

**Draft Report on Public Consultation Procedure
24 of June 2014**

Prepared by SEENetwork Kft



**Danube Transnational
Programme 2014-2020**

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Introduction

In line with the Partnership Principle, as defined in Article 5 of the Common Provisions Regulation, the preparation of the DANUBE programme involves a partnership including public authorities, economic and social partners, and relevant bodies representing civil society, including environmental partners, non-governmental organisations, and bodies responsible for promoting social inclusion, gender equality and non discrimination. The main reason for involving stakeholders in programming was to identify mutual interests and needs, secure commitment and ownership for the programme and ensure its practical implementation.

After finalizing the first draft version of the Danube Cooperation Programme, in June 2014 the document was launched for a public consultation procedure. Since the document was not entirely finalized, only the first two Sections were opened for consultations: the strategy of the programme and the description of Priority Axes. In order to reach the largest possible participation, the procedure consisted of two elements: national stakeholder consultation events and online consultation. The aim was to match the needs and interests of the stakeholders and target groups from the region with the findings of the territorial analysis, the strategic framework provided by the EUSDR and the intervention approach already identified by the Programming Committee.

The public consultation procedure served as a “reality check” of draft programme content. The relevance of the proposed thematic focus was verified and weighted and the types of projects which stakeholders would like to see supported in the next period were identified.

The feed-back provided by the stakeholders was carefully analysed by the external experts and presented to the members of the Programming Committee on 2nd and 3rd of July 2014, during its 9th meeting held in Split, Croatia. The results were discussed, the relevant inputs being considered in the next phases of the development of the Cooperation Programme. The relevant comments were taken into consideration, while new ideas and approaches were incorporated in the content of the document.

The present report is presenting the outcomes of the procedure. Besides its general informative role, it served as a working tool for the Programming Committee in deciding upon the content and structure of the programme. Since the consultation was based on the first draft version of the Cooperation Programme, the references (Specific Objectives, Sections, pages) may differ from the final version of the document.

NATIONAL STAKEHOLDER CONSULTATION EVENTS

Methodology

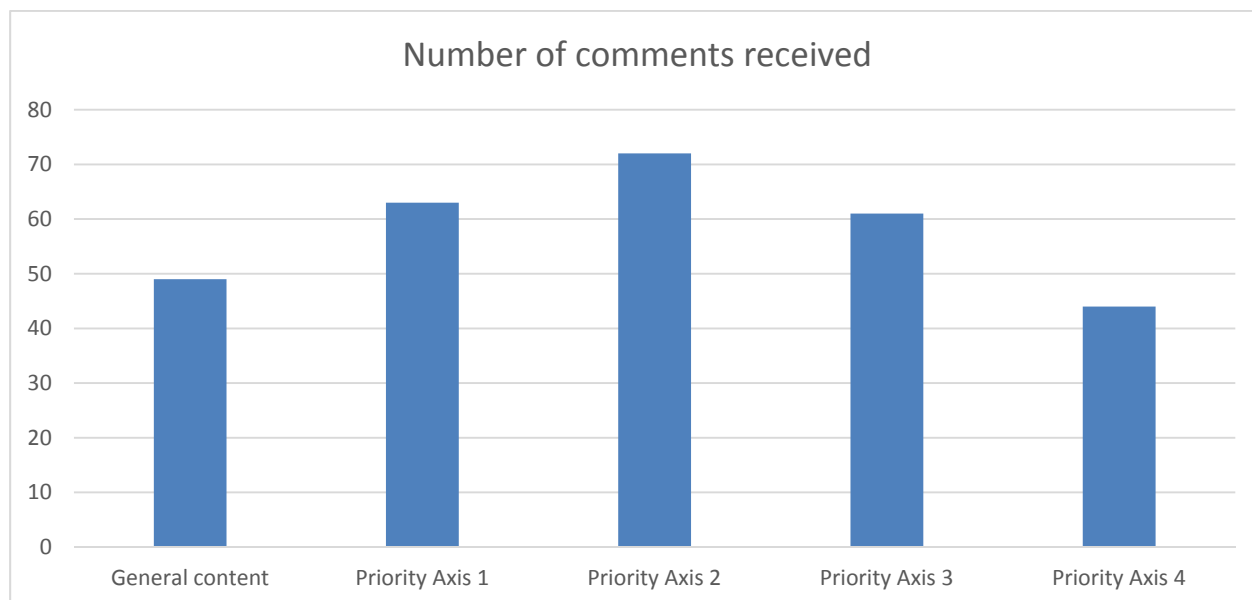
The national stakeholder consultation events were organized during June 2014 in most of the countries participating in the Danube Transnational Programme. The organization of the events was the responsibility of the members of the Programming Committee, technical assistance being offered by the team of external experts in charge with elaboration of the Cooperation Programme. The assistance consisted in supporting documents to be used in the organization and follow-up of the events (draft agenda, indicative screenplay, power point presentation of the draft Cooperation Programme, “harvesting sheets” to collect and centralize the comments and observations). Besides the role in helping the organizers in conducting the meetings, the supporting documents were important in order to secure similar approaches in all the countries, thus to ensure the extraction of comparable data.

Invitations to take part in the events were sent out to the relevant stakeholders existing in the databases of the representatives in the Programming Committee. Besides the beneficiaries of the previous transnational cooperation programmes, experts in relevant fields were also taking part in the events. In case the number of participants was sufficient, the organizers were encouraged to form 4 working groups, related to the four priority axes, in order to focus the discussion on the specific topics and to give the possibility for everybody to make their comments in their own field of competence.

The outcomes of the debates were centralized in the so-called “harvesting sheets” in order to better compare the data and manage the information, and are presented in full in the Annex to the present report.

Results of the national stakeholder consultations

There were 10 stakeholder consultation events properly documented by the organizers and included in the present report. A total number of 289 comments were included in the “harvesting sheets”, the highest number being related to TO6 - Priority Axis 2 (Environment).



The comments received were analyzed by the team of external experts and presented to the Programming Committee, during its 9th meeting held in Split, Croatia, on the 2nd and 3rd of July 2014. They were of different nature, ranging from general approval of the structure and content, to observations and proposals for improving the document. Some of the comments were containing proposals related more to the implementation phase of the programme than to programming. These are documented and will serve as an input for the management bodies in developing and coordinating the future programme.

The stakeholders provided very useful observations related to the technical details of the draft Cooperation Programme which were incorporated in the

ONLINE SURVEY

Methodology

While the national stakeholder consultations were addressing mainly the experts in the relevant topics, the online survey was open to a wider participation. The exercise served as a bridge between a top-down and bottom-up approach to developing the cooperation programme.

The online platform was opened for the public in between 6th and 16th of June 2014. In order to reach as many relevant stakeholders as possible, besides the approximately 1500 invitation e-mails sent to the contact persons existing in the SEE JTS database, the procedure was advertised on Central 2014-2020 Programme's webpage as well.

The respondents were inquired along the fields of actions identified for each of the Thematic Objective and Specific Objective of the draft Cooperation Programme, which was available for downloading on the online platform. They were asked to rank the fields of actions according to their relevance for the region, from transnational cooperation perspective. Based on their opinion, the team of external experts prepared a set of recommendations related to their inclusion in the future Danube Programme. The recommendations are based exclusively on the results of the online survey, without considering other elements of the public consultation process.

In order to ensure a high degree of accuracy of the results, those questionnaires which did not contain the name of the organization were not taken into consideration. Counting only the valid ones, 257 questionnaires were filled in by the respondents.

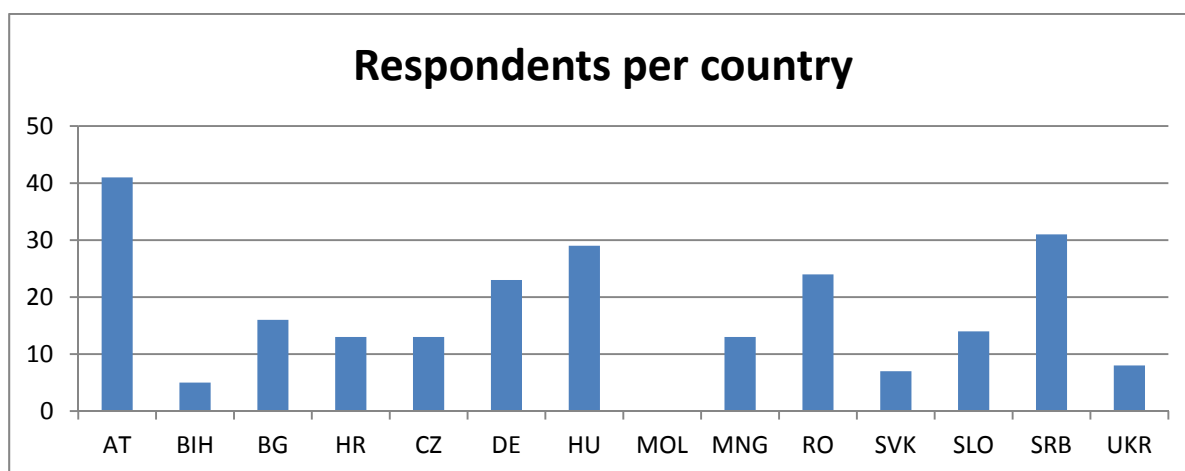
The respondents were asked to mark their field of competence and to answer only those topics which are within their expertise. Nevertheless, they had the possibility to choose more than one field of competence, considering that among the responding organizations there were institutions with an active role in more than one topic (e.g. municipalities, development agencies, universities, etc).

Additionally, the stakeholders were given the possibility to make comments related to the content of the draft programme. More than 228 comments were received and analysed, the results being presented in the Annex to the present Report.

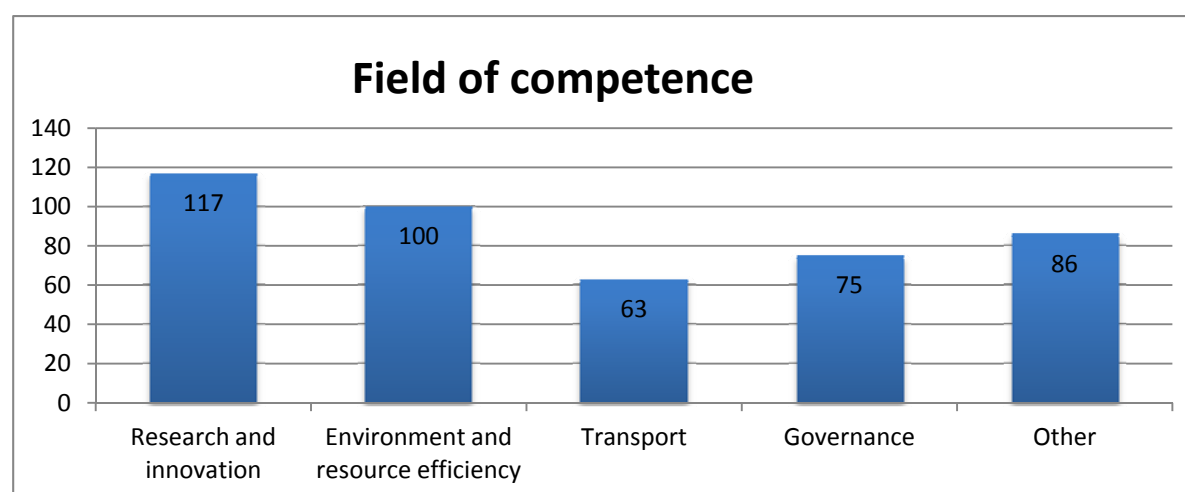
Results of the online survey

Quantitative findings

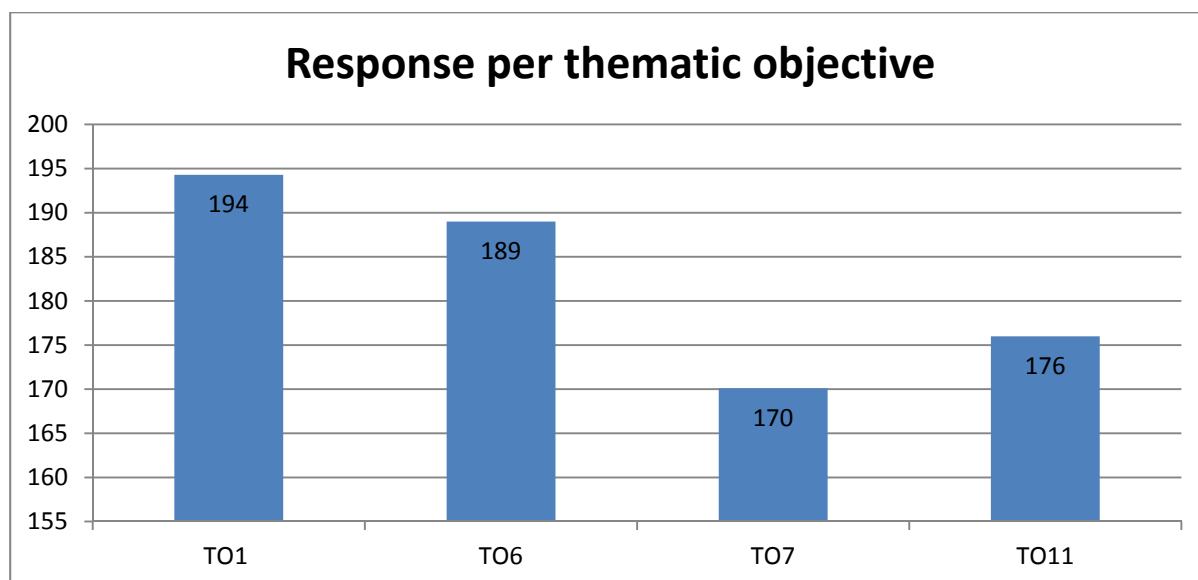
- The distribution per country of the responses reveals that more than 60% of the filled in questionnaires were received from Austria, Germany, Hungary, Romania and Serbia. Unfortunately, no reactions came from Moldova, while the participation of the stakeholders from Bosnia and Herzegovina, Slovakia and Ukraine was rather modest (less than 10 respondents).



- Considering the expertise of the respondents, the results show a larger interest from stakeholders with competences / experience in research & innovation and environment, while stakeholders interested in transport were filling in the questionnaire in a smaller number. The rate of the respondents from other field of competence is also important, this category being represented mainly by Universities (having other specialties as well) and state institutions (especially bodies responsible for emergency situations).



- Linked to the previous, if analyzed based on the number of responses received on average for the fields of action of each of the Thematic Objectives, the situation reflects the field of competence indicated by the respondents. Most of the reactions were received on topics related to research & innovation and environment, while the fields of actions referred to transport were less tackled by the stakeholders.



Qualitative findings

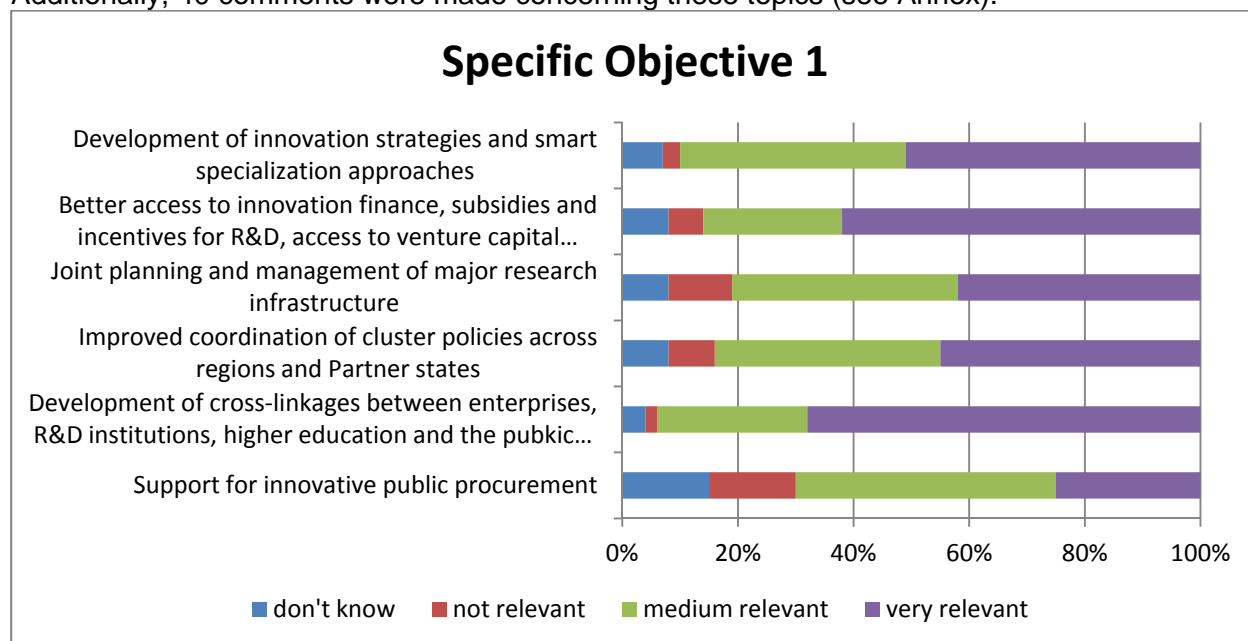
The qualitative analysis is focusing on the appreciations of the respondents with regard to the relevance of the fields of actions identified for the Thematic Objectives and Specific Objectives in the draft Operational Programme. Below we are presenting them, grouped according to Specific Objectives:

Thematic Objective 1

Priority Axis 1: Innovative and socially responsible Danube Region

Specific objective 1: Improve framework conditions and a balanced access to knowledge

On average, 194 responses were received for the fields of action on Specific Objective 1. Additionally, 40 comments were made concerning these topics (see Annex).



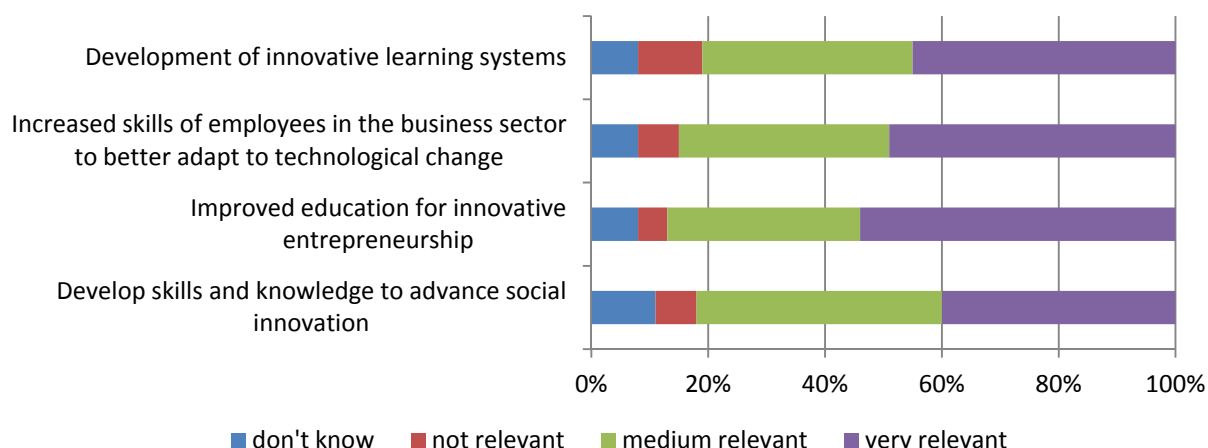
Findings:

- Based on the stakeholders' responses, Specific Objective 1 is confirmed as being relevant for the Programme;
- According to the results, the vast majority of the respondents are considering that the strengthening of the triple helix is of special importance for the programme territory;
- Other fields of action show a sufficient level of interest except Innovative Public procurement which was considered as very relevant by less than 25% of the respondents.

Specific objective 2: Increase skills and knowledge for innovation

On average, 195 responses were received for the fields of action on Specific Objective 2. Additionally 21 comments were made concerning these topics (see Annex)

Specific Objective 2



Findings:

- Based on the stakeholders' responses, Specific Objective 2 is confirmed as being relevant for the Programme;
- The improvement of education for innovative entrepreneurship was the most popular field of action among the respondents;
- Develop skills and knowledge to advance social innovation was considered as very relevant by less than 40% of the respondents.

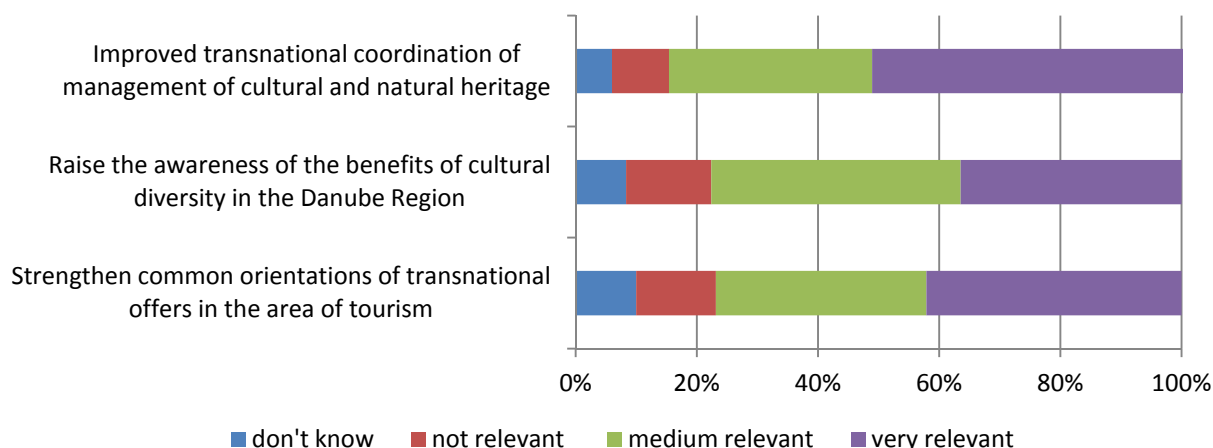
Thematic Objective 6

Priority Axis 2: Environment and cultural responsible Danube region

Specific objective 3: Natural and cultural heritage valorization

On average, 191 responses were received for the fields of action on Specific Objective 3. Additionally 22 comments were made concerning these topics (see Annex)

Specific Objective 3

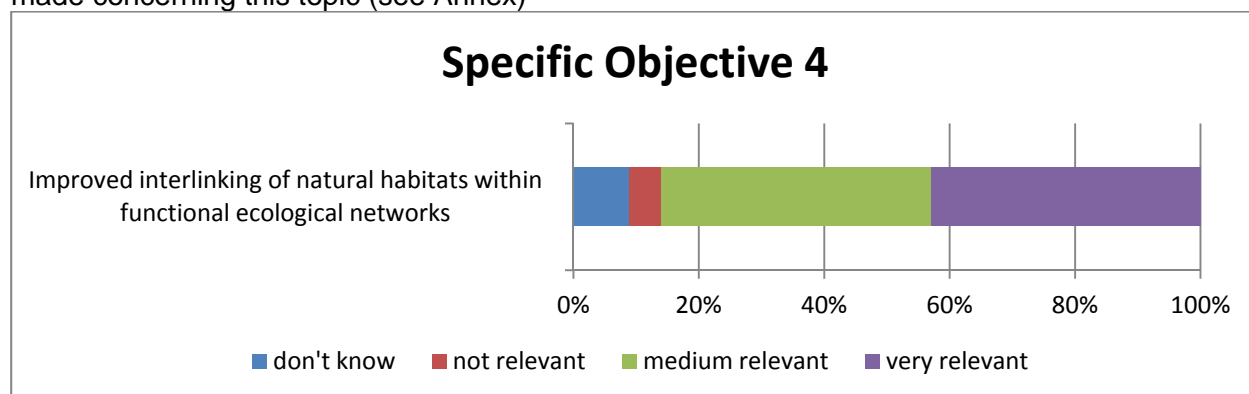


Findings:

- Based on the stakeholders' responses, Specific Objective 3 is confirmed as being relevant for the Programme;
- The management of cultural and natural heritage is considered as being of special importance;
- Raising the awareness of the benefits of cultural diversity in the Danube Region has been marked by less than 40% of the respondents, having an important share of considerations as "not relevant".

Specific objective 4: Restoring and managing ecological corridors

187 responses were received on Specific Objective 4. Additionally 17 comments were made concerning this topic (see Annex)

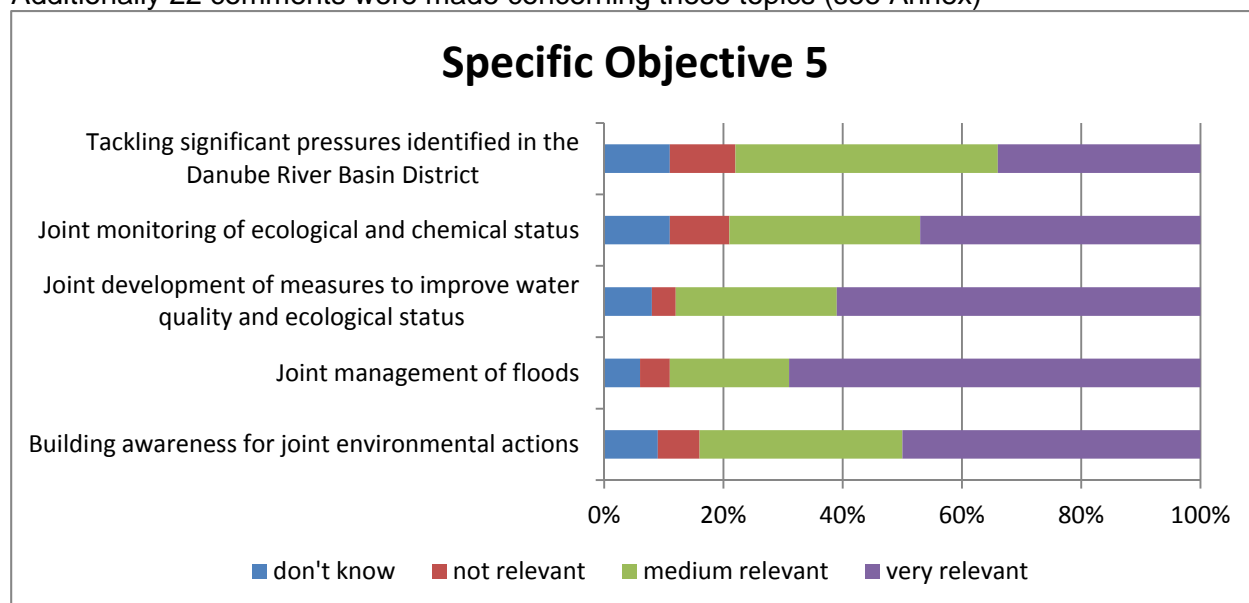


Findings:

- Based on the stakeholders' responses, Specific Objective 4 is confirmed. Almost 90% of the respondents considered it as medium or very relevant

Specific objective 5: Transnational water management and flood risk prevention

On average, 188 responses were received for the fields of action on Specific Objective 5. Additionally 22 comments were made concerning these topics (see Annex)



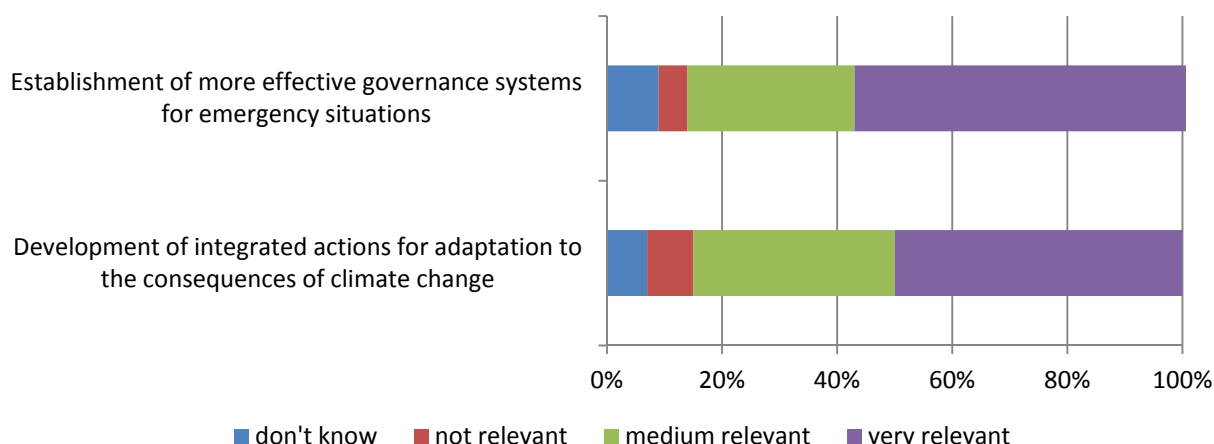
Findings:

- Based on the stakeholders' responses, Specific Objective 5 is confirmed as being relevant for the Programme;
- Water quality and management of floods was considered of special relevance, but most of the other fields of actions were highly supported as well;
- Tackling significant pressure identified in the Danube River Basin District was considered as very relevant by less than 40% of the respondents, the majority considering as having it a medium and low relevance.

Specific Objective 6: Improve the preparedness to manage risks

On average, 190 responses were received for the fields of action on Specific Objective 6. Additionally 17 comments were made concerning these topics (see Annex)

Specific Objective 6



Findings:

- Based on the stakeholders' responses, Specific Objective 6 is confirmed as being relevant for the Programme;
- Both fields of actions were considered as highly relevant by the respondents.

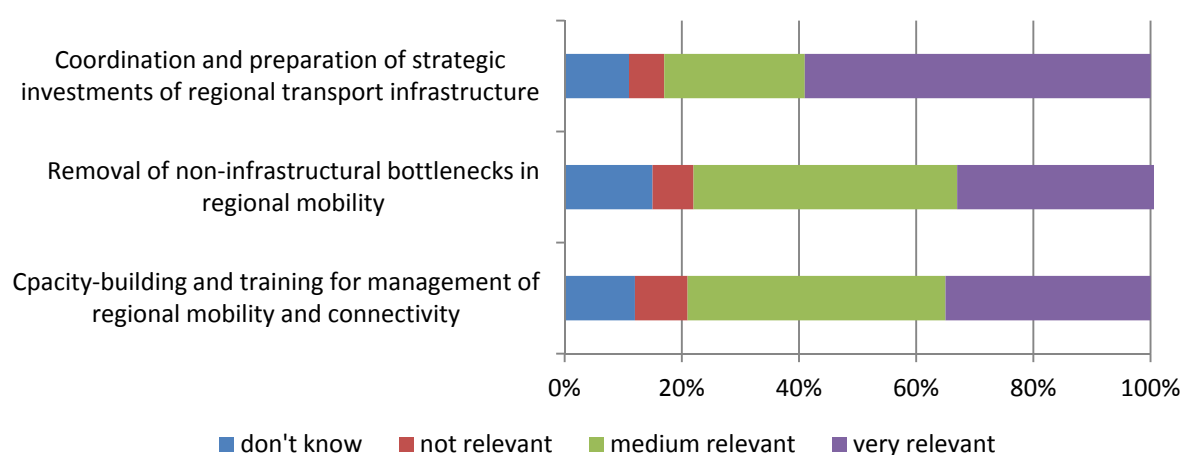
Thematic Objective 7

Priority Axis 3: Better connected Danube Region

Specific objective 7: Planning, coordination and management of regional transport systems

On average, 172 responses were received for the fields of action on Specific Objective 7. Additionally 9 comments were made concerning these topics (see Annex)

Specific Objective 7



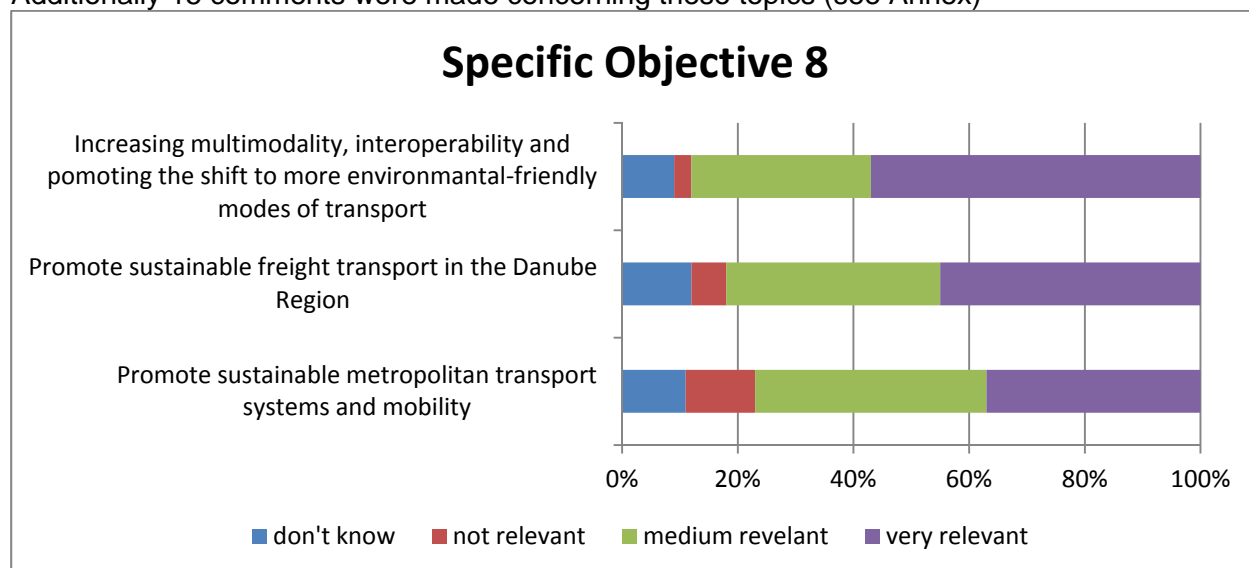
Findings:

- Based on the stakeholders' responses, Specific Objective 7 is confirmed as being relevant for the Programme;

- The preparation of future strategic investments of regional transport infrastructure was considered as being the most relevant of the fields of actions;
- The removal of non-infrastructure bottlenecks and the capacity-building and training for mobility management were considered as very relevant by less than 40% of the respondents.

Specific objective 8: Environmentally-friendly, low-carbon and safe transport systems

On average, 169 responses were received for the fields of action on Specific Objective 8. Additionally 15 comments were made concerning these topics (see Annex)

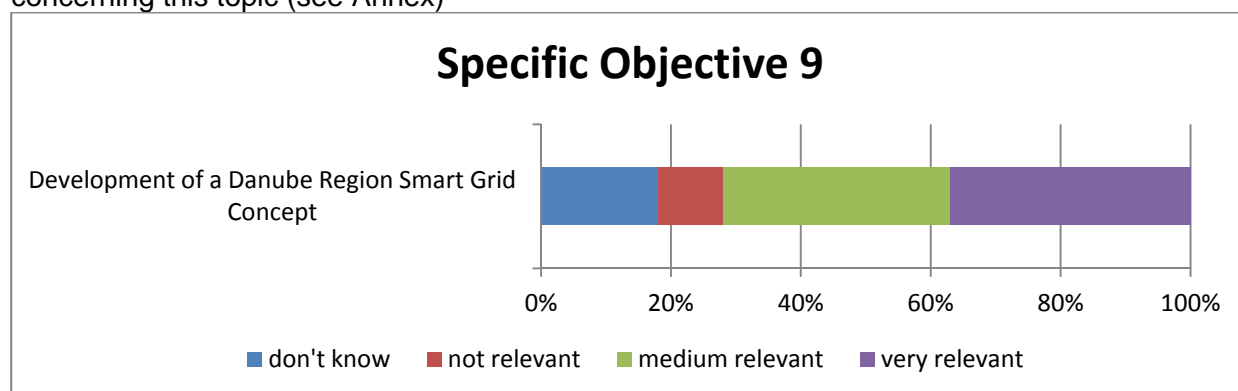


Findings:

- Based on the stakeholders' responses, Specific Objective 8 is confirmed as being relevant for the Programme;
- Multimodality and interoperability was ranked as relevant by more than 80% of the respondents;
- The promotion of sustainable metropolitan transport systems was considered as very relevant by less than 40% of the respondents, having also a high rate of "not relevant" answers.

Specific objective 9: Coordinate smart energy distribution systems

169 responses were received on Specific Objective 9. Additionally 1 comment was made concerning this topic (see Annex)

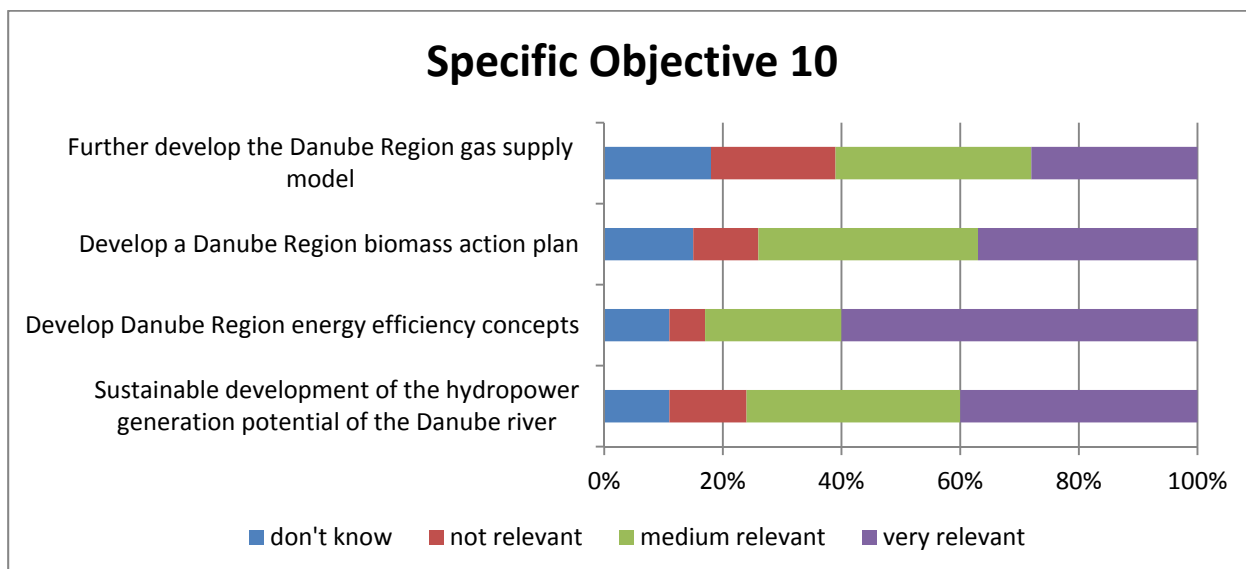


Findings:

- Based on the stakeholders' responses, less than 40% of the respondents considered Specific Objective 9 as being very relevant for the Programme

Specific objective 10: Improve regional energy planning and coordination

On average, 170 responses were received for the fields of action on Specific Objective 10. Additionally 22 comments were made concerning these topics (see Annex)



Findings:

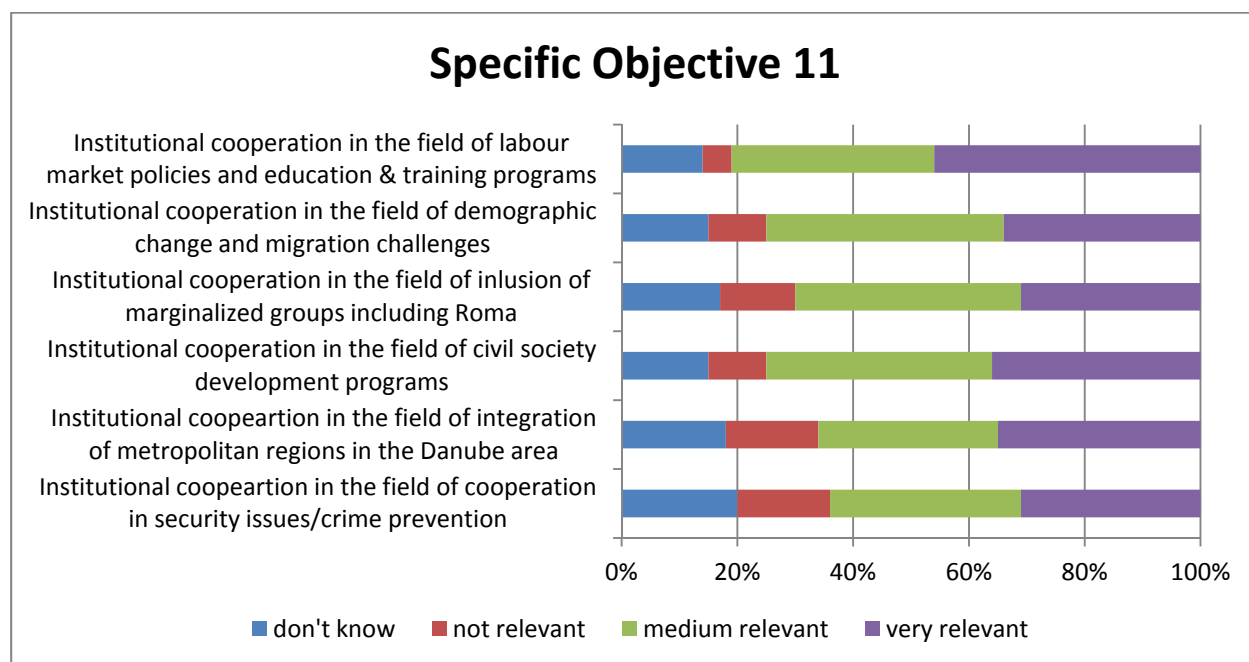
- Based on the stakeholders' responses, Specific Objective 10 is confirmed as being relevant for the Programme;
- The development of energy efficiency concepts in the Danube region is considered as being very relevant by 60% of the respondents;
- Other fields of actions received relatively high support, except of the development of gas supply model in the Danube Region, considered as very relevant by less than 30% of the respondents.

Thematic Objective 11

Priority Axis 4: Well governed Danube Region

Specific objective 11: Multilevel and transnational governance

On average, 177 responses were received for the fields of action on Specific Objective 11. Additionally 33 comments were made concerning these topics (see Annex)



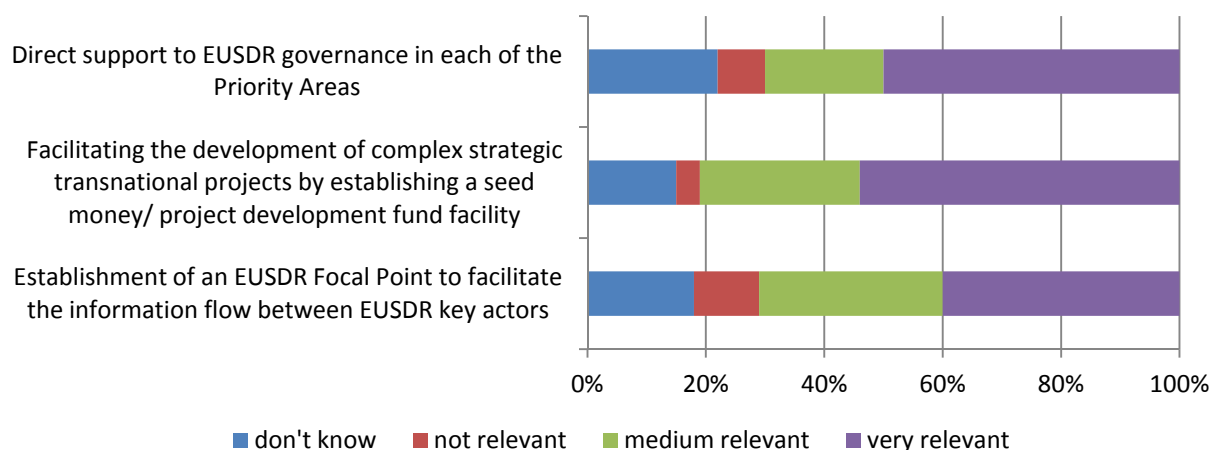
Findings:

- Based on the stakeholders' responses, Specific Objective 11 is confirmed;
- Institutional cooperation in the field of labour market and education & training programs is considered as the most relevant by the stakeholders;
- The inclusion of marginalized groups was considered as very relevant only by 25% of the respondents;
- The integration of metropolitan areas and the cooperation in the field of security and crime prevention were not supported by the stakeholders – more than 30% of the respondents didn't know or considered these topics as not relevant.

Specific objective 12: Governance of EUSDR

On average, 175 responses were received for the fields of action on Specific Objective 12. Additionally 10 comments were made concerning these topics (see Annex)

Specific Objective 12



Findings:

- Based on the stakeholders' responses, Specific Objective 21 is confirmed as being relevant for the Programme;
- The establishment of a EUSDR Focal Point was considered as very relevant by 40% of the respondents.

OVERALL CONCLUSIONS

- Based on the number of participants in the national stakeholder events and the number of questionnaires received, it can be stated that the future Danube Transnational Programme is presenting a high level of interest among the possible stakeholders in the region;
- The interest per Thematic Objective expressed is generally reflecting the participation shown in the past programming period in the SEE as well as in other transnational programmes (i.e. being the *transport* theme less tackled than *research & innovation*) hence giving an important piece of information on expected number and type of applications;
- The large majority considered most of the proposed fields of actions as being relevant for the scope of the programme;
- Considering the comments received, most of the proposals related to Priority Axis 1 were related to the improvement of framework conditions for innovation, which seems to be the most popular among stakeholders;
- For Priority Axis 2, the comments were mainly focused on cultural and natural heritage and water management, often combining them with the other elements of environmental protection and the challenges of the climate change;
- Environmental-friendly ways of producing energy and multimodality in transport were the most popular topics the stakeholders were mentioning in their comments related to Priority Axis 3;
- Regarding Priority Axis 4, it can be noted that there are different expectations/ ideas/ proposal in terms of alignment of the Cooperation Programme with the EUSDR therefore a sound and effective communication on different scopes/ roles/ responsibilities shall be ensured since the beginning.

ANNEXES TO THE REPORT

The Annexes are presenting the comments received from the participants in the national stakeholder consultation events and the respondents to the online survey¹. The comments were rather heterogeneous, ranging from expressing opinions about the content and the structure of the programme, presenting project ideas, to advancing proposals for the implementation phase of the future programme.

Taken into account that the participation to the national stakeholder consultation events was opened to relevant experts and experienced organizations in the field of territorial cooperation, all comments received were included in the Annex. They are classified by Priority Axes and countries, with a first section containing general considerations about the programme.

Considering the scope of the online survey, only those comments were taken into consideration, which were related to the content of the draft programme and have a transnational character. The very detailed project ideas, the presentations of organizations/institutions and the comments without a relevant content (e.g. not referring to the programme territory, not in English language, etc) were not considered for this Annex.

The comments received during the online survey are presented with indication of the Thematic Objective, Investment Priority and Specific Objective which they are related to. Depending on their character, we have tried to categorize them as being comments of support, or proposals for improving/widening the content of the programme.

All the proposals received were thoroughly analyzed and taken into consideration in the process of further developing the Cooperation Programme. They were submitted for consideration to the Programming Committee and served as an input for refining the content and structure of the Danube Transnational Programme.

¹ Please note that the comments were made based on the first draft version of the Danube Transnational Programme. The document was further developed, therefore the references (Specific Objectives, Chapters, pages, etc) may not correspond to the final version of the Cooperation Programme.

ANNEX 1 – RESULTS OF THE NATIONAL STAKEHOLDERS CONSULTATION EVENTS

GENERAL COMMENTS RELATED TO THE DRAFT COOPERATION PROGRAMME	
AUSTRIA	Positive feedback was expressed that the current intervention logic is very well covering most EUSDR priority areas (PA).
	It should be avoided that identical actions are listed under different specific objectives / priority axis in order to avoid confusion (e.g. joint research infrastructures under priority axis 1 & 2). Nevertheless clear framework for research infrastructure flagships should be ensured.
BOSNIA AND HERZEGOVINA	There is a need for better coordination of entry cards (Decisions made by State government) on the co financing of specific measures and priorities (there were situations in the past territorial cooperation programs such as MED in which the already approved projects could not be financed due to the lack of the Decision adopted by Council of Ministers applicable for specific Measure/Priority).
	There is need for introduction of the pre-financing at the level of at least 20% of the value of the approved project to be paid at the very begging of the project implementation.
	In terms of the eligibility for IPA country beneficiaries, it is not clear from the documents whether the public authority (cantonal government) would be eligible to apply at the Public calls. It is highly recommended that the public authority, especially cantonal governments that have constitutional competency to cover the issues under the Program's priorities, are eligible to participate in the projects.
	Related to the programme priorities and intervention approach(es), it would be useful to think about dimension of "health" within the programme. As the programme has been planned for the countries of EU, as well as candidates and precandidates, area of the harmonisation of activities for preparedness and response to the public health threats of international concern, innovation and health technologies, intersectorial approach for improvement of health of the population and public health activities for ensuring of health security and control of non communicable diseases could be part of the program too.
BULGARIA	Online-tool for partner search/networking would be highly appreciated as soon as possible, so therefore networks, need to be ensured and supported
	The list of the beneficiaries shall be formulated in a broader way, in order not to exclude relevant organizations due to the different legal systems.
CROATIA	-
CZECH REPUBLIC	There is too many SO - some of them should be merge (especially within priorities 2 and 3)
	Some of the SO are proposed very narrowly then the others (unbalanced) e.g. SO5
	wording of SO11 title is quite general - lacks a unifying framework e.g. Social topics
GERMANY	Online-tool for partner search/networking would be highly appreciated as soon as possible.
	Demographic change should be considered not only under priority 4, but also under 1 and 3.
	Integrated approaches, e.g. enhancing competitiveness and attractiveness of cities and regions (town and regional planning), should be mentioned, even if the 2020 philosophy is more thematic oriented. Message should be: It is still possible and appreciated, but the access has to be done through a concrete thematic priority. For example smart and innovative rural areas could basically be approached by all priorities (innovation, education, SME, demographic change, natural resource protection, bio-energy).
	Also smaller projects with 4 or 5 partners are welcome, if the transnational benefit can be described. Size and coverage of the partnership should not be the crucial criterion.
	Page 18, bullet points on relevant strategies: Under the relevant strategies the programme should also include Natura 2000 and Prioritised Action Frameworks (PAF).
	Page 21, first paragraph Characteristics We suggest a change of the first sentence: The Danube region with its low land areas and Carpathian Mountains is a unique...
HUNGARY	The programme should build on the experience of the previous transnational programmes and make use of the results of initiatives and projects implemented in 2007-2013. TA of previous and even the current programme could finance the distribution, circulation, and promotion of these experience and results in order to develop further existing initiatives or facilitate new projects
	Direct link to EUDRS and its institutions should be ensured in an explicit way. There should be a real added value and relevance of the recommendation letters given by the EUDRS steering group.
	Transnational projects should influence national programmes and policies, and encourage the realisation of investments or development projects at national, regional or local level. EUSDR's strategic approach and link to all programmes can play an important role in strengthening the link between the transnational and the national/regional level. The Transnational Programme must have its own identity and message to the stakeholders which would also clarify its connection to EUDRS and to other strategies and programmes.

	Climate change should be taken into account as a horizontal issue due to its relevance in multiple priority axes and investment priorities (mainstreaming into all actions where relevant). Also, climate change related individual actions should also be eligible (i.e. separate PA/IP).
	Establishing of a „small project fund“ so that projects with lower (eg. 100,000 €) budget have the opportunity to be implemented.
	Equipment purchasing and investments should be eligible costs withing project budgets.
	Integrateing environmental aspects into the priorities and specific objectives of the operatiional programme (at some points this has already happened)
	Generally, an estimation on the support distribution rates among the Priority axes would be helpful. It would be even more helpful if distribution rates within Priority axes would be also provided e.g. environment protection versus culture heritage conservation within Priority 2., or transport development versus development of energy systems within Priority 3.
	In chapter 1.1.1.4 General policy framework should be completed with EU 7th Environmental Action Programme.
	In chapter 2.1.1.3 environmental industry should be focused and enhanced, as that sector has the potential to trigger local economy on a sustainable way.
	The role of the programme shall be better defined. At present, the program is defined in exclusive terms, as being complementary to „rural development, jobs and investments“ thematic of the EU. However, for obtaining an identity, the program should be defined for what it stands, for example „for the territorial cohesion of the Danube region“, „for better governance of the Danube region“ etc. The budget size of the program and its investment potential has no primary relevance to the Chapter „role of the project“, therefore it should be moved or rephrased.
	The mission of the programme should be strategically defined. The definition given to the programme is formulated in „complementarity“ terms at present, therefore the programme itself seems to be missing a strategic vision.
	The EUSDR is mentioned as complimentary programme, but without explaining whether DTP will de facto adopt the strategic points of the EUSDR, or if not, in what form the complementarity is being sought. In case DTP is not complying with the strategic vision of EUSDR, the EUSDR shall not be mentioned in the mission Chapter of DTP but at the “General Policy Framework”. „Tools and services and concrete pilot investments whereby strong complementarities with the broader EUSDR (not presented.) will be sought.”
	The definition of the „needs“ should be detailed in the relevant Chapter, rather than at the mission chapter of the programme. „Needs are related to the issues how to improve institutional frameworks for cooperation, how to improve the quality of policies and their delivery and how to deliver solutions through concrete investments and smart pilot action.”
	The success of the programme should be related to the (so far undefined) overall objectives. At the same time, promoting the number of LPs is a management type of challenge, and is not necessarily linked to highest level mission of the programme. Rather, the areas of cooperation should be defined already here. „The success of programme implementation will depend on targeted selection of the most relevant interventions and a further increase in the efficiency of administrative procedures and a reduction of the administrative burden for the beneficiaries. One clear lesson learnt during the period 2007-2013 was, that the number of institutions which are able to take over the function of a lead partner is clearly limited for a variety of reasons. Thus, the programme for the period 2014-2020 has to be developed with a view to cooperation areas in which competent actors and feasible ideas can be expected in sufficient numbers.”
	The role of the SEE Programme, as antecedent, should be better explained in terms of achievements in the specific cooperation areas rather than in terms of management. In relation to the projects implemented through the SEE programme, we propose to DTS management to create an online tool where all the former project results and partners can be seen in a user –friendly manner.
	The challenges identified should be coherently indicated trough the document and the actions should better build on these challenges. On page 15., a table summarizes the findings of a comprehensive territorial analysis carried out by external experts. However, these findings do not seem to be fully coherent with the intervention chapters of the programming document or their relation is not enough clearly explained.
	For example: 3 challenges have been identified under the Climate: (i) Decreasing the negative effects of climate change, (ii) Improvement of climate change adaptation abilities; (iii) Risk management plans for sites exposed to climate change. But the explanative Chapter of 1.1.1.6 Climate change & risk management, energy (page 20) relies primarily on flood and river basin management, and climate change is mentioned only at the end of the narrative: „Characteristics Deriving from the river which is acting as a catalyst of the area, a central element of international cooperation within the Danube Region is the water management. Based on the Water Framework Directive, the Danube River Basin Management Plan (DRBMP) defines the general objectives for the protection and enhancement of river basin and the sustainable and long-term use of water resources. Within this framework, countries are preparing their River Basin Management Plans developing tools of monitoring and measures of improving the water quality and the ecological balance. In order to maximize their effect, there is need for cooperation at international level among the countries involved. Transnational initiatives may support this activity, as well as future development of DRBMP. Due to its geographical profile, the Danube area is exposed to floods, often of impressive scale.”
	The climate related risks should be built on a scientific or at least stakeholder consensus, and made coherent throughout the document. Since fires and droughts are also intensified by climate change, it should go to the same bracket. “Beyond floods and exposure of water resources to polluting elements, other risk factors are endangering the human and natural habitats of the region, such as industrial accidents, fires or droughts. Not the least, a very relevant phenomenon is the climate change, which impose a threat on the entire region.”
	More intense involvement of different national stakeholders to the project preparation and implementation process.
	Standardization of the application interface both on EU and on national levels.

ROMANIA	Please emphasize more the connection with EUSDR and the objectives and targets of the EUSDR Priority areas
	The eligible beneficiaries should be mentioned using the same criteria. Right now they are mixed. Their description should be as general as possible and then detailed for each call and the relevance analyzed at national level : ie : - legal form - local regional national public authorities/institutions; private bodies, bodies governed by public law - scope: business support organizations, research institutions; higher education...ecc Bodies governed by public law should be mentioned as eligible beneficiaries. Regional Development agencies should be included as eligible beneficiaries and in the target groups as well for all priorities
	For each priority please ask for the input of the EUSDR Priority Area Coordinators in order to ensure the correlation with EUSDR
	Indicators should be more precise and prepare a decision paper for the PC on whether to use qualitative or quantitative indicators
	The list of the beneficiaries shall be formulated in a broader way, in order not to exclude relevant organizations due to the different legal systems.
	-
SLOVAKIA	-
SLOVENIA	All Priority Axes are relevant.
	There are too many specific objectives in the general table.
	Some specific objective could be merged, especially Investment priority 6d.
	Quadruple Helix approach is an overarching relevant approach under all priority axes.

COMMENTS RELATED TO PRIORITY AXIS 1	
AUSTRIA	The current intervention logic received high acceptance among the participants. All specific objectives and corresponding actions fields were identified as highly relevant. It was noticed with appreciation that the EUSDR PAs 7, 8, & 9 are well reflected under this priority axis.
	ad SO 1: Under action 5 (triple helix), the word "higher education" should be replaced by "education" only, since all educational institutions should be included.
	ad SO 1: The focus of Action 4 on cluster policies is too limited; transnational cluster cooperation and cluster cross-linking should be integrated which are currently not directly covered by the programme. There is a high interest to facilitate the cooperation of thematic clusters which are able to generate joint innovations. Social cluster should also be considered.
	ad SO 1: In case further concentration of actions is necessary, the following considerations were undertaken regarding potential overlaps with other programmes or institutions: - JRC is already very active in the field of smart specialization - The European Strategy Forum on Research Infrastructures (ESFRI) committee works on joint research infrastructures. The DANUBE TN programme could also think about focusing on Danube-specific and/or smaller, etc. infrastructures and try to raise them to excellence. - HORIZON 2020 has a funding scheme for innovative public procurement.
	There was general consensus that in case that some topics of other priority axes are being moved to priority axis 1 or 4, that the current social dimension issues should be retained in the intervention logic.
BOSNIA AND HERZEGOVINA	Organizational social responsibility should be in the core of the government's relations towards SMEs and potential entrepreneurs, thus this priority should be opened especially to the governments at all levels in BiH with the final goal of the removal of the different subsidy/grant schemes implemented by Ministries that are very often politically led.
	ICT is the tool that can help local entrepreneurs and SMEs to increase their competitiveness, but ICT should be also seen as a chance by public administration because through the ICT tools public administration becomes more open and transparent while the services are cheaper for final users, and the overall efficiency and effectiveness of public authorities can be increased by stronger use of ICT.
	As socially responsible Danube region, it could promote healthy choices through formulating and designing products, regulating marketing, excise duties and taxes and educating consumers
	Encouraging public health research with aim to provide more extensive information to decision-makers and practice.
	"8 Employment • Decreasing the presence of black economy." Instead of term "black economy", we propose to use "grey economy".
	In the case of agriculture, Ministry of Agriculture, Forestry and Water Management of Republic of Srpska supports increasing of skills and knowledge in the area of agriculture production and we suggest, considering recent events (floods), that increasing skills and knowledge transfer to agriculture producers (farmers) should be especially focused to the new, innovative technologies which are adjusted to climatic changes (extreme drought, extreme rain)
	Increasing of skills and knowledge in the area of agriculture production could be made over Agricultural Advisory Service Network made by members of Advisory Services of Danube region countries.

	Regarding the implementation of the Programme in BiH there is a need to include the relevant competent entity institutions in all activities regarding SMEs and innovation, having in mind that the competence for innovation and SME sector is on entity level
BULGARIA	<p>Innovation is major engine development and is very important to have transnational projects in this area. Development of innovative learning systems, increased skills of employees in the business sector to better adapt to technological change, improved education for innovative entrepreneurship, develop skills and knowledge to advance social innovation are very important topics for transnational projects in the frame of this program.</p> <p>Development of cross-linkages between enterprises, R&D institutions, higher education and the public sector should be mentioned</p>
CROATIA	<p>Provide more details about Danube Region Research and Innovation fund - page 37</p> <p>Is it possible for big companies to be beneficiaries supported under this investment priority? Explanatory: In many countries and Croatia as well, the main research potential is associated with the big companies - page 39</p>
CZECH REPUBLIC	<p>missing the support of SME as important holder of Innovative potential (e.g. education for innovative enterprises)</p> <p>cooperation of municipalities on dissemination of knowledge, best practise and best procedure exchange, mutual learning - innovative development and management of public administration</p> <p>there was a few comments on better explanation and more details of some terms e.g. Development of innovative learning systems</p>
GERMANY	<p>Recycling management should also be mentioned as an important part of eco-innovation.</p> <p>Development of cross-linkages between enterprises, R&D institutions, higher education and the public sector should be mentioned</p> <p>Joint planning and management of major research infrastructure</p>
HUNGARY	<p>Creative industry, environmental industry, cultural incubators and other preferred branches should get more focus under the priority axis. Here is to be mentioned, that clusters and incubators shall be regarded as instruments rather than an objective of the programme. Establishment of a Danube Creative Region (including creative clusters, networks) was mentioned by one of the participants.</p> <p>In spite of producing only studies and strategies, an effective support of micro, small and medium enterprises, start-ups and clusters shall be ensured by the programme.</p> <p>The definitions of the supported areas within the specific objectives are very broad, a concrete definition of interventions would be welcome.</p> <p>Development of curricula for educational institutions and dual vocational trainings shall be supported by the programme.</p> <p>There is a need for a direct or indirect (through intermediary bodies with mentoring tasks) support of SMEs. Micro enterprises should be also taken into consideration in order that funds become available for them.</p> <p>Support of mobility in the area of innovation and R+D would be welcome especially for start-ups. Exchange programmes, networking events which make the transfer of knowledge possible are to be mentioned here.</p> <p>The activity defining the development of smart specialisation approaches is very broad. Focus should be on the cooperation of clusters based on S3.</p> <p>Word "research" should be replaced by knowledge. Activities supporting the exploitation of knowledge shall be emphasised.</p> <p>There are EU standards for establishing creative management. Development of training materials would be very important in this field.</p> <p>Activities for the establishment of an entrepreneurial culture shall be supported also by the programme. Atypical forms of employment fit better the today's economic and technological environment, because in some branches this kind of approach would be much more effective and sustainable, therefore it should be introduced in partner countries. Projects for tackling this issue should have place in the programme.</p> <p>For the sake of simplification number of indicators shall be reduced in the next programming period. Definition of indicators should be clear.</p> <p>The presence of social innovation as supported area is very welcome by the participants.</p> <p>The title of this priority refers to innovation, but the content is less focused. The main element of innovation is the use of knowledge and to reach market launch. This is the main field where the Danube Region (except the German and Austrian regions) are remarkably lagging behind, while in the field of research it is in a more favourable position. Therefore the programme should focus more on innovation: the utilisation and use of knowledge, instead or besides R&D and cluster-development. Possible tools: "Making a Creative Danube Region", support creativity management initiatives, promote crowdfunding mechanism, support formal and informal innovation networks in the region.</p> <p>Development of tools to support creative industry.</p> <p>Promotion of setting up and operation of transnational clusters</p> <p>To improve competitiveness and employment of SMEs, joint marketing and SME trainings, promote atypical employment, increase labor mobility</p> <p>Transnational partnership in the field of vocational training and adult education networks</p>
ROMANIA	Please ask for contribution to the relevant EUSDR PACs

	Regional Development Agencies are not just business support organizations, but public policy promoters at regional level as well .
	Action 2.1.3. (og 37) what do you mean when discussing about "• Improve the access to finance through the establishment of a Danube Region Research and Innovation fund."
	"Support for innovative public procurement" - please rephrase or better explain the outcomes of such an action
	SP 2: please replace skills with competences, as the second one has a broader definition
	pls rephrase the 2nd proposed action to: "Increased skills of employees in the business environment to better adapt to technological change and market requirement"
	Please reformulate the indicative action including education and training, because one can not delimitate research from education and training, unless it is purely a research project • Joint planning and management of major research -education and training infrastructures (e.g. research centres, technology transfer centres) taking into consideration pan-European research infrastructures which are in the preparatory phase in the Danube region
	Should be made more clear, what is „support for the ratification of new World Heritage sites refer to.
SLOVAKIA	To include cooperation in the area of information and communication technologies. We should collaborate on building a "digital" Danube region as a horizontal priority.
	Building transboundary ICT clusters, cross-border data flows, dealing with ICT challenges in a transboundary trade, potentially eInvoicing.
	Development of e-government services within the Danube region and promotion of interoperability among public administrations in the region.
	One of the major project of the concerned PA7 is the establishment of the future DRRIF (Danube Research and Innovation Fund) project is the flagship project of Priority 7 of the EU for the Danube Region, with the main goal of mobilizing and distribution of funds for support of development of activities in the field of research and innovation in the countries of the Danube Region. A process of public procurement just finished with the objective that the winner should propose a feasibility study (manuals and/or directives) to describe the future project with the objective to conclude the task within the next 12 months. Therefore a possibility for a support for future funding of the DRRIF establishment is a crucial element for all Danube countries which will be involved in the future. The Danube programme 2014-2020 should take this into consideration. As well the application of elements of dual education into the reform of the educational systems, in the Danube Region countries is an important objective to be taken into consideration within the Danube Programme. For example Slovakia is working on the preparation of a dual education project together with the German colleagues and future financing would be inevitable for the future.
SLOVENIA	New title of SO 1: Improve framework conditions and balanced access to COMPETITIVENESS
	To be added: SMEs, start-up support for creation of new jobs; internationalisation, access to new markets, innovative ways of financing (crowdfunding etc.)
	SO1: New diction of the ACTION 1: »Development of innovation strategies and transnational smart specialisation approaches«
	SO1: New diction of the ACTION 2: Better access to innovation finance and support for start-ups
	SO1: Action 3: The topic could be merged with Action 1 (cluster policies should be integrated in smart specialisation approach)
	SO1: New diction of the action 5: Development of new open innovation approaches in quadruple helix
	SO1: Action 6 should be moved into PA 4 (governance)
	SO2: New diction of the action 1: Learning systems for development of open innovation
	SO2: New diction of the action 2: Increased skills in the business sector to better adapt to the global trends
	SO2: New diction of the action 3: Improved competences for innovative entrepreneurship
	SO2: New diction of the action 4: Develop skills and knowledge for implementation of social innovation

COMMENTS RELATED TO PRIORITY AXIS 2	
AUSTRIA	In principle, all mentioned objectives and activities are considered as relevant. Optionally, the specific objectives (SO) could be reformulated / restructured by combining SO 5 and SO 6 while keeping all activities. The priority axis for environment should also consider soil protection and land use (see formulation of IP 6d).
	ad SO 3: The term valorisation should be reconsidered, since protection and renaturalisation / revitalization are equally important as valorisation and touristic use of natural & cultural heritage. It is recommended to speak of cultural resources instead of cultural heritage, since culture is not always historical (e.g. contemporary art). It is proposed to rename Action 1 to "Improved transnational coordination & management of cultural and natural resources" Action 2 should also include the awareness-raising for natural diversity (not only cultural diversity).

	<p>ad SO 4: With its focus on corridors only, the SO4 appears as a very specific / exotic topic. Competing claims / interest regarding land use (e.g. development pressure) should also be considered. Managing sustainable land use (incl. biodiversity, soil use, etc.) is an important topic which should be included under this specific objective. Another action field should be: "To raise awareness of soil protection and sustainability"</p> <p>ad SO 5 & SO 6: If specific objectives need to be reduced, a possibility could be to combine SO 5 & SO 6 to prevention & management of natural disasters and risks while keeping all current action fields. Flood prevention was considered as a topic of very high importance. Action 3 under SO 5 should be amended by adding the monitoring of hydromorphical status of waters. Currently, hydromorphology which is included in the EU Water Framework Directive. ("...monitoring of ecological, hydromorphical and chemical status...")</p>
BOSNIA AND HERZEGOVINA	<p>This priority should be addressed to the territorial cooperation initiatives addressing the issues of floods that affected recently most part of BiH North.</p> <p>It would be valuable if the programme support creating healthy local communities (on the basis of healthy cities and healthy communities concept).</p> <p>Pertaining environmental factors in order to promote healthy environment and reduce negative impact of environment on health</p> <p>Promotion of environmentally sustainable health care institutions</p>
BULGARIA	<p>Water quality, flood risks, government systems for emergency situations, climate change are very important topics for joint transnational activities</p> <p>The idea of connecting climate changes with disaster management is very useful. Regarding the experience in projects within the South East Europe programme we would like to continue our work for managing risks of different natural and man-made disasters. We made stable connection with our partners and we had developed a GIS map for wildfires for one pilot area. We would like to continue the work and together with other institutions to elaborate such maps covering more areas in Bulgaria.</p> <p>Establishment of more effective governance systems for emergency situations regarding natural disasters (such as floods, forest fires, landslide, land erosion, earthquakes, etc.)</p>
CROATIA	<p>Specific objective 3 - Actions to be supported...there are missing: sustainable management of protected areas; connection of nature conservation and tourism; sustainable and responsible use of natural heritage - pages 41/42</p> <p>Specific objective 3 - In subheading Types of beneficiaries supported under the investment priority are missing local or regional tourism boards and museums - page 43</p>
CZECH REPUBLIC	<p>SO3 project ideas - destination marketing management; search a compromise between capacity, economy and environment</p> <p>missing the educational factor also here - environmental education/education in tourism</p> <p>SO5 not only floods but also other extremes are closely connected- droughts. SO title should be slightly adjust to it - e.g. use common management of risks/hazards - technological and natural risks</p> <p>SO5 multipurpose actions can solve more problems at once (synergetic effect - floods, pollution...)</p> <p>SO5 improving the condition/revitalization/restoration of watercourses, connecting dead branches</p> <p>migration of species/migration corridors</p> <p>transnational water management - early warning/flood risks plans</p> <p>project idea - recreational waterways=sustainable tourism</p> <p>*multimodality in recreational transport- complex solution-possibility to generate of related investments</p> <p>SO5 activity 1-4 are important for river basin (Morava river)</p>
GERMANY	<p>Wastewater treatment should also be foreseen under transnational water management (SP 5) and should not only be part of eco-innovation (priority 1).</p> <p>Under SP 3 not only tourism should be mentioned, but also thematic areas like bioenergy villages (Bioenergiedörfer) with emphasis on small district heating system and heat storage.</p> <p>Establishment of more effective governance systems for emergency situations should be mentioned</p>
HUNGARY	<p>After becoming a world heritage site, already established cooperations should be allowed to continue cooperation (eg. to protect and utilise the sites)</p> <p>Geological researches could also be supported (eg. elaboration of a joint method and guidance, clarification of terminology, building joint vision)</p> <p>The management and protection of earth resources including the access of the mineral raw materials in close relation and interaction with nature conservation areas and cultural heritages should be developed. For more effective sustainable mineral raw materials planning these factors should be considered together and based on the state of the recent situation joint guidance and joint vision should be developed in the partner countries in co-operation of stakeholders (authorities, industry, researchers, NGO's). For these aims joint strategies should be supported.</p>

	Protection of biodiversity: support should be provided - among others - for recolonisation of certain fish species (eg. sturgeon) and for improving their living conditions in the Danube, for protecting of certain species from extinction, for analysing migration of species.
	Utilisation of building and wrecking refuse
	Potential research area: examining of flood basin and floodplain, linking it with soil formation
	Cooperation of cities at Danube in order to jointly develop the tourist destinations, and the infrastructure linked to them (such as cruise tourism, bicycle roads, etc.)
	In chapter 2.2.1 it is maybe wise to focus on environment protection and on tourism within the same Priority axis, as in many cases these fields are overlapping. On the other hand financial support should be given only to sustainable / green tourism projects. Thus: (i) Tourism based on renewable energy resources like bicycle riding and rowing (both as leisure activity and also as transport mode of tourism) should be prioritized and supportable. (ii) A special benchmark system should be elaborated for all sustainable and green tourism service within the Danube Region.
	In chapter 2.2.2.4 Sturgeon 2020 strategy is wisely referred, as a possible flagship co-operation in the Danube Region. It would be useful to provide opportunity to financially support for physical investments of special strategic importance. Without building fish passes at the Iron Gate wirs the whole Sturgeon 2020 strategy reminds theoretical.
	In chapter 2.2.2.4 the second and third bullet point is probably a compilation error, as it would go to other specific objectives (eg. No. 5. or No. 8.) ("Promoting an integrated approach to better coordinate environmental interest with flood protection and the further expansion of inland navigation and transport infrastructure by establishing multi-sectorial partnerships (stakeholder networks)"; "Developing planning and pilot measures to harmonize flood protection and rehabilitation of river systems.").
	Climate change should get more focus under this priority besides flood protection and risk management
	"Tackle poor governance and knowledge gaps in the development of integrated national RBM plans" should be more detailed e.g. providing data and evidence base for these plans, harmonisation of national actions and measures.
	Project proposal: examining and monitoring sediment deposition in the Danube (and its tributaries) provides a basis for measures likned to varous sectors including flood protection, navigation, etc.
	Project proposal: a real added value has been identified in further developing the SEERISK project implemented in the period 2007-2013; in addition to the sigle risk analysis there is also a clear need to apply the multi-risk approach in actions supported by the new programme
	Project proposal: development of natural water retention measures and sustainable land use, research in the field of sustainable irrigation systems and agriculture
	Project proposal: integrated river basin management and institutional cooperation on the sub-basins of the Danube, such as the Tisza and Sava, based on the results of successfully implemented projects (such as the TICAD) and established transnational partnerships in the 2007-2013 period; supporting integrated river basin management and territorial development actions
	The Urban waste water treatment directive (91/271 EEC) relegates the wastewater treatment issue of settlements (agglomerations) below 2000 P.E. (small municipalities) to the competence of Member States, without any specification of the implementation deadline. However, according to the Water Framework Directive (2000/60/EC), the Member States should provide to decrease the pollution load on their natural surface waters and groundwater in order to maintain or reach the good ecological/chemical status of them, respectively. While the pollution load must be taken into consideration, the small settlements should be provided with proper waste water solution. Because of special conditions of small settlements the traditional, centralized sewerage and wastewater treatment is not a cost effective solution in most cases. Therefore it is necessary to develop, demonstrate, implement and spread as alternative solution and good practice the decentralized wastewater treatment solutions, which is also suitable to reduce the manmade risks in the small municipalities' environment.
	SP6 has been defined as „Improve the preparedness of public authorities and civil protection organisation to better manage risks such as floods, droughts and water scarcity but also manmade risks (SP6)". However the textual explanation of SP6 on page 48. o. is not related to Disaster Management, but it depicts „special attention to the 2nd DRBM Plan (Danube River Basin Management Plan) and the 1st DFRM Plan (Danube Flood Risk Management Plan). The Danube River Basin Management Plan and its indicator are related to SP5 and not to SP6, therefore the related narrative should be moved from SP6 to SP5.
	The Priority Axis 2 is well defined and well-structured making a clear distinction between transnational flood protection and disaster risk management and assessment. However SO 6d section (Improve the preparedness to manage risks, page 46. and onwards) is currently quite vague. According to past SEE project experiences (e.g. SEERISK) the cooperation could be deeper than simply facilitating "knowledge-based prevention policies and linking relevant actors across borders." The programme should include the whole disaster management (response-recovery-mitigation-preparedness) cycle in which the prevention policies have a high priority. Mutual capacity-building and knowledge transfer should be the guiding principle of this specific objective. Linking cross border actors is an appropriate aim but the programme should be more ambitious by going further creating just the linkage and setting up operational and meaningful cooperation between DM actors.
	It is correct that the document refers to the link between climate change and disaster risk assessment and management but the reasoning and the cause-effect should be better elaborated. What is the reason that the prevention, preparedness and disaster risk assessment means and methods need to be developed under regional cooperation. What are the external constraints to do so? Why climate change has a major effect on natural disasters? Why DM authorities in countries need to cooperate in tackling consequences of climate change? Why the spill-over effect is a major risk in the region? etc.

	The disaster risk assessment should both cover single-risk and multi-risks as it is important to analyse the negative synergies of the natural disasters. This should be stated in the title of the SO. Looking at and simulating cascading effects will help DM authorities to better understand the nature and the aggregate impacts of disasters.
	On page 47. the range of natural hazard types should be expanded to all relevant types occur in the region.
	The same paragraph is currently controversial as flood protection among the natural hazard types is a priority of SO5 and not of SO6. The linkage should be clarified.
	Specific objective No 5: Transnational water management and flood risk prevention: in accordance with the EU Water Framework Directive and RBMPs the SO cannot be limited only to surface water and flood risk management, but must include sustainable groundwater management. Besides quality measures, quantitative status should be also mentioned. (pp. 45-46; 48-49)
	Specific objective No 6: Improve the preparedness to manage risks: geological risks (e.g. landslides) are relevant issue for the whole region, and therefore it should be also mentioned in the text. (pp. 47)
ROMANIA	Please ask for contribution to the relevant EUSDR PACs
	Within SP 1 please refer also to wellness tourism and development of a common DANUBE brand
	Within SP 2 please refer to the Danube Delta, as the largest humid zone in Europe and make clear reference.
	SP 5 should be called "Transnational water management and risk prevention" as the risks and consequences produced by the water do not only refer to floods.
	SP6 - the 1st proposed action should be rephrased as: "Establishment and implementation support of more effective transnational governance systems for emergency situations"
	The results should be reformulated in order to be correlated to the indicators
SLOVAKIA	Please include among the eligible beneficiaries and the target groups the following: - the authorities dealing with emergency and risk situations - education and research centers
	We propose to include an activity focused on building and promoting the geo-parks.
	We should focus on integrated river basin management plans which would allow to combat flood risks and to tackle the landscapes in a holistic way.
	The Danube region is rich in cultural diversity and so our actions have to be focused on the promotion and conservation of this diversity, especially in the transnational and international context.
	The former Iron Curtain is an especially biodiversity-rich region in Europe. Therefore we have to strive to take all efforts to conserve and maintain this diversity as these areas are endangered by unsustainable development patterns.
SLOVENIA	PA2: Priority axes are relevant; specifically relevant is S.O. »Natural and cultural heritage valorisation«. Namely, the whole Danube region is especially rich in natural and cultural heritage, which has already been recognized as a development asset, and there is a great number of best practice examples in the field of tourism.
	SO3: It is important to formulate and preserve an adequate balance between the protection of natural and cultural heritage and its use in economic terms.
	SO3: In the period 2014-2020 foundations should be laid for sustainable tourist products focussed on nature, rural areas (the countryside), sports activities, and river-based tourism.
	SO3: A common branding may be a good idea, however, in certain countries (also in Slovenia) it might be difficult to achieve a proper level of the awareness, its approval and adoption.
	SO3: There is a general agreement that all stakeholders should join under the Danube 2014-2020 transnational programme in order to cooperate in the preparation of development plans, taking the valorisation of natural and cultural heritage into consideration.
	SO3: The content of the S.O. »Natural and cultural heritage valorisation« could be validated, with comments above to be integrated first.
	SO4: The working title of the PA2 suggests that the PA is fostering the development of the entire region into environmentally and culturally responsible region. However, in the further text the objectives are somehow narrowed to the issues being geographically associated to the areas of natural and cultural heritage (e.g. NATURA 2000, cultural sites...). By our belief, a sustainable use of very rich and diverse natural and cultural capital of this region cannot be only associated to the above referred areas, but it goes to the entire area of the region and should as such be in the function of increasing the quality of life for residents of the region as an opportunity to foster the development of tourism.
	SO4: To manage, conserve, protect, utilise and further develop environmental and cultural capital of the region the multiple use of same (shared) spaces should be promoted by the program, supporting initiatives based on integrated approach and wise spatial planning. Use of water resources, protection of nature and the environment, protection of cultural heritage, agriculture production, urban development all exist in the same space. Better coordination among the relevant actors is needed and multi-purpose use of sectoral infrastructure and natural resources (e.g. flood protection infrastructure, artificial or natural water bodies...) is needed. Same water infrastructure can be deployed to serve several different purposes – flood protection, irrigation, and mitigation of droughts, tourism and recreation, preventing soil sealing in the urban areas...

	<p>SO4: In the field of agriculture increase of irrigation is necessary in order to improve local food supply, to cope with the effects of climate change and support the local economy. The conflicts with other water users and nature protection seems inevitable. Innovative measures, different management practices such as improved coordination and dialogue among different water (or other resources) should be promoted and supported by the programme.</p>
	<p>SO4: In order to loosen up the pressure of urbanisation to agricultural, forest and other semi natural areas and to keep or to improve the quality of natural and living environment, protecting soil and green corridors between different settlements in the Danube area, common measures to detect, map and rehabilitate degraded spaces (urban and industrial areas such as abandoned quarries or waste dumps in the rural areas) should also be promoted by the programme. Such areas could be reused for different economic activities (tourism, production...) or diverted to natural habitats (e.g. abandoned sand or clay pits)</p>

COMMENTS RELATED TO PRIORITY AXIS 3	
AUSTRIA	<p>In general, this priority axis includes two very broad topics, transport and energy. The topics on which the EUSDR PACs are working on are well addressed.</p> <p>The field of energy, however, is defined very specifically - no other ETC programme has such a specific focus. Even though all 4 specific objectives are considered important, serious doubt was expressed that all of them can be best covered by this programme - and would not be maybe covered better by other instruments.</p> <p>It was discussed if the topic energy efficiency could be placed under other priority axes. (e.g. P1)</p>
	<p>It was discussed if the topic energy efficiency could be placed under other priority axes (maybe P 1).</p>
	<p>The definition of SO 8 is ecological-friendly and integrated. However, this approach should be extended to the whole priority axis 3. SO 7 & SO 8 should not cancel each other out within their approach (SO 7 with focus on streets - SO 8 with focus on environmentally friendly transport systems)</p>
	<p>SO 9 & SO 10 address a very sectoral energy policy. Furthermore, these topics are of high political importance / attention (energy security, energy supply). The question was raised if the transnational programme is the adequate level and/or appropriate forum for working on these topics. Furthermore, it was questioned if national solutions have to be searched / found first.</p>
	<p>ad SO 7: IP7b is very narrowly defined - improvement of regional transport connections, only streets. SO 7 consists not only of pure infrastructure measures, but also of managerial aspects with regards to regional mobility. If the DANUBE programme would not like to focus on streets as stand-alone solutions, this SO could be given up and integrated under IP7c / SO 8.</p>
	<p>ad SO 8: The targets/activities of IP7b could be easily integrated under IP 7c. SO 8 is broader than SO 7 since this objective could not only address streets but also transport networks with higher priorities as a whole. Exchange of experience should be enabled between regions of the Upper and the Lower Danube. The last action field should not only consider metropolitan areas, but also (urban) hinterland and recreation areas close to metropolises. In general, the focus should not be put on urban areas only, but the topic of accessibility regarding rural areas should also be highlighted.</p>
	<p>ad SO 9: Could be integrated under priority axis 1 (smart grids as an innovation topic)</p>
	<p>ad SO 10: Action field 1: The current focus on gas only is too limited and could be addressed under priority axis 4 (governance). Again, question if the TN programme is the adequate instrument has been raised. Action field 2: The current focus of biomass only is too narrow and should be expanded to incorporate renewable energy sources as a whole. However, this topic (RES) could also be covered by priority axis 1. Action field 3: could be covered under eco-innovation / energy efficiency under priority axis 1. Action field 4: The improvement of efficiency of existing hydropower stations was identified as an important topic of action field 4 (NOT building of new hydropower stations). However, these topics could also be considered under priority axis 2 (environment).</p>
	<p>In summary: IP 7b / SO7 could be given up and regional mobility could be stressed under IP 7c / SO 8. Streets should not be addressed as stand-alone solutions. IP 7c / SO 8 is considered as highly relevant. The aspect of accessibility in rural regions could be additionally emphasized. IP 7d / SO 9 & SO 10 could also be deleted. The listed activities and topics can be integrated under other priority axes (energy efficiency & smart grids under innovation; hydropower under environment; gas under governance).</p>
	<p>Programme could include developing of healthy environment for work and studies, promoting road safety and active living, developing healthy transport, education and nutrition, promoting safe physical and social environment that is capable to provide protection from injuries and violence,</p>
BOSNIA AND HERZEGOVINA	<p>Section 2.3.3.: Wherever applicable (in whole document), the term "national", should be replaced with applicable terms "Local, entity or national" (eg: in the case of :2.3.3.4 Main target groups supported under the investment priority-dot 4.: • National Regulatory Authorities a...) 2.3.3.5 Types of beneficiaries supported.... dot 1: • Local, regional and national public authorities and organisations,,,, must include term entity). Or, the beginning of the document should contain the explanation that the term "regional" imply "entity", wherever is applicable.</p>
BULGARIA	<p>Developing a Danube Region Smart Grid Concept, Danube region gas supply model, Danube region energy efficiency concepts, development of the hydropower generation potential of the Danube river are very important topics for joint projects</p>

	Other types of regenerable sources apart from biomass could be mentioned as well.
CROATIA	Specific objective 10 - it should be inserted in text Drava river among other rivers they are mentioned as Danube tributaries - page 59
	Specific objective 10 - text should refer to the whole Danube basin, not only on Danube river pages 59
	Main target groups - add entrepreneurs who are producing the specific equipment for energetics e.g. Smart counters - page 60
CZECH REPUBLIC	SO8 alternative urban transportation - exchange of experiences, new solutions, adaptation of legislative framework
	*multimodality in recreational transport- complex solution, sustainable tourism -possibility to generate of related investments
	SO9+SO10 could be merged; keep it on implemetation level (not political)
	SO9+SO10 connection of alternative energy sources - analyzing capacity, how to deal with impacts of energy, blackouts
	study on the sustainability of the region supply, capacity of gas storages
	searching for solutions of uncontrollable flows of energy
	interconnection of energy networks
GERMANY	-
HUNGARY	There is a need to indentify the transnational aspects of intrastructure and transport policy. Exchange of experience and knowledge may foster awareness of policy makers and other stakeholders.
	Not only smart-grid energy systems but also smart solutions for transport should be included in the concept of smart cities.
	The wording must give more flexibility for the use of renewable energy to ensure the eligibility of the use of any type of renewable resources and hybrid systems.
	Developing interoperable and transparent transnational information systems
	Human resource developmnet and the exchange of related knowledge and experience is also needed besides technolgy development.
	In order to promote the use of renewable energy sources, it is important to support the harmonisation of RES data collection.
	In order to ensure the support of policy makers, Steering Groups of EUDRS PAs should be involved in decision making. It can also ensure the visibility of projects and actions for governments, thus the information gap and unnecessary duplications can be avoided.
	Specific objective No 10: Improve regional energy planning and -coordination: Biomass Action Plan was released under PA2 of EUDRS in 2014, only its further development must be supported. At the same time there is a strong support among DRS countries to elaborate a Geothermal Action Plan, which is another importand renewable energy resource in the region. (p. 59-60)
	It is necessary to emphasise vulnerable road users (i.e. passegners, bicycles) within PA3.
ROMANIA	Please ask for contribution to the relevand EUSDR PACs
	"Regional transport systems" should be repahres as "Transport systems within the macroregion" as the first one is restrictive
	SP 7 should be formulated more clear (in light of the above observation): "Planning, coordination and management of transport systems wihtin the macroregion"
	please repahrese "permeability of borders " as wihtin the present context might be miss interpreted. (eg: improved border crossing"
	SP 9 should reffer to the Increse of the energy efficiency and proportion of the renewable sources used wihtin the region. It should be reformulated to "improving energy efficiency and security of supply" as the following text is actually a proposed action
	There is a contradiction in terminology between hinterland and multimodal nodes – page 51. This should be solved. The terminology of regional transport shall be clarified, since for the moment is a bit confused
	The notion of growth poles shall be eliminated since it is narrowing the area of potential beneficiaries.
	Is there any rationale for including only biomasa and not dealing with other types of regenerable sources?
	The notion of energy efficiency concepts should be clarified
	The activity „develop a danube region biomasa action plan” should be reformulated since it looks like it will be a dedicated project
SLOVAKIA	It is important to build a comprehensive, mutually inter-connected transpost system. That means that the lower-level transport routes should be connected to the TEN-T system.
	We propose to promote sustainable modes of urban transport whis is necessary in order to enhance the quality of living standard in towns and cities. These include especially railway systems (trams and metro) and non-motorised modes of transportation (cycling routes and pedestrian zones).
	Facing global energy problems it is necessary to take effective steps to diversify energy sources in the Danube region.
SLOVENIA	TRANSPORT: DCP version 1.1. is well structured and in general describes transport in the Danube macro region briefly and adequately.
	TRANSPORT: Chapter 1.1.1.4. table 1 Thematic Objective 7 – transport should under main challenges clearly mention (also) connection of core transport infrastructure of non-EU countries of the region to TEN-T network.

	TRANSPORT: in order to improve and ensure better connectivity and accessibility of and in the Danube region, special attention should be paid to all modes of transport (land, waterborne and air transport).
	SO7: Proposed that »Coordination and preparation of strategic investments in regional transport infrastructure« is changed to: »Preparation of strategic documents and coordination of strategic investments in regional transports infrastructure«
	SO7: Proposed that »Removal of non-infrastructure bottlenecks in regional mobility is changed to: »Removal of infrastructural and non-infrastructure bottlenecks in regional transport systems« or »Removal of infrastructural and non-infrastructure bottlenecks in regional mobility and freight transport«
	SO7: Proposed to be changed to: »Capacity-building and training for management of regional freight transport and (passenger) mobility and connectivity.«
	SO8: Proposed to be changed to: »Promote sustainable freight transport and mobility in the Danube region«.
	SO8: Proposed projects of the utmost importance for the Danube region in the programming period 2014-2020 are, among others: 1.) A Common Transport Vision for the Danube Region - Transdanuvios, 2.) The Danube Region Intermodal Strategy - DRIS 3.) The Danube Region Air Transport Development- DAirNet 4.) The Western Balkans Corridor linking the EU and non-EU member states of the Danube region - WBC 5.) Innovative intermodal technological solutions for small countries 6.) Planning and development of urban, interurban and cross-border bicycle routes in the Danube region (working title)
	IP7e: We agree with the selection of Specific Objectives No. 9 and 10 under Priority 3 (energy-related)
	IP7e: Energy should be included under Priority 1, S.O. 2: »Increase skills and knowledge for innovation.«
	IP7e: Project idea in line with transnational criteria: a multi-purpose, cross-sectorally coordinated transnational project on the Sava river, integrating the relevant issues of transport, flood prevention, tourism, agriculture (irrigation), and inland waterways.
	SO9 deserves all support as it represents a great economic / business opportunity.
	SO10: All four actions listed under S.O. 10 are relevant for the Danube region and Slovenia. Especially relevant is the action »Sustainable development of the hydropower generation potential of the Danube river,« of course taking its tributaries into full consideration as well (reword please, e.g. the Danube river basin or similar).
	SO10: Two important actions are missing and are to be added: - Comprehensive spatial planning in order to position adequately generation and transmission capacities; - Action plan development for geothermal and wind energy.

COMMENTS RELATED TO PRIORITY AXIS 4	
AUSTRIA	The current intervention logic was assessed as highly relevant - the specific objective 11 and its corresponding action fields are considered important. It was positively highlighted that the targets and activities of EUSDR priority areas 9 and 10 are well reflected.
	ad SO 11: Action field 1 should include "education systems and policies" instead of "education & training programmes", since it is unclear on which education programme are actually being focused. If a further concentration of actions is needed, the action fields 2, 3 & 4 could be merged. Activities under these fields usually result in education & training measures following a thematic analysis. Action field 5 should include "cities" in addition to "metropolitan regions". Since cooperation with metropolitan regions in third countries and the approach of urban networks are only considered under the DANUBE TN programme, this action field is of high importance. Action 6 (security issues) was not stressed as adequate to be tackled under the TN programme.
	ad SO 12: was not discussed
BOSNIA AND HERZEGOVINA	The governance at the different levels of the public authorities in BiH remain ongoing issue that requires significant effort especially in the context of the voluntary ISO24000 standard on the organizational social responsibility concept.
	There is a need to develop the EU funds absorption capacities in the different institutions including the absorption capacities for Danube transnational program and other transnational programs for which central parts of BiH are eligible (parts of BiH that are not eligible for CBC programs).
	Building capacities for evaluation of effects of all sectoral policies, strategies, programs and projects on health of the population and making improvement of health one of the priorities in all sectoral policies, strategies, programs and projects.
	Regarding governance of Danube region related to agriculture production, Ministry of Agriculture, Forestry and Water Management of Republic of Srpska is suggesting creation of Agricultural Advisory Service Network made by members of Advisory Services of Danube region countries.

BULGARIA	Institutional cooperation in the field of labour market policies and education & training programmes, Institutional cooperation in the field of demographic change and migration challenges, Institutional cooperation in the field of integration of metropolitan regions in the Danube area, Institutional cooperation in the field of cooperation in security issues/crime prevention are very important topics for transnational projects in the frame of DANUBE Program.
	“Civil” monitoring on the Strategy implementation and exchange of good practices and project examples between the countries need to be established. They will help improve the capacity of institutions and foster international and multi-sector partnership. Efficient citizen monitoring mechanisms will contribute to improve the trust of citizens and stakeholders in political authorities and strengthen the region, which totally complies with Priority Area 10 of the Strategy. The possibility of implementing independent monitoring on the EUSDR will definitely contribute to the democratization of the whole process and satisfaction with the policy results. Active involvement of citizen organizations’ platforms and media in the monitoring and implementation of the EUSDR will also foster their motivation and the quality of projects implementation.
CROATIA	It should be further explored whether the role of the future Focal Point could be taken over by INTERACT. INTERACT’s inputs on macroregional strategies were extremely useful for EUSDR stakeholders, especially in the context of different events organised throughout Europe. Current INTERACT staff is very knowledgeable and familiar with all relevant issues and developments within macroregional strategies. - page 65
CZECH REPUBLIC	Very important to involve the lowest level of state administration (municipalities) - integrate local development into TNC
	projects focused on prevention - indication of a problem before they grow - pilot investments!
	missing the institutional capacity should be more visible from the priority (original it is TO11- institutional capacity building) - training government employees, sharing information, transfer of knowledge
	project ideas: demographic projections (employment, brain drain)
	SO11 participants missed some unifying framework - title is quite general
GERMANY	Overall goal of PA 4 should be the creation of leverage effects towards the development of a good and cooperative governance (e.g. leading to a more polycentric approach and based - if possible - on already existing concrete INTERREG-results)
	2.4.1 on page 61 should be shortened as follows: Investment priority 11) enhancing institutional capacity of public authorities and stakeholders and efficient public administration through actions to strengthen the institutional capacity and the efficiency of public administrations and public services
	Complementary character of PA 4 should be underlined and concretised by a description of the methodology. For example top-down elements should be included in regular calls and additional strategic calls; also criteria for the partner selection should be scheduled (e.g. mandatory involvement of ministries)
	Relevance of cross-sectoral approaches should be underlined (PA 4 is the only priority where issues like regional planning/development can be picked up in a direct way)
	First paragraph on page 62 should be changed as follows: Transnational action may encourage national, regional and local administrations and other stakeholders to work together and improve governance in areas which will contribute significantly to programme objectives. Establishing institutional cooperation and transnational governance structures should lead to improving legal and policy frameworks, developing strategies and action plans, development of joint capacities and coordinated delivery of services in the following (interlinked) thematic areas (examples): · Labour market policies and education & training programmes, · Demographic change and migration challenges, · Inclusion of marginalized groups including Roma, · ("Civil society development programmes" should be rephrased into:) Participatory planning process and involvement of civil society · Integration of metropolitan regions in the Danube area, · Urban-rural cooperation and partnership, · Cooperation on safety and security issues · (to be further claimed)
	A more safe Danube region should be addressed with improved governance on issues, such as elimination of unconventional explosive and incendiary devices as well as hazardous ammunition and handling of dangerous goods and possible accidents involving hazardous substances under 11 a (it might also be possible to include such actions under PA 2
HUNGARY	Cooperation between different institutions are more difficult if the thematic fields of PA4 are specified in such detailed form. More general framing is need.
	Those participants who had experiences in the field of TAF financing, preferred and welcomed BSR Seed money model in PA4.
	Selection of those institutional cooperation fields which are not covered or which are treated peripherally in the frame of EUSDR. Selected fields could be involved under PA4.
	Promoting entrepreneurship, actions to tackle imbalances in demand and supply of labor, increase of labor mobility should also be included
	Joint action to the re-integration of disadvantaged groups into labour market should also be supported

ROMANIA	There is a need for a clear delimitation of the demographic, migration and brain drain between PA1 and PA4
	Please ask for contribution to the relevant EUSDR PACs
	Please verify that some of the proposed actions do not overlap with proposed actions for priority axes 1
SLOVAKIA	Within this PA we should concentrate on the support of administrative capacities dealing with the DTP and EUSDR.
	The Danube Strategy Point has to be fully utilised to ensure smooth information and communication flows among the key stakeholders and to organise various events within the EUSDR and DTP.
	The DTP financial tools should be used to support the preparation of projects.
	Actions should be focused also on the solution of problems with Roma communities as this is a very serious problem in a number of Danube countries. Projects should be aimed at integration of Roma communities into the major society and at promotion of their traditional skills.
SLOVENIA	SO11a: It is essential to develop the quadruple helix in the governance of societal problems.
	SO11a: The example 6 – to be added: »... and justice affairs«. It should support the exchange and transfer of knowledge and best practice and institutional cooperation in security issues. Crime prevention and justice affairs.
	SO11a: The term metropolitan regions seems to be inadequate for the Danube region. Therefore we propose the wording »functional urban areas«.
	SO11a: In the Danube region, polycentric development is of special importance for the development of the region.
	SO11a: The title of the example Institutional cooperation in the field of civil society and development programmes is misleading, as it probably does not mean the inclusion of civil society in the development programmes (what kind of programmes?).
	SO11a: The example Institutional cooperation in the field of inclusion of marginalised groups, including Roma, could be changed, without excluding Roma, into the wording marginalised and vulnerable groups.
	SO11a: The example Institutional cooperation in the field of inclusion of marginalised groups, including Roma, could be changed, without excluding Roma, into the wording marginalised and vulnerable groups.
	SO12: In general, this objective is very relevant for the macro-regions and should be properly reflected in the budget allocation.
	SO12: Regarding the Danube Programme focal point, the text should be added: The focal point shall be supported by a network of national focal points consisting of half to one FTE per Member State, in order to liaise with other programmes and instruments (ETC, mainstream, EU...).
	SO12: National authorities, but in line with the Open method of coordination also other nationally relevant stakeholders, could be nominated by the Member State to act as a national focal point in the network.

ANNEX 2 – COMMENTS RECEIVED THOUGH THE ONLINE SURVEY

Priority Axis 1 Innovative and socially responsible Danube Region

TO	IP	SO	Comments:	Type
1	1b	1	Encourage projects which establish new mechanisms for cooperation and policy learning between modest inovator and the innovation follower regions., promote eco-innovation.	proposal
1	1b	2	also focus on non-technological innovations, such as service-innovations in tourism	proposal
1	1b	1	1. Foresight exercise related to research and innovation, creating science and innovation policy using bottom-up and smart specialisation approach2. Transformation and restructuring of high education, research and innovation systems into functional national innovation system	support
1	1b	2	non-technological innovation in certain business areas (service economy) as well as in the social policy sphere., innovation and social entrepreneurship., regional research funding is important too., evaluation and impact assessment in the field of science, research and innovation	proposal
1	1b	1	third party financing is a key tool to use private capital for the refurbishment process of the building stock, funding for the development of regional capacities and structuies district heating systems with very low temperatures are a important	support
1	1b	2	Development of competencies and modern methods of learning. Preparation of common platforms and centers of education	support
1	1b	1	Structure the existing organizational forms of knowledge transfer in the region attributed to the activity (in the process) of knowledge transfer carried out, and the target group (to whom these services are offered), in order to match organizational capacity with activities.	support
1	1b	1	Open innovation and living labs should be priority over old closed innovation systems.	proposal
1	1b	1	Important topics:tech transfer in wood sector, international networking among tech institutions in wood sector, innovative design of wood products	support
1	1b	1	Improving the legislation in Eastern countries, creating legal conditions for the students to spend at least 6 months in practical stages in environmental industry.	support
1	1b	1	By our opinion for raising the competitiveness of Companies is most needed to strengthen the research/development capacities of the companies, Tech Transfer and innovation, design management (as added value generator) and strengthen capacities/network of the so called supporting organizations by sectors. We also think that development of the Bio Based Economy should be on focus of Donabue Region due its natural predispositions.	proposal
1	1b	2	improving the innovation culture and innovation management skills., development of innovation ecosystems in specific areas and sectors-textile, agrofood,tourism,etc. (incl.transnational)., innovation networks and expert pools for boosting innovative entrepreneurship especially among the young researchers and entrepreneurs	support
1	1b	2	Inovation consist of technical and social inovation, give the social inovation more space in future., the technical inovation benefited already from EU and nationale programs grants enough, please define borders to e.g. Horizon 2020 program	proposal
1	1b	2	different studies show the dominance of the traditional work organisation in the region. That is why workplace social innovation should be encouraged.	proposal

1	1b	1	third party financing is a key tool to use private capital for the refurbishment process of the building stock, funding for the development of regional capacities	support
1	1b	1	General/specific comments: in my opinion the following factors hinder the innovation in the SMEs: lack of financial power, no motivation for innovation (they are happy if they can survive the everyday competition), lack of foreign language knowledge, thus they miss a lot of information and possibilities., the question of intellectual property (some of them might think that "if I have a good idea and I share it, someone would steal it"). So in the elaboration of the DANUBE programme these issues should be also considered.	proposal
1	1b	1	Focus on innovative research infrastructures, long term research (LTSER) as basis for securing economic and social basis - model regions focus on water related research, link to JPI water, EIP water	proposal
1	1b	2	Emphasis should be put in "institutional learning" and building capacities of public administration as well as social innovation. Innovation are often considered too closely in technical terms while the problem of the DANUBE regions is much less the lack of technical skills but much more in lack of "soft skills" of public administration.	proposal
1	1b	1	My opinion is that the innovation actions of the Danube Transnational Programme 2014-2020 should be more focused. One of the main problems in the area of innovation in most of the Danube Region is that the business exploitation of the research results is low. Innovative start-up and spin-off companies can help to tackle this problem. Therefore, I suggest supporting the cooperation of the start-up ecosystems among these countries.	proposal
1	1b	1	As head of PA8 Working Group Clusters of Excellence, I would like to state that the focus only on "cluster policies" is too narrow in the actions of priority axis 1. Many of the Danube Region cluster are eager to participate in specific thematic cluster cooperation projects that lead to joint innovation (topics: green technology and energy, diversity management, automotive etc.), and such projects are currently not covered at all by the Danube Programme. I therefore suggest the action "Stimulating improved cluster policies and transnational cluster cooperation for innovation"	proposal
1	1b	1	It is necessary to improve the existing scientific and educational institutions, as well as establish new ones. It is also necessary to achieve close cooperation between scientific and educational institutions with existing private sector (producers), as well as cooperation with local authorities. In this way it will be possible to develop existing businesses and attract new foreign direct investment.	support
1	1b	1	The field of activity such as "Development of innovation strategies and smart specialisation approaches" could be judged as "Very important" on the condition that the development of innovation strategies will be based on the results of the qualified long-time forecast of development of different economic sectors.	support
1	1b	2	integration of eco-friendly transport in education and training	proposal
1	1b	1	"innovative procurement" needs clear definition / sustainability (in the triple sense) indicators., better skills for green technologies particularly important	proposal
1	1b	2	It is important to identify solutions so that the procurement system not to be bottleneck in developing a project (as today in some countries is, eg Romania). Also it is necessary to develop education systems for the Eastern European countries that will provide easy access to people who want to become professionals in the naval and port strategies.	support
1	1b	1	Within the framework of this field, we need faster linking of different institutions, transfer of good practice and knowledge of well developed regions towards the less developed ones. In this way both specific objectives can be reached.	support
1	1b	1	As regards proposed action "Development of cross-linkages between...", it should be noted that not only higher education, but education sector as such is an essential element of the knowledge and innovation triangle.	proposal
1	1b	1	Very important to consider different potential models for technology transfer capacity building in the region including participation of Ukraine	support

1	1b	2	1. "Support for innovative public procurement" is closely related to the Priority Axis 4 and is so marked as medium relevant. On the other hand, proposed fields of action should be strongly linked to other priority areas of the Danube Programme and should help overcome identified development issues whether they are closely linked to innovation or not. Degrees obtained must be backed-up with knowledge and skills and should not be the objective for themselves, which is often the case at present.	proposal
1	1b	2	Better training in entrepreneurial thought and activities within the state education system, secondary and tertiary levels.	support
1	1b	1	Research, Technology Development and Innovation is a key dimension for prosperity and growth in the region. The coordination and capacity building in the field of RTDI is a main point for the future programme. It is indispensable to address the public sector as ministries in charge of RTDI and agencies delivering. It is advisable to integrate in future activities that address national and regional stakeholders involved in RTDI policy making.	support
1	1b	1	The field of innovation is the main lagging behind area of the Danube Region. There is no such problems with research for example which has a quite good quality level in the target area. The problem is the utilization of the research and knowledge. So why support to produce more research if it won't be used well for the development of the Danube Region economy? We need to support the innovation management process therefore this priority needs more focus on creativity and innovation management instead of research and cluster policies.	support
1	1b	1	strengthening support cluster development, as the optimal form of implementation industry innovation - cross-border partnerships / networking of research, academic institutions and business entities - Support of integration into in	support
1	1b	2	1) Cross-disciplinary networks and joint transnational actions among the training and the sustainable transport sector stakeholders (incl. administrations) for enhancing future needed job qualifications and competences for the logistics and water-borne sectors.2) Information and training actions for the transport-logistics and industry sectors about the potentials and benefits of sustainable modes of transport, such as multimodal-based Danube waterway transport.	support
1	1b	1	Exchange of experiences and knowledge for innovation	support
1	1b	2	we need to make a reform in the education system, we need integration in the education and design or develop Roma cultural education system. We recommend to use our material in the education which have been used for 20 years. It is called: Kalyi Jag - centre of treasure - which consist of an education, culture and tourism development programme and it has got a pilot project is the Duna Romani Luma which can be made or develop with the European Danube Academy, the Hungarian, Baden-Wurttemberg, Bayern, Austria, Slovakia, Romania, Serbia, Bulgaria, Moldavia Governments and other partners. This is the part of the Danube Strategy as well. In Europe there are 6 million poor Roma people and with these programmes we would like to help them in the integration and development.	proposal
1	1b	2	There should be an awareness, that due to the continuing transformation process and low state capacities in many of the post-socialist Danube countries many basic social services are not provided within the social, health and educational field. Step by step also the social standards should be developed parallel to the economic developments. The conditions, especially in rural areas are precarious, e. g. especially elderly people due to price developments and low pensions cannot heat their apartments during the winter time etc.. Furthermore due to work migration, demographic changes and ineffective and corrupt behavior many basic services are just inexistent. So for example a dual professional education in social professions, e.g. for elderly care and people with special needs and the consequent development of private care services with an entrepreneurial approach would be very much needed. In connection to the comment at point 4 there could be developed innovative learning systems in the area of social professions.	proposal
1	1b	1	Unclear what "innovative procurement" means, however it should be based on Green Public Procurement principles., Need better skills for green technologies., Innovation should have a strong focus on eco-innovation.	proposal

1	1b	1	The main difficulty in transforming the scientific results into commercial success is due the poor cross-linkages among scientific centres, public authorities and SMEs. Therefore we strongly suggest to canalise financial means mainly to disposal of SMEs so that they can directly influence the purpose of allocated funds and financing their own innovation projects in order to achieve effective results.	proposal
1	1b	1	It is important to recognize innovative ideas with practical value and connect inventors with entrepreneurs experienced in business development, so that those ideas can become commercially successful. For successful implementation of innovative ideas in practice, the development of adequate and supportive legislation is crucial. Existing legislation developed in other countries could be used as template (e.g. Act on registration of innovative start-ups).	support
1	1b	1	Comment on the types of beneficiaries supported under this investment priority: Under German constitutional law, the churches have a special status as bodies governed by public law (Körperschaft des öffentlichen Rechts), which makes them public entities (as opposed to NGOs). Given the very active role that the churches have played, and intend to continue playing, in the development of the macroregion and in the implementation of the Danube Strategy, we assume that churches would be eligible for funding within the Danube Programme. We suppose that the term “public authority” is to be understood in a broad sense, so that churches that constitute public entities would be covered as well. A clarification, however, for instance by using a term like “public institutions” or “public entities”, would be welcome.	proposal
1	1b	2	Specific objective 2- improvement of skills and competences of employess in public sector is also important.	support
1	1b	2	It is important to encourage SMEs and start ups to become more innovative. Exchange of experiences and know-how to strengthen the innovation potential (chambers, incubators, service centers for founders etc.). Educate and train employees (eg. dual vocational training) in innovative sectors. Build crossboarder partnerships to exchange best practice among innovative firms.	support

Priority Axis 2 Environment and culturally responsible Danube Region

TO	IP	SO	Comments:	Type
6	6d	6	In my opinion, SO6 (Improve the preparedness to manage risk) is somehow limited. I would formulate it differently, e.g. Improve disaster risk reduction strategies in the region. Moreover, in the SOs I do not see anything about climate change/adaptation/socio-economic change although it is addressed in the "Draft Danube Transnational Programme 2014-2020". "Change" has to be addressed by one of the SOs separately. The SO has to be formulated in such a way to address the following:-Socio-economic and land use change-Climate change-Climate change adaptation and disaster risk reduction strategiesMoreover, I would like to point out that "risks" as they are mentioned in the draft programme are mainly water related (flood or drought) whereas many other relevant risk for the area are not mentioned, such as heat waves, extreme wind, extreme snowfall, landslides, wildfires, etc. probably there should be a SO addressing climate change related hazards and another one for man made hazards.Some project ideas could include: coordination of risk mapping efforts for climate change related hazards in transnational regions, coordination of documentation of natural hazard events and consequences, coordination efforts in making future scenarios for risk management, public educational and awareness, educational programmes for emergency and disaster management officials, common database of event and damage data, the establishment of discussion platforms in the topic of climate adaptation and disaster risk reduction in the area (in the form of a recurring annual workshop/conference/discussion platform)	proposal
6	6c	3	DANUBE should also support training programmes which promote cultural diversity or strengthen cultural heritage.	proposal
6	6c	3	This topic is not applicable, as it is described today, to the regions not bordering directly the Danube river. Encourage projects which are reducing the carbon footprint of the human activity., increase efficient use of energy., encourage sustainable use of the cultural and historical patrimony in the Danube Region	support
6	6c	3	As the importance of tourism for the Danube-Region is pointed out in the analyses, there should be an even stronger focus on tourism in the variety of actions.	proposal
6	6d	6	1) The programme should not only focus on floods as a natural hazards, many more hazards are most important. These include landslides, debris flows, wild fires, heat waves, etc. Therefore, this programme should widen its vision to natural hazards, not only on floods.2) It is highly recommended, to support the initiatives on Disaster Risk Reduction. The current development in the world, and also in the Danube region, shows, that we have to initiate joined effort to cope with the issues of natural hazards and risk.3) The society is influencing the environment immensely. The processes like floods or landslides operate still on physical laws, but the society changes the frameworks more and more through interventions (e.g. land modifications, channeling of rivers, deforestations). The human impact on our environment needs to be addressed in much greater detail.3) Within the domain of risk management, the capacity building of the potentially affected stakeholders needs to be increased.4) Within any engineering and natural science calculation, numerous errors and uncertainties are associated. These should not be hidden, but instead need to be addressed openly - since major management decisions have to be taken and therefore, it has to be known how certain, or uncertain a given result and information is.[5] Spatiotemporal analysis of natural hazards AND risks (this including also the potential CONSEQUENCES of the processes) need to be supported. These information are most important for any future sustainable development of a given region, e.g. within spatial and land-use planning.	proposal
6	6d	4	Projects related to enhancing forest protective functions and assessment of ecosystem services., Effect of climate change on forest ecosystems. Development of ecotourism in forest territories	support
6	6d	4	Forest ecosystems services and their benefits to the society Networking ecotourism in forest areasThe role of forest ecosystems in erosion control in climate change conditions	support
6	6c	3	The Danube Programme should especially support transnational efforts for cultural protection and joint actions for UNESCO World heritage sites like the Danube Limes	support

6	6d	6	General adaptation of the society has remained behind the quick evolution of the climate changes, and also of the disasters generated by them. The discrepancy will increase in geometric progression, the life lost and the material sets backs will be bigger and bigger. Unless a huge effort will be made in order to change the thinking paradigm regarding the entrepreneurial thinking, this battle might lead us to a very big crisis. The new paradigm would change from : " who makes profit must obey to the law and protect the environment" in "protecting environment it is profitable". But the mechanisms have to change the general way of thinking.	support
6	6c	3	Natural and cultural heritage , a common and durable resource	support
6	6d	5	Flash flood high risk areas with associated gully erosion and landslides,assessment, mapping and measures prevention identification, changing good practices and providing a guidelines for good practices and prevention action plan, must be a priority under the large floods great losses of the last years.	support
6	6c	3	Activities are to be promoted by the Programme to motivate sustainability engagement among tourism establishments. Quality heritage interpretation is the most important approach in this direction.	support
6	6d	4,5	integrated view of ecological corridors, flood management and energy/transport issues is important!!!	support
6	6d	5	Medium and low flow management at the whole Danube basin scale. The same for flood risk management.	support
6	6c	3	Generally, the development of quality tourism offers with an innovative approach should be encouraged and marketed in the Danube region. Priority should be given to project proposals which have been labelled by the Steering Group of the EUSDR Priority Area 3.	proposal
6	6d	5	program related to the effects of plastic on river-delta-sea systems network of protected areas]focussed program tackling the significant water management issues in the DRB	support
6	6d	6	The management of risks, includin th eflood risks, is very important. Public sector should be taught this skill as soon as possible and by all available means.	support
6	6d	6	consequences of climate change are not clear to define, therefore a combination of protection from natural / man made hazards and nature protection should be part of trananational activities. The implementation of rules and guidelines into transnational spatial planning instruments need to be managed at trananational level. A consequent common strategy to protect Nature and to set up direct and inderct interventions for sustainable integrated management. socio ecological and economical benefits and public interests need to be respected, balance between nature and economy	support
6	6c	3	The management and protection of earth resources including the access of the mineral raw materials in close relation and interaction with nature conservation areas and cultural heritages should be developed. For more effective sustainable mineral raw materials planning these factors should be considered together and based on the state of the recent situation joint guidance and joint vision should be developed in the partner countries in co-operation of stakeholders (authorities, industry, researchers, NGO's). For these aims joint strategies should be supported.	proposal
6	6d	5	Hot topics/additional project ideas:- Improve the integrated management of contmainated sites and redevelopment of brownfields. - Improve integrated approach to reach better soil and groundwater qualities- Protection of sustainable use of natural water resources- Protection of natural and high quality soils - Strengthening inner urban development The important issues of grounwater protection are missing completely	support
6	6d	6	-Tackling the environmental Impact of Nuclear Facilities along the Danube River, reduce radioactivity risks and improve communication to the public and specific target groups.[CR][LF]2-Restoration of hystorical poluted uranium mine areas along the Danube.	support

6	6d	4	JRC initiative Scientific Support to the Danube Strategy should be considered, focusing mostly on land and soil nexus and water nexus. The important aspect is to enhance cooperation and design environmental research and innovation for solutions and uptake of results in the Danube region. Further important aspect is the support to the sustainable management of natural resources and effective use and protection of natural resources in the Danube area. Another aspect that should be included is the mapping of ecosystems, monitoring of their changes, basic drivers, land use changes and their impact on biodiversity.	support
6	6d	5	Flood risk management should focus on ecosystem based solutions in order to maximize synergies with Water Framework Directive and in order to harvest the multiple benefits., awareness raising and management should communicate and preserve the value of the natural capital / ecosystem services, in particular benefits for sustainable development, job creation and recreation	proposal
6	6c	3	It is important to promote tourism along Danube River up to Danube Delta.	support
6	6d	5	As the Danube countries this year were affected by terrible floods where even the human lives were lost and a lot of property destroyed, maybe this can be a primary objective in the future period with the permanent empowerment of the management in emergency risk situations.	support
6	6d	5	Due to recent floods that happened in our region and affected 3 countries Serbia, Croatia and Bosnia and Herzegovina, everyone is aware that this should be our priority in the following period. The next most important issue is ecology which also has to be addressed on the level of all countries in the river basin. The cultural heritage should be used more in economically developing undeveloped regions of the Danube basin through tourism development, especially rural tourism.	support
6	6c,6d	3,5,6	2. "Improved transnational coordination of management of cultural and natural heritage" and "Development of integrated actions for adaptation to the consequences of climate change" are marked as medium relevant because such issues need to be solved at national level first and some countries have not yet done so. The same applies to "Joint management of flood risks" but the hazardous effects of such disasters require high importance. Danube Programme should so give a very strong support to the implementation of the Danube River Protection Convention and other activities of the ICODR. "Building awareness for joint environmental action (e.g. communication to the public and specific target groups)" is marked as medium relevant because of a number of already existing initiatives in the field. Cultural heritage should be given a higher importance than in the previous programmes as many countries lack a proper management of such heritage for the purpose of both protection and (tourist) valorization, especially in rural and outermost areas.	proposal
6	6d	4	Energy Performance Contracting in the Danube region., "Moore Future": protection and future of peatland and biodiversity., Sustainable tourism in the Danube region	support
6	6c, 6d	3,4	Regarding to continuity of habitats along the Danube the management of natural values should be harmonised, joint projects could be one of the more efficient way to reach Danubewide approaches. Common monitoring activities, transnational habitat restorations, harmonised strategies could be scope of Danube Region Programme also establishing transboundary protected areas. The sustainable ecotourism- which shall not harm natural values- has importance, also. For effective nature conservation work that projects, which improve cross-sectorial communication (e.g nature conservatin and waterway administration, nature conservation and forestry etc)should has priority.	proposal
6	6d	4	Our opinion is (perhaps because our occupation) that have strengthened the role of forests in developing environmental projects, the water cycle, generally ecosystems	support
6	6d	4	Our opinion is (perhaps because our occupation) that have strengthened the role of forests in developing environmental projects, the water cycle, generally ecosystems	support
6	6d	5	Karst water resources are very sensitive to ecological and climate change in Future. As many people depend on These drinking water resources, transnational strategies and Projects are necessary to garanty a sustainable use in also in Future.	support

6	6d	4	cross-border Cooperation transboundary Environment Education Development of nature-friendly tourism Establishing a network of protected area supervisors Cooperationspecies conservation, such as Danube - sturgeon Creation and protection of retention areas Preservation and protection of lowland forest sites	support
6	6c	3	In tourism there are also huge potentials regarding the economic development of the area.	support
6	6d	4	For S.O.3 - in general there is lack of Nature conservation issues- for example - developing transboundary sustainable touristic infrastructure for protected areas and Natura2000 sites, enhancing effective visitor management of protected areas through development of visitor infrastructure etc. For S.O.4. There is a lack of terms from the general investment priority 6d (restoring and promoting ecosystem services, Natura 2000 and green infrastructure). Programme should support activities in restoration of biodiversity and ecosystem services (as set out in EU biodiversity strategy for 2020), implementation of EU Green infrastructure strategy, and efficient implemetation of Birds and Habitats Directives (through Natura 2000 network), protecting the biodiversity by tackling Invasive ALien Species etc.	proposal
6	6d	5,6	1) Environmental training for schools and businesses covering all topics related to inland navigation and inland waterway transport. 2) Joint environment and water management actions (i.e. neophyte management). 3) Civil protection and supporting measures (i.e. risk analyses) in the field of Danube flood risk management.	support
6	6d	5	We suggest to - change wording of "Joint monitoring of ecological and chemical status" to the following "Joint monitoring of water quality, ecological and chemical status" change wording of "Joint development of measures to improve water quality and ecological status" to the following "Joint development of measures to improve water quality, ecological and chemical status" - harmonize these two points	proposal
6	6d	4,5	sediment management - ensuring sustainable sturgeon population in the Danube- floodplain restoration- basin-wide hydrological modelling - Danube water balance- water scarcity & droughts	support
6	6d	5	Improvement of water supply and wastewater treatment	support

6	6d	6	<p>The Ministry of Internal Affairs is responsible for ensuring prevention and intervention during emergency situations, through the specialized unit, respectively the General Inspectorate for Emergency Situations. Within the Annex of the Partnership Agreement proposed by Romania for 2014-2020, „Correlation of the Priorities of EUSDR and the Challenges and Funding Priorities Identified in Romania's Partnership Agreement”, there are some key elements that refer to the strengthening of the technical and administrative capacity of the ESMNS (Emergency Situation Management of the National System). In this respect we consider appropriate the funding of the following pillars within the Danube Operational Program:- Environment protection from Danube Region- Risk management In this context, it is advisable to introduce in this chapter the following priorities and actions, as these are presented in the Annex of the PA for Romania Actions</p> <ul style="list-style-type: none"> o Strengthening the operational cooperation among the emergency response authorities in the Danube countries and to improve the interoperability of the available assets. Updating the existing database of accident risk spots (ARS Inventory), contaminated sites and sites used for the storage of dangerous substances. o Developing a rapid response procedures and plans in case of industrial accidental river pollution. o Establishing standardized operational procedures for joint activities in case of trans boundary technical-technological water traffic accidents. Priorities for funding o Improvement of professional emergency response services at local and national level in order to respond to major national and international emergencies, including transnational cooperation in the framework of the Danube macro-regional Strategy., Strengthening of institutional and technical capacity of Emergency Situations Management National System through collaborative solutions between different authorities., o Developing modern management systems and tools for increasing performance in public institutions at all levels., o Promoting good practice related to the delivery of public services and encouraging exchange of experience/networking site between public and private entities providing public services, including stakeholders. <p>PROJECT PROPOSALS: 1. Strengthening the transnational cooperation and management capacity of emergency situation occurring on the Danube and an Riverine Area. The general Objectiv of the project is to improve the quality of life in the Danube Region through common planning and management of human and material resources in order to prevent common risks and intervene in case of disasters.[CR][LF]2. Improving professional intervention services for the emergency situations in aquatic environment. The general objective of the project is to ensure training for specialist personnel in accordance with EU standards for intervention and rescue in aquatic environment.[CR][LF]3. Developing a unitary cooperation framework on the Danube River in emergency situation produced by incidents regarding the transport of nuclear, radioactive or other special character materials.[CR][LF]4 Developing the regional capacity for aerian intervention in emergency situations.[CR][LF]</p>	support
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6	6d	6	<p>The Ministry of Internal Affairs is responsible for ensuring prevention and intervention during emergency situations, through the specialized unit, respectively the General Inspectorate for Emergency Situations. Within the Annex of the Partnership Agreement proposed by Romania for 2014-2020, „Correlation of the Priorities of EUSDR and the Challenges and Funding Priorities Identified in Romania's Partnership Agreement”, there are some key elements that refer to the strengthening of the technical and administrative capacity of the ESMNS (Emergency Situation Management of the National System). In this respect we consider appropriate the funding of the following pillars within the Danube Operational Program:- Environment protection from Danube Region,- Risk manageme In this context, it is advisable to introduce in this chapter the following priorities and actions, as these are presented in the Annex of the PA for Romani Actionso Strengthening the operational cooperation among the emergency response authorities in the Danube countries and to improve the interoperability of the available assets.o Updating the existing database of accident risk spots (ARS Inventory), contaminated sites and sites used for the storage of dangerous substances.o Developing a rapid response procedures and plans in case of industrial accidental river pollution.o Establishing standardized operational procedures for joint activities in case of trans boundary technical-technological water traffic accidents.Priorities for fundingo Improvement of professional emergency response services at local and national level in order to respond to major national and international emergencies, including transnational cooperation in the framework of the Danube macro-regional Strategy.o Strengthening of institutional and technical capacity of Emergency Situations Management National System through collaborative solutions between different authorities.o Developing modern management systems and tools for increasing performance in public institutions at all levels.o Promoting good practice related to the delivery of public services and encouraging exchange of experience/networking site between public and private entities providing public services, including stakeholders.PROJECT PROPOSALS:1. Strengthening the transnational cooperation and management capacity of emergency situation occurring on the Danube and an Riverine Area. The general Objectiv of the project is to improve the quality of life in the Danube Region through common planning and management of human and material resources in order to prevent common risks and intervene in case of disasters.2. Improving professional intervention services for the emergency situations in aquatic environment. The general objective of the project is to ensure training for specialist personnel in accordance with EU standards for intervention and rescue in aquatic environment.3. Developing a unitary cooperation framework on the Danube River in emergency situation produced by incidents regarding the transport of nuclear, radioactive or other special character materials.4 Developing the regional capacity for aerian intervention in emergency situations.</p>	proposal
6	6c, 6d	3,6	<p>Risk management should focus on ecosystem based solutions and maximise synergies with relevant environment legislation, e.g Water Framework Directive for flood or Natura 2000 for ecosystem services provided by biodiversity. Natural heritage must not be only managed but also effectively protected, there should be also a focus on the multiple benefits provided by nature for jobs, recreation and local development.</p>	proposal
6	6d	5	<p>There is quite a large number of fields of actions in this priority axis. Field of actions like "Tackling significant pressures ...", "Joint monitoring ..." and "Joint development..." could be reduced to one field of activity in case of generalizing the name of this activity. "Joint management of flood risks..." and "Establishment of more effective governance..." can be also unified to one file of activity.</p>	proposal
6	6d	4	<p>Considered a flagship species for the Danube River Basin and valuable indicators of water quality and ecosystem health, sturgeons are today on the brink of extinction due to the overexploitation, disruption of spawning migration and loss of habitats. Hence, urgent measures are needed to stop their dramatic decline and prevent their disappearance. Sturgeon 2020 program of Danube Sturgeon Task Force (DSTF) http://dstf.eu/ is based on the Sturgeon Action Plan objectives and actions which can be grouped in four major categories: (A) Basin-wide coordination of sturgeon policy and best-practice management, (B) Legislation and enforcement controls for sturgeon fisheries and trade, (C) Conservation of sturgeon species and populations, including their genetic integrity, and (D) Protection, management and restoration of sturgeon habitats, including reopening of migration routes. The Danube Cooperation Programme should support a specific priority addressing the conservation and restoration of sturgeons in the Danube River.</p>	support
6	6d	5	<p>Water quality and quantity monitoring in Montenegro is on low level, so our country is maybe a mirror for all countries in a region. Solution for that problem will be found through projects of water management. Also support to transboundary water management projects is very important.</p>	support

			<p>Comment on the types of beneficiaries supported under this investment priority: Under German constitutional law, the churches have a special status as bodies governed by public law (Körperschaft des öffentlichen Rechts), which makes them public entities (as opposed to NGOs). Given the very active role that the churches have played, and intend to continue playing, in the development of the macroregion and in the implementation of the Danube Strategy, we assume that churches would be eligible for funding within the Danube Programme. We suppose that the term “public authority” is to be understood in a broad sense, so that churches that constitute public entities would be covered as well. A clarification, however, for instance by using a term like “public institutions” or “public entities”, would be welcome.</p>	proposal
6	6c	3	<p>It is important to ensure sustainable preservation of cultural heritage by developing relevant clusters and networks of public and private institutions, national, regional and local public authorities within the Danube region. We also believe it, the support of the ratification process of the joint tentative World heritage sites, and the developing of the existing, and new cultural routes in the Danube Region.</p>	support
6	6c, 6d	3,5	<p>For strengthening joint and integrated approaches for managing and preserving assets of the Danube territory wider territorial approach (going beyond designated natural and cultural sites) is needed. More stress to urban areas facing environmental difficulties is needed. In particular improvement of degraded urban areas having a huge potential for environmental improvements, improvement of quality of life for residents and having a big economical potential is needed. An overall economic development strategy must not only focus to the historical buildings but should address urban renewal including social, functional as physical renovation (p. 41). In specific objective on water management and flood risk prevention again urban areas being most vulnerable to flooding is entirely left out, what should be the case. 2.2.2.8 Coherence with the Framework Agreement on the Sava River Basin (FASRB) should also be supported.</p>	proposal

6	6c,6d	3,4,6	<p>Danube:Future aims at demonstrating the necessity to tackle cultural and natural heritage as well as environmental and ecological problems as an interdisciplinary endeavor which requires the inclusion of social sciences and humanities and a long-term perspective. The specific objectives and the different actions proposed are all very important to preserve cultural and natural heritage, to mitigate societal risks from pollution and flooding, to adequately address the consequences of future climate change and to raise public awareness and behavior in order to support a shift to sustainability in the DRB. Cultural heritage is addressed in this priority axis but ecological and environmental subjects are in the foreground. Natural and cultural heritage as well as environmental problems are perceived as something which exists isolated from each other. This is however not the case in reality. Making the hybrid quality of these phenomena visible can improve protection, restoration and the provision of societal services from healthy ecosystems. A historical long-term approach can help to explain and better understand the present potentials and challenges of the Danube and support transnational agreements on restoration issues and water management in the future. In particular the investigation of societal and environmental legacies on a regional scale is an often ignored prerequisite building a sustainable future as legacies restrict the realm of possible action. Close links between cultural and natural heritage and diversity in specific regions exist and should be taken into account by research projects as well as (water) management. Often, there are negative mutual reactions. Traditional fishing or recreational fishery which have an adverse effect on biodiversity because certain fish populations have become threatened over time or new, recreationally interesting species have been released can serve as an example. New ways to investigate and manage natural and cultural heritage as the product of a common history of a specific region should be developed to address such issues. Clear links between SO 3 (heritage) SO4 (ecology, diversity) and SO 6 (climate change) exist. With respect to natural heritage and biodiversity, it should be (further) investigated how future climate change will affect habitat conditions and thus the potential occurrence of animal and plant species. Also, the influence of non-native and invasive species on protected and threatened species has not yet evaluated in detail in the Danube Region (see Interim Overview SWMI in the DRB, ICPDR 2013). Danube:Future helps to overcome the obstacles created by the multilinguality and different scholarly level of Danube Basin countries. Environmental legacies, in particular toxic and hazardous substances from past industry and waste disposal pose a clear risk for heritage, the ecology of riverine landscapes and societies. Long-term studies can add to an inventory of risk spots in particular in the floodplains where inundation might activate such remains. International workshops are organized to identify challenges and potentials for interdisciplinary, humanities-driven research in the creation of a knowledge basis for sustainable development. These workshops will lead to interdisciplinary project proposals and policy recommendations identifying main issues and ways to tackle them.[CR][LF][CR][LF]We also suggest to include in the SP3 - as new action - the "Citizen science". Citizen science is defined as organised research where the balance between scientific, educational, societal and policy goals varies across projects. It is a new strategic approach, which could enhance and improve the knowledge of policies on biodiversity in the Danube Region activating initiatives of collaboration and active engagement of civil society. These initiatives are an excellent means for the collection of data potentially of high scientific value, and at the same time a useful means of providing scientifically sound information to the general public, involving them in a conscious way in the activities of biodiversity conservation.</p>	proposal
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6	6c, 6d	3,4,6	<p>Danube:Future aims at demonstrating the necessity to tackle cultural and natural heritage as well as environmental and ecological problems as an interdisciplinary endeavor which requires the inclusion of social sciences and humanities and a long-term perspective. [CR][LF]The specific objectives and the different actions proposed are all very important to preserve cultural and natural heritage, to mitigate societal risks from pollution and flooding, to adequately address the consequences of future climate change and to raise public awareness and behavior in order to support a shift to sustainability in the DRB. [CR][LF]Cultural heritage is addressed in this priority axis but ecological and environmental subjects are in the foreground. Natural and cultural heritage as well as environmental problems are perceived as something which exists isolated from each other. This is however not the case in reality. Making the hybrid quality of these phenomena visible can improve protection, restoration and the provision of societal services from healthy ecosystems. [CR][LF]A historical long-term approach can help to explain and better understand the present potentials and challenges of the Danube and support transnational agreements on restoration issues and water management in the future. In particular the investigation of societal and environmental legacies on a regional scale is an often ignored prerequisite building a sustainable future as legacies restrict the realm of possible action. [CR][LF]Close links between cultural and natural heritage and diversity in specific regions exist and should be taken into account by research projects as well as (water) management. Often, there are negative mutual reactions. Traditional fishing or recreational fishery which have an adverse effect on biodiversity because certain fish populations have become threatened over time or new, recreationally interesting species have been released can serve as an example. New ways to investigate and manage natural and cultural heritage as the product of a common history of a specific region should be developed to address such issues. [CR][LF]Clear links between SO 3 (heritage) SO4 (ecology, diversity) and SO 6 (climate change) exist. With respect to natural heritage and biodiversity, it should be (further) investigated how future climate change will affect habitat conditions and thus the potential occurrence of animal and plant species. Also, the influence of non-native and invasive species on protected and threatened species has not yet evaluated in detail in the Danube Region (see Interim Overview SWMI in the DRB, ICPDR 2013). Danube:Future helps to overcome the obstacles created by the multilinguality and different scholarly level of Danube Basin countries. [CR][LF]Environmental legacies, in particular toxic and hazardous substances from past industry and waste disposal pose a clear risk for heritage, the ecology of riverine landscapes and societies. Long-term studies can add to an inventory of risk spots in particular in the floodplains where inundation might activate such remains. [CR][LF]International workshops are organized to identify challenges and potentials for interdisciplinary, humanities-driven research in the creation of a knowledge basis for sustainable development. These workshops will lead to interdisciplinary project proposals and policy recommendations identifying main issues and ways to tackle them.[CR][LF][CR][LF]We also suggest to include in the SP3 - as new action - the "Citizen science". Citizen science is defined as organised research where the balance between scientific, educational, societal and policy goals varies across projects. It is a new strategic approach, which could enhance and improve the knowledge of policies on biodiversity in the Danube Region activating initiatives of collaboration and active engagement of civil society. These initiatives are an excellent means for the collection of data potentially of high scientific value, and at the same time a useful means of providing scientifically sound information to the general public, involving them in a conscious way in the activities of biodiversity conservation.</p>	support
6	6d	5	<p>Climate changes affect the sources of water supply, which will have a significant impact on our ability to continue to provide a secure and sustainable supply of good quality drinking water for the population. Under such circumstances, public authorities and water companies are required to develop and implement procedures that are necessary for sustainable management of water resources. 1. Adequately evaluating groundwater resources 2. The formation of databases on the relevant parameters (water management data at the national level, the geological and hydrogeological information, data on water quality). 3. Monitoring water (quantity and quality of water resources). 4. Making of detailed maps of vulnerability. 5. Primary protection and conservation of existing water sources on the Montenegrin coast, after the construction and commissioning of regional water supply system for the Montenegrin coast. 6. Creating a database of existing and potential pollutants. 7. Transboundary aquifer.</p>	support

6	6c, 6d	3,4,5	<p>We suggest to replace the title of the Priority Axis in “Cultural and natural heritage and responsibility in the Danube region” We also suggest to insert in 2.2.1.1 the same sentence of 2.2.2.1: “: “Support should also be given to accompanying research and evaluation activities including development of advanced tools for mapping, diagnosing, protecting and managing natural landscapes.” Danube:Future (EUSDR PA7 FS project) In SO3: Natural and cultural heritage valorization: There are often close links between cultural and natural heritage and diversity in specific regions, sometimes starting from a negative effect on each other. As an example, one might think to traditional fishing societies and cultures having an adverse effect on diversity because a fish population has become threatened in recent time. New ways to investigate and manage natural and cultural heritage as the product of a common history of a specific region should be developed to address such conflicts. International workshops are organized to identify challenges and potentials for interdisciplinary, humanities-driven research in the creation of a knowledge basis for sustainable development. These workshops will lead to interdisciplinary project proposals and policy recommendations identifying main issues and ways to tackle them. In SO4: Restoring and managing ecological corridors, exist and should be addressed adequately in the program. With respect to natural heritage and biodiversity, it should be (further) investigated how future climate change will impact habitat conditions and thus the potential occurrence of animal and plant species. In addition, the influence of non-native and invasive species on protected and threatened species has not yet been evaluated in detail in the Danube Region (see Interim Overview SWMI in the DRB, ICPDR 2013). Danube:Future helps to overcome the obstacles created by the multilinguality and different scholarly level of Danube Basin countries.</p> <p>SUSTAINABLE PRESERVATION OF CULTURAL HERITAGE The general theme “sustainable preservation of cultural heritage” may link to activities aimed at the re-discovery and re-evaluation of neglected cultural sites and works of art. The main objective of the proposal is safeguarding the cultural identity of specific territories through their material and non-material cultural heritage. This goal can be achieved by: I) identifying sites of significant cultural value, hence worthy of preservation (small museums, religious and archaeological sites, monuments, historic buildings, works of art, etc.), II) investigating how to highlight the value of such heritage, also by means of an inter-disciplinary approach conducted by academia experts., III) planning a network of the cultural sites., IV) developing itineraries for tourists, as well as citizens, focusing on different aspects of the city’s history and culture., V) creating a common (transnational) online platform involving different local actors in order to raise visibility of the city’s sites and increase local attractiveness.</p> <p>BIOMONITORING WATER RESOURCES [CR][LF]The evidence for a pollution incident in freshwater, for example a stream or lake, is often only too obvious. Environmental scientists working for water quality monitoring agencies are often alerted by members of the public who have spotted dead fish (or worse) floating on the surface of the water. The causes of such pollution are many and various: for example, fuel oil from a storage depot or sewage from a farm may run into water courses when containers rupture or storms cause flooding. But also dams are now indicate as sours of biodiversity reduction. Each government is provided with legislation to meet the EU Water Framework Directive make it a criminal offence to pollute a lake, river, groundwater or the sea or to discharge any liquid into water bodies without legal permission. Scientists from the national environment agencies play an essential role in helping the governments uphold legal requirements using a battery of chemical tests to assess the concentrations or effects of pollutants or their derivatives, moreover scientists use living organisms to measure the quality of the water. For example, many algae or mosses are intolerant of the anaerobic conditions and ammonia found in a sewage pollution incident. Water quality can be measured using bioassays e.g. conducted by growing algae in water samples, or by using invertebrates to obtain a biotic index. Biotic Indexes are based on the fact that certain species tend to disappear and the species diversity decreases as the organic pollution in a water course increases. We also suggest to include in the SP3 - as new action - the “Citizen science”. Citizen science is defined as organised research where the balance between scientific, educational, societal and policy goals varies across projects. It is a new strategic approach, which could enhance and improve the knowledge of policies on biodiversity in the Danube Region activating initiatives of collaboration and active engagement of civil society. These initiatives are an excellent means for the collection of data potentially of high scientific value, and at the same time a useful means of providing scientifically sound information to the general public, involving them in a conscious way in the activities of biodiversity conservation.</p>	proposal
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Priority Axis 3 Better connected Danube Region

TO	IP	SO	Comments:	Type
7	7e	10	Addressing some issues above, could be very expensive in comparison with the Program financial envelope(ex. Development of the Danube Region gas supply model, of the Danube Region smart grid or Sustainable development of the hydropower generation potential of the Danube River.	proposal
6	6d	6	Also in this field, I think it is most important to address risk management strategies which overcome national borders. Porcesses do not stop at borders. Foods, widnstorms, fires move from one nation into the other, thus there needs to be a common development goald to tackle these issues in scientific ways, but also in terms of societal and administrative response capacities.	proposal
7	7e	10	More efficient and environmentally friendly energy generation	support
7	7b	7	Better utilization of existing transport infrastructre and development new of transport infrastructure	proposal
7	7e	10	besides biomass, solar energy - both für electricity production and heat - and wind energy should be considered. The use of solar energy should be considered as large scale systems	proposal
7	7e	10	Construction of integrated energy cogeneration systems	proposal
7	7e	10	The question is technically incorrect assumption, because who is willing to fill in this questionnaire, you are familiar with the Danube basin development needs, and therefore useless to ask 'do not know' and the possibility of 'not relevant'.[CR][LF]SO+ - Development of water transport on every possible rivers, channels in the basin of the Danube. - a necessary development for cohesion, the Western European inland shipping rates for aim must be to achieve. Do not miss out on the concept of 'renewable energy' that might be also outside of the 'smart grid'.	proposal
7	7e	10	Hydro-power production should be better planned and designned for next investments., this is a priority taking into account the natural gas decreasing resources	proposal
7	7c	8	This is crucial action in order to preserve natural resources, i.e. transport system must be improved towards sustainability and more eco-friendly transport modes, both in cities and on the national and regional levels.	proposal
7	7c	8	Sustainability impact assessment and social impact assessments on infrastructure and developmental issues	proposal
6	6d	5	Intelligent renaturation of the floodplain in lower Danube based on complex studies and multidisciplinary teams: hydraulic simulations, water quality, ecological approaches. Delivering a Best practices book in floodplain renaturation.	proposal
7	7e	10	besides biomass, solar energy -both for electricity production and heat- and wind energy should be considered Project ideas:- use of solar energy as large scale solar thermal systems in district heating networks- status of integral	proposal
7	7c	8	In the priorities are not even mentioned inland waterways. A special focus should be made on improving of safety on inalnd waterways in region and pervention of pollution from ships navigating inland waterways.	proposal

7	7c	8	Engineering road infrastructure safety is a horizontal requirement for Priority Axis 3: better connected Danube region. Poor and unsafe road infrastructure is a major block to development in the region. There is a need to: Benchmark road performance to common standards across borders, Appreciate the overall contribution of infrastructure to different elements of road risk, Recognise the costs and benefits of infrastructure investment and its crash reduction efficacy, Provide common targets for road performance, Have a well-informed professional network of specialists involved in all areas of road safety, Generate and prioritise large, affordable, high-return programmes of safety engineering countermeasures, Operate on a scale that is cost-efficient and can be project-managed to deliver reductions in the cost of death and crippling injury that are economically significant and contribute to total losses of 2-3% of GDP, Provide methodologies to implement performance tracking so that funding agencies are able to track outcomes and improvements in safety performance. Provide the training, technology and reporting tools to build and sustain national, regional and local capability, Share experience and knowledge of effective road safety programmes in the region.	proposal
7	7e	10	Biomass production versus sustainable ecological production of food cannot be a solution. Clean., see problems with water, drought, ... energy efficiency measures should be 1st priority. The expansion of environment-friendly infrastructure e.g. transport is very cost efficient. A transnational strategy should focus the transport budget of EU and the benefits for each country. A SWOT analyses about green energy and energy efficient production, economic potentials of the Danube river should be based not only on economic factors. the consequences of the status quo affect to all countries which are dependent from the Danube River (plastic, power plants, floods, ...)	proposal
7	7e	10	Raising the quality of build environment through the development of suburban public transport	proposal
7	7b	7	Infrastructure is a very important component in the development of every country. Of course, the building of infrastructure should pay attention to the feasibility and the impact on the environment. In order to achieve this it is necessary to improve the level of infrastructure planning through the development of strategic and planning documents as well as the development of high quality technical documentation in accordance with the regulations.	support
7	7b	7	We would like to suggest you add the abovementioned fields of action with the subject "Roadnet extension as a base for the integrated territory's development".	proposal
7	7c	8	Important terms: LNG, inland waterway transport, awareness for eco-friendly transport, connectivity between transport modes	support
7	7e	10	1) Hydropower is only one of the renewable energy sources in the Danube region and on that is most difficult to bring in line with sustainability criteria due to its impact of freshwater ecosystems. However, the issue is not unimportant because hydropower is presently developed without strategic planning and ecological strings attached. It's important to start applying biodiversity safeguards as soon as possible and this would be an important cooperation project in the region2) Mobility: the goal has to be to move towards sustainable mobility, moving people and goods when really necessary and in the most environmentally friendly manner, avoiding impacts as far as possible. This requires a strategic approach. Many of the present transport projects have followed the old-fashioned approach that transport infrastructure leads to economic development which has led to wasteful and high-impact solutions.3)Biomass: There is potential for better biomass use in the Danube region but the emphasis has to be on ecologically sustainable biomass use. Defining sustainability criteria and planning sustainable use of biomass would be a meaningful endeavour. Without the "sustainability" attribute, biomass development can be very damaging. For all "grey" infrastructure measures, it will be essential to maintain habitat and landscape connectivity in order to ensure continuous flow of ecosystem services	proposal
7	7c	8	focus on the cities as nodes in the TEN-T network, and development of sustainable transport models expansion of innovative port infrastructure	proposal
7	7c	8	Projects to support development on LNG terminals in the ports (eg Constanta Port) as it is also a mandatory action for TEN-T core ports., projects to improve intermodality strong related to the future of containers industry, projects to improve the cooperation between port administration and the customs., and training programs available for the infrastructure current and future managers., projects for improvement of the utilities systems used in ports (energy system., water and sewage system)., IT projects to implement single-window concept in port.	proposal
7	7c	8	Exchange of knowledge in port (hub) infrastructure development, identification of new markets and cargo flow, encourage modal shift from road to waterway (Danube), support the cooperation of multimodal terminals alongside the Danube.	proposal

7	7b, 7e	7,10	3. Unfortunately, many countries in the Danube region still suffer from a less-performant main transport networks, which limits the development and improvement of regional networks connected to them. Besides many studies, initiatives and projects prepared in the previous period, the lack of investments and sometimes long-term political support undermines the accomplishment of high performance main roads and even more of the main railroads. Environmental sustainability is also threatened as main cargo traffic is done by road. Further development of gas supply should be question from the view point of the gas provision, the gas being almost exclusively imported from Russia. Danube region should so strongly focus on renewable energy sources, namely hydro power and biomass.	support
7	7e	10	Technology partnerships in the field of bioenergy production (also in the fields sewerage and waste management)	proposal
7	7b	7	Do not underestimate the role of secondary roads (local, forestry) in framing local-regional networks. It must be emphasized that the only field of energy - biomass has the future in the present context	proposal
7	7b	7	Do not underestimate the role of secondary roads (local, forestry) in framing local-regional networks. It must be emphasized that the only field of energy - biomass has the future in the present context	proposal
7	7c	8	1) Waterway infrastructure & maintenance incl. sediment management at the river Danube.2) Provision of data and information regarding the Danube waterway for logistic users (i.e. monitoring system for shallow sections, hydrologic data for logistics use, RIS data for logistics use).3) Identification of potential cargo for Danube Navigation including targeted market observations. 4) Business-to-Business platforms for sector- and region-specific potentials in Danube Navigation.	proposal
7	7e	10	Water Research Institute - the issues of biomass are solved in cooperation with universities - is involved into the research process related to defining the most suitable location where to build a hydropower plant.	proposal
7	7c	8	Topic relevant for ICPDR because of impacts of transport systems on the Danube ecosystem - sustainable solutions required taking into account the environmental legislation and promoting the inter-sectoral cooperation	support
7	7b	7	Infrastructure development in order to better regional cooperation	support
7	7c	8	Given the example of the Romania-Bulgaria Operational Program, we suggest the introduction to the funding priorities of non-structural measures regarding traffic safety and security improvement on TEN-T network, for all transport modes. This measure is recommended to further foster economic security and business environment stability as a safe transport in the Danube area is critical to regional economic well-being. Project Proposals: 1.Consolidating regional capacity for aerial monitoring of Danube traffic.2.Danube – a safe transport corridor	proposal
7	7c	8	Given the example of the Romania-Bulgaria Operational Program, we suggest the introduction to the funding priorities of non-structural measures regarding traffic safety and security improvement on TEN-T network, for all transport modes. This measure is recommended to further foster economic security and business environment stability as a safe transport in the Danube area is critical to regional economic well-being.Project Proposals: 1.Consolidating regional capacity for aerial monitoring of Danube traffic. 2.Danube – a safe transport corridor	proposal
7	7e	10	It is extremely important to have first a clear picture about the energy needs and the most efficient use and distribution of energy in the Danube region before starting to develop biomass or hydropower that can bring difficulties with sustainability criteria.From the geographical perspective the Danube programme covers also the Carpathians, however it should be included in the scope of actions to improve the environmental conditions in the Carpathians, therefore the programme should also ensure participation of Poland on Carpathian related projects in order to ensure territorial coherence.	proposal
7	7e	10	Energetic questions should be solved by states' governments while it is also a political issue. Biomass action plan - the accent should not be given on biomass only, other alternative sources should be born in mind.	proposal
7	7e	10	Other renewable energy sources, apart from hydro power which is obviously most important in this region, should be taken into account (solar, wind, biomass, geothermal).	proposal

7	7e	9,10	Energy interconnection of the Danube region is of utmost relevance in order to ensure its energy security. The Region has a great potential to become more energy independent. Thanks to various concepts, analysis models and action plans, the Danube region might strengthen its energy security. The Smart Grid concept should be developed in order to achieve objectives of Europe 2020 Strategy. Smart grids are considered to be one of the key components of a more ecologic and energy efficient infrastructure. The concept should include all participating countries, however Transmission System Operators and Distribution System Operators have to be involved as much as possible. Further development of the Danube region gas supply model that was commissioned by the Priority Area 2 should be assured. Thanks to this model, weak spots of the Danube region gas market could be pointed out. Such a model could help as well when simulating gas flows disruptions in the region. Better connected Danube region means also a coordinate approach toward renewable energies. The Danube region disposes of a great potential in the use of biomass. Developing common biomass action plan should be supported. Such an action plan will help to achieve renewable energy goals of the Region as stated in Europe 2020 Strategy. As regards to the energy efficiency, the Danube region disposes of an unused potential. Thanks to investments in energy efficiency, the region might become less energy dependent. Initially, public buildings energy efficiency concept should be supported.	proposal
7	7e	10	It is important to cooperate in this field not only at governmental level. We propose the integration of companies with their know-how mainly in the field of energy supply. The network can benefit from the accumulated experience of the companies. Business matching of companies active in energy supply (devices to save energy, etc) should also be organized.	proposal
7	7e	10	Technology partnerships in the field of bioenergy production (also in the fields sewerage and waste management)., Regional bioenergy distribution, Green Chemistry Belt	proposal
7	7b	7	Not only connectivity of the secondary and tertiary roads and nodes to the TEN-T network is of special importance in the Danube Region. Indeed consists the TEN-T network in the Region mainly from motorways and expressways, however in most countries are still included also busy primary national roads - single carriageways. Quality and safety level of these roads varies from good to very poor. On such roads is concentrated the majority of deaths and serious injuries in road traffic. A single carriageway without any safety features and with high traffic volume is not able to "forgive" the human error. Moreover, motorists and vulnerable road users demands the same standards on the whole TEN-T road network, when travelling across the Region. Therefore a transnational project, similar to the SEE SENSOR Project (2012-14, assessing the TEN-T road network in the Region) would be highly appreciated, however: 1) focused in more detail on the quality and safety level of the part of the TEN-T network, where single carriageways with high traffic volumes are carrying the TEN-T traffic in the Region., TARGET: to create a TEN-T network with minimum 3-star EuroRAP standard 2) focused in more detail on the connectivity, quality and safety of the secondary and tertiary roads in the Region., TARGET: to create a healthy, safe and TEN-T-connective regional transport network with minimum 2-star EuroRAP standard	proposal
7	7c	8	General remarks: - 2.3.2.6, add one more bullet point: "Clearly integrated approach by establishment of multi-sectoral partnerships, as outlined in the Joint Statement for Inland Navigation and Environmental Sustainability in the Danube basin, published by ICPDR in 2007." - 2.3.3.7, add one more bullet point: "Clearly integrated approach by establishment of multi-sectoral partnerships, to support the strategic planning process outlined in the Guiding principles on sustainable hydropower development in the Danube basin (published by ICPDR in 2013)." Project ideas: - Cooperation between waterway administrations and Protected Area administrations, to review and revise existing plans for waterway infrastructure to be built, or to be integrated in the planning process for new waterway improvements from the very beginning.	proposal

7	7c	8	<p>Support of multimodal bicycle tourism: bicycle tourism is booming - especially along rivers - and also due to the boom of e-bike. The Danube offers the unique possibility of combining bicycling with going by boat. And of discovering new relatively unknown areas. Projects should cover cross-border multimodality including rail and including addressing organisational and logistic barriers. Joint buildup and marketing of Eurovelo 6 and Eurovelo 13 routes Both routes connect dozens of cities and many cultures. Projects should connect these cities and foster exchange and cooperation between them in the field of bicycle policies - highlighted through joint marketing, benchmarking, corporate design. Joining the bicycle boom innovation abounds in the field of cycling: more and more efficient e-bikes, sophisticated cargo bikes, bicycle sharing systems - leading to doubling of cycling in world cities were just ten years ago, cycling was marginal: London, New York, Paris. This is a sustainable low cost measure. Some Danube region cities take the lead, others can learn from them. Projects should foster city cooperation. Sustainable Urban Mobility Plans Many DG MOVE projects address and foster Sustainable Urban Mobility Plans. Project in the Danube regions should profit from this initiatives and further foster cooperation in special fiels: harmonisation of education, evaluation, metropolitan cooperation beyond city borders. Multimodal urban cargo concepts[CR][LF]integration of city logistics with river logistics, consolidation centres and cycle logistics Capacity building developing a Danube region course programme on sustainable mobility - including (e.g. bicycle-) policy audits, mobility management, e-mobility and access for people with reduced mobility</p>	proposal
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Priority Axis 4 Well governed Danube Region

TO	IP	SO	Comments:	Type
11	11	11	Projects which provide a transnational approach towards the strengthening of national policies/programmes (education and employment being mainly national competences according to the TFEU) should be supported, e.g. initiatives which focus on better spending within the ESF (cf. the current ETC regulation), especially with regard to Roma Inclusion.	proposal
11	11	11	Encourage projects which support reduction of gaps between East and West EUSDR regions administrative systems., encourage better institutionalization in Eastern Regions., better flow of information between EUSDR stakeholders.	proposal
11	11	11	Governance based on knowledge and technology	support
11	11	11	Vertical and horizontal institutional cooperation will be important for all projects activities	support
11	11	11	Roma inclusion is a topic of utmost importance. In defining the best strategies for their inclusion, they should be involved from the beginning.	proposal
11	11	11, 12	Based on the experience/knowledge gained by INTERACT in supporting MRSs since 2009, we suggest to take following aspects into account:- Macro-regional (MRS) approach within and beyond transnational programmes: A dialogue and joint understanding should be reached between DR and EUSDR stakeholders, who might have different understanding especially on questions such as: What is the MRS made for, what is the added value and difference to the scope and way of working of transnational programmes? What is the difference between a DR project and an EUSDR project? (See also EUSDR labgroup papers on these topics).- Direct support to EUSDR governance: The same dialogue and joint understanding should be reached on the difference between transnational programme specific objective (supporting the governance) and the objectives of the MRS (action plan objectives). It should also include questions like: How can the lack of clarity in the role, commitment and competence of some PACs and their steering groups (as highlighted in the EUSDR evaluation) be addressed by the programme? Do all PACs know ETC rules? Which simplified cost options can be used, to reduce the administrative burdens and mitigate error risk? How to solve potential conflict of interests (PACs being financed and at the same time developing DR projects in other P.Axis)? To whom are PACs/NCPs finally accountable and for what results?- Facility to develop projects: Clarification to MRS stakeholders would help the implementation on following questions: Is it only-mainly for the EUSDR projects or open? Or are all transnational project potentially EUSDR projects? If only-mainly for EUSDR-projects, how to make sure MRS actors have a say in the projects to be prepared? How can the facility use simplified financing, to ensure innovative approaches and allow for more risky projects? - Strategy point: How does this comply with the principles of three NOs, or can this be considered "new institution"? What needs would be fulfilled, whom is it for? What is the link to the EC? Where will reporting/ monitoring/ evaluating of the MRS happen? To whom (and for what) is the point accountable: MA/(extended)MC, EUSDR NCPs/PACs or EC or all of these? How to avoid identification i.e. reducing the MRS scope to DR scope? How can the lessons learnt and expertise achieved by INTERACT during the EUSDR starting phases be successfully transferred to the strategy point?	proposal
11	11	11	Try to co operate with URB ACT. Try to implement Charta of Leipzig. Do not Focus to metropolitan cities, Focus to medium sized cities and all their development potentials.	proposal
11	11	11	demographic change is one of the most important challenges of the region due to ageing and emigration. It could increase the vulnerability of specific groups and create obstacles for the economic development. That is why this challenge should be addressed adequately.	proposal

11	11	11	Again, OP DANUBE funded project should primarily lead to the establishment of networks through which public administrations can learn from each other and through which the know-how, knowledge and best practices could be spread out. Programme should not be aimed to e.g. "solve problem of marginalized groups" or "solve migration challenges" but rather to create networks and platforms which may be used for sharing experience with dealing many different problems. Of course, projects supported under the OP DANUBE should deal with the actual problems (like aging of population or integration of Roma) but these problems should be considered as examples of serious challenges the societies in DANUBE region have to face and not as the problems that should be solved by OP DANUBE funded projects. Monitoring criteria should be carefully adjusted to what can realistically be expected (e.g. "number of municipalities" sharing the knowledge about how to deal with integration of Roma is better indicator than "number of Roma" who were successfully integrated due to OP DANUBE sponsored project....	proposal
11	11	11	According to the Law on Official Statistics, official statistics provides, on impartial basis, the figures and representative data and information on mass economic, demographic and social facts, and on the phenomena of working and living environment, for all respective users: economic subjects and their associations, government bodies, authorities of autonomous provinces and local self-government units, cultural, educational and scientific institutions, and public at large. The activities of official statistics are based on five-year statistical program (adopted by the Parliament) and on annual implementation plans (adopted by the Government). As the part of the official statistics, Statistical office of the Republic of Serbia could answer only to the Part 4 of the questionnaire as the counterpart in the coordinated cooperation with other parties.	proposal
11	11	11	The challenge for Danube Region in the area of spatial planning and regional development is develop and verify the tools for implementation of strategies for increase potential of Danube regions by spatial planning and its tools: (1) to develop Danube Spatial Planning Information System (DANIS), (2) to develop Danube Spatial Planning Network (DANNET) and (3) to verify the method of implementation the Danube region strategy in selected Cross-Danube regions. The implementation of this challenge represents the reasonable application of the modern information technologies in the sphere of spatial planning. Specifically creation an interface between the strategies implemented in individual Danube Regions and the official planning documents at regional, national and higher system levels of spatial planning.	proposal
11	11	11	Bearing in mind consequences of catastrophic floods in West Serbia region, at this moment we consider flood management and prevention as primary objective of this programme. We are aware of lack of management resources and poor educational background of people that were obliged to prevent and minimise effects of floods and our project idea will be series of seminars and other educational activities aimed to empower them.	proposal
11	11	11	Establishment of cooperation between the countries located in the Danube region is very important. It is especially important for human resources development in less developed countries. Establishing partnerships and the establishment of common institutions would achieve a high level of development in all areas.	support
11	11	11	We would like to suggest you add the abovementioned fields of action with the subject "Institutional cooperation for the development of the mutual understanding in the process of transnational dialogue".	proposal
11	11	11	cooperation on illegal wildlife trade, e.g. of caviar would be an important issue of crime prevention	proposal
11	11	11	In order to achieve specific results it is necessary to have joint governance of the resources of the river Danube and better link among the key actors.	proposal
11	11	11	It is necessary that EUSDR directly helps those local governments in undeveloped regions through some programs of education because they don't have the capacities to take actions on their own, especially the rural ones.	proposal

11	11	11	As regards proposed action 1 (LM/EDU), the wording should be changed from "education & training programmes" to "education & training policies and systems". Investments in education and training have a specifically high return on investment. Education – as an essential element of the knowledge triangle – provides the basis for innovation in the region. The contribution of vocational education and training (VET) as well as work-based learning is crucial in this respect. The programme therefore need to enhance knowledge, skills and competences at the transnational level to serve as drivers for advancing employability, innovation, active citizenship and inclusion in the Danube Region. Relevant activities could be: - Developing and enhancing policies, transnational networks and broader learning communities (incl. education institutions, civil society, social partners, business sector etc.) in the field of education and training through exchange of best practices, peer learning and (institutional) capacity building - Improving knowledge, skills and competences of all (incl. youth, low-skilled adults, marginalised communities, etc.) and at all levels of education and training to increase employability and adaptability (e.g. development of innovative learning environments and training schemes / curricula., improving the attractiveness and quality of VET and dual and other work-based learning systems, implementation of lifelong learning strategies, fostering entrepreneurial initiative, digital and language skills, second chance options for low-skilled adults etc.)	proposal
11	11	11, 12	4. Civil society should take a more active role in the decision making and should not hide behind an individual instead of public interest (experienced in spatial planning). "Establishment of an EUSDR Focal Point to facilitate the information flow between EUSDR key actors" is marked as not relevant because the EUSDR was prepared on the basis of THREE NOs, including no new institutions/structures.	proposal
11	11	11	Vocational Education and Training with focus on youth employment, youth training and further education of adults	support
11	11	12	Danube Programme is a financing instrument, thus should not be part of the EUSDR policy. EUSDR should be financed and coordinated by Member States involved, not by EU funding programmes. Naturally they should be linked to eachother but not such in a direct way.	proposal
11	11	12	As Croatia (Ministry of Environmental and Nature protection) is co-coordinating Priority Area 6 of the EUSDR, we support S.O.12. Nevertheless, direct support to PACs is not very clear- which activities will be supported in what ammount and under which conditions. Also, envisaged EUSDR focal point has activites which are similar to rotaitng NCP activities (from the last Report from the COM concerning the governance of macro-regional strategies (from 20 May 2014).	proposal
11	11	12	Since the Water Research Institute provides the technical assistance to EUSDR PA 4 coordinator, it is essential for EUSDR PA 4 technical staff to be financed by the Danube Programme.	proposal
11	11	11	The key to good governance is involve the existing institutions.	proposal
11	11	11	Security is an important priority for achieving the objectives of the 11th Priority Area of EUSDR. This area has no alternative sources for transnational European.funding, all dedicated programs have a national character and the Transnational Cooperation Programs developed for 2014-2020 do not financed security projects proposals.Moreover within the Annex of the Partnership Agreement proposed by Romania for 2014-2020, „Correlation of the Priorities of EUSDR and the Challenges and Funding Priorities Identified in Romania's Partnership Agreement”, the 11th Priority Area from EUSDR is correlated with Thematic Objective 11 which is financed under the Danube Operation Program. PROJECT PROPOSALS: 1.Developing the operational capacity of Danube region states to combat tax fraud and evasion and the ability to promote higher standards of fiscal governance at european level. 2.-Improving cooperation in combating contraband and fraud within the intra-community operations regime in the Danube region. 3-Protection of the Danube area business environment from cyber-crime attacks 4- Improving regional cooperation for ensuring the safety of the business environment in the Danube region 5 - Developing a sustainable transport system in the Danube region through the improvement of road traffic between the regions states. 6- Improving cooperation between destination and transit states in the Danube region regarding the prevention and combating illegal migration.	proposal

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11	11	11	To develop modern social, health and educational services could be used existing civil society networks with long term actors in the Danube Region, in order to effectively root projects in local conditions. There are existing many networks, like the Civil Society Network EUSDR in Baden-Württemberg in connection with NGO networks in Romania, Bulgaria, Moldova, Croatia and Serbia. These networks represent long term actors and providers of social services in the Danube countries and managing different and specific projects. E. g. the already started and supported project of the Baden-Württemberg State Ministry: "work based learning for social professions in Bulgaria. These networks could be used in order to connect top-down and bottom-up processes for the development of innovative learning projects along the Danube.	proposal
11	11	11	It should be ensured that the programme contributes to the goals of the EUSDR, therefore better coordination of the transnational programme and EUSDR should be ensured. While dealing with demographic change or marginalized groups also the effects on natural resources in the Danube regions should be considered.	proposal
11	11	11	social fragmentation and economic marginality of the area must be addressed with a program of social inclusion, capable of responding to the people of the area in question, through actions and active labor market policies. The professional culture, the culture of respect for the rules and the environment, the development of initiatives to grow the business and entrepreneurship, both in manufacturing industries, fisheries, and tourism offer opportunities for development and economic growth.	proposal
11	11	11	Those fields of actions whose names begin on "Institutional cooperation ..." can be reduced to one in case the name of this field will be generalized.	proposal
11	11	111	We need to provide a project with objective to support capacity building, studies and investments to strengthen the capacity of the governments.	support
11	11	11	Comment on the types of beneficiaries supported under this investment priority: Under German constitutional law, the churches have a special status as bodies governed by public law (Körperschaft des öffentlichen Rechts), which makes them public entities (as opposed to NGOs). Given the very active role that the churches have played, and intend to continue playing, in the development of the macroregion and in the implementation of the Danube Strategy, we assume that churches would be eligible for funding within the Danube Programme. We suppose that the term "public authority" is to be understood in a broad sense, so that churches that constitute public entities would be covered as well. A clarification, however, for instance by using a term like "public institutions" or "public entities", would be welcome.	proposal
11	11	12	It is necessary to provide a systemic and long term support to the Danube Region Strategy, which could, by its expertise and established networks provide important input to the Programme and help to the fulfilment of its goals.	proposal
11	11	11	Institutional cooperation within the education & cultural institutions for the long life learning.	support

11	11	12	Transnational Programme Danube 2014-2020 should provide funding primarily for transnational projects from regional level The Interact should takeover the role of Focal point	proposal
11	11	12	SO 12: The Danube:Future knowledge base will be built incorporating existing and fostering new research and education projects addressing natural and cultural heritage from a long-term and interdisciplinary perspective with a strong focus on the humanities and social sciences. The creation of a service for developing new project ideas in the framework of the EUSDR (connected, in this case, to Sustainable Development) into Grant Applications is very important to support researchers and entrepreneurs and link them internationally and interdisciplinary. This service is also connected to the Danube Rectors' Conference and Alps-Adriatic Rectors's conference activities.	support
11	11	12	SO 12: The Danube:Future knowledge base will be built incorporating existing and fostering new research and education projects addressing natural and cultural heritage from a long-term and interdisciplinary perspective with a strong focus on the humanities and social sciences. The creation of a service for developing new project ideas in the framework of the EUSDR (connected, in this case, to Sustainable Development) into Grant Applications is very important to support researchers and entrepreneurs and link them internationally and interdisciplinary. This service is also connected to the Danube Rectors' Conference and Alps-Adriatic Rectors's conference activities.	support
11	11	12	SO12: Establishing a network of EUSDR contact and information points along the whole Danube.	proposal
11	11	11	Vocational Education and Training with focus on youth employment, youth training and further education of adults., Danube Academy for Administration, Specific trainings for specialists and executives	proposal