrum Ressourceneffizienz	Germany	No program can certainly ensure "policy changes". They are also very much the results of political processes.	The overall objective is indeed challenging but experience has shown that interregional cooperation can achieve policy changes (see examples provided in the Annual Report to the Commission).
2,19	ministry for economic and european affairs state of Brandenburg	Germany	the strategy based not on all interregional needs; we lost some partner	Due to the concentration principle of the new regulation, Partner States decided on the selection of four Thematic Objectives. The rationale for the selection is explained in table 1 of the programme. A small programme like INTERREG EUROPE can anyway not answer all interregional and regional needs.
2,20	Steinbeis-Europa-Zentrum	Germany	We would welcome if also results of relevant initiatives and projects as funded in INTERREG IV A and B etc. were to be considered in the context of identification of good practices. These de-centrally operated projects are not necessarily known to regional policy makers but do often provide relevant results with regard to the scope of the exchange of experiences and policy learning as envisaged by INTERREG EUROPE. Relevant project actors could be pro-actively involved in exchange on good practices and experiences. In this context, we would like to point especially to the strategic projects implemented under INTERREG IV B.	As long as the relevance to the four thematic objectives is kept, INTERREG EUROPE is also supposed to build on the experience gained under other ETC programmes (i.e. cross-border and transnational cooperation).
2,21	Grants Europe	Hungary	see previous comment	See comment above.
2,22	Észak-Alföld Regional Development Agency	Hungary	How TO2 (ICT) will be integrated in other TOs? It is mentioned in the strategy, but not later by the investment priorities how ICT will be incorporated as a cross-cutting issue.	The programme was amended in section 2 to better reflect ICT as a cross-cutting notion.
2,23	Gect -ezts go	Italy	Mobility and best practice in health sector is a challenge for Europe. There is not any objective related to health	Due to the concentration principle of the new regulation, Partner States decided on the selection of four thematic objectives. The underlying rationale is explained in table 1 of the programme. A small programme like INTERREG EUROPE can anyway not answer all regional needs.
2,24	UNIONCAMERE PIEMONTE	Italy	Maybe it should be better detailed especially concerning the aspect related to the creation of platforms for the exchange of good practices and experiences.	Further details will be provided in the programme manual.
2,25	University of l'Aquila	Italy	The active participation of the regional authorities must be clearly required and checked. What happend so far is that the proposal and implementation of projects are made by agencies external to the decision making board wirth no capacities/skills/power to influence decisions. Development Agencies and similar private organisation must work only if accredited and the accreditation must follow rigorous criteria.	The idea is indeed to check the policy relevance of the partners at the application stage.
2,26	Vidzeme Planning Region	Latvia	The proposed strategy an overall objectives are sound and relevant. The outlined focus on smart specialization and cluster approach should be more integrated thorough all the programme, especially in the Section 2 "Description of the priority axes" of the document.	A reference to smart specialisation strategies was added in section 1.1.3. However, the reference to smart specialisation cannot be imposed beyond TO1 so that the programme remains sufficiently open for the regions.

INTERREG EUROPE - Comments and programme responses to

2. Strategy

N°	Organisation name	Country	Comments	Responses
2,27	Gemeente Heerlen	Netherlands	I personally believe that as long many of these projects are run by public authorities and have strict deadlines they will remain projects. It would be good if there's a change in roles. That local authorities through this programme can facilitate SMEs to work together in projects with clear goals. For instance most programmes that I have experienced are made by authorities instead putting SMEs in front and ask them what will truly help them.	This depends on the aim of each programme. Some of the EU programmes like COSME are directly targeted at SMEs.
2,28	Bureau PAU	Netherlands	see comments above	See comment above.
2,29	Movares	Netherlands	One of the main problems which is slowing innovation and smart growth, is the contracting strategy of public organizations. Most contracts are still awarded based on lowest price, which inhibits commercial organizations to invest in innovations and in the education of their young employees. In my opinion part of the strategy should be to help or facilitate public and private organizations to develop new contracting strategies that promote innovative and educational solutions.	Public procurement of innovation is covered in specific objective 1.2 of the programme.
2,30	Subvention BV	Netherlands	too general, I miss specific areas of attention, for example ICT. Less attention to environmental measures, please	Due to the concentration principle of the new regulation, Partner States decided on the selection of four Thematic Objectives. The underlying rationale is explained in table 1 of the programme. A small programme like INTERREG EUROPE can anyway not answer all interregional and regional needs.
2,31	ProRail	Netherlands	Lot of overlap with strategy and objectives of other EU schemes like Horizon 2020 and CEF	INTERREG EUROPE is the only programme being dedicated to a better implementation of Structural Funds programmes and in particular programmes under the Investment for Growth and Jobs goal. This is a fundamental difference with any other EU programme.
2,32	Delft University of Technology	Netherlands	The difference between operational objective 1 and 2 could be better explained as well as the concept of policy learning platform	Further details will be provided in the programme manual.
2,33	Ministry for Infrastructure and Development	Poland	Proposed modification (p. 14): IP 4e- justification: - To reduce CO2 emissions, regions must put in place strategies for the development and use of renewable energies, sustainable multi-modal mobility options and the adoption of energy efficiency measures to reduce energy consumption. Rationale: Expression sustainable multi-modal mobility options is in accordance with the text of Selected IP 4e - Promoting low-carbon strategies for all types of territories, in particular for urban areas, including the promotion of sustainable multi-modal urban mobility and mitigation relevant adaptation measures; (page 14 and 34)	As already highlighted for section 1.1.3, it is true that the Investment Priority 4e refers more particularly to 'multi-modal urban mobility'. But the idea of the programme is to be more open for the regions by referring more generally to 'sustainable mobility options'. The description of Specific Objective 3.1 is also revised to better reflect sustainable transport issues.

INTERREG EUROPE - Comments and programme responses to

2. Strategy

N°	Organisation name	Country	Comments	Responses
2,34	RDA North-East Romania	Romania	<p>Many projects were approved under INTERREG 2007-2013 calls having as partnership consortium a structure that was covering everything from geographically, experience and expertise point of view, but the importance of decision making role of a particular project partner in the policy management process was not strictly envisaged in the selection process. This caused many problems during project implementation, particularly when capitalization results were targeted.</p> <p>The platform learning instruments (4) envisaged will involve mainly MA initiatives, would be much simple to create a single INTERREG learning platform with the same goals but with 4 thematic areas instead of 4 such instruments.</p>	<p>INTERRE EUROPE will provide a single entry point to the platforms. However, for the sake of clarity, it would still be important to keep one platform per thematic objective.</p>
2,35	Ministry of Regional Development & Public Administration	Romania	<p>It is clear that the overall objective of the programme is: "To improve the implementation of policies and programmes for regional development,...", however, the implementation strategy is not so clear. This objective is extremely broad and there are many aspects that could contribute to it. Therefore, it is not really clear what this programme will do to improve the implementation of policies for regional development. This itself might be confusing for future beneficiaries.</p>	<p>The implementation strategy and intervention logic will be further specified in the programme manual. The regional policies should be improved by integrating good ideas coming from other regions.</p>
2,36	Association of lifelong education	Romania	<p>Not mentioned: - Poverty reduction; - Reducing migration from rural to city, etc.</p>	<p>Due to the concentration principle of the new regulation, Partner States decided on the selection of four Thematic Objectives. The underlying rationale is explained in table 1 of the programme. A small programme like INTERREG EUROPE can anyway not answer all interregional and regional needs.</p>
2,37	BN Chamber of Commerce	Romania	<p>In my opinion, "To improve the implementation of policies and programmes" refers only to the way the policies and programmes are implemented and does not involve changes within policies and programmes, which I think should be the impact of this programme</p>	<p>To improve the implementation refers both to the way the programme are implemented and to the content of these programmes.</p>
2,38	Eudace	Slovenia	<p>ICT should remain a separate priority axis. It's unclear about how the activities will be led in a country like Slovenija, where we have two NUTS2 regions, but there is no administrative separation of the regions in terms of government. Slovenija has only two levels of management, municipalities (more than 220) and the central government. The regional development bodies over the NUTS2 regions are organisational entities without any employees and/or other assets to enable them to lead the activities.</p>	<p>Due to the concentration principle of the new regulation, Partner States decided on the selection of four Thematic Objectives. The underlying rationale is explained in table 1 of the programme. ICT should be considered as a cross-cutting issue within the programme. The word 'region' is used in a broad sense for a relevant territory which can be represented by a local, regional or national organisation (depending on the country).</p>
2,39	Avila County Council	Spain	<p>Clear 4 thematic objectives to be addressed</p>	<p>Remark noted</p>
2,40	Girona City Council	Spain	<p>a) It is important not to take for granted INCLUSIVE GROWTH: Interreg Europe strategy must integrate EQUALITY and DIVERSITY in learning & sharing & capitalising positive ways of action for both proactive and preventive policies on equality and diversity. b) It seems to have a confusion between the EU2020 priority "Inclusive Growth" and the Interreg Europe Programme Horizontal Principle 8.2. "Equal opportunities and non-discrimination".</p>	<p>a) Those horizontal principles are fully integrated in the programme strategy. b) There is no such confusion in the programme document. The selection of the Thematic Objectives can also be explained by the fact that Inclusive Growth related issues will primarily be tackled through ESF.</p>

INTERREG EUROPE - Comments and programme responses to

2. Strategy

N°	Organisation name	Country	Comments	Responses
2,41	EREN	Spain	<p>It is missed the reference of why it is selected the TO4 Low carbon economy in the paragraph referring to "Thematic objectives of the programme". Which of course we consider crucial for the Growth and Jobs in Europe, as it is appear for the other 3 TO.</p> <p>Also in the Table1, page 14 of the "Investment priorities", we consider that energy should be explicitly mentioned, as efforts for a "low carbon energy regional strategies" need support.</p>	<p>The justification to select TO4 is provided through the concentration principle imposed by the new regulation (i.e. second and fourth paragraphs).</p> <p>The energy issue is mentioned in the first bullet point of the first column.</p>
2,42	East Sweden Regional Council	Sweden	<p>What is the definition of "actors of regional relevance"?</p> <p>Policy learning platforms - still rather unclear...what is the pupose? How will the regions participate? Will there be an application procedure or are the regions automatically invited if they are engaged in an INTERREG Europe project?</p>	<p>Players of regional relevance will vary according to the issue addressed by the project. Under innovation, it may be development agencies, universities, incubators, etc.</p> <p>One of the main aims of the policy learning platform is to open the programme to bodies that are not directly involved in projects but still would like to learn from others. Partner regions involved in projects will automatically be members of the platform. For other organisation, there will be a light application procedure in order to ensure their relevance to the platform topic.</p>
2,43	Winnet Sweden - Europe	Sweden	<p>It is important to form co-operation in between EU countries, perhaps to use the Macro Regions as a tool for interregional and strategically crossborder co-operation, in horisontal goals for EU, such as horisontal principles, such as Gender Equality. It is needed so we can really have an impact on policy and action - implementation for the future, learning and doing. Allocation of finance and follow up in this, eveidence and results. There is good practices already, knowledge - but could focus also on Gender research and Economci Growth. Secure the Winnet8 result in the next programming period, both for policy, action, thematic focus and Winnet Centre of Excellence, for interactive research and development.Make it a policy learning platform on a EU level. Crosscutting themes and ICT needs to be generic</p>	<p>The INTERACT programme will have a particular role in building on the experiences of the macro regions. INTERREG EUROPE will have a more particular focus on the Investment for Growth and Jobs goal programmes.</p>
2,44	Regio Basiliensis	Switzerland	Findings and results of INTERREG IVC missing	<p>The lessons learnt from INTERREG IVC are integrated through the actions proposed (e.g. local stakeholder groups, elaboration of action plans, phase 2 to projects, development of platforms). The results are indeed not developed since this is not the purpose of the document. Further information on the INTERREG IVC results can be found on the programme website and in the Annual Report to the Commission.</p>
2,45	North of England EU Health Partnership	United Kingdom	<p>Diffusion of innovation between regions should receive greater prominence considering the policy platforms that are proposed in the programme. This implies a more robust approach to knowledge transfer than exchanges of experience.</p> <p>The social dimension needs to be developed and could incorporated as a cross-cutting theme.</p>	Remark noted.

INTERREG EUROPE - Comments and programme responses to

2. Strategy

N°	Organisation name	Country	Comments	Responses
2,46	Kent County Council	United Kingdom	It is unclear how the two operational objectives differ from each other - terms such as 'capitalisation of practices' also need to be expressed in plain English.	The first operational objective reflects the aim of the platforms while the second one reflects the aim of the projects. But it is true that they both relate to improving policy through policy learning. The word capitalisation refers mainly to the results of the policy learning (i.e. transforming learning into action).
2,47	European Division, Dept of Finance and Personnel , NI Civil Service	United Kingdom	A significant amount of programmes are coming up with similar Thematic Objectives to fund.	This reflects the principle of concentration which is set out in EU regulations.
2,48	Eleanor Dearle	United Kingdom	In my opinion one of the issues facing the EU relates to demographic change and the need to maximise our potential workforce. This requires development of public policy, and business processes. Therefore there should be support for developing policy initiatives which identify and harness such change to support growth.	Demographic change is considered as a cross-cutting challenge that could be for instance tackled through the innovation priority.
2,49	Marches Local Enterprise Partnership	United Kingdom	We propose changes in strategy and suggest that it reads as "The programme will contribute to smart, sustainable and inclusive growth in Europe by promoting exchange of experience and policy learning to create growth and jobs, tackle climate change and energy dependence, and reduce poverty and social exclusion." In delivering the strategy, we suggest that there should be greater involvement of a wider network of stakeholders through the creation of local stakeholder groups, multidimensional policy learning, and broader dissemination of knowledge.	The proposal does not exactly reflect the strategy adopted by the Partner States, in particular the selection of 4 thematic objectives. The selection of these Thematic Objectives can also be explained by the fact that Inclusive Growth related issues will primarily be tackled through ESF. The greater involvement of a wider network of stakeholders should also be ensured through the creation of a local stakeholder group in each partner region.
2,50	New Economy Manchester	United Kingdom	It is a shame that SMEs can participate but can't benefit from the funding. While I understand that projects should be driven by public sector organisations, policy related to business growth should be informed by the SME community, otherwise it will be difficult or impossible to implement.	The importance of the private sector in certain priorities of the programme is clear. This participation should be ensured through the creation of local stakeholder groups. Nevertheless, it does not seem appropriate that SMEs are direct beneficiaries for the following main reasons: - the programme primarily focuses on policy learning and not on implementation. From that point of view, it is fundamentally different from any other cooperation programme and from any other EU programme such as COSME and Horizon 2020. - administrative constraints (e.g. first level control, second level control) are not adapted to this target group.
2,51	University of Ulster Centre for Sustainable Technologies	United Kingdom	International exchanges of information and good practice are welcomed to support overall EU growth. The thematic themes of Strengthening research, technological development and innovation (TO1), Enhancing the competitiveness of SMEs (TO3), Supporting the shift towards a low-carbon economy in all sectors (TO4) and Protecting the environment and promoting resource efficiency (TO6) are seen as complementary and more than one, if not all should be addressed in proposals.	Remark noted

INTERREG EUROPE - Comments and programme responses to

2. Strategy

N°	Organisation name	Country	Comments	Responses
2,52	Aberdeen City Council	United Kingdom	The strategy is well aligned to Europe 2020, but also it can be seen to support actions at a local level and has not been prepared in a top down approach but rather with a bottom up approach to ensure stakeholders are able to identify benefits of collaboration.	Remark noted
2,53	Brighton & Hove City Council	United Kingdom	Low carbon Economy and environment resource and efficiency are the areas i see much promise in for the Interreg Europe programme. In the UK there are sufficient national programmes around SME support whilst Horizon 2020 would be the natural home of research, technological development and innovation. The question is where is, considering subsidiarity, where is Interreg Europe, as a cross Europe best practice sharing programme, the best option for tackling the objectives rather than a national programme?	INTERREG EUROPE cannot be compared with national programmes or with any other EU programme. It is an exchange of experience programme aiming at a better implementation of policies and in particular programmes under the Investment for Jobs and Growth goal. The lessons learnt within INTERREG EUROPE should ideally be integrated into the relevant local / regional / national programmes.
2,54	Scottish Government	United Kingdom	The objective is concise and direct, but it remains unclear how mainstreaming of policy and good practice can occur when concentration of support appears focussed primarily at the project partner level. To achieve the objective, there will need to be full buy-in at the MA/Regional Authority level from the start - however, where is this to rest - within conditional support at the project inception level, indirectly (and perhaps less influentially) at the policy learning platform level, or must commitment be notably present at both levels? A Programme strategy for initial and sustained MA/Regional Authority level engagement over the 2014-2020 period will need to be established and implemented.	This remark is very important and the programme is in close cooperation with the European Commission to establish a closer link with MA/Intermediate Bodies. In INTERREG IVC, there were examples of good projects where MAs were directly the partners of cooperation projects. These projects have demonstrated direct impact on the Structural Funds programmes of the participating regions (not always in terms of funding but also in the way the programmes were managed). In the future, when Structural Funds programme will be targeted, the support of the MA would need to be demonstrated.
2,55	RENREN Network	various EU MS	It is missed the reference of why it is selected the TO4 Low carbon economy in the paragraph referring to "Thematic objectives of the programme". Which of course we consider crucial for the Growth and Jobs in Europe, as it is appear for the other 3 TO. Also in the Table1, page 14 of the "Investment priorities", we consider that energy should be explicitly mentioned, as efforts for a "low carbon energy regional strategies" need support.	The justification to select TO4 is provided through the concentration principle imposed by the new regulation (i.e. second and fourth paragraphs). The energy issue is mentioned in the first bullet point of the first column.
2,56	BIO-EN-AREA Network	various EU MS	It is missed the reference of why it is selected the TO4 Low carbon economy in the paragraph referring to "Thematic objectives of the programme". Which of course we consider crucial for the Growth and Jobs in Europe, as it is appear for the other 3 TO. Also in the Table1, page 14 of the "Investment priorities", we consider that energy should be explicitly mentioned, as efforts for a "low carbon energy regional strategies" need support	The justification to select TO4 is provided through the concentration principle imposed by the new regulation (i.e. second and fourth paragraphs). The energy issue is mentioned in the first bullet point of the first column.

INTERREG EUROPE - Comments and programme responses to

2. Strategy

N°	Organisation name	Country	Comments	Responses
2,57	WWF Germany	WWF Germany but acting for WWF in Europe	<p>The general rule for beneficiaries is not sufficiently taking into account the role of partnership principles as set out in the CPR and code of conduct, partners as defined under the common rules, should also be empowered to play a stronger role in the project implementation.</p> <p>The text mentions that the full range of topics within the selected thematic objective can be addressed, however not all investment priorities have been addressed, this for example excludes 6.d whereas in the strategy addressing the protection of environment is identified but funding for biodiversity, ecosystems and green infrastructure is not included.</p>	<p>The creation of local stakeholder group at the level of each partner region partly answers to the partnership principles as set out in the CPR and code of conduct.</p> <p>The issues tackled under investment priority 6.d have been covered under the investment priority 6.c (specific objective 4.1).</p>

INTERREG EUROPE - Comments and answers responses to

3. Thematic Objective 1

N°	Organisation name	Country	Comments	Responses
3,01	Upper Austrian Tourist Board	Austria	Many actors in tourism do not have any capacities for research. So not only infrastructure, but especially human resources in public bodies like regional tourism organisations is needed. They should perform the research activities and transfer knowledge and innovations into the SMEs.	The specific objective 1.1 does not only refer to research and innovation infrastructure but also to 'capacities'.
3,02	Provincie Vlaams-Brabant	Belgium	The description of investment priorities 1a and 1b should make clear that social innovation is included.	Social innovation is covered by investment priority 1b (page 14).
3,03	PURPLE - Peri-Urban Regions Platform Europe	Belgium	Networking peri-urban regions within PURPLE would strongly support opportunities to capitalise on benefits of sharing experience and good practice in regional development strategies and programmes in any field as a way of avoiding reinventing the wheel or making costly mistakes.	This is exactly the aim pursued by INTERREG EUROPE within the four thematic objectives selected by the Partner States.
3,04	ERRIN Network	Belgium	<p>Need to specify 'enablers' – (how far do these link to the Regional Innovation Scoreboard 2014?) Need more monitoring that 'sharing of practices and policy learning will improve capacities of individuals and organisations.</p> <p>ERRIN supports the concept of a 'Policy learning Platform' and sees a specific objective of linking Interreg projects with other EU programmes.</p> <p>ERRIN supports the minimum link with Operational Programmes as there are instances where regional governance and administrative practice can act as a barrier to getting full support for projects although the projects have a clear utility in the region or involve credible actors with string track records.</p> <p>ERRIN supports the Policy Learning Platforms which should keep close links with all relevant EU programmes not just RIS3. See Figure 1 above. More transparency is required on how the Policy Learning Platforms will be selected. ERRIN suggests that a tendering process should be undertaken for each TO. The TOs should be connected by a coordination unit covering a technical (website), administrative, policy and outreach role. The coordination unit should include representatives of European networks relevant for the TOs as well as links to key EU funding programmes and activities</p> <p>ERRIN supports the two-phase approach and proposes that learning from the Regions of Knowledge programme should be integrated into this first phase. Phase 2 should include funding for travel and accommodation. If there are no funding opportunities for Phase 2, there may be issues of continuation especially in times of public sector budget cuts.</p>	<p>The enablers for innovation refer to education level of the labour force, the quality of the research system and the public investment in R&D. It is indeed related to the Regional Innovation Scoreboard.</p> <p>Remarks noted on the platforms and on the two-step approach for the projects.</p>
3,05	Department of Environment	Cyprus	<p>We support the contribution of specific objective 1.1 to synergies with themes covered under other specific objectives of the Programme i.e. low-carbon technology or resource efficiency. We encourage the proposed actions under specific objective 1.2 related to exchange of practices in the field of green technologies. This SO can contribute to synergies i.e. eco-innovation, low-carbon technologies or resource efficiency.</p>	Remark noted
3,06	INTERACT	EU wide	It may be enough with only one SO, the second one as it covers the first one to the extent an interregional cooperation programme can influence it.	The definition of each specific objective is still specific and in principle the second objective does not cover the first one.

INTERREG EUROPE - Comments and answers responses to

3. Thematic Objective 1

N°	Organisation name	Country	Comments	Responses
3,07	MTT agrifood research Finland	Finland	Development and testing of biochar based technologies wil give a huge innovation opportunity. Because of many claims and lack of hard data a lot of research work is need	This remark is very specific and cannot be integrated at programme level. But this may be taken over at project level.
3,08	AViTeM	France	Not all elements of regional strategies are relevant for cooperation. A lot of them end in fuzzy results usually described as exchange of experience. Few lead to real changes in regional or local strategies.	Experience under INTERREG IVC has shown how efficient interregional cooperation can be in changing policies. Numerous examples can be found every year in the Annual Report to the Commission.
3,09	Political Science Institute Grenoble	France	The problem is not the relevant character of the objectives but the way you can deal with at a regional level.	Further information will be provided in the programme manual.
3,10	Chambre de Commerce & d'Industrie Marseille Provence	France	1/ The programme should not only consider Technology Innovation but also Global Innovation (including Humanities) as well as Open Innovation and regional policy supporting measures (living labs...) 2/ Policies related to Smart Specialization should not be only mono-technology but, where relevant, should encourage multi-technology systems (for ex. Mechatronics)	These elements are already taken into consideration. For instance, the programme clearly refers to different forms of innovation (page 19).
3,11	Agropolis International	France	The interregional cooperation may help to improve the implementation of regional policies and programmes (for instance in idenfying best practices or new ideas in other region), but is not the key factor of sucess	Remark noted
3,12	Lille Métropole	France	Local development policies must be taken into account. Clarification to make in the use of "programmes for Investment for Growth and jobs": does it mean that activities under this specific objective will have to be in the regional ESF OPs? Innovation through cross-actions of companies/SMEs in line with regional and local policies can also be relevant in those objectives.	The improvement of Investment for Growth and Jobs programmes can also come from the local level for instance through the quality of the bids submitted to the programme. From that point of view, the local level is important. Due to the partnership principle, the local level should also be represented in the management bodies of Structural Funds. This kind of innovation should indeed be relevant.
3,13	Energy Cities	France	Energy Cities would like to highlight the importance of research in the energy transition of cities and towns and vice-versa. Local and regional sustainable energy strategies hold a huge potential for academia as demonstrated in the Covenant of Mayors and in the Energy Cities initiative "IMAGINE the energy future of our cities". IMAGINE was set up in 2006 by Energy Cities as an exchange platform to discuss the energy future of European cities. Therefore, we suggest that this specific objective be translated into a mobilisation of universities in the definition and implementation of the regional and local strategies.	Remark noted
3,14	Technopôle Brest-Iroise	France	This objective mainly focuses on regional authorities, local authorities and cities in particular, play a major role in terms of innovation policies and programmes development and implementation	Remark noted
3,15	Brest métropole océane	France	This objective mainly focuses on regional authorities, local authorities and cities in particular, play a major role in terms of innovation policies and programmes development and implementation	Remark noted

INTERREG EUROPE - Comments and answers responses to

3. Thematic Objective 1

N°	Organisation name	Country	Comments	Responses
3,16	CRITT agroalimentaire PACA	France	Ensure that activities, services and actions will be according to the needs of SMEs	Remark noted
3,17	Euromontana	France	<p>The clearer focus on implementation after research co-operation is welcomed as is the recognition of the importance of growing regional infrastructure for research and innovation. The success of the Policy Learning Platform will be key to this and needs to be more fully developed to support inter-regional co-operation projects.</p> <p>Nevertheless, for Regions of Knowledge, there is a doubt about the attractiveness of the programme: indeed, when they were funded under FP7, the management and reporting of these projects were much easier than they will be under Interreg Europe (especially regarding the necessity to have First level control every 6 months under Interreg Europe). So it may be more difficult to develop projects under Interreg Europe than during the previous programming period for these regions.</p>	For the Regions of Knowledge, the remark is important since INTERREG EUROPE will have to comply with the rules of the EU cohesion policy.
3,18	Eurisys	France	<p>Innovation is not just R&D and should therefore not be evaluated solely in terms of R&D activities. Innovation is also the use of new technologies to innovate in the way things are done.</p> <p>INTERREG programmes in the field of innovation should also cover initiatives from regions and cities to use operational innovative products and services in order to improve working practices and processes; knowledge-intensive products and services based on satellite applications impact practices and processes in Regions.</p> <p>Feedback from Eurisys's work with Regions is that, for local and regional authorities, innovation means more than producing "new technology" through R&D. Indeed, practices too can be made innovative by using emerging, but operational products and services. Because innovation is too narrowly defined as the production of innovative technologies, other barriers to the penetration of innovation (organisational, funding, legislative etc) are often overlooked. Non-technological obstacles to the penetration of innovation into professional practices should also be better taken into account.</p> <p>INTERREG programmes should also focus more on stimulating market demand for innovative products and services that result from R&D programmes, such as FP7. For example, in the case of the Galileo and Copernicus programmes, a lot of operational information and services are already available for companies and public administrations to use. However, these users are not well aware of what is available, and under what conditions.</p>	<p>In the description of the specific objective 1.2, innovation is indeed closely related to the R&D activities. But the programme also refers to other forms of innovation that are not only technological. Organisational and social innovation are for instance mentioned in the main target groups.</p> <p>There may be a confusion on the role of INTERREG EUROPE programme in relation to R&D programmes. Cross-border and transnational cooperation programmes may have indeed a direct role in stimulating market demand. But INTERREG EUROPE is an exchange of experience programme aiming at a more efficient implementation of Structural Funds programmes. Its primary target group is therefore the policy makers.</p>
3,19	Regional Authority FrankfurtRheinMain	Germany	Universities, research institutes and enterprises in the region Frankfurt/Rhein-Main are competitive European and global players in the field of research and innovation. These are creative and innovative stimulants to promote the economy. Regarding relevant regional development policies and strategies for research and innovation more work can be done at regional level. Interregional cooperation can be an accelerator to define and implement this.	Remark noted

INTERREG EUROPE - Comments and answers responses to

3. Thematic Objective 1

N°	Organisation name	Country	Comments	Responses
3,20	Technologiepark Heidelberg GmbH	Germany	Regional development policies and programmes will strengthen international cooperations	Remark noted
3,21	City of Munich / Dept. of Labor and Economic Development	Germany	The urban dimension should be stressed. There is a need to stimulate the cooperation of relevant stakeholders at local levels i.e. by integrated urban development concepts	Even if the urban dimension is important, the core focus of INTERREG EUROPE is on the implementation of the Investement for Growth and Jobs programmes. Urban issues will be also covered under the URBACT programme.
3,22	Steinbeis-Europa-Zentrum	Germany	<p>For the delivery of innovation in regional innovation value chains, a systemic approach – involving all relevant stakeholders including research, finance, end-users etc. - which is clearly demand-driven and oriented towards solving concrete problems and / or coping with major societal challenges is a needed. New forms of flexible, possibly even ad hoc innovation cooperation within, between and beyond clusters and other actors, as well as cross-industry / cross-technology approaches are particularly promising in order to upgrade innovation ecosystems. The exchange of experiences should integrate these concepts, with a specific view to multi-disciplinary approaches and good practices on implementation of key-enabling technologies. Awareness for the potentials of cross-industry / cross-technology approaches as well as the implementation of Key enabling technologies with a view to upgrading traditional industries should be raised. Innovation value chains should not only be addressed from a regional, but also from a transnational perspective (experience on transnational value chain deployment in the light of Smart Specialization Strategies). The CENTRAL EUROPE strategic project CluStrat (www.clustrat.eu) offers new concepts in this regard.</p> <p>Nevertheless, as the innovation community as well as the cluster community is developing over the years, the topics of the exchange of experiences and policy learning should not be too specific and enable new approaches to be proposed and assessed.</p> <p>In a more general yet targeted way, following issues are relevant:</p> <ul style="list-style-type: none"> -New and efficient ways of technology and knowledge transfer to SME -Raising awareness in SME and especially the CRAFT sector on the potential applications of key enabling technologies -Large scale demonstration facilities for testing and validating new technology applications -Transnational cooperation across sectors, involving industry, sme and research to enhance the development of new products and services in emerging industries 	Remarks noted. The multi disciplinary approach is becoming more and more important in innovation policies.
3,23	The Athens Chamber of Small-Medium Industries	Greece	What do you mean with the phrase "programmes for Investment" (it is a bit elliptical)	This phrase refers to the first pillar of the 2014-2020 Cohesion Policy: programmes for the 'Investment for Growth and Jobs goal'
3,24	Chamber of Commerce and Industry for Győr-Moson-Sopron County	Hungary	Although several priorities are similar to the Horizon2020 programme, considering the target group and scope of actions overlaps are avoided.	The focus of INTERREG EUROPE is primarily on policy learning (not on implementation). From that point of view, it is fundamentally different from Horizon 2020.

INTERREG EUROPE - Comments and answers responses to

3. Thematic Objective 1

N°	Organisation name	Country	Comments	Responses
3,25	Istituto per le Piante da Legno e l'Ambiente S.p.A.	Italy	I consider that the Growth should be more specified and considered not only as an economic progress in term of local income, but also in sustainability of the proposed models. Perhaps a controlled decrease, even though not politically appreciated, would be better for the future of all the world.	This approach is partly covered under the paragraph on 'sustainable growth'.
3,26	ARPA Piemonte	Italy	In the Specific Objective 1.1, the implementation of regional development policies and programmes should be completed by professional advice and technical support, in order to choose the best policies development and programmes.	To a certain extent, the policy learning platform should bring a certain level of expertise but it is up to each region to judge what is the most adapted to its territory.
3,27	University of l'Aquila	Italy	The involvement of universities must be stressed. They are the key actors for research and innovation.	Universities are clearly mentioned among the main target groups.
3,28	Unioncamere-Union of the Italian chambers of Commerce	Italy	<p>With regard to the “better match between education curriculum and needs from innovative companies”, since 1997, the Union of the Italian Chambers of Commerce (Unioncamere) has developed, with the collaboration of the Ministry of Labour and the European Union, the Excelsior Information System (http://excelsior.unioncamere.net), which represents one of the main sources of information on labour market forecast. The survey provides detailed information on the occupational needs of Italian enterprises, and is aimed at supporting the policies concerning the mismatch between the labour market and the education and training system, and at favouring the matching between labour supply and demand. Every three months, the survey covers a sample of over 180,000 private enterprises operating in Italy (100,000 private enterprises for the annual survey) and provides detailed information on the characteristics of the labour demand in the country, in addition to the number of employees that the enterprises plan to recruit for next following months.</p> <p>Moreover, the Italian Chambers of Commerce are active in promoting the diffusion of innovation in the business environment in the field of industrial property, since they receive the trademarks and patents registration applications, and technology transfer. Unioncamere supports the initiatives of the Chambers Network through informative tools and studies aimed at finding out the needs of companies. In particular, through the collaboration with the Consortium for Technological Innovation in the Chambers Network (DINTEC), Unioncamere promoted the establishment of an Innovation Platform (http://www.innovazione.dintec.it) which aims to:</p> <ul style="list-style-type: none"> •stimulate the creation of innovation networks based on knowledge and experience at local and national level; •facilitate SMEs' access to tools to support innovative processes; •investigate the dynamics of SME development at the sectoral level in order to support the Chambers in the definition of interventions aimed at fostering innovation in enterprises; •help to stimulate the creation and growth of innovative start-ups or companies that develop new business ideas (in terms of both process and products and services), with high technological content. 	Remark noted. This topic could be the subject of a possible project.

INTERREG EUROPE - Comments and answers responses to

3. Thematic Objective 1

N°	Organisation name	Country	Comments	Responses
3,29	Vidzeme Planning Region	Latvia	Projects, activities and pilot actions should be implemented in both: NUTS 2 and NUTS 3 levels. The focus on end-user inclusion and inclusion and funding of pilot actions to test Action plans, should be more emphasized, and made an integral part of Inter regional cooperation projects.	The word 'region' is used in a broad sense for a relevant territory which can be represented by a local, regional or national organisation (depending on the country). It is true that the capacity of the programme to influence structural funds programmes will partly depend on the country's organisation. Pilot actions cannot be systematised for all projects and all regions. It will very much depend on the outcome of phase 1 and on the actions described in the action plan.
3,30	Subvention BV	Netherlands	the description is too general	Text is limited due to the constraints imposed by the EC template.
3,31	ProRail	Netherlands	Companies seek for their innovation the most logical partner and that does not have to be in a certain pre-defined region.	Remark noted
3,32	Central Statistical Office	Poland	<p>Proposed modification (p. 21) It is proposed to add to the target groups as well as types of the beneficiaries: public statistical bodies as entities monitoring regional policy in the field of scientific research, technological progress and innovation, inter alia, in the context of the implementation of the goals within Investment for Growth and Jobs.</p> <p>Rationale: Support for the research and analysis which provide information on the regional structure of the innovation.</p> <p>Proposed modification (p. 19-20): It is proposed to add to the target groups as well as types of the beneficiaries: public statistical bodies running research and analysis in the field of R&D and innovation activity.</p> <p>Rationale: Support for the research and analysis which provide information on the scientific research, technological progress and innovation.</p>	Even if the monitoring of the regional policies will be important (not only in TO1 but in all TOs selected), to indicate public statistical bodies as a main target group is not totally clear. These bodies are anyway be covered under the first or third bullet points (i.e. public authorities or research and academic institutions).
3,33	RDA North-East Romania	Romania	<p>The 1a) list of examples of possible projects includes the establishment of regional fund for technology innovation and creation of research facilities. Those regions with no administrative authority can hardly respond to this issue.</p> <p>The 1b) list of examples of possible projects has no reference to a possible correlation with regional smart specialization strategies priorities, but induce the idea of concentrating initiatives toward green technologies, cross-border and life-science related clusters or IT and new media sectors. This limits the number of potential applicants.</p>	<p>a/ This is just an example and the establishment of the fund can be at national level depending on the country organisation.</p> <p>b/ Again, this is just an example. The programme does not have any restrictions in terms of targeted sectors.</p>
3,34	Ministry of Regional Development & Public Administration	Romania	In areas of "smart specialisation" there is great need for exchange and learning in order to define areas and specific domains for smart specialization	Remark noted

INTERREG EUROPE - Comments and answers responses to

3. Thematic Objective 1

N°	Organisation name	Country	Comments	Responses
3,35	Association of lifelong learning	Romania	These objectives are difficult for the rural families or NGOs	Due to the concentration principle of the new regulation, Partner States decided to select four Thematic Objectives. Table 1 of the programme provides the underlying rationale behind this decision. A small programme like INTERREG EUROPE can anyway not answer all interregional and regional needs.
3,36	BN Chamber of Commerce	Romania	With the mention that the paragraph "Improve the implementation of .. policies and programmes" should be revised	It seems that this sentence refers to the first pillar of the 2014-2020 Cohesion Policy - programmes for the 'Investment for Growth and Jobs goal' - which is the core focus of INTERREG EUROPE.
3,37	Avila County Council	Spain	The specific objective is interesting, but maybe the Horizon 2020 is covering this subject also. Somehow potential overlappings could show up in case.	The focus of INTERREG EUROPE is primarily on policy learning (not on implementation). It is also dedicated to a better implementation of structural funds programmes. From that point of view, it is fundamentally different from Horizon 2020.
3,38	BCD Barcelona Design Centre	Spain	It would be useful to provide examples of kind of projects to be developed	First examples of possible topics are provided in the Cooperation Programme. More detailed examples will be provided in the programme manual.
3,39	East Sweden Regional Council	Sweden	It is difficult to understand the difference between specific objective 1.1 and 1.2, they are too similar in terms of content.	The first specific objective focuses on the innovation infrastructure and capacities (enablers of innovation) whereas the second objective deals with the innovation chain.
3,40	Winnet Sweden - Europe	Sweden	Quadruple Helix partnerships platforms, is important to also involve the civil society in development - include EU citizens, which means; Women and Men, Quadruple helix, partnership platforms, actors from Public, authorities, decision makers, Reserachers, Business/private and NGO s such as Women Resource Centres (WRC Winnet Centre of Excellence, with thematic focus on, Gender Innovation for Economic Growth, is one, - it includes, entrepreneurship and ICT to.	Remarks noted
3,41	Regio Basiliensis	Switzerland	too strong focus on innovation and smart specialisation	The choice of the thematic focus is made by the Partner States and is explained in table 1 of the programme.
3,42	Westcountry Rivers Trust	United Kingdom	There needs to be an emphasis on spatial knowledge hubs, where data, evidence and information can be stored so that the wider society can access, analyse and interpret this. Example platforms need to be identified and trialled to demonstrate the collation of ecosystem information.	This remark seems too specific to be integrated in the cooperation programme.
3,43	Cambridgeshire County Council	United Kingdom	Agree with the identification of science parks operators in the target groups. However, it is difficult to see how the activities can bring real enhancement to the R&I infrastructure.	Activities primarily refer to interregional policy learning which later on should be transformed into actions.

INTERREG EUROPE - Comments and answers responses to

3. Thematic Objective 1

N°	Organisation name	Country	Comments	Responses
3,44	Eleanor Dearle	United Kingdom	It should be recognised that innovation covers a broad range of activities, including public and business innovation outside of what it termed "smart specialisation". In my opinion this theme will be an effective support for currently innovative regions, but it will have little effect in driving innovation where there is little innovation at present especially if there is dispersed and isolated innovation potential which doesn't fit into a single "smart focus" Also many of the enablers are outside of the scope of public authorities.	Remark noted
3,45	Marches Local Enterprise Partnership	United Kingdom	<p>This specific objective (1.1) can be delivered by national and local authorities for stimulating all forms of innovation, including technological and social innovation which will support their respective local growth plans.</p> <p>We maintain that specific objective 1.2 "improve the implementation of regional development policies and programmes, in particular programmes for Investment for Growth and Jobs and, where relevant, ETC programmes, that support the delivery of innovation by actors in areas of Smart Specialisation and innovation opportunity" is relevant for interregional cooperation as it will facilitate sharing of practices and policy learnings which will result in the better implementation of Growth and Jobs objectives. This will also complement the LEPs (Local Enterprise Partnerships) Smart Specialisation provision as provided in their European Structural and Investment Fund strategies by creating platforms in improving technology transfer and emergence and economic exploitation of research results.</p>	Remark noted
3,46	New Economy Manchester	United Kingdom	We would like to see this priority to focus on four key areas: 1. How to retain and exploit our regions' excellence in science, technology and innovation assets; 2. How to create the right conditions to increase the capacity of our European SMEs to innovate and exploit the commercialisation of the opportunities emerging from our science and technology assets; 3. How regions and cities can take advantage of the innovative solutions and technologies that can tackle the major global societal challenges, i.e active ageing, climate change, secure energy, secured food, unemployment, etc; How to grow a science, technology and innovation economy by providing our population with the relevant skills and qualifications for the existing or future career opportunities.	All these topics will be possible under INTERREG EUROPE.
3,47	University of Ulster Centre for Sustainable Technologies	United Kingdom	Our research proposals will address energy storage whose implementation contributes to policy fulfilment in facilitating integration of renewable energy and stimulate new jobs in manufacture, construction, installation and operation. Its support of renewable energy contributes to the innovative infrastructure agenda. Given that areas of Europe are deemed to be suitable for non-dispatchable renewable energy, specialisation strategies to concentrate resources for innovation support on key areas of underpinning intervention, at that the resource for Compressed Air Energy Storage i.e. salt deposits lies across a significant portion of the region s for this call, the opportunity exists to support this emerging agenda as a potential R&D/job creation/economic growth stimulus.	This remark seems too specific to be integrated in the cooperation programme.

INTERREG EUROPE - Comments and answers responses to

3. Thematic Objective 1

N°	Organisation name	Country	Comments	Responses
3,48	Aberdeen City Council	United Kingdom	<p>Objective 1.1 - There would be clear added value in this type of area and the benefits of collaboration is clear. However, clarification would be welcomed on the scale of project which can be considered. Could demonstration projects be supported, or would the focus be more targeted at policy implementation and strategic planning type activities through exchange of knowledge and best practice.</p> <p>Objective 1.2 - This is a broad definition and further targeting of key growth areas may provide greater focus on this. This objective is not written in clear terms and therefore it is not clear how local regions can benefit from participation in this area through interregional collaboration. This appears to be thematically based on innovation, despite innovation being a cross cutting theme which is required in all projects. If there were a small number of priority sector areas in this then the programme would have more focus. This area could include actions for development of a low carbon economy through smart specialisation.</p>	<p>Objective 1.1. Even if this objective deals with innovation infrastructure and capacities, INTERREG EUROPE will support primarily exchange of experience and policy learning in this policy field.</p> <p>Objective 1.2. The focus of the programme is not reflected in the selection of certain sectors but in the policies to be improved. INTERREG EUROPE is primarily dedicated to the improvement of the Investment for Growth and Jobs which means that the programme is much more targeted than before. To go further in the thematic focus would prevent a lot of regions from applying.</p>
3,49	Brighton & Hove City Council	United Kingdom	<p>In the UK we do not have regional development policies as such. It is done on a NUTS3 level and also by Local Enterprise Partnerships which do not follow necessarily follow NUTS boundaries at any level. Smart specialisation may be of interest although the UK national government has decided the smart specialisation strategy for England some individual local authorities have signed up to the smart specialisation platform independently.</p>	<p>The word 'region' is used in a broad sense for a relevant territory which can be represented by a local, regional or national organisation (depending on the country).</p>

INTERREG EUROPE - Comments and responses to

4. Thematic Objective 3

N°	Organisation name	Country	Comments	Responses
4,01	Upper Austrian Tourist Board	Austria	As mentioned above regional tourism organisations can be seen as research and innovation clusters which support SMEs in their development.	The programme does not deny this point.
4,02	Provincie Vlaams-Brabant	Belgium	We prefer focusing support for SME's on thematic objectives 1, 4 and 6.	Due to the concentration principle of the new regulation, Partner States decided to select four Thematic Objectives. Table 1 of the programme provides the underlying rationale behind this decision.
4,03	PURPLE - Peri-Urban Regions Platform Europe	Belgium	As above	See remark above
4,04	FLEMISH ENVIRONMENT AGENCY (VMM)	Belgium	It may be relevant for the programme but it is not relevant for our agency	Remark noted
4,05	ERRIN Network	Belgium	Comments ERRIN recommends that any engagement with SMEs at the European level should aim at reinforcing SMEs that have a research and innovation base and wish to internationalise. There should be close cooperation with the Enterprise Europe Network for all aspects of projects involving SMEs.	As explained under question 1, INTERREG EUROPE cannot be dedicated to excellence only. The EU cohesion policy is of particular importance to less performing countries. When relevant and in particular for the platform, the cooperation with EEN may indeed be important.
4,06	Department of Environment	Cyprus	We support the contribution of Specific objective 2.1 to synergies with themes covered under other specific objectives of the Programme i.e. supporting SMEs on EMAS or resource efficiency issues.	Remark noted
4,07	Kainuun Etu Oy	Finland	In this thematic objective really the link with H2020 & COSME might be made more explicit. Also, reference to the combination of funds might be useful.	Section 6.2 is revised accordingly. The combination of funds itself is more relevant for investment / implementation related projects.
4,08	MTT agrifood research Finland	Finland	Production of biochar and biocahr based tehcnologies will support SMEs in many ways all over the Europe.	This remark is too specific to be integrated in the cooperation programme but it may be the subject of a possible project.
4,09	Regional Council of Central Finland	Finland	The strategy and the objectives are relevant. However, they do not meet with the needs of SME's on practical level. SME's need concrete actions and results.	SMEs will directly benefit from the actions supported within the Investment for Growth and Jobs programmes. INTERREG EUROPE is there to make these programmes more efficient.
4,10	Lahti Region Development LADEC Ltd	Finland	SME*s and micro companies they need help without huge bureaucracy	The primary target group of INTERREG EUROPE remains the policy makers and in particular the bodies in charge of the Investment for Growth and Jobs goal programmes.
4,11	AViTeM	France	Same comment as above. Moreover, this is a domain where regional disparities are usually important and are an obstacle to fruitfull cooperation.	The INTERREG IVC experience has demonstrated how efficient interregional cooperation can be in changing policies. Numerous examples can be found every year in the annual report to the Commission. The regional disparities usually bring added-value to the cooperation as long as the project addresses a real shared need.

INTERREG EUROPE - Comments and responses to

4. Thematic Objective 3

N°	Organisation name	Country	Comments	Responses
4,12	Chambre de Commerce & d'Industrie Marseille Provence	France	Priority should be given to : 1/ traditional VSMEs (about 90% in South Europe) and ETCs which are in desperate need of specific accompanying measures (finance, international, research...), 2/ VSME access to complex Public & Private markets & tenders 3/ VSME access to the Green Economy	Partner States have decided on the thematic objectives of the programme. The programme is also very specific considering that it primarily targets Investment for Growth and Jobs programmes. Any further specific focus would prevent a lot of regions from applying to the programme.
4,13	Chambre d'Agriculture Savoie Mont Blanc	France	I think it's very important to share experience between company in competitiveness especially in agro business. For exemple, research in food waste could be a common matter.	This remark is too specific to be integrated in the cooperation programme but it may be the subject of a possible project.
4,14	Agropolis International	France	The interregional cooperation may help to improve the implementation of regional policies and programmes (for instance in identifying best practices or new ideas in other region), but is not the key factor of success	Remark noted
4,15	Lille Métropole	France	The objective does not specify the economic sectors. All economic sectors and kind of SMEs have to be concerned, This objective should also include the following items: •Developing innovative and sustainable business parks •Developing and supporting existing activities/SMEs within the city •Supporting Industrial SMEs Exchanges of experiences and good practices about new funding models for SMEs is also a key topic (regional or local financial tools, European financial instruments...).	The programme does not introduce a focus on specific sectors. However, the proposed items including funding models for SMEs will be possible within INTERREG EUROPE.
4,16	EGCT Aquitaine-Euskadi	France	Very relevant because we have to be able to boost the small and medium sized Enterprises, specially since they have a deep lack of credits from the banks.	Remark noted
4,17	Energy Cities	France	Energy Cities would like to highlight the importance of SMEs in the energy transition of cities and towns and vice-versa the huge potential lying into local and regional sustainable energy strategies for SMEs. Therefore, we suggest that this specific objective be translated into a mobilisation of SMEs in the definition and implementation of the regional and local strategies.	It is not clear to which extent this proposal fits within the current programme and its focus on structural funds programmes. The role of SME is recognised throughout the programme and their involvement will be possible through the creation of local stakeholder groups.
4,18	CRITT agroalimentaire PACA	France	It is important to favorise the organisation of pilot actions.	INTERREG EUROPE remains primarily dedicated to policy learning. Pilot actions will be possible only in justified cases.
4,19	Euromontana	France	It is hard to see this objective being realized without easier access to mainstream match-funding and a policy-shift on the part of the banking sector. For peripheral areas, there must be a recognition that high transport and fuel costs, coupled with poor ICT infrastructure obstruct paths to growth for SME's, which are often micro-businesses.	The link to the 'mainstream match-funding' is indeed the main challenge for the future programme which is currently working with the Commission on the way to build this link.
4,20	Eurisy	France	Regions which have smart specialization policies in place can support innovative SMEs in two ways: - by using the innovative services produced by those SMEs themselves - by "prescribing" the use of innovative services by SMEs who provide services to the Region Satellite applications can give SMEs a competitive advantage. They can help SMEs offer innovative products, access bigger and international markets and enlarge their demand. INTERREG programmes should support those Regions who help consolidate SMEs' access to new services and technologies and help integrate them in their business models. INTERREG funding schemes will allow Regions or SMEs contracted by Regions within a project to evaluate innovative services (geo-information for instance) without incurring the inherent risk of adopting a new technology. Information about eligible innovative services resulting from European investments in Copernicus and Galileo should be provided alongside calls for project proposals. The EU has a key role in federating user needs and stimulating demand by informing users on what is available.	These remarks are interesting but are too specific to be integrated in the cooperation programme.

INTERREG EUROPE - Comments and responses to

4. Thematic Objective 3

N°	Organisation name	Country	Comments	Responses
4,21	Regional Authority FrankfurtRheinMain	Germany	SMEs in the region Frankfurt/Rhein-Main can benefit from various programmes to support the development of SMEs in all stages of their life cycle. However, especially SMEs which are in their expansion phase need more support. For regional policies and programmes which help SMEs in this phase more knowledge and experience is needed.	Remark noted
4,22	Technologiepark Heidelberg GmbH	Germany	Especially for SME international cooperation is important for growth	Remark noted
4,23	City of Munich / Dept. of Labor and Economic Development	Germany	It is difficult to cooperate with SMEs at local level because of limited capacities of such companies. The argument gets more weight at the European level.	Remark noted
4,24	ministry for economic and european affairs state of Brandenburg	Germany	erdf is abolutly enough support	Remark noted
4,25	The Athens Chamber of Small-Medium Industries	Greece	What do you mean with "programmes for Investment"?	This phrase refers to the first pillar of the 2014-2020 Cohesion Policy: programme for the 'Investment for Growth and Jobs goal'.
4,26	Zala County foundation for Enterprise Promotion	Hungary	We suggest to encourage special programmes as well as knowledge transfer for young and woman enterprises It would be important to support the training of enterprises, e.g. export academy	The first topic could be the subject of a possible project but it will not be possible for INTERREG EUROPE to finance directly training of enteprises.
4,27	University of l'Aquila	Italy	Universities/research centers must work directly with SMEs without intermediary bodies. projects must develop immaterial infrastructures for achieving this.	Remark noted

INTERREG EUROPE - Comments and responses to

4. Thematic Objective 3

N°	Organisation name	Country	Comments	Responses
4,28	Unioncamere-Union of the Italian chambers of Commerce	Italy	<p>With a view at SME development policies, the Union of the Italian Chambers of Commerce (Unioncamere) looks favorably at a “supply chain” potential approach that fosters the involvement of different actors in the entire value chain. The objective is to highlight the main sectors of excellence in manufacturing on the territory, including activities related to qualifications of various companies and workforce skills. In this field, it is considered essential to adopt the same qualification tools, education method and assistance methodology to SMEs, in order for them to increase awareness, extend boundaries and promote cohesion by implementing the innovative models of cooperation between various actors in the production chain (cooperative system, network contracts between companies, clusters, etc..) in different countries. The Chambers of Commerce could be identified as local potential partners, by defining their competences in promotion/dissemination of a model capable of engaging research centers, universities, technology transfer centers, in order to ensure the development aiming at innovation and applied research.</p> <p>Unioncamere, together with the Chambers of Commerce, has also focused much on the potential contribution of the “business network contracts” (contratti di rete), which are private agreement between two or more enterprises to jointly perform one or more economic activities to increase their potentials for innovation and competitiveness. In fact, these contracts have an added value, since they can provide the incentive for companies to grow competitively, allow knowledge and information sharing, preserve legal independence and business autonomy and overcome geographic segmentation. The network of the Italian Chambers of Commerce has played a fundamental role in promoting business network contracts, through training seminars, the collaboration with territorial entities, the conclusion of agreements with private companies (e.g Memorandum with Google aimed at promoting of the digitalization of districts), and assisting companies to set contracts, also the ones targeting economic activities related to SMEs access to foreign markets.</p> <p>In this context, in January 2013 Unioncamere has also launched a process of strengthening and rationalization of assistance and guidance to businesses: the Italian Worldpass (http://www.worldpass.camcom.it) . This is an experience concerning the promotion of internationalization in Chambers of Commerce, by organizing creating a network of “one-stop shops” in all 105 local Chambers. Through this approach, they are responsible, in cooperation with other relevant institutions, for carrying out the primary point of contact on the ground, providing services for the establishment and growth of Italian SMEs abroad, giving rise to a service having similar characteristics and basic common services in all territories. The services provided by these one-stop shops are: issue of certificates, information and first assistance regarding foreign markets, international standards, analysis of the propensity to export, added-value information, tailor-made assistance (legal formalities for setting up an import-export company, how to approach international markets, market, potential analysis, EU and national funding possibilities).</p>	<p>This experience could be exploited through a future project. But the link with regional policies and in particular Structural Funds policies should be better explained.</p>
4,29	Vidzeme Planning Region	Latvia	<p>Projects, activities and pilot actions should be implemented in both: NUTS 2 and NUTS 3 levels. The focus on end-user inclusion and inclusion and funding of pilot actions to test Action plans, should be more emphasized, and made an integral part of Inter regional cooperation projects.</p>	<p>The word ‘region’ is used in a broad sense for a relevant territory which can be represented by a local, regional or national organisation (depending on the country). It is true that the capacity of the programme to influence structural fund programme will partly depend on the country's organisation.</p> <p>Pilot actions cannot be systematised for all projects and all regions. It will very much depend on the outcome of phase 1 and on the actions described in the action plan.</p>
4,30	Association of Local Authorities in Lithuania	Lithuania	<p>Excessive emphasis on innovation only as if it was a goal in itself. I would suggest focus more on growth, jobs, competitiveness and quality of life instead.</p>	<p>The approach described in the programme follows the EU2020 strategy and innovation is one of the means to achieve better quality of life.</p>
4,31	Subvention BV	Netherlands	<p>please more a bottom-up approach</p>	<p>Interregional Cooperation Projects will still be submitted by partner regions (bottom-up).</p>

INTERREG EUROPE - Comments and responses to

4. Thematic Objective 3

N°	Organisation name	Country	Comments	Responses
4,32	Hoogheemraadschap Schieland en de Krimpenerwaard	Netherlands	SME's need to first focus on local and regional growth before they are ready to tackle interregional growth.	The idea is not that SMEs focus on interregional growth but that, through interregional cooperation, the policies dedicated to SME support are improved.
4,33	ProRail	Netherlands	It is doubtful if SMEs can and will benefit from regional development policies, i.e. IPR issues if grants are given to them	The importance of the private sector in certain priorities of the programme is clear. This participation should be ensured through the creation of local stakeholder groups. Nevertheless, it does not seem appropriate that SMEs are direct beneficiaries for the following main reasons: - the programme primarily focuses on policy learning (not on implementation). From that point of view, it is fundamentally different from any other cooperation programme and from other EU programmes such as COSME and Horizon 2020. - administrative constraints (e.g. first level control, second level control) are not adapted to this target group.
4,34	Ministry of Labour and Social Policy	Poland	Proposed modification (p. 29): It is proposed to include social entrepreneurship sector. The document is comprehensive at this stage and it would be enough to add after "small nad medium enterprises" a phrase: "including social enterprises" Rationale: Taking into account their specificity the social enterprises should be literally included in the document. Exchange of experience in this field or building the support systems requires specific, dedicated tools. The role of the entrepreneurship in the social and human capital building, reinforcement of the social cohesion or support for local society development as well as building of the innovation sector is emphasised more and more clearly on the European level (inter alia in the documents related to the new programming period 2014-2020) and on the national level as well.	Section 2 is revised accordingly. Objective 2.1 refers more explicitly to social enterprises.
4,35	BN Chamber of Commerce	Romania	With the mention that the paragraph "Improve the implementation of .. policies and programmes" should be revised	It seems that this sentence refers to the first pillar of the 2014-2020 Cohesion Policy - programmes for the 'Investment for Growth and Jobs goal' - which is the core focus of INTERREG EUROPE.
4,36	Winnet Sweden - Europe	Sweden	A policy learning partnership for policy learning but also for actions is of utmost importance, Doing, is a strong method to reach a goal. Here it is important to use all good examples and experiences from previous Interreg projects, as well as developed and tested in EU Member States as succesfull. For instance Winnet 8 result and Intereg South Balitc program, Going Abroad, a handbook for mentoring for business, which has been develop from previous Intereg III C W.IN.NET as well as Interreg III B FEM project. Use the actors that have knowledge on gender equality and how it can be intergrated - and done in actions - implementation.	Remark noted
4,37	Westcountry Rivers Trust	United Kingdom	There needs to be a clear link within all applications to the applicability to SME's and all projects should demonstrate a clear link with SME's to ground truth work, research and policies.	Without questioning the importance of SMEs, the link to SMEs cannot be imposed to all applications submitted to INTERREG EUROPE. This link will depend on the topic addressed by each project.

INTERREG EUROPE - Comments and responses to

4. Thematic Objective 3

N°	Organisation name	Country	Comments	Responses
4,38	Eleanor Dearle	United Kingdom	Central to achieving this is the involvement of SMEs. Public authorities need to work together with the sector rather than "doing something for them". The programme document debars SMEs from being beneficiaries, which in effect debars them from participating. SMEs cannot contribute their resources without some support for the costs they incur in doing this.	The importance of SMEs is clear. Their participation should be ensured through the creation of local stakeholder groups (their travel and accommodation costs could be covered). Nevertheless, it does not seem appropriate that SMEs are direct beneficiaries for the following main reasons: - the programme primarily focuses on policy learning and not on implementation. From that point of view, it is fundamentally different from any other cooperation programme and from other EU programme such as COSME and Horizon 2020. - administrative constraints (e.g. first level control, second level control) are not adapted to this target group.
4,39	Marches Local Enterprise Partnership	United Kingdom	We think that specific objective 2.1 "improve the implementation of regional development policies and programmes, in particular programmes for Investment for Growth and Jobs and, where relevant, ETC programmes, supporting SMEs in all stages of their life cycle to develop and achieve growth and engage in innovation" is relevant for interregional cooperation as it will enable policy learning in SME competitiveness. This objective can provide synergies with themes covered by other specific objectives of Interreg programmes such as supporting SMEs on environmental performance management and resource efficiency issues in SMEs. We are concerned that State aid may be an issue in the case of pilot actions which involved private bodies.	Remark noted. The question of state aid in case of pilot action is important and procedures to ensure compliance with the state aid regulations have to be implemented.
4,40	New Economy Manchester	United Kingdom	We agree with all the suggested bullet points listed under this priority. We would like to see a greater focus given to entrepreneurship opportunities, sector development programmes, opportunities for European SMEs to access new global markets, to access new technology or innovative business models that will help them to grow and develop. It may be a good opportunity to link with other EU Programmes also supporting business competitiveness such as Horizon 2020 and COSME.	All the topics proposed are potentially eligible to the priority. The link with other programmes is tackled in section 6 of the programme and will be further developed in the programme manual.
4,41	University of Ulster Centre for Sustainable Technologies	United Kingdom	SME support to engage with innovation given the lack of capacity in SMEs is vital. The ability to develop business opportunities from RTD activities performed by academia is key to creating jobs and sustainable growth.	Remark noted
4,42	Aberdeen City Council	United Kingdom	This type of activity is already supported through many national ERDF programmes and would be seen as duplication of EU funds. It is hard to see the benefit of this type of action at interregional level when there is already targeted national funding driven at this type of activity. If the programme is looking to provide this type of support then it should be targeted at a strategic level for those bodies who provide such support. In Scotland bodies such as Scottish Enterprise take a leading role in this type of work alongside business gateway. They may benefit from exchange knowledge and best practice with other similar bodies across Europe and enable the development of their future programmes of support, but the physical delivery of this support does not seem likely to be relevant for interregional cooperation.	The role of INTERREG EUROPE is fundamentally different from that of national ERDF programmes. National ERDF programmes are designed to implement concrete actions on the territories. INTERREG EUROPE is there to increase the quality of these programmes through EU wide exchange of experience and policy learning. The strategic level is indeed important in INTERREG EUROPE.
4,43	Brighton & Hove City Council	United Kingdom	I see ERDF and EAFRD as being the main funding streams for this area for most LEP areas in the UK ,and maybe Interreg Va where it is available, however the question is can government organisations supply the support that SMEs want and need?	This question can only be answered at the local, regional or national levels.
4,44	WWF Germany	WWF Germany but acting for WWF in Europe	This specific objective should have a better outline of the application of horizontal principles especially as they provide a wide scope for innovation and new business opportunities, green economy and eco-innovation should be outlined as focus areas, the indicators address SME growth, this should be changed in SME development and better specified what growth is meant e.g. the number of jobs created? the turnover of SME, the number of newly registered SME? not clear. Examples of possible projects should include the creation of a local circular economy, the creation of green jobs, SME should not be just focussed on international markets!	Most of the topics listed in the remark are in fact present in the programme. Eco-innovation and green growth are for instance included under specific objective 2.1. One of the examples provided page 26 of the programme is also related to green technologies. There will be no restrictions on the topic of internationalisation of SMEs.

INTERREG EUROPE - Comments and programme responses to

5. Thematic Objective 4

N°	Organisation name	Country	Comments	Responses
5,01	Provincie Vlaams-Brabant	Belgium	Please elaborate on the concept 'in particular for urban areas', what does this mean for actors focusing on rural areas. Please elaborate on 'mitigation relevant adaptation measures'.	These references are extracted from the regulation. Further information on the definition of the Thematic Objective and investment priorities can be found on the Commission
5,02	PURPLE - Peri-Urban Regions Platform Europe	Belgium	This has strong significance for peri-urban areas which have potential to make significant contributions to low carbon economic development. They are located close to energy consumers in urban and peri-urban locations and have a diverse mix of exploitable territorial assets including agriculture, open space and forests/woodlands.	Remark noted
5,03	ERRIN Network	Belgium	The Policy Learning Platform should establish close links with Climate-KIC, the Covenant of Mayors, Energy Cities and Climate Alliance and other relevant working groups in Brussels and in Europe in energy.	The idea of the platform is also to link INTERREG EUROPE with other relevant EU initiatives.
5,04	Department of Environment	Cyprus	We strongly support this Specific Objective as it is targeting groups like national authorities responsible for low-carbon economy or environmental agencies. The contribution of this objective will improve the policies related to low-carbon technology, low-carbon partnership or green public procurement.	Remark noted
5,05	Regional Council of North Karelia	Finland	Renewable energy in transport should be highlighted since transportation and logistics are a major source of pollution.	Specific Objective 3.1 was revised accordingly. Sustainable transport is more clearly mentioned.
5,06	MTT agrifood research Finland	Finland	Use of biochar will one of the most important technologies having impact on low carbon economy. It can be an essential part of carbon neutral farming systems in the future.	This remark is too specific to be included in the programme but it could be the subject of a possible project.
5,07	AViTeM	France	Same as above	See comment above
5,08	Chambre de Commerce & d'Industrie Marseille Provence	France	1/ Encourage VSMEs & SMEs with specific measures to better manage energies and the use of RENs, 2/ Encourage the development of specific clusters, knowing that energy transition must create new jobs and economic development.	These issues are covered under the Specific Objective 3.1.
5,09	Chambre d'Agriculture Savoie Mont Blanc	France	Particularly in logistic system	Mobility is included in the description of the Specific Objective 3.1.

INTERREG EUROPE - Comments and programme responses to

5. Thematic Objective 4

N°	Organisation name	Country	Comments	Responses
5,10	Agropolis International	France	The interregional cooperation may help to improve the implementation of regional policies and programmes (for instance in identifying best practices or new ideas in other region), but is not the key factor of success.	Remark noted
5,11	Lille Métropole	France	<p>This objective should more precisely address the following topics:</p> <ul style="list-style-type: none"> - alternative modes of public transports (with renewable energy) - soft travel modes: cycling, walking and carsharing as well (all the mobility services reducing the car use). - fluvial and rail freight - information, communication and trainings for travelers - multimodality - social housing and energy retrofitting - sustainable housing and energy efficiency in private housing - energy retrofitting of public buildings 	Most of these issues are covered in the description of Specific Objective 3.1 (e.g. mobility is included).

INTERREG EUROPE - Comments and programme responses to

5. Thematic Objective 4

N°	Organisation name	Country	Comments	Responses
5,12	Energy Cities	France	<p>Energy Cities considers that the INTERREG and the Structural and Cohesion Funds should encourage local actions contributing to the achievement of the EU energy and climate targets. By generating energy savings and local jobs, those actions do optimise the use of the Structural Funds while maximising the leverage effect of public money. Especially in current times of proposed budget cuts, support should be provided for projects that are aligned with local sustainable energy action plans harmonised with the European energy and climate «3 x 20% » objectives.</p> <p>Further, the transition to a low carbon economy represents high potentials to address job creation, creation of local value and support of local economies.</p> <p>Priority of INTERREG funding under the Low Carbon Economy axis should therefore be given to local authorities having adopted a Sustainable Energy Action Plan (SEAP) under the Covenant of Mayors initiative. Thanks to this unique and unprecedented EU initiative, mayors engage to develop and implement SEAPs, thus translating the EU 20-20-20 targets for climate and energy on the ground. Huge efforts have been undertaken by these towns and cities which put in place long-term visions, an integrated approach and clear strategies leading to tangible results affecting millions of citizens. It is also worth noting that the Covenant of Mayors has contributed to regional models of multi-level governance where municipalities, provinces and regions work jointly together to develop and implement climate and energy strategies.</p> <p>Prioritizing them in the allocation of INTERREG funding would maximise the number of local authorities opting for a strategic approach to local sustainable energy development and to the dissemination of their good practices and further synergies between different levels of government.</p>	<p>The relevance of territorial strategy will be checked at the application stage. The reference to SEAP and the Covenant of Mayors would certainly be of added-value but no specific priority can be given at programme level to these initiatives.</p>
5,13	CRITT agroalimentaire PACA	France	<p>important to develop tools for SMEs to evaluate their carbon impact.</p> <p>subject to develop can be :</p> <p>life cycle assesement/innovation of environmental technologies/green packaging/sustainable development in SMEs.</p>	<p>Businesses are included in the description of specific objective 3.1.</p>

INTERREG EUROPE - Comments and programme responses to

5. Thematic Objective 4

N°	Organisation name	Country	Comments	Responses
5,14	Euromontana	France	<p>Mountain/peripheral/sparsely populated areas have a key role in the development of different scales of renewable production, from large on-shore/off-shore wind to tidal innovations, to small scale community-led initiatives and access to land assets. However, the objectives of the programme to support actors in these areas will not materialize unless significant barriers to market entry are overcome. For instance, grid infrastructure is poor in some mountain/peripheral areas and the cost of connection is prohibitively high.</p> <p>So far, a specific focus is put on urban mobility, whereas the Interreg IV C project, Move on Green (coordinated by the Province of Teruel and in which Euromontana is a partner), showed clearly the huge needs for rural and mountain areas to develop sustainable mobility in these areas too. Policy makers should be encouraged to develop new sustainable rural mobility solutions in these specific areas, where cars are generally predominant and where distances are generally larger than in urban areas. So we would welcome a stronger focus on rural mobility, a sustainable mobility strategy cannot ignore 90% of the territory.</p>	Urban areas are just mentioned in the title of the investment priority. Even if sparsely populated areas are not specifically mentioned, they are covered by the specific objective 3.1.
5,15	IdE Institut dezentrale Energietechnologien gGmbH	Germany	emphasis on transition of energy production	This issue can be covered under the specific objective 3.1.
5,16	Regional Authority FrankfurtRheinMain	Germany	Low carbon economy is one of the key challenges of the region Frankfurt/Rhein-Main. The region Frankfurt/Rhein-Main is currently working on a strategy for the use of efficient and renewable energy. The exchange of knowledge and experience with other European regions is crucial.	Remark noted
5,17	Technologiepark Heidelberg GmbH	Germany	Regional action plans are the basics for interregional knowledge transfer	Remark noted
5,18	City of Munich / Dept. of Labor and Economic Development	Germany	There is a need to foster an exchange of experiences between existing thematic platforms / regional networks / PPP	Remark noted
5,19	ministry for economic and european affairs state of Brandenburg	Germany	too specific - its up to the regions	Remark noted

INTERREG EUROPE - Comments and programme responses to

5. Thematic Objective 4

N°	Organisation name	Country	Comments	Responses
5,20	Managing Authority of Rural Development Plan	Greece	"Low carbon issue" is particularly linked with interregional cooperation, as naturally atmosphere can't be enclosed among borders! Therefore, for specific objective 3.1 the interregional cooperation should be considered as the key issue and also as a	This is also the reason why 'low carbon issues' are often included in crossborder and transnational cooperation programmes. INTERREG EUROPE is designed to primarily
5,21	ARPA Piemonte	Italy	Many projects have been funded on this theme. The scarce interaction with decision bodies limited the results,. This must be avoided working directly with regional offices and regional staff . Without enhancing the staff skills and competences no progress can be done.	The close link with the decision bodies will be one of the selection criteria in INTERREG EUROPE.
5,22	University of l'Aquila	Italy	Projects, activities and pilot actions should be implemented in both: NUTS 2 and NUTS 3 levels. The focus on end-user inclusion and inclusion and funding of pilot actions to test Action plans, should be more emphasized, and made an integral part of Inter regional cooperation projects.	The word 'region' is used in a broad sense for a relevant territory which can be represented by a local, regional or national organisation (depending on the country). It is true that the capacity of the programme to influence structural fund programme will partly depend on
5,23	Vidzeme Planning Region	Latvia	Make it specific. More focus on development and access to markets.	The focus of specific objective 3.1 is on low carbon economy.
5,24	Subvention BV	Netherlands	Grant obligations could be an hindrance for a logic cooperation, especially the demands for trans-nationality and ownership / publicity requirements	This question may be more relevant for transnational cooperation programmes.
5,25	ProRail	Netherlands	Energy efficiency should be encouraged not only in companies but also in public entities and their facilities.	This point is included in the description of the specific objective 3.1.
5,26	RDA North-East Romania	Romania	Rural populations are not informed of the problem "the carbon emission".	Remark noted

INTERREG EUROPE - Comments and programme responses to

5. Thematic Objective 4

N°	Organisation name	Country	Comments	Responses
5,27	Association of lifelong learning	Romania	With the mention that the paragraph "Improve the implementation of .. policies and programmes" should be revised	It seems that this sentence refers to the first pillar of the 2014-2020 Cohesion Policy - programmes for the 'Investment for Growth and Jobs goal' - which is the core focus of INTERREG EUROPE.
5,28	BN Chamber of Commerce	Romania	hydrogen technologies are to a certain extent neglected	This issue seems too specific to be covered by the programme but it may be the subject of a possible project.
5,29	jozef stefan institute	Slovenia	Highly relevant objective for achieving the European goals foreseen in 2020, the Low Carbon (green economy) is one of the most important challenges for gaining competitiveness	Remark noted
5,30	Avila County Council	Spain	It needs to be in focus, and there is also a challenge to include geonder in this area of concern, Use the expert knowledge and include gender. To use Winnet Centre of Excellence, platform in BSR as a pilot, can be a proposal. most of all if this area will	Remark noted
5,31	Winnet Sweden - Europe	Sweden	not only an european subject but especially also global one	Remark noted
5,32	Regio Basiliensis	Switzerland	I think this is an area of work which lends itself particularly to the lower level of governance. The place-based approach fits these priorities well as it can capitalise on the opportunities presented by that geography. Much of the progress in this policy area has been driven by ambitious cities and other urban areas in the EU. Local areas need help to engage at the national level with national and international energy providers	Remark noted
5,33	Eleanor Dearle	United Kingdom	The Specific Objective 3.1 "improve the implementation of regional development policies and programmes, in particular programmes for Investment for Growth and Jobs and, where relevant, ETC programmes, addressing transition to low carbon economy is relevant for interregional cooperation. We would like to emphasise the need for investment to increase levels of energy efficiency, including in public buildings and the housing sector by supporting exchange of experience and sharing of practices to identify low carbon technologies and strategies and increasing awareness on using low carbon alternatives.	Remark noted

INTERREG EUROPE - Comments and programme responses to

5. Thematic Objective 4

N°	Organisation name	Country	Comments	Responses
5,34	Marches Local Enterprise Partnership	United Kingdom	We would like to see here opportunities to explore and develop new financial instruments or innovative ways to structure finance for low carbon infrastructure projects such as heat networks, low carbon transport, wind and hydro generation, photovoltaic and domestic and non domestic energy efficiency. We would also like to see new way of working with the universities and the industry in order to capitalise some of the technology and knowledge that is emerging from the universities and the private sector related to energy efficiency and low carbon generation.	These topics are covered in the specific objective 3.1.
5,35	New Economy Manchester	United Kingdom	State-aid-rules might need some consideration for SMEs engaging is the broader policy as well as economic growth and job agendas. SME engagement requires financial support which is often not available within an SME, and difficult to attain from private means in the current economic climate of Europe. An assessment scale based on the quality of the project and its regional relevance could be developed to consider more consistently the levels of support available and to ensure that the most relevant projects are funded adequately.	The question of state aid in case of pilot action is important and procedures to ensure compliance with the state aid regulations have to be implemented. INTERREG EUROPE would not directly support the low carbon strategy of an SME but the Investement for Growth and Jobs may be able to do so.
5,36	University of Ulster Centre for Sustainable Technologies	United Kingdom	This should be a key area for intervention. EU policy on low carbon economy shows that regions will be eager to find ways of developing strategies and actions on this area. Collaboration will therefore be hugely beneficial to ensure that existing best practice is used to develop these. Whilst a focus on the technological development is obvious, the need for skills development is also vital and should not be overlooked.	Remark noted
5,37	Aberdeen City Council	United Kingdom	I believe there is a lot to be shared in this area as whilst the low carbon economy is often shown to be a priority, in the short term it has been replaced by pure economic growth as a reaction to the recession.	Remark noted

INTERREG EUROPE - Comments and programme responses to

5. Thematic Objective 4

N°	Organisation name	Country	Comments	Responses
5,38	Brighton & Hove City Council	United Kingdom	Although addressed in the investment priority the relevance of projects in relation with mitigation relevant adaptation measures is not mentioned in the results, as this topic has a huge potential for innovative approaches to CO2 reduction, e.g. through peatland restoration or forests as carbon sinks while at the same time only few regions have experience with such innovative approaches Interreg Europe should address this activity in order to speed up the learning process across regions. Actions should include projects to look for synergies and innovative solutions between mitigation and adaptation.	Remark noted
5,39	WWF Germany	WWF Germany but acting for WWF in Europe	Although addressed in the investment priority the relevance of projects in relation with mitigation relevant adaptation measures is not mentioned in the results, as this topic has a huge potential for innovative approaches to CO2 reduction, e.g. through peatland restoration or forests as carbon sinks while at the same time only few regions have experience with such innovative approaches Interreg Europe should address this activity in order to speed up the learning process across regions. Actions should include projects to look for synergies and innovative solutions between mitigation and adaptation.	Remark noted

INTERREG EUROPE - Comments and programme responses to

6. Thematic Objective 6

N°	Organisation name	Country	Comments	Responses
6,01	Upper Austrian Tourist Board	Austria	Natural and cultural heritage is a main resource/capital for tourism.	Remark noted
6,02	Provincie Vlaams-Brabant	Belgium	The combination of both specific objectives in one policy learning platform is questionable.	These two specific objectives are still closely interrelated as they both relate to environmental protection. Specific thematic working groups could also be created within each platform.
6,03	VVIA - Flemish Association for Industrial Archaeology	Belgium	Heritage and culture are often the most efficient basis to develop regional cooperation - unfortunately they are almost ignored in the new Interreg documents	Natural and cultural heritage are covered under specific objective 4.1.
6,04	PURPLE - Peri-Urban Regions Platform Europe	Belgium	As above, this is highly relevant to the peri-urban areas of the EU.	Remark noted
6,05	ERRIN Network	Belgium	<p>Comments</p> <p>The role of 'natural and cultural heritage needs more explicit thinking. Cultural heritage projects often require capital funds for restoration which would be outside the scope of Interreg. There may be opportunities to complement but not overlap with the UNESCO Routes programme http://www.unesco-welterbe.de/en/unesco-routes#.UytfSvldWSo</p> <p>Given recent severe weather events in some EU Member States, the study of coastal zones, river basins and flooding may be of interest to more regions.</p> <p>ERRIN welcomes an increased focus on eco-innovation and the reduction of waste. These policy areas have a clear regional focus and have a real added value for the exchange of best practice. This is an area also where more skills and training is needed. This priority would merit in being connected to 'peri-urban' projects that could add in their experience gained over the past decade.</p>	Most of the topics covered by INTERREG EUROPE may require funds outside the scope of INTERREG. The idea of the UNESCO Routes programme from cultural heritage is interesting and may also be particularly relevant to transnational cooperation programmes.
6,06	Department of Environment	Cyprus	We strongly support this Specific Objective 4.1 as it is targeting groups like environmental agencies. The contribution of this objective will enhance the exchange of good practices on green infrastructure in urbanised regions, management and exploitation models for nature parks and NATURA 2000 areas, and seminars to present and disseminate regional practices on ICZM. The same support we provide for the Specific Objective 4.2. as it can enable businesses to pursue green growth, eco-innovation, minimise waste, etc.	Remark noted

INTERREG EUROPE - Comments and programme responses to

6. Thematic Objective 6

N°	Organisation name	Country	Comments	Responses
6,07	MTT agrifood research Finland	Finland	Impacts of Biochar based technologies will cover all the aims of this objective.	This remark is too specific to be included in the programme but it could be the subject of a possible project.
6,08	Lahti Region Development LADEC Ltd	Finland	Ecoinnovation and advanced technologies are interested by developing countries and can be the area where the growth of SME's happens. Internationalization is the key word. We need to learn how to do business in different countries. These interregional projects can be starting point and they have to be possibilities to do activities in global level.	Remark noted
6,09	AViTeM	France	Same as above	See above remark.
6,10	Chambre de Commerce & d'Industrie Marseille Provence	France	The programme should take into account : 1/ Enforce territorial policies in view of protecting regional landscape heritages, 2/ Sustainable natural resources management by SMEs, namely for water, 3/ Circular Economy in SMEs (including industries) own waste management	These different topics are covered under the specific objectives 4.1 and 4.2.
6,11	Agropolis International	France	The interregional cooperation may help to improve the implementation of regional policies and programmes (for instance in idenfying best practices or new ideas in other region), but is not the key factor of success.	Remark noted

INTERREG EUROPE - Comments and programme responses to

6. Thematic Objective 6

N°	Organisation name	Country	Comments	Responses
6,12	Lille Métropole	France	<p>Objective 4.1 needs to take into account:</p> <ul style="list-style-type: none"> •Restoration and enhancement of existing natural environments (ordinary and extraordinary ones) •Water environments (blue connections) to preserve and recovery. Water is part of the natural heritage •Management plans for natural heritage and work with the private sector •Green and blue connections <p>Objective 4.2 needs to take into account the following topics:</p> <ul style="list-style-type: none"> •Preservation of the water resource •Preservation of agricultural areas •Heat networks development •Geothermal energy and biomass •Innovative actions in energy production and storage •Renewable energy production sectors •Eco-activities as: waste reuse, textiles, paper, plastic, construction industry waste, biogas •Industrial ecology 	<p>Most of these topics are covered by the programme but there may be sometimes confusion between specific objective 4.2 and the specific objective 3.1 dedicated low-carbon economy where issues like renewable energies are included.</p>
6,13	Energy Cities	France	<p>Energy Cities considers the Resource Efficiency agenda as key for the sustainable, inclusive and smart growth of our territories. Innovation, not only technological but in terms of systems, offers a huge potential for local development and an improvement of quality of life. In addition, experience gathered in terms governance of climate and energy policies under the Covenant of Mayors could serve as a model to be replicated to other fields (e.g. waste, water, ...) This governance model combines voluntary commitment of mayors with facilitation and coordination efforts from the EU and the Member States, and the collaboration with other stakeholders and citizens in order to reach common goals.</p>	<p>Remark noted</p>
6,14	CRITT agroalimentaire PACA	France	<p>Encourage stakeholders to go to sustainable development step. but pay attention to include human resources and economic aspects in sustainability, and not only environment aspects.</p>	<p>Remark noted</p>

INTERREG EUROPE - Comments and programme responses to

6. Thematic Objective 6

N°	Organisation name	Country	Comments	Responses
6,15	Euromontana	France	<p>Engaging the relevant stakeholders at local level is essential if place-based strategies are to be effective and avoid conflict between the aims of conservation bodies and land managers.</p> <p>Mountain/peripheral areas have key regional roles in the management of precious natural resources. With the right support systems and recognition of the barriers to market entry, these areas have an opportunity to develop innovative management systems to deliver positive, sustainable outcomes.</p>	Remark noted
6,16	Eurisy	France	<p>Satellite services can help Regions and private companies comply with European environmental regulations and improve green growth.</p> <p>For example, in the case of renewable energies, satellite imagery can be used to manage hydropower production, which is in line with the EU Directive 2001/77/EC. INTERREG programmes should invite participants to use the satellite tools developed under Copernicus and Galileo that favour environmental protection and resource efficiency issues. Moreover, calls for project proposals should include indications on the potential of using geo-information services (including those partly derived from satellite data) for complying with environmental regulations.</p> <p>In the field of sustainable tourism, INTERREG funding programmes should foster a better use of geo-information services, including those derived from satellite. Indeed geo-information and location-based services are innovative, emerging tools which can help valuing the Regions' natural and cultural heritage in an attractive and innovative way, while contributing to its preservation. The region of Normandy is for instance using a mobile application combining GPS and augmented reality to recreate World War II events in the area, without any additional damage to the monuments.</p>	This remark is too specific to be included in the programme but it could be the subject of a possible project.
6,17	Regional Authority FrankfurtRheinMain	Germany	We appreciate that the development of natural and cultural heritage are mentioned explicitly because we have considerable experience in this filed we can share. This is about both contents and governance.	Remark noted

INTERREG EUROPE - Comments and programme responses to

6. Thematic Objective 6

N°	Organisation name	Country	Comments	Responses
6,18	Technologiepark Heidelberg GmbH	Germany	Interregional cooperations can help to learn from each other	Remark noted
6,19	Managing Authority of Rural Development Plan	Greece	<p>i. (p 39) 'Improve capacities (skills, knowledge)'. The sharing of practices and policy learning can base on clustering, networks (aggregate actions) as well.</p> <p>ii. Specific Objective 4.1 & Specific Objective 4.2 (both of them)</p> <p>a. Indicators:</p> <ul style="list-style-type: none"> - (p 40, 43) The indicator 'share of regional policies ... heritage" as a % of all regional policies and programmes is a little bit undefined to be collected as a target value. Cohesion policy and impacts actions required more strong values for wise planning. - (p 40, 43) The indicator of 3rd column "% of all Growth and ... programmes" can be replaced by the "% of all Growth and Jobs implemented by all ECT programmes". <p>b. Pilot actions (phase 2) Which are the main actions can be formulated in Phase 2 of the ICProjects that can't be in / included in the (referred) activities of Phase 1? Which the distinguished line?</p> <p>c. Target figure '1897', (eg table p 43) mystified the detail to be succeed according the programme monitoring and annual reporting.</p>	<p>i. The capacity building should lead to policy change (in particular through the implementation of the action plan). This is how the programme considers the 'aggregate actions'.</p> <p>ii. a. Indicators The remark is relevant and the programme would need to be defined what is meant by '% of all regional policies and programmes' There may be a confusion there since Investement for Growth and jobs programmes are not implemented by ETC programmes.</p> <p>b. Pilot actions Pilot actions cannot be included in phase 1 since by essence these pilot actions will depend on the results of phase 1. They will also be possible only in justified cases as, in principle, the measures described in the action plan should be supported by the relevant local, regional or national programmes.</p> <p>c. Further details on the indicators will be provided in the programme manual.</p>
6,20	Zala County foundation for Enterprise Promotion	Hungary	<p>It would be important to support the innovative solution in the use of renewable energies regarding the architecture activities at enterprises.</p> <p>Encourage the renewable energies during the rebuildings, collecting of best and worst practices.</p>	The issue of renewable energy is covered under the specific objective 3.1 dedicated to low carbon economy.
6,21	ARSIAL	Italy	I find that there is an overcrossing with the other financial instrument of EU for Environment (eg: LIFE+ Programme). I think that once LIFE+ is focused mainly on natural biodiversity resources and wildlife, Interreg should be exclusively addressed to farming biodiversity protection and cultural heritage intended as traditional skills and crafts.	The role of INTERREG EUROPE is different from that of LIFE+. LIFE+ is more implementation-oriented while INTERREG EUROPE is dedicated to the improvement of policies (primarily Structural Funds programmes) through exchange of experience. The overall between these programmes is therefore limited; on the contrary the programmes can complement each other.
6,22	University of l'Aquila	Italy	Universities have competences, ideas, targeted solutions. Strict cooperation between decision makers and researchers must be implemented.	Remark noted

INTERREG EUROPE - Comments and programme responses to

6. Thematic Objective 6

N°	Organisation name	Country	Comments	Responses
6,23	Vidzeme Planning Region	Latvia	Projects, activities and pilot actions should be implemented in both: NUTS 2 and NUTS 3 levels. The focus on end-user inclusion and inclusion and funding of pilot actions to test Action plans, should be more emphasized, and made an integral part of interregional cooperation projects.	The word 'region' is used in a broad sense for a relevant territory which can be represented by a local, regional or national organisation (depending on the country). It is true that the capacity of the programme to influence structural fund programme will partly depend on the country's organisation. Pilot actions cannot be systematised for all projects and all regions. It will very much depend on the outcome of phase 1 and on the actions described in the action plan.
6,24	Subvention BV	Netherlands	Not interesting for SME's	SMEs can be directly involved in the development of natural and cultural heritage. They are also tackled through green growth and eco-innovation.
6,25	RDA North-East Romania	Romania	The relation with cultural heritage topic is not visible in the description of the actions to be supported under investment priority 6c.	Apart from the examples provided, the description of the actions to be supported remains generic. It refers to the Interregional Cooperation Projects and Policy Learning Platform and should not relate specifically to cultural heritage.
6,26	BN Chamber of Commerce	Romania	With the mention that the paragraph "Improve the implementation of .. policies and programmes" should be revised	It seems that this sentence refers to the first pillar of the 2014-2020 Cohesion Policy - programmes for the 'Investment for Growth and Jobs goal' - which is the core focus of INTERREG EUROPE.
6,27	Avila County Council	Spain	We consider crucial for the EU the main goal of preservation of the natural resources for future generations through Environmental and Resource Efficiency. Several good practice and knowledge must be exchanged in this field.	Remark noted
6,28	Winnet Sweden - Europe	Sweden	Gender Equality needs to be included - to secure the development and issues which also is Labour Market issues, Always focus on expert area, and include gender. It is a goal.	Gender equality is included as a cross-cutting notion through the horizontal principles.
6,29	Region Västra Götaland	Sweden	SO 4.1 Development of natural and cultural heritage is important. Most regional administrations in Europe work with culture as a policy field. Culture is considered an asset economically and socially; a driver for innovation and maker of attractive places. This could be mentioned more explicit - here or elsewhere in the text, or in technical papers when implementing the program.	The programme does not put emphasis on the topic of 'culture' as such. But cultural industries can be covered under several specific objectives. Cultural heritage is also covered under the specific objective 4.1.
6,30	Regio Basiliensis	Switzerland	Not all environmental actions are linked with growth and innovation.	This link to growth and innovation is indeed present under specific objective 4.2 but not in the specific objective 4.1.

INTERREG EUROPE - Comments and programme responses to

6. Thematic Objective 6

N°	Organisation name	Country	Comments	Responses
6,31	Westcountry Rivers Trust	United Kingdom	There needs to be a clear spatial planning system that builds on EU policy drivers such as the Water Framework Directive, Floods Directive and the Habitats and Species Directive that generates multi sector multi benefit solutions to shared problems.	As the application stage, projects will have the opportunity to refer to possible relevance directive. Integrated approach will also be encouraged.
6,32	Marches Local Enterprise Partnership	United Kingdom	<p>The Specific Objective 4.1 “improve the implementation of regional development policies and programmes, in particular investment for Growth and Jobs and, where relevant, ETC programmes, in the field of protection and development of natural and cultural heritage” is relevant for interregional cooperation. We maintain that resource efficiency is essential for sustained economic growth. Reducing environmental impacts contributes to well-being derived outside the market economy, notably the quality of life that comes from living in a healthy, attractive environment. Moreover, promoting resource efficiency can increase the competitiveness of industry, create jobs, stimulate innovation, boost sectors such as recycling and resource recovery, and help ensure secure supplies of key resources.</p> <p>Specific Objective 4.2 “improving the implementation of regional development policies and programmes, in particular programmes for Investment for Growth and Jobs and, where relevant, ETC programmes, aimed at increasing resource-efficiency, green growth and eco-innovation and environmental performance management”. Boosting green growth and eco-innovation is needed to tackle environmental challenges and resource constraints, while preserving EU competitiveness. However, there are many barriers to the penetration of eco-innovative solutions to the markets. The main barriers are the uncertain demand from the market and the overly long payback period, so there is a need for exchange of practices on the market viability of eco-innovative solutions.</p>	Remark noted
6,33	New Economy Manchester	United Kingdom	We would be keen to see opportunities related to the growth of the European SMEs in the low carbon and environment sector, including skills and eco-innovation. We would also like to see opportunities for SME support across all sectors to increase their energy and resource efficiency of their business products and services reducing their environmental risk.	These opportunities are covered in INTERREG EUROPE.

INTERREG EUROPE - Comments and programme responses to

6. Thematic Objective 6

N°	Organisation name	Country	Comments	Responses
6,34	University of Ulster Centre for Sustainable Technologies	United Kingdom	<p>Job growth requires business planning and therefore an integral part of any proposal should be an implementation plan illustrating how far the successful completion of this work takes any project towards its goal of jobs and sustainable growth.</p> <p>Energy storage allows the more successful integration of non-dispatchable renewable energy on the existing electricity network. New job opportunities will arise from a more stable investment platform in renewable energy arising from energy storage integration, new jobs in energy storage (detailed earlier) and more efficiency use of green energy displacing fossil fuels from spinning reserve power stations etc currently used to balance wind energy for example.</p>	<p>In an Interregional Cooperation Project, each participating region will commit itself to the production of an action plan.</p> <p>The second remark is relevant to the specific objective 3.1 dedicated to low-carbon economy and in particular the development of renewable energy.</p>
6,35	Aberdeen City Council	United Kingdom	<p>Objective 4.1 This appears to overlap with the support which can be provided from the Life+ programme which is specifically targeted at those types of action.</p> <p>Objective 4.2 Very supportive of this action at interregional level. Many of the challenges faced by regions would enable transferable solutions to be developed. The programme should consider the support for similar activity available in other programmes to ensure that there is minimal duplication and overlap. One point to emphasis is that projects should have their main focus on growth rather than just environmental issues, that could be the USP of this programme.</p>	<p>Objective 4.1 The role of INTERREG EUROPE is different from that of LIFE+. LIFE+ more implementation-oriented while INTERREG EUROPE is dedicated to the improvement of policies (primarily Structural Funds programmes) through exchange of experience. The overlap between these programmes is therefore limited; on the contrary the programmes can complement each other.</p> <p>Objective 4.2 Remarks noted. The platforms should also ensure synergies with other programmes.</p>
6,36	Brighton & Hove City Council	United Kingdom	I see these areas as being ones where there is a huge disparity in knowledge across the EU and a large amount of interest, where Interreg Europe is best placed to have a role in influencing policy across a number of member states	Remarks noted
6,37	WWF Germany	WWF Germany but acting for WWF in Europe	When writing about improvement of Natura 2000 it should be also mentioned to improve application and usability of Prioritized Actions Frameworks (PAF as requested by DG Environment based on Art. 8 of the Habitats Directive) as developed for a better financing and implementation of Natura 2000 in the regions.	This point may be too specific to be integrated in the programme but it can of course be taken into consideration by projects.

INTERREG EUROPE - Comments and programme responses to

7. Interregional Cooperation Projects

N°	Organisation name	Country	Comments	Responses
7,01	ECOLISE	Belgium	As above, we would like to see a greater focus on community-led initiatives and support for action in this area.	Community-led actions could be identified as good practices within the INTERREG EUROPE projects and platforms. But INTERREG EUROPE, as an exchange of experience programme, will not directly support community-led actions. The creation of local stakeholder groups will also ensure the involvement of the relevant local players in the interregional cooperation.
7,02	Provincie Vlaams-Brabant	Belgium	Multiple references to Growth and job programs remain unclear. Does this only refer to regional EU programs (common strategic framework), or to all relevant regional programs? Contribution to improved implementation of structural funds programmes remains uncertain.	The reference to Investement for Growth and Jobs programmes refers indeed to the Structural Funds programmes of the EU cohesion policy. Improving the implementation of these funds is indeed challenging but this is the main objective of INTERREG EUROPE.
7,03	PURPLE - Peri-Urban Regions Platform Europe	Belgium	Should build capacity at regional and local level, allowing actual practitioners/experts to exchange ideas and build relationships and enabling exploration of issues in depth.	Building capacity at local and regional levels is indeed at the heart of INTERREG EUROPE.
7,04	ERRIN Network	Belgium	The second phase must have limited funding to retain motivation for the actors to continue in the project. There may be an issue of the principle actors leaving the project and losing the continuity.	From the start, partner regions will commit themselves to the two phases through the signature of the subsidy contract. The feature of the second phase will be further developed in the programme manual.
7,05	Department of Environment	Cyprus	The two phases of this action dedicated to exchange of policy experience and the implementation of the Action Plan are well defined, while providing good examples of possible Projects.	Remark noted
7,06	Institute of Sociology of the Czech Academy of Science	Czech Republic	Human resources in local and regional authorities are weak (low or improper education, low english knowledge, low ownership of projects; it is likely to remain so), which leads to incompetent management of SF programmes. Close cooperation with research institutes might make the situation better because of learning effects and knowledge spillovers.	The aim of INTERREG EUROPE is to contribute to capacity building at local and regional levels.
7,07	Regional Council of North Karelia	Finland	In 2007-2013 projects the capitalisation type of projects were very efficient compared to the interregional cooperation projects since in the capitalisation projects the cooperation themes were thought and selected before the project kick-off.	There may be a confusion there between the topic for cooperation and the good practices to be build on. In INTERREG IVC, all projects has to have a clear focus before starting but, compared with the Regional Initiative Projects, the Capitalisation Projects had to demonstrate available practices ready to be exchanged and transferred.
7,08	Kainuun Etu Oy	Finland	In some regions ESIF amount is much smaller than before. Therefore, for GP transfer and real benefits it would nice to foresee funding sources beyond ESIF.	This is planned in the interregional cooperation projects where only half of the participating regions will have to demonstrated of focus on Structural Funds (i.e. the other half can focus on other regional/national programmes beyond Cohesion Policy).
7,09	Regional Council of Central Finland	Finland	Monitoring the results is relevant. Though, the implementation of the good practices and lessons learnt from the others require money. The programme should allow piloting on a very early stage.	INTERREG EUROPE is primarily dedicated to policy learning. Pilot actions will only be possible in justified cases and will depend on the results of the first phase. Pilot actions can therefore be included in phase 2 only.
7,10	Chambre de Commerce & d'Industrie Marseille Provence	France	Project objectives between institutional partners in charge of SME support & business development (for ex. Chambers of Commerce & Industry) need to be more clearly defined.	The project objectives should contribute to the programme's objective which is primarily to improve Structural Funds programme's implementation. Regardless of the partners involved, projects would need to demonstrate how they will contribute to this objective.

INTERREG EUROPE - Comments and programme responses to

7. Interregional Cooperation Projects

N°	Organisation name	Country	Comments	Responses
7,11	Lille Métropole	France	<p>Examples of possible projects can include the above-mentioned items (thematic priorities part). Actions aim should also be disconnected from ESF programmes: indeed, some local policies and actions can be out of those programmes. Nevertheless they contribute to EU development (economic, urban...)</p> <p>Most of these actions aim at sharing knowledge on specific thematic. This should be the core objective of the program. These actions are very helpful and useful for partners and can help the implementation of structural funds programmes but it not automatic.</p>	<p>This is planned in the interregional cooperation projects where only half of the participating regions will have to demonstrated of focus on Structural Funds (i.e. the other half can focus on other programmes beyond Cohesion policy).</p>
7,12	EGCT Aquitaine-Euskadi	France	<p>I agree that we must look after the correct use of the EU funds, but also making an effort not to be a problem for the project holders.</p>	<p>Remark noted</p>
7,13	Mission Opérationnelle Transfrontalière	France	<p>Action : The clear-cut thematic division does not correspond to territorial strategies or cooperation projects (quid for integrated territorial approaches?)</p> <p>Objectives: An overall table at the end could be useful to summarize the type of supported actions and beneficiaries. Please insert also detailed eligibility criteria.</p> <p>Implementation of SF : Cooperation actions go beyond improved implementation of Structural Funds programmes, and should also include local/territorial programmes and strategies</p>	<p>Similarly to INTERREG IVC, INTERREG EUROPE projects will need to have a clear thematic focus. By working on a shared thematic issues, partner regions contribute to their territorial strategies. Integrated approach would also be encouraged as long as this does not blur this thematic approach.</p> <p>Further information on the details of the programme will be provided in the programme manual.</p> <p>This is planned in the interregional cooperation projects where only half of the participating regions will have to demonstrated of focus on Structural Funds (i.e. the other half can focus on other programmes beyond Cohesion policy).</p>
7,14	CRITT agroalimentaire PACA	France	<p>It may be more precise and less general.</p>	<p>Further information on the details of the programme will be provided in the programme manual.</p>

INTERREG EUROPE - Comments and programme responses to

7. Interregional Cooperation Projects

N°	Organisation name	Country	Comments	Responses
7,15	Euromontana	France	<p>Type of action: it is relevant to maintain a first phase focusing on exchanges of experience.</p> <p>The indicative project activities are relevant: Only a few pilot actions will be funded. We would welcome additional possibilities to fund pilot projects. Pilot projects are very important to demonstrate the possibility to transfer Good Practice. They appear as concrete evidence of what could be realized in the regions and they help to convince policy-makers of the importance of the project and of its thematic orientation. The exchange of GP and the seminars' activities risk remaining a "sterile" activity without visible results coming from pilot projects or demonstration projects. In addition, these pilot projects, if successful, could be implemented on a larger scale within all partners regions, during phase 2 of projects.</p> <p>It is not always clear how to establish links with local stakeholders and what is concretely expected from these local stakeholders: should they share their experiences? Should they be involved in the drafting of Action plans? Should they be involved in the implementation of Action plans? How will their activities be funded ?</p> <p>More details on exactly what will be requested under the compulsory "Action Plans" would be welcome.</p> <p>Second phase: This will be useful in focusing on implementation and adding value to co-operation projects.</p> <p>Nevertheless, having a second phase without any pre-scheduled financial support to concretely implement these Actions Plans will be difficult and the implementation will certainly be delayed. Indeed, the Action Plans will be defined at the end of phase 1, if project partners need to request ERDF /ESF grant to fund their phase 2, the concrete implementation of their Action plans will be delayed for at least 6 months or 1 year (time to submit a proposal and to get an ERDF or ESF grant). As a result, partners will have to address a huge delay risk in the implementation of phase 2.</p> <p>Improved implementation of Structural Funds programmes:</p> <p>Improving the implementation of structural funds will be really challenging:</p> <ul style="list-style-type: none"> -Managing Authorities do not always know well Interreg Europe and the aim of this programme -Once the Operational Programmes for Goal 1 will be adopted, it will be difficult to change them. -In some countries, (e.g.France) the Managing Authorities are not the same as in the previous programming period for ERDF and ESF, so they will already have to learn how to manage structural funds: it is not obvious that all of them will be pleased to receive contributions from other projects requesting to change either Operational Programmes or calls for proposals of Goal 1 programmes. <p>In addition, improvements are dependent on overcoming barriers to entry and further developing infrastructure, particularly of ICT.</p> <p>Additionally, a programming period of EU funds can seem short in comparison with the time it takes to develop a region and having in mind necessary long term investments. The programme should not lead to prioritizing short term strategies for delivery of smaller but quicker impacts at the expense of longer term more strategic developments the results of which will not be measurable rapidly.</p>	<p>INTERREG EUROPE is primarily dedicated to policy learning. The importance of pilot actions is not denied but they will be possible only in justified cases and will depend on the results of the first phase.</p> <p>INTERREG IVC projects have demonstrated that exchange of experience activities can lead to effective policy changes.</p> <p>The local stakeholder group will be composed of organisations that are relevant to the topic tackled by the project. The group will be involved in the interregional exchange of experience meaning that they will be asked to share their experience, to react to the experience of other regions, to contribute to the elaboration and implementation of the action plan. Travel and accommodation costs of the members of this group can be financed by the partner directly involved in the project.</p> <p>Further details on the action plan will be provided in the programme manual.</p>
7,16	Technologiepark Heidelberg GmbH	Germany	<p>In our opinion the thematic objectives are overlapping and difficult to distinguish especially T06 + T04</p>	<p>The thematic objectives are defined in the regulation. Even if they can be interrelated, each thematic objective is specific. For instance, Thematic Objective 4 on Low Carbon Economy focuses on the reduction of greenhouse gasses (in particular through energy issues). Thematic Objective 6 is related to environment protection and resource efficiency.</p>
7,17	City of Munich / Dept. of Labor and Economic Development	Germany	<p>There are already existing hundreds of local action plans (LAP) to reduce the consumption of CO2 and to reach the climate goals. There is no need to add more LAPs. The exchange of experiences among the LAP-partners should be facilitated.</p>	<p>The action plans developed within INTERREG EUROPE will refer to the lessons learnt within the cooperation. The actions to be undertaken will particularly target Structural Funds programmes. They are therefore very specific to INTERREG EUROPE but can of course complement existing LAP.</p>
7,18	ministry for economic and european affairs state of Brandenburg	Germany	<p>especially the second project is a good chance for deeper effects</p>	<p>Remark noted</p>
7,19	The Athens Chamber of Small-Medium Industries	Greece	<p>We fully support the monitoring of action plans.</p>	<p>Remark noted</p>

INTERREG EUROPE - Comments and programme responses to

7. Interregional Cooperation Projects

N°	Organisation name	Country	Comments	Responses
7,20	Grants Europe	Hungary	Programme has a strong focus on SME support. However private companies cannot be a partner. I am afraid that the programme will deliver project results which will not be fully in line with the needs of SME's if they can only participate on a "voluntary" basis.....	The importance of the private sector (and in particular of SMEs) in certain priorities of the programme is clear. This participation should be ensured through the creation of local stakeholder groups. Nevertheless, it does not seem appropriate that SMEs are direct beneficiaries for the following main reasons: - the programme primarily focuses on policy learning and not on implementation. From that point of view, it is fundamentally different from any other cooperation programme and from other EU programmes such as COSME and Horizon 2020. - administrative constraints (e.g. first level control, second level control) are not adapted to this target group.
7,21	MRA	Ireland	Monitoring of Implementation Plans may prove difficult, as generally there is a significant time lag (3-5years) before you can monitor the impact of new policy.	The idea of INTERREG EUROPE is not to launch a new policy but to improve existing ones. Based on the INTERREG IVC experience, most of the measures of the actions plans are implemented quickly after the finalisation of the plans.
7,22	City of Terni	Italy	Not at all optimistic that regions in Italy will make full use of the project's results especially those where cities or local authorities in their regions are taking part. Even within this new Interreg Europe Programme.	Projects in which cities and local authorities are involved should ideally work directly with their regions to ensure that the action plan is endorsed by the relevant policy makers.
7,23	Calabria Region	Italy	For the monitoring phase clear indicators and responsibilities should be indicated in all projets' proposals.	Further information on phase 2 will be provided in the programme manual.
7,24	University of l'Aquila	Italy	The results can be obtained if and only if the gap between decision makers and project implementation teams are solved. Competent staff must be created inside the regional structure.	Remark noted
7,25	Vidzeme Planning Region	Latvia	Projects, activities and pilot actions should be implemented in both: NUTS 2 and NUTS 3 levels. The focus on end-user inclusion and inclusion and funding of pilot actions to test Action plans, should be more emphasized, and made an integral part of Inter regional cooperation projects. The integration of pilot activities is crucial factor that allows to ensure that qualitative and relevant Action plans are designed and implemented. If pilot actions are not integral and properly funded part of the projects, there will be serious risks, that designed Action plans will not be sustainable, will be theoretical and not practically applicable and that the results and goals set by the program will not be fully achieved.	The word 'region' is used in a broad sense for a relevant territory which can be represented by a local, regional or national organisation (depending on the country). There is therefore no restriction for the teritorial level at which the pilot actions should take place. Pilot actions cannot become an integral part of interregional cooperation projects for the following reasons: - INTERREG EUROPE is primarily dedicated to capacity building and to policy learning, and the overall budget of the programme is limited considering the number of regions in Europe. - The key objective of projects is to make sure the lessons learnt from the cooperation are integrated into the relevant policies at local, regional or national levels. They should therefore not rely on INTERREG EUROPE funding to make sure actions are taking place. - Based on the INTERREG IVC experience, the successful implementation of Action Plan does not necessarily require the funding of pilot actions. All depends on the results of phase 1 dedicated to the exchange of experience.
7,26	Bureau PAU	Netherlands	The 2nd phase is valuable. If pilots are implemented in this phase you would expect funding through INTERREG EUROPE which is not planned for at the moment. It could be difficult to encourage stakeholders to join this phase if their is no funding accomodated for.	There maybe a misunderstanding there since the funding of possible pilot projects by INTERREG EUROPE is planned in the programme. Partner regions will commit themselves to the two phases from the beginning of the project.

INTERREG EUROPE - Comments and programme responses to

7. Interregional Cooperation Projects

N°	Organisation name	Country	Comments	Responses
7,27	Subvention BV	Netherlands	too bureaucratic, of no use for SME participants	The importance of SMEs in certain priorities of the programme is clear. Their participation should be ensured through the creation of local stakeholder groups. Nevertheless, it does not seem appropriate that SMEs are direct beneficiaries for the following main reasons: - the the programme primarily focuses on policy learning and not on implementation. From that point of view, it is fundamentally different from any other cooperation programme and from other EU programmes such as COSME and Horizon 2020. - administrative constraints (e.g. first level control, second level control) are not adapted to this target group.
7,28	Westpomeranian Marshal's Office in Szczecin, Poland	Poland	We observe necessity of monitoring the action plans prepared for the projects as well as monitoring the results disseminated!	Remark noted
7,29	RDA North-East Romania	Romania	The program implementation should indicate how the second phase will take place (separate subsidy contract, a new project application, etc). It is most likely that all project proposals will include both phases' activities. The idea to give to JTS the option to approve pilot actions (resulted from approved action plans) seems not feasible in the absence of any administrative details related with the dimension, the duration, the terms of implementation, etc.	Partner regions will commit themselves to the two phases from the beginning of the project. Further detailed information on the second phase and on the pilot actions will be provided in the programme manual.
7,30	ASSOCIATION OF LIFELONG EDUCATION	Romania	I believe that small entities are excluded and individuals	The target groups and types of beneficiaries are specified in the programme. Small entities can be members of the local stakeholder group.
7,31	Eudace	Slovenia	The results should be set in terms of effective results, not number od Action plans and similat. Too many Interreg projects in the past perspective had objectives like "Print XY leaflets" or "attract YZ participants to the dissemination activities", which have no real impact on the real effectiveness of the consumed public money.	This is the reason why programme result indicators refer to improved policies. Phase 2 was also introduced to reinforce the result-oriented approach of projects.
7,32	Avila County Council	Spain	The monitoring is useful but should be considered as a complementary tool for the Action Plan rather than a goal itself.	The monitoring of action plans is not a goal in itself but the idea is to have access to more tangible results related to the implementation of these action plans.
7,33	Winnet Sweden - Europe	Sweden	It is important to learn of previous Interreg projects and most of all Interreg IVC Capitalisation project, on this. Just to secure that - there will be interregional cooperation projects, that reeally focus on "action and using action plans," not only like a document - to be laying. Demand of actions, and co-operation in a Quadruple Helix perspective. And how it can be used in actions and improved for Structural Funds. When it comes to Gender Equality Goal, it is of outmost importance. So indicative project within all thematic areas needs to have Gender Equality included - Clear and loud, indicators, goal, monitoring etc	This is the whole idea behind the introduction of phase 2. From the start of the cooperation, partner regions will not only commit themselves to the elaboration of an action plan but also to the monitoring of its implementation.
7,34	Regio Basiliensis	Switzerland	the monitoring will be difficult and the outcomes probably not relevant	It is important to go beyond the elaboration of the action plan. Phase 2 should therefore bring added value not only to the programme but to the projects themselves that can learn from the implementation of the action plan.
7,35	Hampshire County Council	United Kingdom	The second project phase is useful to ensure policy does not stall, but it may not be realistic if there is no allocated funding. Final question unclear.	Costs related to the monitoring of action plans' implementation will be supported by INTERREG EUROPE.
7,36	Westcountry Rivers Trust	United Kingdom	The objectives need to clearly state the articulation between the need for growth and a sustainable economy, environment and society.	This articulation is developed in section 1 of the programme.
7,37	North of England EU Health Partnership	United Kingdom	Evaluation and selection/eligibility criteria for projects should compel projects to orientate their actions towards achieving social cohesion and contributing to improving well-being.	Selection criteria will be developed in the programme manual. The qualitiative evaluation will indeed check the result-oriented approach of projects.

INTERREG EUROPE - Comments and programme responses to

7. Interregional Cooperation Projects

N°	Organisation name	Country	Comments	Responses
7,38	Kent County Council	United Kingdom	Whilst the implementation of lessons learnt via Action Plans is probably the most important aspect of the interregional cooperation projects. However, the fact that implementation of these actions is not funded by INTERREG EUROPE could mean that this is not followed through.	The key objective of projects is to make sure the lessons learnt from the cooperation are integrated into the relevant policies at local, regional or national levels. They should therefore not rely on INTERREG EUROPE funding to make sure that actions are taking place. However, INTERREG EUROPE will support the costs for monitoring the implementation of the action plan and for implementing possible pilot actions.
7,39	Eleanor Dearle	United Kingdom	I welcome this programme's focus on concrete results and the changes to facilitate this. However I feel that there should be more emphases on trial and error (pilots) and fully support the 2nd project phase to monitor the action plan, but this needs to be funded and then ways developed to make this part of the normal business of the organisation. I would also support the development of business cases in order to attract investment for successful interventions (and it must be accepted that some will also fail)	The programme will support phase 2 by financing the costs for monitoring the implementation of the action plan but also for implementing possible pilot actions. But INTERREG EUROPE is not designed to support business cases.
7,40	Marches Local Enterprise Partnership	United Kingdom	Interregional Cooperation is relevant, however we think that Interregional Cooperation projects need to be more focused and result-orientated. The objective of the Interregional Cooperation Projects which is "to improve the implementation of the policies of participating regions by supporting exchange of experiences and sharing of practices between actors of regional relevance with the specific aim to prepare the integration of lessons learnt into regional policies and actions" is not clear. We propose the redrafting of this objective and make it SMART (specific, measurable, achievable, realistic and time bound) and highlight the added value of exchange of experiences and the benefits it brings to policy improvement and regional development. The Interregional Cooperation Projects have two phases: Phase 1 is exchange of policy experience and sharing of practices and Phase 2 is monitoring of the Implementation of Action. We think that Phase 2 (monitoring of action plan) is useful as it will open the possibility to test and try new things in small pilot actions.12.From experience in innovation projects, we think that the implementation of interregional cooperation projects is much closer to regions' competitiveness than to over-coming disparities among regions. Hence, we do not think that the actions will contribute to an improved implementation of Structural funds which aims to reduce disparities across EU.	The focused and result oriented character of the projects will be carefully assessed at the application stage. It is through the improvement of the performance of individual Structural Funds programmes that the programme can contribute to the EU policies and to reducing disparities across EU. Further detailed information on Interregional Cooperation Projects will also be provided in the programme manual.
7,41	New Economy Manchester	United Kingdom	a second monitoring phase is helpful however it would be helpful to understand how it will be monitored, and the consequences if a region is not implementing their Action Plan as original planned.	Partner region would need to explain why the action plan was not implemented as initially planned. Further details on phase 2 will be provided in the programme manual.
7,42	Aberdeen City Council	United Kingdom	<p>The second project phase dedicated to monitoring the action plans is an understandable addition but could be an unwelcome addition. Most projects should include monitoring as a standard function within a project and to have it bolted on as an extra may detract from the original aim of the intended project.</p> <p>If projects are to be faced with additional monitoring duties over and above what would have been expected in the past then significant amounts of funding may require to be spent on this activity.</p> <p>Implementation of structural funds projects are a result of the work of those projects which have been supported. Additional monitoring will not improve the actual level of implementation of the programmes, it will only improve the levels of reporting. And how would the implementation of the programmes be monitored? Through even more reporting? Will there be much budget left to support projects or will it all be spent on the monitoring of monitoring?</p> <p>Structural funds have a limited budget. Audit and compliance are serious issue to deal with in a project, however, simplification has always been promised and this appears to be a step the other way.</p>	<p>The second phase will also be an opportunity for the partner region to learn from each other from the implementation of their action plan. Up to now, project did not include any monitoring system going beyond the funding period.</p> <p>The aim of monitoring the implementation of the action plan is not to improve the actual level implementation but to follow-up on the impact of interregional cooperation. It also reinforce the result oriented character of the projects. Costs related to the monitoring of action plans' implementation will be supported by INTERREG EUROPE.</p>
7,43	New Economy Manchester	United Kingdom	To ensure close synergies between the regional Structural Funds programmes and the ETC programmes, it would be useful to support some kind of mechanism where Managing Authorities of regional/national Structural Funds are engaged with the platform and the ECT projects their regions are involved with.	This is a very relevant remark but this kind of mechanism does not exist yet.

INTERREG EUROPE - Comments and programme responses to

7. Interregional Cooperation Projects

N°	Organisation name	Country	Comments	Responses
7,44	Brighton & Hove City Council	United Kingdom	I think the second phase is a good idea if includes funding for pilot actions. If it is just monitoring the action plan it will probably end up being an inconvenient afterthought to the project. It is also unclear who would be considered the managing Authority of structural funds in England, either central government (who run the funds) or the LEPs (who provide the strategy). It seems that Interreg Europe is following the lead of Urbact by developing action plans, however if this is the case maybe there should also be money for external experts to help develop the action plan	The key objective of projects is to make sure the lessons learnt from the cooperation are integrated into the relevant policies at local, regional or national levels. They should therefore not rely on INTERREG EUROPE funding to make sure actions are taking place. However, INTERREG EUROPE will support the costs for monitoring the implementation of the action plan and for implementing possible pilot actions.
7,45	WWF Germany	WWF Germany but acting for WWF in Europe	The general rule of beneficiaries addresses only public or public equivalent bodies, however this does contradict the partnership principle that emphasizes also the role of partners in implementation. With respect to the specific territorial character and objective of Interreg Europe it would be for example good to also accept civil society non profit organizations who operate at least in two or three member states to be part of beneficiaries, especially as such organizations have well developed cross country networks that could facilitate policy learning across borders with benefit for public and public equivalent bodies.	Non-profit organisations can sometimes be considered as public equivalent bodies and can therefore be eligible to the projects. The creation of local stakeholder groups should also ensure that the relevant players are involved in the cooperation.

INTERREG EUROPE - Comments and responses to

8. Policy Learning Platforms

N°	Organisation name	Country	Comments	Responses
8,01	ECOLISE	Belgium	Support for a platform to support community-led action on climate change and sustainable development is much needed would be very welcome?	A platform is envisaged for each of the Thematic Objective selected by the Partner States.
8,02	Provincie Vlaams-Brabant	Belgium	Laudable initiative, but effectiveness remains to be proven.	The platform represents a complete new initiative which will hopefully demonstrate its usefulness.
8,03	Department of Environment	Cyprus	This platform is a very helpful database that will support the European regions on ongoing policy learning on different thematic objectives.	The platform should provide more services than a simple database.
8,04	Institute of Sociology of the Czech Academy of Science	Czech Republic	The idea of PLP is good but it bears certain normative expectation with it, which might not be compatible across regions. The way regions use SF programmes is already learned by stakeholders in regions (often it is not a best-practice!) and this is difficult to change. There is a risk that PLP will lead to a low impact and current practices did not change significantly. New knowledge is not only an opportunity, but also a threat to current distribution of power and competence.	The usefulness of the platform will indeed depend on the capacity of the players to change their ways of doing.
8,05	Regional Council of North Karelia	Finland	This tool might be useful but too little is known for it. However, the most of funding should go to the regions.	Most of the funding will be dedicated to the projects. Further details on the platforms will be provided in the programme manual.
8,06	Kainuun Etu Oy	Finland	...improved implementation of the structural funds and beyond, too	This is planned in the programme since the platform will be open to players who are not necessarily involved in Structural Funds programmes.
8,07	AViTeM	France	Excellent initiative having these platforms. It is not clear however if they only capitalise results or retroact on projects orientation ex ante.	As reflected in the activities and services described in the programme, platforms will go beyond the consolidation of projects results. They should contribute to EU wide capacity building.
8,08	Collectif ville campagne	France	Welcome policies are a new innovative approach to work about social and territorial cohesion and also about the creation of new economic activities.	Remark noted
8,09	Political Science Institute	France	We have a lack of practices on this point and we didn't have any strong example and documentation from the regional level. At this point considering and judging platforms is strongly irrelevant....	The S3 platform developed by the IPTS in Seville provides a good example of the second action planned by INTERREG EUROPE.
8,10	Chambre de Commerce & d'Industrie Marseille Provence	France	Chambers of Commerce & Industry are generally fully prepared to set-up and operate Policy learning platforms dedicated to VSME / SME Competitiveness & Growth.	Remark noted
8,11	Lille Métropole	France	For some examples of possible actions, the use of "regional" words is very pregnant. Cities and local stakeholders should also be concerned by the platforms (also in their practices etc)	The word 'regional' has to be taken in a broad sense. Cities and local level can also be included in the platforms.

INTERREG EUROPE - Comments and responses to

8. Policy Learning Platforms

N°	Organisation name	Country	Comments	Responses
8,12	Energy Cities	France	<p>Most of them are relevant but many mostly already exist elsewhere: expertise of city networks, the Covenant of Mayors e.g. This is why they should be associated in order to leverage their expertise and avoid duplication.</p> <p>It is not clear who will have access to the platform, whether it is only beneficiaries of structural funds, public bodies that specifically apply to it, or any public body.</p>	<p>Apart from the S3 platform in Seville, none of the EU existing platforms focuses on the implementation of Structural Funds programmes. This specific focus makes the INTERREG EUROPE platforms unique even if these platforms should indeed seek synergies with other relevant initiatives.</p> <p>Despite this specific focus, the platform will be open to any bodies relevant to the topic tackled by the platform.</p>
8,13	Mission Opérationnelle Transfrontalière	France	<p>Action : It is said in chapter 8.1 that “Policy Learning Platforms for Priorities 3 and 4 will evidently focus entirely on policy learning related to sustainable development”: this is too restrictive and should apply more largely.</p> <p>Platform activities: Please clarify who will carry out these actions and which possible partnerships could be developed in link with outside-secretariat bodies (resource centers, training organizations, thematic or regional/local stakeholder networks, etc.).</p> <p>Implementation of SF : Support and learning actions go beyond improved implementation of Structural Funds programmes, and should also include local/territorial programme and project management</p>	<p>Due to their definitions (low carbon economy; environment and resource efficiency), Priorities 3 and 4 will directly contribute to the issue of sustainable development. It is also recognised in section 8 that the two other priorities can indirectly contribute to sustainable development.</p> <p>Platform activities will be carried out by a team of experts that can be made up of any private or public bodies.</p> <p>The platform will be open to any bodies relevant to the topic tackled by the platform.</p>
8,14	Euromontana	France	<p>Relevance of action: It is really important to capitalize the results of all the projects. Too often, several different projects, under Interreg IV C, had similar experiences or had the same political conclusions, without being able to disseminate them more widely among other EU regions and at EU level in general. If well implemented, the Policy Learning Platforms could be very interesting and efficient.</p> <p>Relevance of activities: There is not enough emphasis on the use of digital platforms. These platforms should be translated into different languages if we wish to have regional actors using them.</p> <p>The links between the Interregional Cooperation Projects and these platforms are not well defined.</p> <p>In addition, the budget dedicated to these platforms is really restricted to ensure that a dedicated team will keep these platforms “alive” during the whole lifetime of the programme (and beyond!). The example of “The European Network for Rural Development (ENRD)” platform shows the amount of time and (staff and financial) resources needed to have a good and active platform. So this will be really a challenge to have 4 active platforms, with active stakeholders from all over Europe. Furthermore the issue of overlap between these should be carefully addressed. PLP will enlist interesting practices which respond to several TOs, which, themselves, overlap to a very significant extent. Common templates and methodologies should be explored to avoid incompatibilities in the communication products deriving from activities. Links with Region2020 Network should be emphasized.</p> <p>Improved implementation of Structural Funds: Not enough emphasis on digital media as a driver of innovation and therefore the learning platform comes across as too traditional.</p> <p>In addition, the Interreg Europe programme should ensure that the Managing Authorities are using these platforms, which is unlikely if the content is not translated and if the budget dedicated to these platforms is too weak to ensure at least weekly activity on each platform.</p>	<p>The use of digital media is planned since the platforms will be embodied by a team of experts and also by a digital tool.</p> <p>The platforms have to be considered as a new type of initiative and the programme is aware of its challenging character. The question of the language is one issue among others but it will need to be properly tackled for the platform to be efficient.</p> <p>Links with relevant EU initiative such as 'Region 2020 Network' would need to be established.</p>

INTERREG EUROPE - Comments and responses to

8. Policy Learning Platforms

N°	Organisation name	Country	Comments	Responses
8,15	City of Munich Department of Labor and REconomic Development	Germany	not only structural funds, governance issues in general	The main focus of the platform will be on the implementation of Structural Funds programmes. Despite this specific focus, the platform will be open to any bodies relevant to the topic tackled by the platform.
8,16	Technologiepark Heidelberg GmbH	Germany	learning platforms are very relevant for the success of the programme	Remark noted
8,17	ministry for economic and european affairs state of Brandenburg	Germany	where is the test? We try a tool like a black box!	The platform represents a complete new initiative which will hopefully demonstrate its usefulness.
8,18	Managing Authority of Rural Development Plan	Greece	It is mystified why the text of actions/ content / approaches / objectives is repeated in the two statements. They are too similar to be true (specific considering). The diversification of approaches can be process hindering ways of testing and activated monitoring of the Programme actions/ implementation and so on.	The platform represents a complete new initiative which will hopefully demonstrate its usefulness.
8,19	Grants Europe	Hungary	It is unclear how these platforms and individual projects will benefit from each others activities. The type of activities to be funded are overlapping and I fear some overlaps and inefficient competition.	Platforms are fundamentally different from projects. Platforms will provide a thematic service to interested stakeholders throughout the lifetime of the programme whereas projects involve a limited number of regions that want to find solution to shared problems.
8,20	Istituto per le Piante da Legno e l'Ambiente S.p.A.	Italy	I deem the ral impact should be not so high	The platform represents a complete new initiative which will hopefully demonstrate its usefulness.
8,21	ARSIAL	Italy	I think that more platforms then only one on each theme should be more usefull. There is no evidence that only one platform could reach out overall in Europe, even if well-realised and managed. Perhaps a network of 3-4 platforms could be more advisable , one for each macro-area of Europe with similar features	The programme plans to have one platform per Thematic Objective. But depending on the needs of the regions, more specific working groups could be created under each platform.
8,22	University of l'Aquila	Italy	It depends on how it is done	Remark noted
8,23	Vidzeme Planning Region	Latvia	The focus within the program should be the Inter regional cooperation projects, with clear emphasis on pilot actions and inclusion of the end users. The role of the policy learning platforms should be a supporting one for the successful implementation and sustainability of the Action plans, designed within the Inter regional cooperation projects. The clear synergies and mutual complimentary nature between Inter regional cooperation projects and Policy learning platforms must be outlined. The program funding should be primary aimed at the Inter regional cooperation projects, with much smaller funding proportion aimed towards the Policy learning platforms.	This is the case in the programme where the majority of funds is allocated to interregional cooperation projects.
8,24	Gemeente Heerlen	Netherlands	I don't believe in holostic platforms and believe there are enough platforms that should be better used. Of course there's room for improvement but these should be driven be bottom-up initiatives.	Apart from the S3 platform is Seville, none of the EU existing platforms focuses on the implementation of Structural Funds programme. This specific focus makes the platforms unique even if these platforms should indeed seek synergies with other relevant initiatives. The platforms will also leave room for bottom-up initiatives. The idea is as much as possible to have a demand driven system where the platform would be at the service of the regions.
8,25	Bureau PAU	Netherlands	The results of these platforms depend very much on the execution of it's activities and the cooperation with the relevant thematic platforms already existing.	Remark noted
8,26	Subvention BV	Netherlands	No effects, no results, regarding to previous actions.	The platforms and the projects are in fact closely interrelated.

INTERREG EUROPE - Comments and responses to

8. Policy Learning Platforms

N°	Organisation name	Country	Comments	Responses
8,27	Hoogheemraadschap Schieland en de Krimpenerwaard	Netherlands	interregional interaction regarding policy learning platforms will only contribute to an understanding. They will not contribute to remove barriers.	Understanding should be the first step to learning that could leave to remove barriers.
8,28	RDA North-East Romania	Romania	The administrative burden of creating and managing 4 learning platforms seems too much for the program scale. A single learning platform with 4 thematic areas would be preferable to be activated.	Remark noted
8,29	Association of lifelong learning	Romania	"policy learning platforms" is a unrealistic target for many countries in the EU in 2014 - 2016, in particular for individuals;	The platforms have to be considered as a new type of initiative and the programme is aware of its challenging character.
8,30	North-West Regional Development Agency	Romania	Poor information of how the PLP component will be accessed by beneficiaries; from the description seems sometimes to be part of the Technical Assistance Priority, providing support to beneficiaries and to extended groups, governments included "tool to allow a faster, better share of knowledge to help governments to do their job"	By providing a service to anyone interested in a specific field of regional development, the activities of the platform goes much beyond the work financed under the Technical Assistance priority. The access to the platform will be further explained in the programme manual.
8,31	Avila County Council	Spain	Likely is not clear enough the link between the implementation of the Structural Funds and these Platforms	The main focus of the platform will be on the implementation of Structural Funds programmes. Despite this specific focus, the platform will be open to any bodies relevant to the topic tackled by the platform.
8,32	Girona City Council	Spain	It is likely that the actions contribute to an improved implementation of Structural Funds programmes provided that accessibility to those platforms & services & support will be ensured.	Remark noted
8,33	Winnet Sweden - Europe	Sweden	It needs to be more clear, how to use the policy learning platforms and secure actions, in thematic areas, How EU Member States could use it in implementation, to use Structural Funds in this work for actions - results. There is a need of a Winnet Centre of Excellence, policy learning platform - to secure implementation of GE,	The activities of services of the Platform are described in the programme. Each platform will have a specific focus on the implementation of Structural Funds.
8,34	Hampshire County Council	United Kingdom	Objectives - More information and publicity about the Policy Platforms is needed. This must be communicated in layman's terms. Implementation - Ensure learning and outcomes from projects goes further but unsure as to whether this relates to programme implementation.	A clear communication on the platform will indeed be a key success factor. The idea of the platform is also that the interregional cooperation benefits go beyond the partners involved in interregional cooperation projects.
8,35	North of England EU Health Partnership	United Kingdom	In order to be fully relevant to improving the implementation of the ESIF, more information and greater consultation is needed in order to reach the target audience.	Remark noted
8,36	Kent County Council	United Kingdom	A concern might be that the activities of the Policy Learning Platform would duplicate, rather than just complement much of those of the existing Smart Specialisation Platform	As far the the first thematic objective is concerned, the added-value compared with the S3 platform can be seen at two levels. First, the platform in Seville will focus exclusively on S3 strategies whereas the INTERREG EUROPE platform will relate more generally to Thematic Objective 1. Second, the S3 platform focuses mainly on processes and methodologies whereas the platform in INTERREG EUROPE will focus more on the concrete implementation of S3.
8,37	Eleanor Dearle	United Kingdom	The Platforms are an excellent idea and fairly overdue. However I think they could got further and extend the impact of the Interreg projects, by developing links to the EIB so that they can band together developments, support the development of compelling business investment cases and liaise with the EIB to faciliate funding to extend and embe successful practice.	There may be cases where the link with the EIB should be ensured but INTERREG EUROPE is not designed to support business cases.

INTERREG EUROPE - Comments and responses to

8. Policy Learning Platforms

N°	Organisation name	Country	Comments	Responses
8,38	Marches Local Enterprise Partnership	United Kingdom	The objectives of the Policy Learning Platforms on Environment and Resource Efficiency which are: 1) contribute to EU wide capacity building by supporting networking and exchange of experience among relevant actors related to Growth and Job and ETC and 2) exploit the results of Interregional Cooperation Projects and make them available to a wider audience of regional policy actors across Europe are relevant as they will facilitate broader policy learning and knowledge dissemination in improving regional development policies, especially investment in Growth and Jobs programmes. We think that the learning platforms need have wider dissemination network for it to contribute to the wider objectives of the Structural Funds Programme which is to reduce disparity across Europe.	Remark noted
8,39	New Economy Manchester	United Kingdom	To ensure close synergies between the regional Structural Funds programmes and the ETC programmes, it would be useful to support some kind of mechanism where Managing Authorities of regional/national Structural Funds are engaged with the platform and the ECT projects their regions are involved with.	This is a very relevant remark but this kind of mechanism does not exist yet.
8,40	Aberdeen City Council	United Kingdom	Further explanation on how to monitor the objectives of policy learning platforms would be welcome as in many cases the exchange of knowledge is not a measurable outcome, despite being highly beneficial for regions. these actions may improve the implementation of Structural Funds programmes, but how this can be evidenced is not clear. We are not calling for further requirements on beneficiaries to provide this, but trying to outline that additional resources targeted at monitoring may not be a valuable use of the limited budget available.	The results of the platforms will be monitored through surveys sent to beneficiaries of the platform's services.
8,41	Brighton & Hove City Council	United Kingdom	This appears to be aimed at regional authorities (in our case LEPs) I am not sure as to what LEPs policies on smart specialisation is, but I would wonder if they would have the capacity to be involved in England, being (outside of London) small scale organisations with an ever increasing remit of responsibilities.	The platform will be open to any authorities interested in the topic tackled by the platform.
8,42	Scottish Government	United Kingdom	The PLPs read as a good idea, and would appear to have the potential for greater stakeholder interaction and translation of learning and good practice than other methods like basic thematic expert reporting. There are many platforms that regional players are participating in; therefore, the relationship between those existing and the new PLPs, the added value that they bring, and how to avoid causing confusion and duplication of effort, need to be clarified. It is also important to highlight that these platforms are not portals solely for project partners – the profile of the PLPs need to reflect that if they are to attract MA/RA participation. Regional stakeholders will, in the main, find the PLP model useful and engaging – as long as it is user-friendly, intuitive and well-maintained over the programming period. The main challenge will be for MAs/RAs to become active and participatory members – encouragement of their input needs to be considered alongside their on-going challenges for coordinating activities within their organisations across a growing number of EU policy and learning platforms (e.g, S3, RFSC).	Apart from the S3 platform is Seville, none of the EU existing platforms focuses on the implementation of Structural Funds programme. This specific focus makes the platforms unique even if these platforms should indeed seek synergies with other relevant initiatives.

INTERREG EUROPE - Comments and responses to

8. Policy Learning Platforms

N°	Organisation name	Country	Comments	Responses
8,43	WWF Germany	WWF Germany but acting for WWF in Europe	The platforms can be a useful tool to improve policy learning on specific topics, however the central approach to only one platform per investment priority does not seem to be able to cover all challenges related to specific thematic objectives or investment priorities. Especially the added value of such platform to focus learning on new topics that include innovative approaches, new funding solutions and projects, e.g. like mitigation relevant adaptation through peatland will fall out of the scope of the platforms if they address the whole investment area and tend to remain dealing with the mainstream approaches. My understanding would be to allow for specific new field of intervention smaller expert, innovation platforms that allow for more flexibility and gathering expertise outside of mainstream actions.	The programme plans to have one platform per Thematic Objective. But depending on the needs of the regions, more specific working groups could be created under each platform. Each platform will also have the possibility to hire specific expertise not available at the expert team level in case it is needed.

9. Objections

N°	Organisation name	Country	Comments	Responses
9.01	Provincie Vlaams-Brabant	Belgium	<u>Section 6</u> The coordination between funds is still unclear. Please elaborate on how complementary projects can be funded by different funds, and whether this is encouraged. (e.g. Horizon 2020, ITIs, ...)	It will not be possible to finance INTERREG EUROPE projects from different funds. However, certain actions included in the action plans may be relevant to Horizon 2020, COSME or any other EU initiatives.
9.02	Future of Rural Energy in Europe (FREE) initiative	Belgium	<u>Section 1</u> FREE believes that rural and mountainous regions would greatly benefit from establishing links between rural development policy and overall rural development programmes (not just Goal 1).	Even if no particular emphasis is made on rural areas, they are covered by the programme's strategy. Attention should also be paid on avoiding any overlap with EAFRD programmes. Finally, INTERREG EUROPE does not exclusively focus on Structural Funds policies.
9.03	Institute of Sociology of the Czech Academy of Science	Czech Republic	<u>Section 3</u> The previous Interreg IVC was very problematic in this respect. A long delays in re-funding create a high risk of possible financial insolvency for smaller project partners. <u>Section 4</u> It should support more cooperation of different kind of institutions in projects (public administration, SME, research institutions). Otherwise there is a risk that stakeholders just utilise the networks they already have and didn't get new knowledge and inputs.	1. In principle, the six-month reporting allows for regular reimbursement of costs. The timing of reimbursement is also closely related to the quality of the reporting from the project. 2. The future programme will be more open to any relevant organisation through the creation of local stakeholder groups.
9.04	Regional Council of Pääjät-Häme	Finland	<u>Section 1</u> The role and tasks of the policy learning platforms. The tasks and working methods of the platforms are not clear enough. <u>Section 2</u> The role and tasks of the policy learning platforms. The tasks and working methods of the platforms are not clear enough. Also the inclusion of some sectors like silver economy (ageing) and its social and economic consequences in European regions are not specified enough. The horizontal role of the eco-innovations could be explained better. <u>Section 6</u> The use and better coordination between the different funds could be explained better. <u>Section 7</u> E-administration for the project management should be taken in use as much as possible. <u>Section 8</u> The horizontal role of the eco-innovations could be explained better.	1. The main tasks of the platforms are described in the programme but their working methods are still under development. Further details will be provided in the programme manual. 2. Silver economy as an economic sector is covered under the two first thematic objectives. 3. Concerning the coordination between funds, section 6.2 was revised accordingly. 4. Further simplification measures are envisaged for the future programme but e-administration practices can vary significantly according to the Member States and the public authorities concerned. 5. Eco-innovation is regularly mentioned throughout the programme and is even provided as a good example for projects having an integrated approach.
9.05	ADRAMAR	France	<u>Section 2</u> Promotion of cultural heritage is, in my view, embedded within an axis unconnected to the theme.	The Thematic Objectives are defined in the regulation. Cultural heritage is tackled in its wide sense of environmental quality and this is the reason why it is included in Thematic Objective 6.
9.06	Ville de Reims	France	<u>Section 2</u> The priority axis 5 should provide the managing authorities with the sufficient means to organize information meetings in different places in Europe, or, for the national contact points, in different cities. <u>Section 7</u> We would welcome any efforts to reduce the administrative burden (such as the administration costs flat rates)	1. Since the regulation limits the technical assistance to 6% of the total budget, the means of the MA will unfortunately be limited for such a challenging programme. 2. Further simplification measures are indeed envisaged for INTERREG EUROPE.
9.07	Mission Opérationnelle Transfrontalière	France	<u>Section 4</u> The chapter "Integrated approach to territorial development" is of highest importance and should be further developed. For example "prioritised operations with a clear cross-border impact" are mentioned twice in chapter 4.2., but we think this specificity is not sufficiently tackled, no further specification is given. Cross-border cooperation should be much more present, we therefore suggest to introduce a specific focus on cross-border cooperation within the programme.	Section 4.2 is more specifically dedicated to macro-regional and sea basin strategies. But as indicated in the last paragraph of section 4.2, there is not particular strategic reason that would justify a particular emphasis on cross-border cooperation (in comparison with transnational cooperation for instance).
9.08	Euromontana	France	<u>Section 1</u> The choice to focus on supporting the implementation of the programmes for Investment for Growth and Jobs excludes de facto Norway and Switzerland. For rural and mountain regions, it would be important to be able to develop links with rural development policy and rural development programmes, not just Goal 1 programmes. The choice is not coherent with the requirements of a greater integrated approach. Should place more emphasis on access to high quality ICT infrastructure as a key enabling factor <u>Section 2</u> More emphasis could be placed on using the Programme objectives to overcome barriers to market entry and place inequalities. <u>Section 3</u> It is not clear from the Financing Plan how the cross-cutting themes will be financed. <u>Section 4</u> The choices which are made to focus on growth and jobs programmes and ETC programmes only are in complete conflict with the idea of an integrated approach to territorial development. Within the little margin of manoeuvre left by the regulation, the programme should take any opportunity to allow partners of regional relevance to exchange across the full span of their regional policy instruments and to address jointly territorial strategies which include all ESIFunds. <u>Section 6</u> "the coordination between both types of programmes will be ensured through an increased involvement of regional managing authorities for these Goal 1 programme" (page 67 of the draft OP): according to the stakeholders consultation done on 5th February 2014, so far these Managing Authorities are not very aware of the "Interreg Europe" programme and not always really ready to establish links with Interreg Europe. More efforts should be made to encourage these Managing Authorities to directly participate in Interreg Europe and to be interested by the projects funded in their own areas. <u>Section 7</u> Except for the electronic submission and on-line reporting, all the simplification measures were already introduced in the last INTERREG IV C call or projects. We would welcome the introduction of lump sums for instance. It would be useful to specify in the draft Programme what indicators will now be used (to clearly explain the simplification in the number of indicators) and how often project leads will be required to report to MA's. More financial flexibility between the different types of expenditures and components would be welcome, as it is already the case in other EU funding schemes, like Horizon 2020. More flexibility could also be introduced in the amendment procedure of the Grant Contract: being able to change only once the contract, for contracts lasting 5 years, is not realistic, and won't reflect the difficulties on the ground. The direct consequence could be to have more automatic decommitment, due to a not so good management of the contract (which is something neither the project partners nor the programme manager would like). We thus recommend more flexibility in the amendment process. In a period of crisis, having to advance funding for activities under INTERREG EUROPE for more than 18 months will be a barrier to participation of many entities governed by public law. Furthermore, reporting every six months on the basis of expenses for which accounts have not been closed, and with costly and time consuming certification, is a waste of programme funding. The programme financial efficiency would greatly benefit from yearly reporting combined with an advance payment at the beginning of the project (even limited). <u>Section 8</u> The whole draft Programme fails to reflect the growth in importance of digital media as a key to communication, e.g. to mitigate against the effects of air travel. The draft seems to expect there will be the need for the same level of travel as in previous programmes.	1. Despite the text of the regulation, INTERREG EUROPE does not focus exclusively on structural Funds policies. Links with other relevant policies will therefore be possible. Partner States have decided not to select Thematic Objective 2 dedicated to ICT. 2. Place inequalities are taken into consideration through the regional diversity mentioned in section 1 of the programme. As a programme of the cohesion policy, the territorial characteristics will also be taken into consideration throughout the selection criteria. 3. The cross-cutting themes are not related to any specific financing allocation. These relate to important issues (e.g. horizontal policies, ICT) that should be taken into consideration by all projects. 4. We do not see any conflict between the choice to focus on Structural Funds policies and the integrated approach to territorial development. Structural Funds policies are part of territorial development and this focus is anyway not exclusive in INTERREG EUROPE. 5. The direct participation of the MAs is indeed one of the challenges of INTERREG EUROPE. 6. Further simplification measures are envisaged for INTERREG EUROPE. 7. The Strategic Environmental Assessment takes into consideration the level of travel implied by interregional cooperation and proposes solutions.

9. Objections

N°	Organisation name	Country	Comments	Responses
9,09	REM - Consult	Germany	<u>Section 7</u> too little information provided so far to evaluate it.	Further detailed information will be provided in the programme manual.
9,10	Ministerium für Ländlichen Raum und Verbraucherschutz Baden-Württemberg	Germany	<u>Section 1</u> The programmes should shape themselves instead of building on the Structural Funds programmes. This piggybacking method does not increase the added-value. <u>Section 2</u> Less would be more <u>Section 4</u> The plan is not really integrated <u>Section 8</u> no relevant for non-investment projects	The focus of INTERREG EUROPE on Cohesion Policy is defined in the regulation. The EU horizontal policies apply to all projects even those not directly dedicated to investments.
9,11	The Athens Chamber of Small-Medium Industries	Greece	<u>Section 1</u> The Strategy is great. <u>Section 2</u> The priority axis are fine. The examples within priorities have to be expanded. <u>Section 3</u> The rationale for the allocation of funds could be needs driven (based on priority axes & EC agenda for 2014-2020)). <u>Section 4</u> This is fine. <u>Section 5</u> Provisions need further elaboration <u>Section 6</u> Has to be analysed more clearly. <u>Section 7</u> The cost for beneficiaries is much higher when state authorities certify incurred costs.	Remarks noted
9,12	GEOGNOSIS LTD	Greece	<u>Section 1</u> Too theoretical <u>Section 2</u> Too theoretical for the problems that most European countries face (e.g. unemployment, poverty, etc). <u>Section 7</u> Adequate.	Remarks noted
9,13	Hungarian Chamber of Commerce and Industry	Hungary	<u>Section 1</u> There are too many points of view among the objectives. <u>Section 3</u> Such a financial plan is unacceptable where the governing organization's administrative costs are more than 22 million euros (6,15% of the programme total costs). Beside these costs there are other administrative outlays on the side of participants in realization and further costs like this current consultation. We cannot speak about the will of cost reduction, even in the regard of the 74-page-long programme document and the 78-page-long evaluation. In addition, a detailed programme handbook elaborating the specific objectives will also be attached. The controlling system is unbelievably complex. There are five organizations with specified controlling functions and there is also the joint technical secretariat that functions as a managing and controlling body.	1. The strategic approach is indeed quite wide since INTERREG EUROPE covers the whole EU territory. 2. Further simplification measures are envisaged for INTERREG EUROPE.
9,14	Comune di Pordenone	Italy	<u>Section 2</u> Described framework of priority axes is not relevant within strategy	The priority axes derives from the strategy described in section 1 but they also reflect the choice made by the Partner States.
9,15	Gect -ezts go	Italy	<u>Section 2</u> There is not anything related to health objective and in particular mobility in health sector in Europe <u>Section 4</u> The programme should ask clearer how integrated approach is delivered <u>Section 6</u> The national management bodies are not implementing any coordination between nor structural funds and funds directly managed by the EC. In particular, many regional authorities are against programmes / operations financed by more than one fund. The Interreg Europe programme should be more demanding on this, asking a clear engagement to authorities in presenting more complex projects.	1. Mobility in health sector in Europe is indeed not covered in INTERREG EUROPE. This topic does not fit within the proposed strategy. 2. Integrated approach is related to the fact that certain topics although clearly in line with one specific objective can also have side effects on another specific objective of the programme. 3. Remark noted

9. Objections

N°	Organisation name	Country	Comments	Responses
9,16	Vidzeme Planning Region	Latvia	<p>Section 2 1) The clear inclusion of NUTS 3 level regions as a target beneficiaries for the projects and actions is necessary. The cooperation between NUTS 2 and NUTS 3 levels, should be more focused on. 2) The properly funded Pilot actions to test the Action plans, and practical inclusion of the end-users in the Inter regional cooperation projects should be more emphasized, and made an integral part of the projects. 3) The regional cooperation projects should be emphasized as a clear priority Action (also in terms of funding proportion), with the Policy learning platforms, being a complimentary part for the regional cooperation projects, ensuring clear synergies between cooperation projects and policy learning platforms.</p> <p>Section 3 The program funding for the Regional cooperation projects should constitute the proportionally dominant part of the whole program funding.</p> <p>Section 7 The reduction of the administrative burden is very important prerequisite for the successful project and programm. implementation. We strongly support the retaining of the fixed flat rate for the partner staff costs, however, we propose that the fixed amount of these costs is increased from 12 % to optimally 15%, in order to ensure even simpler and effective project implementation.</p>	<p>1/ All territorial levels are relevant as long as they can contribute to the programme objectives. These levels also very much depend on the size and institutional organisation of each country. 2/ Pilot actions cannot become an integral part of interregional cooperation projects for the following reasons: - INTERREG EUROPE is primarily dedicated to capacity building and to policy learning, and the overall budget of the programme is limited considering the number of regions in Europe. - The key objective of projects is to make sure the lessons learnt from the cooperation are integrated into the relevant policies at local, regional or national levels. Therefore they should not rely on INTERREG EUROPE funding to make sure actions are taking place. - Based on the INTERREG IVC experience, the successful implementation of action plan does not necessarily require the funding of pilot actions. All depends on the results of phase 1 dedicated to the exchange of experience. 3/ The majority of the funding is allocated to Interregional Cooperation Projects. 4/ Further simplification measures are envisaged under INTERREG EUROPE.</p>
9,17	Ministry of Labour and Social Policy	Poland	<p>Section 8 No objection just comment Proposed modification (p. 90): Under this specific objective Projects could for instance address the issue of promoting entrepreneurship among specific target groups at risk of discrimination (e.g. unemployed youth, elderly persons, disabled people, women, long-term unemployed and migrants).</p> <p>Rationale: United Nations' Convention on the Rights of Persons with Disabilities, Article 27 Work and employment: '1. States Parties recognize the right of persons with disabilities to work, on an equal basis with others; this includes the right to the opportunity to gain a living by work freely chosen or accepted in a labour market and work environment that is open, inclusive and accessible to persons with disabilities. States Parties shall safeguard and promote the realization of the right to work, including for those who acquire a disability during the course of employment, by taking appropriate steps, including through legislation, to, inter alia: (a) Prohibit discrimination on the basis of disability with regard to all matters concerning all forms of employment, including conditions of recruitment, hiring and employment, continuance of employment, career advancement and safe and healthy working conditions; (b) Protect the rights of persons with disabilities, on an equal basis with others, to just and favourable conditions of work, including equal opportunities and equal remuneration for work of equal value, safe and healthy working conditions, including protection from harassment, and the redress of grievances; (c) Ensure that persons with disabilities are able to exercise their labour and trade union rights on an equal basis with others; (d) Enable persons with disabilities to have effective access to general technical and vocational guidance programmes, placement services and vocational and continuing training; (e) Promote employment opportunities and career advancement for persons with disabilities in the labour market, as well as assistance in finding, obtaining, maintaining and returning to employment; (f) Promote opportunities for self-employment, entrepreneurship, the development of cooperatives and starting one's own business; (g) Employ persons with disabilities in the public sector; (h) Promote the employment of persons with disabilities in the private sector through appropriate policies and measures, which may include affirmative action programmes, incentives and other measures; (i) Ensure that reasonable accommodation is provided to persons with disabilities in the workplace; (j) Promote the acquisition by persons with disabilities of work experience in the open labour market; (k) Promote vocational and professional rehabilitation, job retention and return-to-work programmes for persons with disabilities.'</p>	<p>In the description of the specific objective 2.1, the third paragraph of the results already clearly refers to vulnerable groups such as young people, migrants or femal entrepreneurs).</p>
9,18	Polish State Railways Joint Stock Company	Poland	<p>Section 5 No objection just proposal. Proposed modification (5.1.3, p. 59): The representatives of the monitoring committee will ensure that on the national level all relevant partners are involved in the preparation, implementation, monitoring and evaluation of the cooperation programme as referred to in Article 5(2) of Regulation (EU) No 1303/2013 [CPR]. They will also ensure that the broad partnership and engagement of relevant third-parties (experts, practitioners) in INTERREG projects is secured through appropriate project selection criteria.</p> <p>Rationale: "Following recommendations formulated on pages 8-10 of the draft proposal, it's crucial to secure active participation of relevant third parties and non-public stakeholders in the projects. Although there are numerous references calling on such participation and wider project partnership within the Programme, neither chapter 5.2 nor any other individual section of this draft proposal formulate concrete mechanisms to guarantee their involvement. Taking into account that Programme is addressed to various regional policy makers and public bodies directly involved in shaping development policies within 4 thematic objectives, the whole learning process would be invalid without proper engagement of experts and practitioners coming from outside public sector (where relevant, justified and without breaching "conflict of interest" principle, e.g. railway or urban transport sector). Obviously the costs of their participation should also be fully covered by the project in such case. This is to avoid formulating far-reaching conclusions and action plans based on public sector knowledge solely, without an active engagement and expertise of practitioners allowing for verifying practical implementing ability and transferability of project's outcomes on the ground (taking into account specifics of given sector/policy area). One of proposed mechanisms might be introduced at the level of project selection criteria approved by the Monitoring Committee, where project would need to fulfill broad partnership and engagement of third-parties condition through either formal (0/1) or merit-content criteria where relevant. Therefore, it is proposed to introduce relevant clause in the text of Programme addressing abovementioned need (most appropriate in chapter 5.2 of the Programme as well as in the chapter 5.1.3 devoted to the role of Monitoring Committee)."</p> <p>Proposed modification (5.2, p. 66): "Following recommendations formulated on pages 8-10 of the draft proposal, it's crucial to secure active participation of relevant third parties and non-public stakeholders in the projects. Although there are numerous references calling on such participation and wider project partnership within the Programme, neither chapter 5.2 nor any other individual section of this draft proposal formulate concrete mechanisms to guarantee their involvement. Taking into account that Programme is addressed to various regional policy makers and public bodies directly involved in shaping development policies within 4 thematic objectives, the whole learning process would be invalid without proper engagement of experts and practitioners coming from outside public sector (where relevant, justified and without breaching "conflict of interest" principle, e.g. railway or urban transport sector). Obviously the costs of their participation should also be fully covered by the project in such case. This is to avoid formulating far-reaching conclusions and action plans based on public sector knowledge solely, without an active engagement and expertise of practitioners allowing for verifying practical implementing ability and transferability of project's outcomes on the ground (taking into account specifics of given sector/policy area). One of proposed mechanisms might be introduced at the level of project selection criteria approved by the Monitoring Committee, where project would need to fulfill broad partnership and engagement of third-parties condition through either formal (0/1) or merit-content criteria where relevant. Therefore, it is proposed to introduce relevant clause in the text of Programme addressing abovementioned need (most appropriate in chapter 5.2 of the Programme as well as in the chapter 5.1.3 devoted to the role of Monitoring Committee)."</p>	<p>Section 5.2 is further described in the final version of the Cooperation Programme. The compliance with broad partnership and engagement of relevant third parties at project level will be checked at the application stage. This is in particular covered under the selection criterion 'Quality of partnership'. The composition of the local stakeholder group for each partner region will also be asked at the application stage. Further details will be provided in the programme manual.</p>

INTERREG EUROPE - Comments and responses to

9. Objections

N°	Organisation name	Country	Comments	Responses
9,19	North-West Regional Development Agency	Romania	<p><u>Section 2</u> Learning Platform Tool - excellent idea, but its not understandable how they will work, if it will be a financing mechanism for existing European Platforms which could apply for funding. Also, its not understandable how the 4 Thematic Platforms will gather INTERREG project beneficiaries to various events they will organise. Maybe a compulsory requirement in the activity plan and consequently in the budget of each INTERREG project will be necessary to exist, in order to provide participation to Platforms events and human resources involved in PLP specific actions.</p> <p><u>Section 3</u> There are no indicators which could quantify the target number of the Platforms, nor the budget share dedicated to this component so far.</p>	Further details on the platforms will be provided in the programme manual. Projects will indeed have an obligation to participate in the main activities of their platform.
9,20	Government Office of the Slovak Republic, Central Coordination Authority Section	Slovak Republic	<p><u>Section 1</u> Regarding the fact that EU regulations for European Structural and Investment Funds for the programming period 2014 - 2020, apart from the European Maritime and Fisheries Fund, entered into force on 20 December 2013, we propose harmonising the draft strategic document "INTERREG EUROPE Cooperation Programme" with these EU regulations. Based on the above mentioned, e.g. deleting the reference to "draft" EU regulations from the text, and revising the percentage of the total ERDF resources allocated to transitional regions in accordance with the ERDF Implementing Regulation is recommended. Harmonising the text of the strategic document with the supporting document of the EC (i.e. Fiche 26 of 29 November 2013, DRAFT IMPLEMENTING ACT ON THE MODELS FOR THE OPERATIONAL PROGRAMME AND THE COOPERATION PROGRAMME) is recommended.</p> <p><u>Section 6</u> Coordination between funds provides information on a method of obtaining information from applicants on their projects in order to avoid overlaps, or double-financing of INTERREG EUROPE projects and other projects in the SK mainstream programmes. However, it is not clear how relevant bodies responsible for evaluating project applications will evaluate the information provided by applicants and will avoid possible overlaps of the projects. Based on the above mentioned, it is recommended to state in the draft strategic document the reference to the programme manual, where this issue will be specified in more detail.</p>	For section 1, the remarks are integrated in the revised programme. For section 6, this issue mentioned will be tackled in the programme manual. In particular, the question of overlap and double financing is checked at the application stage under the selection criterion 'Quality of results'.
9,21	Ministry of Environment of the Slovak Republic, Climate Department	Slovak Republic	<p><u>Section 1</u> Page 14, Table 1 - the term "mitigation relevant adaptation measures" does not make sense to us. There are separate mitigation and separate adaptation measures. Therefore, we propose examining whether the given text is correct, or it should be revised as follows: "mitigation or relevant adaptation measures".</p> <p><u>Section 2</u> Page 34 - the term "mitigation relevant adaptation measures" does not make sense to us. There are separate mitigation and separate adaptation measures. Therefore, it is necessary to specify whether the text of the document refers to "mitigation or adaptation measures" or "mitigation of relevant adaptation measures".</p>	The term 'mitigation-relevant adaptation measures' comes from Article 5 of the ERDF regulation.
9,22	Ministry of Finance of the Slovak Republic, Slovak Audit Authority	Slovak Republic	<p><u>Section 5</u> Page 57-58: In chapter 5.1.3. "Summary description of the management and control arrangements", part "Role and task of the audit authority and group of auditors", paragraph 5 is stated: "The audit authority, in agreement with the group of auditors (and the monitoring committee for the budgetary provisions), may decide to contract an external audit firm to carry out audits on proper functioning of the management and control systems and on an appropriate sample in compliance with Article 127 of Regulation (EU) No 1303/2014 [CPR]." Also in accordance with text on page 58: ".Each EU-MS and Norway shall be responsible for the audits carried out on its territory". Regarding the information specified in chapter 5.1.3, as well as in the text on page 58, we would like to know who will be responsible for the performance of audits (external audit firm or member state) and which authority will bear the audit costs in case of externalization (member state or Audit Authority in France)? This information should be detailed in the document (draft CP).</p>	The detailed information on audit procedures are not decided yet. They will be specified later on in the management and control system description.
9,23	Eudace	Slovenia	<p><u>Section 1</u> As already stated, the objectives, as set, have no direct link to real world. A supposition that an Action plan will contribute to some development cannot and must not be done. It's not automatic. Therefore it's wrong to set goals like they are set in the draft. A strong and transparent mechanism that will prevent copy-pasting of project from the past perspectives is needed and not envisaged.</p> <p><u>Section 2</u> ICT should be kept as a separate axis.</p>	<p>1/ The Cooperation Programme specifies the overall strategy for INTERREG EUROPE. Since it relates to the entire EU, this strategy can sometimes sound abstract. But the programme manual will provide further details and in particular examples of possible projects. Then, it will be up to each project to demonstrate its link and relevance to the 'real world'. The innovative character of the projects submitted has always been a selection criterion under the quality of results. This was carefully applied under INTERREG IVC. In INTERREG EUROPE, with the reinforced link with Structural Funds, it would anyway not be possible to finance previous existing initiatives.</p> <p>2/ The Partner States decided that ICT would not be a separate Thematic Objective but would be a cross-cutting issue in the programme.</p>
9,24	Girona City Council	Spain	<p><u>Section 1</u> The comments already done at the Programme Strategy point 2. of the questionnaire: - It is important to include INCLUSIVE GROWHT in the Interreg Europe Programme in positive and proactive ways of action. - It is important not to be confused between the EU2020 priority "inclusive growth" and the Interreg Europe horizontal principle of action "equal opportunities and non-discrimination".</p>	<p>a) Those horizontal principles are fully integrated in the programme strategy.</p> <p>b) There is no such confusion in the programme document. The selection of the Thematic Objectives can also be explained by the fact that Inclusive Growth related issues will primarily be tackled through ESF.</p>
9,25	Regio Basiliensis	Switzerland	<p><u>Section 1</u> thematic concentration will not assure a better visibility and understanding some subjects are not integrated any more in the programme interregional exchange should be an objective as such</p> <p><u>Section 2</u> labour market and employment should be an specific objective</p> <p><u>Section 4</u> monitoring process will increase administration</p>	<p>1/ Thematic concentration is one of the key principles of 2014-2020 programming period. The thematic focus of the programme reflects the choice made by the Partner States. Interregional exchange is only a mean to capacity building and to policy change.</p> <p>2/ Labour market and employment will be indirectly tackled through several of the selected Thematic Objectives (in particular TO1 and 3).</p> <p>3/ The monitoring phase envisaged at programme level for phase 2 is a light procedure. It is also in the own interest of partners to know the results of the action plans. Further simplifications are also envisaged in INTERREG EUROPE.</p>

INTERREG EUROPE Comments and responses to

10. Further remarks

N°	Organisation name	Country	Do you have any further remarks on the INTERREG EUROPE draft programme?	Responses
10,01	ecoplus	Austria	It would be helpful to take measures in order to reduce the finance risk in advance by starting financial grants ex ante (project start) and by publishing clear guidelines for the eligibility of costs	Further detailed explanations will be provided in the programme manual. However, the programme does not plan to have 'advance payments'.
10,02	AustriaTech	Austria	Not to the programme itself, but to the projects. The whole FLC process needs to be evaluated concerning costs and effectiveness. In fact, this process is high costly, which drastically reduces the funds received. With such processes a participation is hardly acceptable.	The organisation of first-level control (FLC) system lies in the responsibility of the participating states.
10,03	European Garden Association - Natur im Garten International	Austria	Anchoring and making eligible organic gardening including private gardening, public green, show gardens and educational programs	INTERREG EUROPE is about exchange of experience and policy learning. In this context, the proposal does not seem relevant.
10,04	VVIA - Flemish Association for Industrial Archaeology	Belgium	More interest needed for culture and heritage	Cultural and creative industries are covered under specific objective 1.2. Natural and cultural heritage are covered under specific objective 4.1.
10,05	PURPLE - Peri-Urban Regions Platform Europe	Belgium	<p>We strongly agree with the desire to 'Better integrate the territorial dimension into the future project selection to ensure that projects and partnerships are equipped to respond to the different needs and potentials of all kinds of territories across Europe.' (P8) The convenient but over-simplistic labelling of 'urban' or 'rural' does not do justice to the complexity of territorial development in both developed and less developed areas of the EU today.</p> <p>To account for the complex and sometimes innovative governance structures in Europe's regions care should be taken not to exclude potential beneficiaries unintentionally. For example the distinction between public and private bodies becomes less meaningful as both policy and "public" service delivery evolves in the face of major economic and demographic challenges. The programme will want to harness such innovation not debar its involvement.</p> <p>As a strong network with a clear focus and wide ranging experience, PURPLE is well suited to participate in policy learning platforms and welcomes this initiative.</p>	The territorial challenges and characteristics will be taken into consideration as much as possible at the level of the partner regions involved in the projects and platforms. The eligibility of organisations ultimately lies in the responsibility of the participating states.
10,06	Technopolis Group	Belgium	No big remark. it is well presented, has clear objectives and most importantly clearly addresses EU2020 objectives	Remark noted
10,07	Future of Rural Energy in Europe (FREE) initiative	Belgium	<p>FREE believes that energy situation in rural areas should be more prominently mentioned among specific objectives under "Low Carbon Economy" priority axis and in the Strategic Environmental Assessment.</p> <ul style="list-style-type: none"> •There is different fuel mix is used in rural areas, with generally more polluting fuels and higher emissions per capita. There are also serious air quality issues in some rural areas of the EU with, for example, higher emissions of NOx, SOx and PM in France (due to oil and biomass use) and higher emissions of SOx in Poland (due to coal consumption). •Energy efficiency of buildings is poorer in rural areas, due to an older building stock and fewer incentives for building renovation. <p>In addition, EU's goals of a competitive, low-carbon and secure energy supply (as outlined in the Energy 2020 Strategy in 2010) would unlikely be attained without particular attention paid to rural areas.</p> <ul style="list-style-type: none"> •Finally, there is great interest among local authorities in improving their energy situation and investing in projects leading to making the countryside cleaner and more energy efficient. 	The specific Objectives 3.1 clearly refers to all type of territories. It does not seem appropriate to give a particular emphasis on rural areas that are anyway included in this objective.
10,08	ERRIN Network	Belgium	ERRIN sees itself playing a strong role in the Learning Platforms either through expert members drawn from the ERRIN network or through the network itself at the coordination level. ERRIN would bring added value to the first TO Research and Innovation Infrastructure and smart specialisation and innovation opportunity. ERRIN would also have a role to play in all the other TOs and would be a good organisation for dissemination throughout the ERRIN network with over 100 members.	Remark noted
10,09	Zagreb County Regional Development Agency	Croatia	will there be a internet site for match making for the project partnership?	A partner search tool will available on the future programme website.
10,10	Federation of Environmental Organizations of Cyprus (NGOs)	Cyprus	Thank you for the quality of the questionnaire.	Remark noted
10,11	Department of Environment	Cyprus	The table in page 53 of the draft Programme propose the equal financial distribution among the four Priorities Axis. On the other hand the Environmental Report suggests higher funding contibution on PA3 and PA4. We suggest that the draft Programme takes into consideration the proposals of the Environmental Report.	This issue was discussed by the Partner States who decided to keep an equal financial distribution of the fund among the four priorities.
10,12	Institute of Sociology of the Czech Academy of Science	Czech Republic	It should be developed a long time ago. The european newspeak might be a challenge for understanding - a lot of regional politicians does not speak English well, so they are automatically excluded from communication.	Language is indeed an issue in particular for the future platforms.
10,13	University of Copenhagen	Denmark	Please do something to shape up and simplify. so far all we think is that the regions working to make this programme are NUTS	INTERREG EUROPE works on a certain number of simplification rules (see section 7 of the programme). It should also be clarified that the rules are not created by the programmes themselves but derive from a variety of constraints at EU and national levels.

INTERREG EUROPE Comments and responses to

10. Further remarks

N°	Organisation name	Country	Do you have any further remarks on the INTERREG EUROPE draft programme?	Responses
10,14	AEIDL	European scope of intervention	I use INTERREG Europe as a resource for IPA evaluation assignments.	
10,15	Regional Council of North Karelia	Finland	Connections to the other R&D&I platforms should be highlighted as well as the cooperation to other ETC programmes.	The coordination with the S3 platform and the coordination between funds are tackled in section 6.
10,16	MTT agrifood research Finland	Finland	Make it easy for SMEs to have active role in the projects. We need action in the practical life and business than big seminars and a lot of printed documents, strategies and information exchange among experts with high salaries	The importance of the private sector in certain priorities of the programme is clear. This participation should be ensured through the creation of local stakeholder groups. Nevertheless, it does not seem appropriate that SMEs are direct beneficiaries for the following main reasons: - the programme primarily focuses on policy learning (not on implementation). From that point of view, it is fundamentally different from any other cooperation programme and from other EU programmes such as COSME and Horizon 2020. - administrative constraints (e.g. first level control, second level control) are not adapted to this target group.
10,17	Uusimaa Regional Council	Finland	It is unclear how the private sector can participate this program. Is it possible at all? If so, how?	The importance of the private sector in certain priorities of the programme is clear. This participation should be ensured through the creation of local stakeholder groups. Nevertheless, it does not seem appropriate that SMEs are direct beneficiaries for the following main reasons: - the programme primarily focuses on policy learning (not on implementation). From that point of view, it is fundamentally different from any other cooperation programme and from other EU programmes such as COSME and Horizon 2020. - administrative constraints (e.g. first level control, second level control) are not adapted to this target group.
10,18	Regional Council of Central Finland	Finland	The bureaucracy should be very light and the instructions from the programme secretariat very clear and set on the very early stage of the programme. Heavy bureaucracy does not support the idea of an effective programme. Payment in advance, like in many other programmes, enables the SMEs participate the programme	INTERREG EUROPE works on a certain number of simplification rules (see section 7 of the programme). It should also be clarified that the rules are not created by the programmes themselves but derive from a variety of constraints at EU and national levels.

INTERREG EUROPE Comments and responses to

10. Further remarks

N°	Organisation name	Country	Do you have any further remarks on the INTERREG EUROPE draft programme?	Responses
10,19	Lahti Region Development LADEC Ltd	Finland	It will be useful to build project for finding best practices from different macroregional area, for ex. Baltic Sea vs. Mediterrean Sea. It will be good to allocate money for 2nd stage that you really can do piloting. Europeans need pilot area to show our competence to for ex. Chinese/Russian. Reporting and bureaucracy have to minimize and trust people. Flexibility to change outputs if something happend for ex. global level.	The INTERACT programme will have a particular role in building on the experiences of the macro regions. INTERREG EUROPE will have a more particular focus on the Investment for Growth and Jobs goal programmes. INTERREG EUROPE is primarily dedicated to policy learning. The importance of pilot actions is not denied but they will be possible only in justified cases and will depend on the results of the first phase. INTERREG EUROPE works on a certain number of simplification rules (see section 7 of the programme). It should also be clarified that the rules are not created by the programmes themselves but derive from a variety of constraints at EU and national levels.
10,20	Collectif ville campagne	France	Welcome policies are a new innovative approach to work about social and territorial cohesion and also about the creation of new economic activities. Philoxenia (http://www.philoxeniaplus.eu/) is network (as an european association) of several rural territories who are involved into a welcome policie to face a demographic decline and the aging of their population. They tend to become more fragile something that is reinforced by the diminution of their social services and commercial enterprises. As a result of these conditions they face the threat to loss their identity. However, the mobility, the information and communication technologies (ICT), the new way of work and family organization, the change of the economy and the labor market due to the crisis, the sustainable development and the search for a high quality of life against urban nuisances could allow to the rural areas to reverse the above mentioned negative trends and to develop a new way of economic development. Indeed, the architectural, cultural and environmental heritage and openness of the rural areas is attracting population and economic activities, under the condition that they provide a set of services that respond to the needs of the "urban lifestyle". Based on this the "Welcome and attractiveness policies of the rural areas" could contribute as an alternative policy to: <input type="checkbox"/> The mobility of people from the cities to the rural areas, in particular those with high skills and who could provide their services as teleworkers, <input type="checkbox"/> Enhancing self-employment of repatriates and returnees, through micro-entrepreneurship, <input type="checkbox"/> Regeneration in attractiveness and therefore the competitiveness of rural areas. The implementation of these policies had always its importance, but today, since we are at the beginning of the global economic crisis, is of a great importance. People who live in the urban centers and they face problems (for example to find a job) it is sometimes easier to live in the rural areas where they originate, so they can homing in it or go to settle there since the living conditions are better.	Remark noted
10,21	Energy Cities	France	Energy Cities strongly urges the European Commission to maintain such programmes allowing for sharing good practices between territories across Europe.	Such programmes are indeed foreseen by EU regulations. European Territorial Cooperation has become the 2nd pillar of EU Cohesion Policy.
10,22	Ville de Reims	France	- For a better understanding, and to facilitate the preparation projects, it would be great to have a version of the programme document translated into EU official languages. This is a real obstacle for projects development, since colleagues who are not working in European departments and who are important for the good achievement of the project, are not comfortable reading English documents. - The application and the progress reports documents should be drafted with another software than Excel... The layout of all the documents to be filled was terrible under the programme 2007-2013. I hope it can be improved for next programming period! The LLP 2007-2013 or the Erasmus+ documents, for instance, are much more readable and understandable...	The language is indeed an issue but the working language of the programme is English, as decided by the participating states. The translation of programme documents into national documents lies in the responsibility of the country concerned. Finally, INTERREG EUROPE will work fully in line with the principles of e-cohesion (section 8.3).

INTERREG EUROPE Comments and responses to

10. Further remarks

N°	Organisation name	Country	Do you have any further remarks on the INTERREG EUROPE draft programme?	Responses
10,23	Conseil régional de Lorraine	France	The thematic platform should help the region to identify which other european regions share the same or a similar SMART strategy in order to help the regions to get closer to similar regions sharing similar strategies. No tools exist to make it possible. We would recommend a two steps application process (go / no go) in order to avoid to many applicants and give the priorities to regional authorities. We would recommend to open the projects to sub-project participants because only one regional authority can not cover the whole topic of interest and should be accompanied by other stakeholders acting as subpartners.	The platform will contribute to match regions experiences and needs. Based on other ETC experiences, the two step approaches can in fact lead to longer and more difficult procedures. Details about submission of application forms and partnership composition will be provided in the programme manual. The local stakeholder groups would allow local actors to be involved in the interregional exchange of experience.
10,24	CRITT agroalimentaire PACA	France	In the step of sustainability it could be interesting to include for agrofood sector some topics like : organic products and nutritional aspects. It is very important to foresee some best practices to share.	The programme strategy does not refer to any economic sector in particular. But the agrofood sector can be covered under the different programme's thematic objectives.
10,25	Ministerium für Ländlichen Raum und Verbraucherschutz Baden-Württemberg	Germany	Mehr Eigenständigkeit der Programme	Remark noted
10,26	Regional Authority FrankfurtRheinMain	Germany	We are concerned about the territorial blindness of the draft, that is, the lack of reference to the ideas of the Territorial Agenda. There is a need to allow for exchange of experience about demographic change, migration and the development of a welcome culture. The focus on SMEs is debatable, as is the reduction of sustainability to economic aspects. We suggest to spending some time to check the text for clarity in language and meaning. It is crucial to clarify the provision about beneficiaries other than public authorities. The reference to "bodies governed by public law" is misleading because it provokes a German translation which suggests limits obviously not intended.	The Territorial Agenda is referred to in section 1 'Strategy'. The territorial dimension will necessarily be addressed at project level. Although the approach has to remain thematic, the way this is relevant is each territory involved in the programme would need to be demonstrated. Thematic concentration is one of the key principles of 2014-2020 programming period. The thematic focus of the programme reflects the choice made by the Partner States. Further details on the eligibility of organisations will be provided in the programme manual.
10,27	Gartenakademie Sachsen-Anhalt e.V.	Germany	Anchoring and making eligible organic gardening included private gardening, public green, showgardens and educational programm	INTERREG EUROPE is about exchange of experience and policy learning. In this context, the proposal does not seem relevant.
10,28	Technologiepark Heidelberg GmbH	Germany	there should be more structure of the text. slides could be helpfull to get an overview	Unfortunately, the EC template of the cooperation programme does not allow for such a flexibility. Further details will be provided in the programme manual.
10,29	Ministry of Economics, Energy, Transport and Regional Development, State of Hessen	Germany	1) Advanced manufacturing holds great potential to making industrial production in Europe more resource-efficient and cost-effective at the same time – thus improving the competitiveness of European regions and their industries. In the next funding period one important aspect should be the promotion of the necessity and the possibilities of advanced manufacturing in the context of the realization of the re-industrialization of Europe. The implementation of transnational approaches for improving framework conditions for industry active in this field are of high importance. Being dominated by large industry stakeholders at the moment, advanced manufacturing holds great – unexploited - potential for SMEs, either as industry suppliers or as developers and providers of innovative services. Thus they form a primary target group. Furthermore the application of these advanced production technologies requires a change also to regional and local framework conditions for industry production sites: While there will be even stronger relevance of broadband access, for example, noise and other production emissions will go down – which could e.g. result also in a more "urban dimension of production", when production sites move closer to urban agglomerations. Regional and local policy stakeholders need to become aware of the framework requirements necessary for industry stakeholders, and to develop coherent policy approaches within Europe. Thus they form the second target group. 2)The state of Hessen supports the cluster formation with the aim of promoting closer cooperation of stakeholders along the value creation. To enable businesses the advancement to fully digital businesses a support within the scope of Interreg EUROPE appears suitable. By this means enterprises can align their business models and –processes accordingly in a dynamic way.	Remarks noted
10,30	VDI Zentrum Ressourceneffizienz	Germany	Regarding the indicators some of important issues have been left open and/or formulated so vague that it is unclear what is meant.	Further details will be provided in the programme manual.

INTERREG EUROPE Comments and responses to

10. Further remarks

N°	Organisation name	Country	Do you have any further remarks on the INTERREG EUROPE draft programme?	Responses
10,31	ministry for economic and european affairs state of Brandenburg	Germany	The public consultations are too late to change contents	It is indeed difficult for the public consultation to have a fundamental impact on the programme's strategy. Still it remains very useful to clarify certain aspects of the programme and to get feed-back from a wider audience. Representative organisations like the Committee of the Regions or the European Economic and Social Committee were also involved since the start of the programming process.
10,32	Steinbeis-Europa-Zentrum	Germany	We would welcome it if the coordination between ESIF funds with other Union instruments would also be looked at from a project-level perspective. We expect this to become relevant in the course of the programme implementation; for instance, combined funding between ESIF and H2020 could play a practical role with regard to the implementation of actions (phase 2) as developed under the interregional cooperation projects.	This remark is important mainly for implementation or investment related projects. For interregional cooperation project, measures of the Action Plans could indeed be financed through other EU programmes if relevant.
10,33	The Athens Chamber of Small-Medium Industries	Greece	At some points the text of INTERREG EUROPE draft programme loses connection and coherence of the arguments being made. A little bit of editing could make this document perfect. We think that it is worth adding on the INTERREG EUROPE draft programme the need for developing policies which support business development and employment as well as business transfer sustainability. Business growth regional plans for business incubators, business hatcheries and special networks for business start-ups and business transfers could be mentioned under both Priority Axis 1 & 2.	All matters related to business support and business start up are included under Thematic Objective 3.
10,34	City of Terni	Italy	Approved projects should be selected by true practioners that have clear experience at local levels. More public officials facing concrete problems should be involved	The majority of assessors involved in INTERREG IVC evaluation had a practical experience in regional development. This will still be the case in INTERREG EUROPE but the Partner States remains the decision making bodies.
10,35	ARSIAL	Italy	It would be interesting and usefull to have a database for partnership research as it was provided in the last Interreg programme	Such on-line tool will exist in the future website.
10,36	Calabria Region	Italy	By far it is a complete and comprehensive document, congrats! PS: please note that this questionnaire is based on personal thoughts and thus does not reflect the opinion or position of the Calabria Regional Administration	Remark noted
10,37	Provincia di messina	Italy	It should be easier and more understandable slender	Further details will be provided in the programme manual.
10,38	University of l'Aquila	Italy	The draft should take into consideration the failures much more than the successes. The mistakes should teach what must be changed in the approach and much must be changed.	Despite the regular reference to good practice, the idea of INTERREG EUROPE is wider and includes building on failures.
10,39	Educore	Netherlands	Please use clearer language, which is more easily understood by ordinary well-educated citizens (and especially (young) entrepreneurs and SME managers). Too much bureaucratic formulation and techno-jargon the will make it difficult for relevant people to understand criteria for proposal and actually submit proposals.	The Cooperation Programme specifies the overall strategy for INTERREG EUROPE. Since it relates to the entire EU, this strategy can sometimes sounds abstract. But the programme manual will provide further details and in particular examples of possible projects.

INTERREG EUROPE Comments and responses to

10. Further remarks

N°	Organisation name	Country	Do you have any further remarks on the INTERREG EUROPE draft programme?	Responses
10,40	Subvention BV	Netherlands	The role of SME's is underestimated. It is a document for governments and not for the inhabitants and companies, who are the most important stakeholders of our economy. It's a too far bureaucratic approach, that will have no serious results.	The importance of the private sector in certain priorities of the programme is clear. This participation should be ensured through the creation of local stakeholder groups. Nevertheless, it does not seem appropriate that SMEs are direct beneficiaries for the following main reasons: - the programme primarily focuses on policy learning (not on implementation). From that point of view, it is fundamentally different from any other cooperation programme and from other EU programmes such as COSME and Horizon 2020. - administrative constraints (e.g. first level control, second level control) are not adapted to this target group.
10,41	Directorate for Cultural Heritage	Norway	good luck	
10,42	Westpomeranian Marshal's Office in Szczecin, Poland	Poland	No. The document is well and clearly prepared.	Remark noted
10,43	Ministry of Labour and Social Policy	Poland	Comments in Polish delivered to the Ministry of Infrastructure and Development during the public consultations organised in Poland. Translated and delivered on-line to the JTS by the Ministry of Infrastructure and Development Answer concerning possible project participation is indicative only. General remark to the Programme: It is proposed to include within the target group and potential beneficiaries the nongovernmental organizations. Rationale: The third sector entities contribute to developing networks between public institutions and society. Their activity enables to meet the differentiated needs of all social groups. Taking into account that the nongovernmental organizations may also implement public tasks, the organizations should be directly indicated as potential target group as well as beneficiary of the activities within INTERREG.	Remark noted
10,44	Central Statistical Office	Poland	Comments in Polish delivered to the Ministry of Infrastructure and Development during the public consultations organised in Poland. Translated and delivered on-line to the JTS by the Ministry of Infrastructure and Development Answer concerning possible project participation is indicative only.	Remark noted
10,45	Ministry for Infrastructure and Development	Poland	Comments delivered to the Ministry of Infrastructure and Development during the public consultations organised in Poland. Delivered on-line to the JTS by the Ministry of Infrastructure and Development. Answer concerning possible project participation is indicative only.	Remark noted
10,46	Polish State Railways Joint Stock Company	Poland	Comments delivered to the Ministry of Infrastructure and Development during the public consultations organised in Poland. Delivered on-line to the JTS by the Ministry of Infrastructure and Development. Answer concerning possible project participation is indicative only.	Remark noted
10,47	North-West Regional Development Agency	Romania	Excellent idea with the Policy Learning Platforms! to be entirely financed by the programme.	Remark noted
10,48	Aviła County Council	Spain	Simplification as much as possible of the Reporting procedure, in order to facilitate the task of beneficiaries, Interreg officers and for accelerating the payment. In the particular case of Spain, there is a double system: First Level Control + National Authority, what takes more time and efforts. Simplification is possible.	INTERREG EUROPE works on a certain number of simplification rules (see section 7 of the programme). It should also be clarified that rules are not created by the programmes themselves but derive from a variety of constraints at EU and national levels. The organisation of first-level control (FLC) system lies in the responsibility of the participating states.
10,49	Acció	Spain	The data financial plan is not finished	The financial plan are completed in the final version of the programme.
10,50	Girona City Council	Spain	We would like to insist on the need of Equality and Diversity policies for Inclusive Growth. As the crisis is showing, this is just the challenge we need to face if we want preserve human beings and earth.	Equal opportunities and non-discrimination are mentioned in section 8 'Horizontal principles'
10,51	East Sweden Regional Council	Sweden	Where can we find information about instructions about the size of the partnership and project budgets? Will there be recommendations as in the previous Interreg IVC-programme?	Further detailed information on the partnership will be provided in programme manual.

INTERREG EUROPE Comments and responses to

10. Further remarks

N°	Organisation name	Country	Do you have any further remarks on the INTERREG EUROPE draft programme?	Responses
10,52	Winnet Sweden - Europe	Sweden	it is a comprehensive and good proposal for Interreg Europe, it was easy to follow and understand. Now it is important to secure that all this good work and proposal can go to actions and secure the work - co-operation in partnership, network within thematic areas for regional innovations in all EU Member States, to connect to the Structural Funds, in each MBS as well secure interregional - crossborder co-operation, where also the civil society organisations will be included. But also to see how it can be interlinked more clearly to Horizon 2020. You need to secure the Gender Equality issues, and use already existing knowledge from previous Interreg IVC projects, how it can be included in all thematic areas of concern for creation, investment of Growth and Jobs in EU. GE is a goal. Winnet Europe and Sweden is prepared to support all work if needed.	Remark noted
10,53	Hampshire County Council	United Kingdom	The new, clearer name for the Programme is welcomed.	Remark noted
10,54	Cambridgeshire County Council	United Kingdom	Key points such as funding/intervention rate and work programme/calls have not been included in this draft programme document for consultation.	The co-financing rate per country is specified page 53. As for further details about calls for proposals, they will be provided in the programme manual and future terms of reference.
10,55	Hull City Council	United Kingdom	Would like to see a clear focus on digital activity, to support business connectivity, innovation opportunities and innovative ways of working, business / resource efficiency, support for 'low carbon' themes and technological development.	Partner States decided that ICT would be a cross-cutting notion of the programme rather than a specific Thematic Objective.
10,56	New Economy Manchester	United Kingdom	Some ETC Programmes are moving toward a two stage application process. We would very much welcome INTERREG EUROPE to move toward this new approach, which will help smaller regions or those with limited capacity to engage better with this programme.	Based on the experience of other ETC programmes, the two stage application process can also lead to longer and more difficult procedures.
10,57	Leeds City Region Local Enterprise Partnership	United Kingdom	We would want to ensure that any INTERREG projects align with and feed directly into the European Structural and Investment Funds (ESIF) Programme for our functional economic area, the Leeds City Region, and would like to see an assessment of how a project will potentially support the implementation of the programme. In England, 39 EU Structural and Investment Fund Strategies define the priorities for funding. These have been drawn up by Local Enterprise Partnerships and their partners and will be an essential element in driving growth and creating employment in each area. Any INTERREG project will have a bearing on the ESIF programme so it must be ensured that there are strong linkages to the relevant thematic objective, in the programme for the specific LEP area. There are no definite plans to be involved in an INTERREG project at this stage. The possibility will be explored as the proposed interventions within the ESIF strategy develops. The LEP is interested in exploring the possibility of projects under each of the topics selected in Question 7 above.	The relevance to the Structural Funds programmes will be checked at the application stage.
10,58	University of Ulster Centre for Sustainable Technologies	United Kingdom	Consistency between national financial assessment procedures to ensure all partners operate in the same way	The organisation of first-level control (FLC) system lies in the responsibility of the participating states.
10,59	WWF Germany	WWF Germany but acting for WWF in Europe	Unfortunately the section "Guidelines for the selection of operations" is missing. This is very relevant as in our view the often very strict limitation of beneficiaries to public and public equivalent is not adequate, as on the one hand the partnership principle in the CPR(EU 1303/2013) Art. 5 emphasizes the possibility of involvement of partners in the whole project cycle which includes implementation. On the other hand other partners can have very specific knowledge in the fields addressed within the thematic objectives and can operate in pan european networks often easier than public authorities within their internal structures, this can provide added value to the policy learning when performed in cooperation. The composition of the monitoring committee does not reflect the provisions as stated in Art.5 EU1303/2013 of the CPR regulation, also the Code of Conduct is not taken into account, this should be added in the program section on partnership principle, however as Member States can delegate three members, they should be encouraged to apply the partnership principle or if countries do not require all three seats the managing authorities should be encouraged to select appropriate partners that for example represent their interest groups on the EU level. Horizontal principles, the program wrongly states that sustainable development is covered with specific priorities 3 and 4, although it is a positive fact that INTERREG Europe addresses very strongly climate and environment, the horizontal principles as stated in Art 8 of the CPR should ensure environmental sustainability across the entire programme, with this, concrete actions and measures should be indicated how sustainability will be reached in all priorities of the programme. The statement that Priority 1 and priority two do not directly focus on sustainable development should be removed as it should be rather shown how these priorities can effectively contribute to sustainable development. It is positive that the projects that fail to demonstrate a clear contribution to regional sustainable development strategies will not be selected, but there is a contradiction as the text says that no specific selection criteria are foreseen to favor the development of projects dealing with this issue. This needs to be revised and clear that all priorities shall include a reference to sustainable development within the selection criteria.	Guiding principles for selection of operation are described page 22 of the Cooperation Programme. Details on the eligibility rules will be provided in the programme manual. The composition of the monitoring committee complies with the regulation of Code of Conduct. In a programme involving 30 countries, the choice was made to involve representative bodies such as the Committee of the Region and the European Economic and Social Committee. The compliance with horizontal policies will be checked for all projects including the projects applying under priorities 1 and 2. This compliance is also covered under the selection criteria.