

Annex 7. Table with the remarks/opinions on the draft JOP consulted submitted via on-line forms and during public conferences.

LIST OF ACRONYMS USED IN THE TABLE

AF	APPLICATION FORM
CBC	CROSS-BORDER COOPERATION
CFP	CALL FOR PROPOSALS
EC	EUROPEAN COMMISSION
ENI	EUROPEAN NEIGHBOURHOOD INSTRUMENT
EU	EUROPEAN UNION
IR	COMMISSION IMPLEMENTING REGULATION (EU) NO 897/2014 OF 18 AUGUST 2014 LAYING DOWN SPECIFIC PROVISIONS FOR THE IMPLEMENTATION OF CROSS-BORDER COOPERATION PROGRAMMES FINANCED UNDER REGULATION (EU) NO 232/2014 OF THE EUROPEAN PARLIAMENT AND THE COUNCIL ESTABLISHING A EUROPEAN NEIGHBOURHOOD INSTRUMENT
JOP	JOINT OPERATIONAL PROGRAMME
JPC	JOINT PROGRAMMING COMMITTEE
JTS	JOINT TECHNICAL SECRETARIAT OF THE PROGRAMME 2007-2013 WHICH WILL BE PLAYING THE ROLE OF INTERMEDIATE BODY IN THE PROGRAMME 2014-2020
NGO	NON-GOVERNMENTAL ORGANIZATION
NUTS	NOMENCLATURE OF TERRITORIAL UNITS FOR STATISTICS
SEA	STRATEGIC ENVIRONMENTAL ASSESSMENT
TO	THEMATIC OBJECTIVE

№	Institution that submits remarks	Chapter of the draft	Content of the remark/ suggested change	Justification	Response Remark included/ not included/partially included.
1	Private person, Poland	3.1.6	3.1.6 Programme indicators for the TO7. In case of the output indicator “total length of newly built roads” and “total length of reconstructed or upgraded roads” also “total length of reconstructed or upgraded railways” should be added. It concerns the project titled “Revitalisation of the railway I-102 Przemyśl - Malhowice (Poland) and Malhowice - Chyrów - Krościenko - Ustrzyki (Ukraine)”. Proposed change will result in possibility of obtaining EU co-financing for revitalisation of railway.	Concerns the Project titled “Revitalisation of the railway I-102 Przemyśl -Malhowice (Poland) and Malhowice-Chyrów-Kroscienko-Ustrzyki (Ukraine)”. The project is classified within the Strategy for Podkarpackie Voivodeship and the Strategy for Przemyśl. Polish and Ukrainian self-governments have been demanding running of the closed railway Przemysl – Chyrów – Kroscienko - Ustrzyki for years. Both feasibility study and initial project should be elaborated with use of the Programme funds. Then on the basis of the feasibility study revitalisation of the railway should be made and the cross-border railway transport should be restored. The project shall be implemented by the Podkarpackie Voivodeship, Lviv Oblast, Polish Railways (PKP S.A.) and Ukrainian Railways (UZ).	<p>Remark not included</p> <p>The output and result indicators specified in the JOP are related to four TOs and priorities of the new Programme. The list of indicators includes some output indicators from the ENI CBC ‘Common Output Indicators’ list as well as output indicators and results indicators proposed by the Programme. The decision of the JPC in regards to the Programme indicators rationale was based on the assumption that this list shall include indicators that the Programme will manage to achieve. The analysis of the applications submitted within the previous editions of Programme shown that possibility of having railway related projects is not very high, thus such indicator was not planned.</p> <p>The list of Programme indicators does not regulate which projects are eligible in the Programme. The achievement of indicators from the list shall be reported on the Programme level. Projects themselves will have possibility to relate to indicators from this list (if they will be suitable for their scope), but projects will also have possibility to propose their own indicators, not included in the Programme list.</p> <p>Thus, the absence of any specific indicator does not mean that projects related to the topic covered by this indicator are not eligible in the Programme. The major limitation for the eligibility of the projects’ themes is related to the description of each of the Programme TO/priority.</p>
2	Podkarpackie Management of Reclamation and Water Facilities in Rzeszów, Poland	3.1.3	We propose to expand the catalogue of output indicators concerning Priority 2 of TO8 “Common challenges in the field of safety and security”, indicative action „joint initiatives on prevention of natural and man-made disasters” with a new indicator “population benefiting from flood protection as a direct result of support”.	One of indicative actions proposed within TO8 are „joint initiatives on prevention of natural and man-made disasters”. In the current JOP, fire is indicated as the main disaster, whereas having in mind climate changes also threat of floods should be treated very seriously (including cross-border rivers floods). One of the Programme eligible areas is Tarnobrzeg	<p>Remark not included</p> <p>Response – see point 1 above.</p> <p>The analysis of the applications submitted within the previous editions of Programme shown that possibility of having projects related to the flood protection is not very high, thus such indicator was not planned.</p>

				Powiat where its main strategic documents shows unacceptable level of flood risk. Only introduction of the proposed provisions (i.e. new output indicator) will enable potential usage of Programme grants for realisation of flood protection investments in the future.	
3	Ministry of Internal Affairs of Republic of Poland	3.2.2	Provisions concerning limitation of cooperation (page 23) are not precise in point "Lack of a local border traffic (LBT) agreement with Belarus (15)". We propose to supplement this point with information that local border traffic agreement between Poland and Belarus is not in force, not binding: "Lack of binding local border traffic agreement between Poland and Belarus".	The local border traffic agreement between Poland and Belarus was signed in 2010 but ratified by Poland only. Belarusian side has not completed the relevant ratification formalities. Therefore, the agreement was signed by both countries but is not in force, not binding.	Remark included The JOP will be modified accordingly.
4	The Committee of Economy of Grodno Regional Executive Committee, Belarus	3.1	In accordance with the main objectives of the Programme, i.e. the growth of mutually beneficial economic development of the regions, it is advisable to establish and develop joint ventures in the field of alternative sources of communication networks, protection and security, the development of inter-regional joint projects the exchange of experience and promotion of migration (labour camps, public and scientific practice, students and others). Is it possible to use and implement this approach (such projects) in the framework of this Programme?	The possibility of improving the accessibility and attractiveness of regions, improving communication through the implementation of joint projects, understanding and solving social problems.	Remark not included The proposition for modifying the draft JOP was not formulated. All projects related to the Programme objectives and its TOs/priorities might be financed under the Programme.
5	Lublin City, Culture Unit, Poland	3.1.1	What is meant by the term "local culture"?	Such term does not exist. It is not related to anything specific.	Remark not included The proposition for modifying the draft JOP was not formulated. Term "local culture" is included in the very name of the TO3 as defined in the <i>Programming of the European Neighbourhood Instrument (ENI) - 2014-2020</i> .
6	Lublin City, Culture Unit, Poland	3.1.1	Proposed change: - addition of the following text to the title of the TO3 and Priority 1: "development of local culture"; - addition of the following text to the TO3 description: "TO3 is aimed at building of open-minded,	In 2014 Lublin Municipality appointed a working group "think-tank" for cross-border cultural cooperation within the Project titled „Investment in culture. Comprehensive action for cultural education,„. The group's aim was elaboration of recommendations and pilot projects for cultural cooperation between the	Remark partially included The Priority 1 is directly related to the TO3 PROMOTION OF LOCAL CULTURE AND PRESERVATION OF HISTORICAL HERITAGE. The list of 10 TOs out of which 4 could be adopted by the Programme was formulated in the <i>Programming of the European Neighbourhood Instrument (ENI) - 2014-2020</i> . Thus the wording of TO3

		<p>creative society on the basis of systemic and modern cultural and artistic education. Support will be given for strengthening potential and role of cultural institutions and NGOs in building cooperation in borderland. Development of culture should be supported through access to modern artistic, media, regional and social education. Educational and artistic actions should integrate inhabitants, make them more active and encourage to participate in culture, therefore it is important to implement art into public space, districts, through organisation of art events.</p> <p>Development of culture is not possible without adaptation of current culture infrastructure to modern functions and standards of cultural education, therefore projects aimed at improvement of existing culture infrastructure (local culture centres, cinemas, theatres, operas, libraries) will be covered by this TO.</p> <p>Proposed indicative actions within the priority 1: addition of the following actions:</p> <ul style="list-style-type: none"> - Joint projects aimed at cultural education development, developing talents and creative potential, as a response for intensive technology development. - Joint projects aimed at increase of offer of artistic and cultural events taking place in districts. - Joint projects aimed at increase of competence in culture sphere (e.g. within Culture Incubator). - Stimulating cooperation between institutions in respect to cultural education (artistic residencies, internships, joint seminars and other similar actions). - Joint projects concerning preparation and realisation of culture infrastructure investments and services increasing capacity of local culture centres to realise 	<p>cities Rivne, Ternopil, Ivano-Frankivsk, Lviv, Lutsk, Brest within the new financing perspective (2014-2020). The group was composed with representatives of cultural institutions and NGOs from abovementioned cities. They defined the most important problems in culture sphere and indicated main subjects of cooperation in the nearest years, such as creation and implementation of new solutions for development of culture and cultural education sectors and increase of competence in culture management (establishment of culture incubators). Also the needs of increase of districts and cities microregions cultural potential as well as supporting NGOs and local non-formal groups acting for the nearest surroundings were pointed out. Not only soft-type issues were mentioned, but also a great need of investment in culture infrastructure (local culture centres, cinemas, theatres, operas, libraries), especially in Belarus and Ukraine, to adapt them for current functions and standards of cultural education. Referring to the abovementioned issues, we would like to introduce to TO3 the main subjects of cooperation indicated as the most important ones by representatives of the cities listed above, i.e. development of cultural education, development of culture in districts, increase of competence of human resources in culture management, investments in culture infrastructure (not only the objects of cultural heritage but also others functioning in culture sphere but not classified as cultural or historical monuments).</p>	<p>cannot be modified.</p> <p>All projects related to the culture development that are also in line with the objectives of TO3 and its Priority 1 will be thematically eligible in the Programme.</p> <p>New wording of the sentence related to the indicative actions within TO3: “Joint initiatives and events regarding promotion, development and preservation of local culture and history”.</p>
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			cultural education (local culture centres, cinemas, theatres, operas, libraries).		
7	Lublin City, Culture Unit, Poland	3.1.6	The following output indicator should be added: number of improved objects functioning in a culture sphere, as a direct result of Programme support. Result indicator: increase of programme offer realised in objects functioning in a culture sphere.	In 2014 Lublin Municipality appointed a working group “think-tank” for cross-border cultural cooperation within the Project titled „Investment in culture. Comprehensive action for cultural education,„. The group’s aim was elaboration of recommendations and pilot projects for cultural cooperation between the cities Rivne, Ternopil, Ivano-Frankivsk, Lviv, Lutsk, Brest within the new financing perspective (2014-2020). The group was composed with representatives of cultural institutions and NGOs from abovementioned cities. They defined the most important problems in culture sphere and indicated main subjects of cooperation in the nearest years. Not only soft-type issues were mentioned, but also a great need of investment in culture infrastructure (local culture centres, cinemas, theatres, operas, libraries), especially in Belarus and Ukraine, to adapt them for current functions and standards of cultural education. Referring to the abovementioned issues, we would like to introduce to TO3 investments in culture infrastructure (not only the objects of cultural heritage but also others functioning in culture sphere but not classified as cultural or historical monuments).	<p>Remark partially included Response in relation to the indicator – see point 1 above.</p> <p>To the description of the proposed indicative actions within Priority 1 of TO3 one more indicative action will be added:</p> <ul style="list-style-type: none"> - Joint initiative directed at improvement of the objects functioning in a culture sphere. <p>Generally, all infrastructure projects that are in line with the objectives of TO3 and its Priority 1 will be thematically eligible in the Programme. The proposed indicative actions within Priority 1 of TO3 does not exclude any other projects consistent with this Priority and TO3.</p>
8	Medical University of Lublin, Poland	3.1.4	Is it envisaged to extent support within TO10 to the so-called soft-projects - trainings, preparation for management, etc.	No justification	<p>Remark not included The proposition for modifying the draft JOP was not formulated.</p> <p>In the draft JOP consulted there are no limitations for financing of the soft-projects within each Programme’s TOs, also TO10. The value of the minimum grant was not regulated yet on the Programme level.</p> <p>The important issue here is the thematic eligibility of the project, whether it is in line with the description and objectives of particular TO/priority of the Programme. The soft or infrastructure character of the project is not the decisive factor for its eligibility.</p>

9	Yanka Kupala State University of Grodno, Belarus	3.1.6	None of TOs or Programme product/output concern the environmental protection. Is it advisable to submit applications with an environmental content.	Not even one TO from the point of view of product and output indicators is aimed at ecology and environmental protection issues.	<p>Remark not included The proposition for modifying the draft JOP was not formulated.</p> <p>Response – see point 1 above.</p> <p>The output and product indicators specified in the JOP are related to TOs/priorities of the Programme. The questions of SEA of the Programme are the elements that need to be explored for the Programme to be submitted for approval of the EC. The SEA relates to the environmental impact of the Programme and its results do not have to influence the determination of Programme indicators</p>
10	Lublin Forum for the Disabled, Poland	3.1.1	Proposal for the need to launch microprojects in TO8, priority 1.	It is important for the social partners.	<p>Remark not included Programme foresees implementation of microproject in TO 3 only. However, details concerning the minimum value of projects as well as rules on specific call for proposals will be elaborated at the later stage.</p>
11	Grodno Regional Executive Committee, Belarus	3.1.2	Will under the new Programme projects related to the reconstruction and development of water supply and sewerage systems be eligible?	Based on the forecast environmental impact, the issues related to water supply and sewerage systems are of significant importance.	<p>Remark not included The proposition for modifying the draft JOP was not formulated.</p> <p>The environmental protection itself as defined in TO6 was not chosen as one of TO of the Programme. Thus projects related to the environmental protection only will not be approved for financing in the Programme.</p> <p>Nevertheless, both TO3 and TO8 in some aspects relate to the environmental protection. Thus, all environmental protection projects related to the objectives either of TO3 or TO8 and their respective priorities will be thematically eligible under the Programme.</p>
12	ProKolej Foundation, Poland	3	TO7 , “Improvement and development of transport services and infrastructure” – we suggest addition of the following indicators: total length of newly built railways , total length of newly upgraded railways”	Programme indicators should include both means of land transport equally.	<p>Remark not included Neither the description of the TO7 nor the indicative actions within its Priority 1 suggest that railway related projects are not eligible under the Programme. It is clearly stated that: TO7 shall finance actions related to improvement of transport accessibility, development of environmental-friendly transport, construction and modernization of communication networks and systems</p>

					<p>and improvement of the informational and communication infrastructure on the Programme area. Such actions may well be related to the railway infrastructure.</p> <p>As to the Programme indicators – see point 1 above.</p>
13	ProKolej Foundation, Poland	3.2.1	There were 14 border crossing points for regular passengers movement on Polish-Ukrainian border including 7 railway-type border crossing points and 12 such points on Polish-Belarusian border including 5 railway-type ones.	Instead of 6 should be 7: Dorohusk, Hrubieszów, Hrebenne, Werchrata, Medyka, Malhowice, Krościenko	<p>Remark not included</p> <p>Information in JOP relates only to border crossing points authorized by the relevant authorities for the crossing of external borders (thus Malhowice cannot be included on this list).</p>
14	ProKolej Foundation, Poland	3.2.1	We suggest adding to the description information regarding logistic potential of railway trans-shipment terminals in Małaszewicze, Sokółka, Chełm, Medyka.	Trans-shipment regions and intermodal terminals constitute elements of economic potential. They are large objects attracting investments and concentrating economic activity.	<p>Remark not included</p> <p>For the reasons of its limited volume, the JOP contains only the most important facts/information concerning the Programme area.</p>
15	ProKolej Foundation, Poland	3.2.3	The problem concerning lack of projects on railway transport shall be indicated.	It is an important issue that requests amendment, it shall be indicated that new edition of the Programme include this aspect.	<p>Remark not included</p> <p>Railway projects will be thematically eligible in the Programme, under TO7. .</p>
16	Logistic Centre in Łosośna, Poland	2	The area of the Programme has been marked out within Puławski subregion, so that it does not include the area important for railway transport, i.e. Pilawa commune in Garwolin powiat. Pilawa is a railway junction connecting southern and northern parts of Warsaw orbital road. It constitutes fork point of Community freight railway corridor no. 8 (RFC8, from Antwerp, Rotterdam, Bremerhaven through Berlin and Warsaw) to Lithuania (Kovno, then Tallin), Belarus (through Kuźnica to Hrodna, through Terespol to Minsk and Moscow), Ukraine (through Dorohusk to Kiev and Dniepropietrovsk, through Hrebenne/Bełżec to Odessa, Nikolayevo).	Basis for CBC in railway transport should be connection of Ukraine and Belarus with this corridor (RFC8) through southern-eastern orbital railway of Warsaw.	<p>Remark not included</p> <p>The delimitation of the Programme area on the Polish side was based on the NUTS3 level in line with the <i>Programming of the European Neighbourhood Instrument (ENI) - 2014-2020</i>.</p>
17	Logistic Centre in Łosośna, Poland	3.1.2	It is necessary to refer to undertakings concerning building Community freight railway corridor no. 8 (RFC8).	Freight transport from Ukraine and Belarus to the Baltic Sea and the North Sea harbours through RFC8 should be taken into account.	<p>Remark not included</p> <p>In the JOP only the examples of actions that can be implemented under particular TOs and priorities are listed.</p>

18	Logistic Centre in Łosośna, Poland	3.1.6 3.2.2	The Programme does not refer to the main problem of railway transport: different width of rails in Belarus and Ukraine than in EU.	Taking into account broad-gauge railway in former USSR countries it is necessary to include in the Programme the problem of freight reloading between both railways: broad-gauge and standard-gauge. It is necessary to build intermodal (road-railway) border reload places and transport junctions. Currently, the Programme does not include this issue, especially in case of indicators.	Remark not included This kind of issues were not mentioned in the socio-economic analysis of the Programme area and consequently solving of such issues are not foreseen on the Programme level. The SWOT analysis reflects the complexity of the problems. As to the Programme indicators – see point 1 above.
19	Podlaski Voivodeship Office, Poland	3.1.3	We suggest adding possibility of support for joint initiatives concerning rescue actions in case of natural disasters and emergency situations.	The priority concerns the question of safety, therefore it is reasonable to enable support for rescue services.	Remark not included This type of actions are already included in the list of indicative actions.
20	Podlaski Voivodeship Office, Poland	3.1.3	REMARK TO THE POLISH WORKING TRANSLATION OF THE DRAFT JOP Point: Improving qualifications of the staff taking rescue actions and developing the ability to participate effectively in a joint response to incurred risks.	The text should be corrected since it is not understandable.	Remark included Remark relates to the working translation of the draft JOP into Polish. The translation will be corrected. Nevertheless, the only binding document, that shall be referred to, is the JOP in English.
21	Podlaski Voivodeship Office, Poland	3.1.3	REMARK TO THE POLISH WORKING TRANSLATION OF THE DRAFT JOP Point: Development of joint prevention, monitoring, response and disaster recovery systems.	Description of this point does not show precisely what kind of actions can be supported.	Remark included Remark relates to the working translation of the draft JOP into Polish. The translation will be corrected. Nevertheless, the only binding document, that shall be referred to, is the JOP in English.
22	Podlaski Voivodeship Office, Poland	3.1.4	REMARK TO THE POLISH WORKING TRANSLATION OF THE DRAFT JOP There is: Support under TO10 will contribute to Strategic Objective C of the transgenic cooperation ENI “Promotion of better conditions and modalities for ensuring the mobility of persons, goods and capital”. Should be: Support under TO10 will contribute to Strategic Objective C of the ENI cross-border cooperation “Promotion of better conditions and modalities for ensuring the mobility of persons, goods and capital”.	Change of the word "transgenic" into "cross-border"	Remark included Remark relates to the working translation of the draft JOP into Polish. The translation will be corrected. Nevertheless, the only binding document, that shall be referred to, is the JOP in English.

23	Podlaski Voivodeship Office, Poland	3.1.6	<p>REMARK TO THE POLISH WORKING TRANSLATION OF THE DRAFT JOP</p> <p>There is: The output indicators for each priority, including the quantified target values, which are expected to contribute to the results.</p> <p>Should be: The output indicators for each priority, including the quantified target values, which are expected to contribute to the achievement of estimated results.</p>	The description shall be more precise.	<p>Remark included</p> <p>Remark relates to the working translation of the draft JOP into Polish. The translation will be corrected. Nevertheless, the only binding document, that shall be referred to, is the JOP in English.</p>
24	Podlaski Voivodeship Office, Poland	3.1.6	<p>REMARK TO THE POLISH WORKING TRANSLATION OF THE DRAFT JOP</p> <p>TO7, priority "Improvement and development of transport services and infrastructure"</p> <p>There is: (indicator) "Total length of reconstructed or upgraded roads (ENI/CBC 27)"</p> <p>Should be: "Total length of renovated or upgraded roads (ENI/CBC 27)".</p>	We suggest change of the naming of kinds of works according to practice and the Polish Construction Law.	<p>Remark included</p> <p>Remark relates to the working translation of the draft JOP into Polish. The translation will be corrected. Nevertheless, the only binding document, that shall be referred to, is the JOP in English.</p>
25	Podlaski Voivodeship Office, Poland	3.1.6	TO7, priority "Improvement and development of transport services and infrastructure" - lack of indicator concerning transport services.	We suggest adding an indicator concerning transport services.	<p>Remark not included</p> <p>Response – see point 1 above.</p>
26	Podlaski Voivodeship Office, Poland	3.1.6	TO7, priority "Development of ICT infrastructure" - lack of indicator concerning directly development of ICT infrastructure.	We suggest adding an indicator concerning development of ICT infrastructure.	<p>Remark not included</p> <p>Response – see point 1 above.</p>
27	Podlaski Voivodeship Office, Poland	3.1.6	TO8, priorities „Support to the development of health protection and social services” and „Addressing common security challenges”.	Given output indicators (4) in fact concern project result. We suggest defining indicators concerning project outputs.	<p>Remark not included</p> <p>The concrete proposition is not formulated. The output indicators proposed for TO8 are either directly taken from the List of ENI CBC 'Common Output Indicators' (see answer to point 1 above) or are in line with the methodology applied to definition of indicators in this document.</p>
28	Podlaski Voivodeship Office, Poland	3.1.6	TO10, priority „Improvement of border management operations, customs and visas procedures"	We suggest adding indicators concerning projects outputs.	<p>Remark not included</p> <p>The concrete proposition is not formulated. This output indicator is directly taken from the List of ENI CBC 'Common Output Indicators' (see answer to point 1 above).</p>

29	Podlaski Voivodeship Office, Poland	3.1.6	TO10, priority „Improvement of border management operations, customs and visas procedures” Given result indicator “Increased efficiency of border clearance” is not measurable, there is no value or objective standard of efficiency of border clearance, thus it would not be possible to notice increase of the indicator.	We suggest that the result should refer to e.g. increase of number of border clearance as a result of implementation of border management operations.	Remark not included The methodology of measuring of each indicator is defined for the purposes of the Evaluation and Monitoring System of the Programme. In case of this indicator such issues like number of detected cases of human/goods smuggling as well as the average length of the customs clearance will be measured.
30	“DIAMEB” LLC, Ukraine	2	Proposal to use a term “cross-border region” to all Programme regions instead of Programme division into core and adjoining regions.	Use the same terms to all regions as all regions are going to participate in the Programme on an equal footing	Remark not included The structure of a programme area as well as terms “core region” and “adjoining region” are defined by Art. 2 of IR, therefore terminology other than that of the IR cannot be used in the JOP.
31	NGO „Ecological Initiatives”, Ukraine	3.1	Proposal to support the TO 6 aiming at protection of the environment by the Programme.	TO6 will face real needs of the Ukrainian regions. A significant number of projects had been already implemented within the current Programme, namely within its priority dedicated to the protection of the environment. The TO6 is missing in TOs defined for the Programme, though it is known that the ecological infrastructure of Ukraine is weakly developed. Having this in view, investments in this field seems to be very desirable. Besides, it should be noted that the TO6 has been selected by other CBC Programmes, where Ukraine participates, such as Hungary – Slovakia – Romania - Ukraine Programme 2014-2020, but, unfortunately, it has not been included into the Poland-Belarus-Ukraine Programme.	Remark not included The selected TOs are the result of compromise achieved by the three Programme participating countries and by the members of the JPC. According to the recommendations of the EC for the period 2014-2020, only 4 thematic objectives may be chosen by each Programme. Whereas, there is some room for pro-ecological projects dedicated to preservation of historical heritage within the TO3, namely „Promotion of local culture and preservation of historical heritage”.
32	Lviv Regional Council, Ukraine	3.1	Proposal to remove Priorities 1 and 2 of TO10 to the TO8 and consider replacing the TO10 by the TO1 “Business and SME development”	While carrying out the analysis of 4 selected thematic objectives, one can notice that two overlapping TOs concerning security are selected (TO8 and TO10), whereas TO1 “Business and SME development” is lacking among Programme TOs in spite of the fact that the lesson learned from the previous Programme denotes that the issue of economic development is overwhelmingly important for Ukraine.	Remark not included The selected thematic objectives are the result of compromise achieved by the three Programme participating countries and by the members of the Joint Programme Committee. According to the recommendations of the EC for the period 2014-2020, only 4 thematic objectives may be chosen by each Programme. In fact, the word „security” is being used more than once in TO8 and TO10, but in different contexts, that is why

				This change is appropriate in view of the fact that the border areas are quite depressed and require dynamic economic development, moreover, these areas are a priority for regional development strategies.	we deal with two different thematic objectives. The first one concerns the common security and health protection challenges, while the second one concerns border management.
33	Lviv Regional Council, Ukraine	2	Proposal to allow a possibility for organizations from Kyiv and Warsaw to submit their AFs in relation to problems solving in the cross-border area	It has been mentioned that in addition to the organizations from core regions, the organizations from Minsk can submit their AFs too.	Remark included partially Possibility of AFs submitting by organizations from Minsk is determined by the fact that Minsk is a part of the Programme area. Therefore all organizations that had been registered in this territory automatically received an opportunity of submitting their AFs. The eligibility criteria which have to be fulfilled by beneficiaries will be defined at the later stage in respect to each Cfp. In duly justified cases and taking into account provisions of the Art. 45.4 of IR such beneficiaries can participate but their projects must be implemented in the Programme area.
34	Lviv Oblast State Administration, Ukraine	3.1.5	Proposal for the next Programme (2021-2027) to minimise the Programme allocation for the LIPs solving problem at the intergovernmental level up to 10%	Allocation of 30 percent of the Programme budget for LIPs is too much. They are not directly addressing cross-border problems. For instance, during implementation of the current Programme we had situation where the Lviv State Regional Administration played a beneficiary role (<i>note: according to Ukrainian legislation the State Oblast Administration of the region where the project is implemented is defined as a beneficiary</i>), whereas the project was implemented by the State Fiscal Service and the State Border Guard Service of Ukraine that had nothing in common with the project – either directly, or indirectly. Perhaps it would be more reasonable to reduce this quote and allocate more funds to solve cross-border issues cross-border issues directly at the local level.	Remark not included The remark does not concern the draft JOP consulted and will be taken into account while preparing the CBC PBU 2021-2027.
35	Agency of European Innovations, Ukraine	3.1.2	REMARK TO THE POLISH AND UKRAINIAN WORKING TRANSLATION OF THE DRAFT JOP The term “joint action and common project”	Correct translation will ensure unified understanding of indicative activities.	Remark included Remark relates to the working translation of the draft JOP into Polish and into Ukrainian. The translation will

			was translated in Polish version only as “common projects”, while in Ukrainian version as “common projects and general actions”. Request to correct the translation.		be corrected. Nevertheless, the only binding document, that shall be referred to, is the JOP in English.
36	Agency of European Innovations, Ukraine	3.1.2	Proposal not to narrow the activities under Priority 2 of the TO7 (“Development of ICT infrastructure”) to only ICT infrastructure development, but to allow also activities related to digital market harmonization (services).	In Ukraine the ICT infrastructure is developed by profit-making specialised organization. The broadening of the scope of possible activities will also meet social requirements and actual needs of programme regions.	Remark partially included The list of indicative projects was expanded by two additional activities deriving from the Programming Document: - joint initiatives on development of digital resources and data sharing; - joint initiatives on ensuring the interoperability of ICT infrastructure.
37	Lviv Regional Branch of National Institute of Strategic Researches, Ukraine	3.3	Proposal to include a risk of delays in funds payments by the State Treasury Service of Ukraine as one of Programme potential risks.	The risk of funds blocking by State Treasury Service is a serious potential risk endangering project implementation that is familiar to almost every participant of the Programme, however it has not been mentioned in draft JOP.	Remark not included The risk is no longer actual, as the changes have been introduced into the Resolution of the Cabinet of Ministries of Ukraine № 65 as of 01.03.2014 (amended by the Resolution of the Cabinet of Ministries of Ukraine № 441 as of 10.09.2014), in particular regarding priority of making payments connected to programme/project implementation.
38	National University of Water Management and Nature Resources Use, Ukraine	3.1.6	Proposal to include one additional product indicator at the level of TO8, namely: - number of certified laboratories of metrology monitoring the quality of environment and production (at universities and research centres etc.).	It is important to ensure monitoring and control over the quality of the environment, water, land, water pools, food products etc. in order to achieve the TO8, that is why universities and research centres shall have own laboratories of metrology.	Remarks not included Response – see point 1 above.
39	Agency of European Innovations, Ukraine	3.2.1	On page 21 is stated that "Renewable energy is not well developed, with the only significant source of this type being a 27 MW hydro-plant in the Zakarpatska oblast." This phrase relates to the situation in Ukraine, but only in Lviv region there are two solar plants with a total capacity of more than 3 MW, and the first stage has been implemented in 2012, a wind power of 6.6 MW capacity began to operate in 2014.	Data obtained within the FARADAY project based on official data of the company who made such investments	Remark not included The concrete proposition is not formulated. Social and economic analysis of Programme regions was developed within the external expertise.

40	National University of Water Management and Nature Resources Use, Ukraine	3.1.1	Proposal to take into account the transformation of nature use and its ecological and economic assessment (the number of land which is not used renaturalised drainage systems, unauthorized overgrown by forest, etc.). TO3 shall be implemented in accordance with legislation and regulations at the level UKRAINE – EU, such as Association Agreement, Annexes 29 and 30 of the Agreement on the Environment Protection, Bird Directive, Directive on Environmental Management etc. Therefore the compliance of all projects with provisions of EU directives, laws and standards should be assessed.	No justification	<p>Remark not included</p> <p>The concrete proposition of JOP modification and justification are not formulated.</p> <p>The SEA of the JOP was developed in dialogue between external environmental experts, the MA, the JPC and the wider audience via public hearings and consultation events, arranged in all participating countries. In addition to the public hearings and consultations, the draft SEA Report was published on the Programme website, which facilitated fluent accessibility to the draft documents from the whole Programme area. Details concerning public hearings of draft report of the SEA will be placed soon on the ENPI CBC Programme Poland-Belarus-Ukraine 2007-2013 website www.pl-by-ua.eu</p>
41	National University of Water Management and Nature Resources Use, Ukraine	3.1.1	Proposal to include the issue "Ecological, economic and social transformation of the agrarian nature use and their influence on the state of livelihood of the population of Volyn and Rivne regions" (compared with Belarus and Poland - analysis of the prospects for sustainable development)	No justification	<p>Remark not included</p> <p>The concrete proposition of JOP modification and justification are not formulated.</p>