

Interreg IPA Cross-border Cooperation Programme Croatia-Serbia 2014-2020

Annex 6: Response sheet for comments within SEA process

This document provides an overview of how were the outcomes of SEA Report and comments obtained through consultations on the SEA Report taken into account during finalising of the Cooperation Programme and before its adoption.

The first table below summarizes recommendations made within the SEA report (left-hand and central column) and explanations how these were taken into account during finalising of the Cooperation Programme and before its adoption (see right-hand column with responses by the Managing Authority).

The second table presents comments obtained through consultations with environmental authorities and the public on the SEA Study. The table presents comments that were received by the Managing Authority for the Cooperation Programme during this process of consultations that was conducted from 20 October 2014 to 19 November 2014. All the documents were published on these web sites:

Croatia: <http://www.mrrfeu.hr/default.aspx?id=4317>

Serbia: <http://www.evropa.gov.rs/CBC/PublicSite/NewsAndEvents.aspx>

The documents published during SEA consultations were the following: non-technical summary in Croatian, Serbian and English language, SEA Study in English language and draft Cooperation Programme in English language. The comments were submitted by the Croatian Ministry of Environmental and Nature Protection, the Ministry of Agriculture and the Ministry of Culture and Serbian Ministry of Agriculture and Environmental Protection. During the consultation period, no comments were received from the public, neither in writing nor during the public consultation meetings held in Zagreb on 12 November 2014 and Belgrade on 13 November 2014.

It is to be noted that, following closure of the public hearing within SEA consultation process, all relevant comments were taken into account. Therefore, SEA Study and the non-technical summary were amended with additional information and final versions of the documents were published on the MA website (<http://www.arr.hr/eu-programi-2014-2020/ipa-program-prekogranicne-suradnje-hrvatska-srbija>) on 20 May 2015 and on SEIO's website (<http://www.evropa.gov.rs/CBC/PublicSite/NewsAndEvents.aspx>) on 22 May 2015.

In addition, revised versions of the relevant documents (final version of SEA Study, including non-technical summaries in national languages, final version of Cooperation Programme and a summary (this Annex 6) of relevant comments received and the method of their implementation into SEA Study and Cooperation Programme) were submitted to the relevant environmental authorities, Ministry of Environmental and Nature Protection in Croatia (7 May 2015) and Ministry of Agriculture and Environmental Protection in Serbia (20 May 2015).

In the second table, the two left-hand columns present authors of the comments and translated summaries of the comments. The two right-hand columns present how were the comments for final adjustments of conclusions made within the SEA Report (responses by the SEA team) and taken into account during finalising of the Cooperation Programme and before its adoption (responses by the Managing Authority).

Response sheet for comments raised within the SEA Report:

Recommendations made in the SEA Report related to Specific Objective 1.1		
Type of measure	Recommendation	Response by the Managing Authority
General (for all activities under this Specific Objective)	<p>Supported facilities for health and social services should be located in flood-safe areas and should be easily accessible in emergency situations (e.g. not be cut-off by floods).</p> <p>Development or modernization of buildings must meet all applicable environmental requirements and should ideally demonstrate good environmental building practices - e.g. easy accessibility for public transport, accessibility for people with disabilities, energy efficiency, sound waste collection, etc.</p>	<p>Accepted.</p> <p>Both requirements are reflected and considered under Section 6 Horizontal principles, sub-section Sustainable development.</p>
Recommendations made in the SEA Report related to Specific Objective 2.1.		
Type of measure	Recommendation	Response by the Managing Authority
General (for all activities under this Specific Objective)	Supported infrastructural projects must be subject to applicable environmental standards and be subject - as and when needed - to applicable environmental impacts assessments, assessments of impacts on Natura 2000 network and possibly consultations on transboundary impacts (if such impacts are expected).	<p>Accepted.</p> <p>Calls for proposals related documentation will clearly specify that projects that require environmental impacts assessments and assessments of impacts on Natura 2000 network (or Emerald network) must prove that they fully meet conditions stipulated within these processes.</p>
Specific - for joint actions in the area of monitoring and management of	Monitoring and management responses should focus specifically on priority issues addressed by the Danube River Basin Management Plan and the EU Strategy for the Danube Region (EUSDR) where more information is needed from the region: i.e. ecological and chemical status of water bodies, source of water pollution, ground-water pollution	<p>Accepted.</p> <p>Recommendation was integrated into the text of the CP. The synergy between the programme and the EU Strategy for the</p>

environmental and/or biodiversity protection	<p>and accidental risk spots inventory, indigenous species (especially Danube sturgeon species), status of all species and habitats covered by EU nature legislation, and invasive species. Improvements of monitoring systems should primarily entail exchange of information and making it publicly available - new monitoring systems should be set up only when really needed. Monitoring system should be coordinated with bodies in charge of Danube River Basin Management Plan (i.e. ICPDR) - in terms of issues addressed, exact parameters monitored, using lessons from the Joint Danube Survey 3.</p> <p>Potential applications for environmental monitoring systems should be cross-verified with the relevant national authorities (e.g. State Institute for Nature Protection, Croatian Waters, etc.) in order to maximise potential synergies with higher-level monitoring systems on national or international levels. Monitoring parameters, periods, data collection methods, frequency and information formats should ideally allow the various monitoring systems to build on one another and fill in the priority information gaps. The data obtained should be shared with any interested institutions and made publicly available to allow their wider use.</p>	<p>Danube Region (EUSDR) is shown in section 4.3 Contribution of planned interventions towards macro-regional and sea-basin strategies whereas the compliance of relevant actions within the programme with Danube River Basin Management Plan is pointed out within Section 1.3. Teritorial Analysis of the programme area and under Priority Axis 2.</p> <p>Besides the fact that potential applications will be assessed taking into account compliance with the relevant regulatory obligations on national or international levels, the applicants will be advised to consult relevant environmental monitoring systems in order to evaluate their added value and synergies with monitoring systems on national or international levels.</p>
Specific - for actions related to environmental and biodiversity protection	<p>The character of proposed activities within IPA CBC Croatia-Serbia programme offers a suitable framework for supporting range of initiatives related to UNSECO Transboundary Biosphere Reserve, especially on the Serbian side which awaits formal designation and where implementation needs are extensive given the large area involved. In this regard, pay increased attention to possible support to activities related to this Biosphere Reserve as long as they fit into logic of programme interventions and they demonstrate additionality to any ongoing projects that may be funded from other sources (EU, international or national).</p>	<p>Accepted.</p> <p>Recommendation was integrated into the text of the CP, under actions within SO 2.1.</p>
Specific - for actions related to risk prevention systems	<p>All supported activities on flood protection should promote a long-term flood protection and retention approach that respects the ecological processes in the flood plains. Priority attention should be given to actions that address the following six targets of the Action Programme</p>	<p>Accepted.</p> <p>Recommendation was integrated into the text of the CP, under actions within SO 2.1.</p>

	<p>for Sustainable Flood Protection in the Danube River Basin which follow the same logic and have been endorsed within the framework of the International Commission for Protection of Danube River - i.e:</p> <ul style="list-style-type: none"> • To reduce the adverse impact and the likelihood of floods in each sub-basin through the development and implementation of a long-term flood protection and retention strategy based on the enhancement of natural retention as far as possible • To improve flood forecasting and warning suited to local and regional needs as necessary. • To increase the capacity building and raise the level of preparedness of the organizations responsible for flood mitigation • To develop flood risk maps • To harmonize design criteria and safety regulations along and across border sections. • To prevent and mitigate pollution of water caused by floods. <p>Interventions on flood risks should be closely coordinated with Danube and Sava basin flood risk management plans and should also take into account potential impacts of climate change. Both of the proposed measures should ideally support implementation of Danube wide flood risk management plans due in 2015 under the Floods Directive. Alternately, should suitable application arise, priority consideration should be given to flood protection measures can support implementation of priority measures endorsed through ICPDR's Sub-Basin Level Flood Action Plan for Pannonian Southern Danube (2009) - i.e.:</p> <ul style="list-style-type: none"> • Spatial planning (Preparation of flood risk maps, Ensuring that spatial plans contain flood hazard maps, Defining limitations related to land use in flood prone areas). • Enhancing retention and detention capacities (Preserving - and where possible enhancing - existing capacities of natural flood retention capacities). • Non-structural preventive measures: (Introducing principles of EU 	<p>All floods related activities and interventions within the programme have to be in line with Floods Directive (mentioned under Section Territorial Analysis of the programme area of the CP) as well as with Danube and Sava basin flood risk management plans.</p>
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	<p>Floods directive to decision-making, Capacity building of professionals, Raising awareness and preparedness of general public (Raise awareness and preparedness of general public).</p> <p>As part of emergency preparedness and risk prevention systems consider also mapping of various flood risks and water pollution hazards in the flood zones in accordance with the EU Floods Directive as part of a single disaster risk prevention and management system.</p>	
Specific - for actions related to pilot and demonstration projects including innovative approaches to risk prevention and mitigation.	<p>Supported measures must not restrict natural retention of flood plains - ideally should expand natural retention by e.g. promoting the 'room for river' approach that allows flooding during periods of high discharge.</p> <p>Consider adding establishment of protection forests amongst the types of eligible activities that can be supported.</p> <p>Flood prevention and drought protection projects should not be planned on locations where they will have a negative impact on the Ecological Network target features or integrity.</p> <p>In case of support to irrigation, give preference to irrigation systems that do not require reservoir construction (especially not on the rivers) for their water source and that are not planned or already located within or in the vicinity of Ecological Network areas.</p>	<p>Accepted.</p> <p>Recommendation was integrated into the text of the CP, under actions within SO 2.1.</p> <p>Calls for proposals will clearly specify that projects that require environmental impacts assessments and assessments of impacts on Natura 2000 network (or Emerald network) must prove that they fully meet conditions stipulated within these processes.</p>
Recommendations made in the SEA Report related to Specific Objective 2.2.		
Type of measure	Recommendation	Response by the Managing Authority
General (for all activities under this Specific Objective)	<p>Priority support should be given to:</p> <ul style="list-style-type: none"> energy efficiency measures in public buildings (such as hospitals, schools - where possible synergies with interventions under Thematic Priority 1 Employment, Social Inclusion, Health and Social services exist) use of agricultural waste for energy production, demonstration projects for solar power on roofs or build surfaces as long as they do not have adverse visual impacts on the amenity of 	<p>Accepted</p> <p>Energy efficiency measures in public buildings are already inserted in CP as a priority under SO 2.2.</p> <p>Use of agricultural waste for energy production and demonstration projects for solar power on roofs or build surfaces (as</p>

	<p>landscape and cultural heritage.</p> <p>Supported projects must be subject to applicable environmental and health protection standards and be subject (when needed) to: environmental impacts assessments, assessments of impacts on Natura 2000 network and consultations on transboundary impacts (if such impacts would be expected).</p>	<p>long as they do not have adverse visual impacts on the amenity of landscape and cultural heritage were included among examples of eligible actions under Specific Objective 2.2.</p> <p>Calls for proposals will also clearly specify that projects that require environmental impacts assessments and assessments of impacts on Natura 2000 network (or Emerald network) must prove that they fully meet conditions stipulated within these processes.</p>
Specific - for actions related to joint studies and incentives to support the utilization of renewable energy resources and energy efficiency	<p>Consider targeted support to elaboration of renewable energy plans for counties in the study area and their optimizing through SEA processes. Such plans may be helpful for guiding preparations of specific investment projects and they can simplify environmental permitting processes (if SEA is done well). Such plans, can also consider any possible transboundary impacts.</p> <p>Any larger-scale promotion of biomass farming should be permitted only if it can be proved that it will not lead to the deterioration of already achieved state of any water body surface and groundwater (which is e.g. a fourth objective of Croatian River Basin Management Plan).</p>	<p>Accepted.</p> <p>Call for proposals will mention that any supported renewable energy strategies and plans must consider environmental constraints and possible risks and must include strategic environmental assessment (if required by national legislation).</p> <p>The recommendation was integrated into Section 6.1 Sustainable development.</p>
Specific - for actions related to joint pilot projects on innovative technologies in the field of renewable energy and joint investing in public infrastructure on sustainable	<p>Wind turbines and large solar parks should not be planned within areas important for bird preservation (Special Protection Areas, SPA).</p> <p>Wind turbines and solar parks should not be located on very valuable agricultural soil (P1) and valuable agricultural soil (P2).</p> <p>Large solar parks and hydropower plants should not be planned within areas important for preservation of species and habitat types (Special Areas of Conservation, SAC)</p> <p>Solar power project should be limited to smaller-scale solar power</p>	<p>Accepted.</p> <p>All recommendations were integrated into Section 6.1 Sustainable development.</p>

energy production and energy efficiency.	installations (use of several panels, rather than large parks) in built urban areas.	
Recommendations made in the SEA Report related to Specific Objective 3.1.		
Type of measure	Recommendation	Response by the Managing Authority
General (for all activities under this Specific Objective)	<p>Ensure in the project preparatory phase, that no important and protected habitats and species are endangered by the planned infrastructure and activities.</p> <p>Preparation and development of joint tourism strategies and action plans should be subject to strategic environmental assessments (when their potential impacts would merit so).</p>	Calls for proposals will also clearly specify that projects that require environmental impacts assessments and assessments of impacts on Natura 2000 network (or Emerald network) must prove that they fully meet conditions stipulated within these processes.
Specific - for actions related to tourism	Consider prioritizing eco/agro-tourism projects that contribute to sustainable management of protected areas (e.g. walking and cycling paths, renovation of visitor centres, etc.) that have been prepared in cooperation with nature protection and culture protection authorities and adhere to the principles of EU Agenda for a sustainable and competitive European tourism such as: taking a holistic, integrated approach; planning for the long term; involving all stakeholders; recognizing, minimising and monitoring risks.	Partially accepted. The recommendation was taken in consideration within Section 6.1 Sustainable development.
Specific - for actions related preserving, restoring and reviving cultural, historical and natural heritage, including improving access to them; and small scale infrastructure related to cultural and natural	<p>The supported projects must meet all applicable national rules for cultural heritage protection.</p> <p>It is also recommended to inform prospective applicants about the following principles that should guide their planning of interventions for sustainable use of cultural and natural heritage:</p> <ul style="list-style-type: none"> • Conservation plans must contribute to the authenticity and integrity of the sites and monuments and their tangible and intangible elements. • Conservation plans must address all relevant factors necessary for adequate long-term safeguarding and sustainable use of the heritage site or monument. • The principal objectives of the conservation plans should be clearly 	<p>Partially accepted.</p> <p>The recommendation was taken in consideration within Section 6.1 Sustainable development.</p>

heritage.	<p>stated. The proposals in the conservation plan must be articulated in a realistic fashion, from the legislative, financial and economic point of view, as well as with regard to the required standards and restrictions.</p> <ul style="list-style-type: none"> • The conservation plans should aim at ensuring a harmonious relationship between the heritage sites and monuments and the surrounding environment as a whole. Wherever necessary for the proper protection of the property, an adequate buffer zone should be provided. • New functions and activities should be compatible with the character of the heritage sites and monuments. Proponents must ensure that such changes do not impact adversely on the outstanding value of the heritage site or monument. • Before any intervention, existing conditions in the area should be thoroughly documented. • Conservation planning should therefore encourage the active participation of the communities and stakeholders concerned with the property as necessary conditions to its sustainable protection, conservation, management and presentation. 	
Recommendations made in the SEA Report related to Specific Objective 4.1.		
Type of measure	Recommendation	Response by the Managing Authority
General (for all activities under this Specific Objective)	<p>If suitable applications for programme support arise, consider prioritizing support business development opportunities related to smart growth - e.g.:</p> <ul style="list-style-type: none"> • producing and marketing organic agriculture products, • waste management and waste reuse (e.g. waste from electronic equipment), • water efficiency and water conservation systems; • water-efficient irrigation systems; • drought-resistant and other climate-resilient crops, etc. 	<p>Partially accepted.</p> <p>It is to be noted that the activity "Establishment of and support to existing and new business related sectorial networks and organisations in developing new products/services/patents/trademarks, standardisation, product protection, marketing and development of cross-border markets" comprises business support activities related to smart growth.</p>

Response sheet for comments raised through consultations on the SEA Study and draft Cooperation Programme

Institution	Comment	Response by the SEA team	Response by the Managing authority
Ministry of Environmental and Nature Protection (Klasa: 351-03/14-06/05; Urbroj: 517-06-2-1-1-14-4; 25.11.2014)	Reformulate sentence " <i>Flood prevention and drought protection projects should not be planned on locations where they will not have a negative impact on the Ecological Network target features or integrity</i> " under titles "Findings regarding Specific Objective 2.1." (page 9) and "Recommendations for implementation of activities within programme Specific Objective 2.1." (page 86)	Accepted and incorporated. Double negation was removed.	Noted.
	Table on the page 21 does not show clearly whether air quality monitoring is part of the joint monitoring mentioned on the page 16. It should be specified which environmental components are included into " <i>joint actions</i> ".	Accepted and incorporated. The scoping table on page 21 was updated to reflect the fact the joint air quality monitoring under specific objective 2.1. (as summarized on the page 16) indeed has potential to support joint air quality monitoring within its eligible activities.	Noted.
	On the page 7 states that there is no impact on air quality, however from the prior text it is evident that there is.	Accepted and incorporated. The table on page 7 was updated to: i) reflect the fact activities under specific objective 2.1 can include joint air quality monitoring and ii) activities under objective 2.2. may have either positive or adverse impacts on air quality – which are however not considered significant given the scale and focus of the envisaged activities.	Noted.
	On the page 49 it is indicated that most of the pollution comes from the neighboring countries (Hungary, Serbia). It is pointed	Accepted and incorporated.	Noted.

	<p>out that not enough attention is given to the joint actions/ measures that should take country that causes pollution (specifically, Serbia to Croatia) to mitigate trans boundary pollution.</p> <p>Study shows that Environmental protection agency of RS has the National register of pollution sources, while for Croatia there are no data regarding Croatian register of pollution sources and Information System of Environmental Protection.</p>	<p>Correct statement. Please note that activities under specific objective 2.1 can include joint air quality monitoring – provided suitable proposals are proposed and selected from implementation. For details of the application process see chapter 5 of the proposed Cooperation Programme, and especially item 5.4.7 with information on Project cycle management.</p> <p>The SEA report was expanded to include information on National Portal of the Environmental Pollution Register (CNPEPR) operated within Croatian Environmental Information System (ISZO).</p>	
	<p>Under “<i>The specific objectives for the above priority areas which are relevant for the programme area..</i>” on the page 53 it is required to prescribe measures for air quality which would result with decreasing of trans boundary pollution (prior are listed policies that includes air and soil protection)</p>	<p>Accepted and incorporated.</p> <p>The SEA report now reads: In order to address interest of the Ministry of Environmental and Nature Protection of Croatia in transboundary air protection they were supplement by a 10th objective: ‘To limit and, as far as possible, gradually reduce and prevent air pollution including long-range transboundary air pollution in accordance with LRTAP Convention. The assessment table was expanded to show linkage especially in monitoring and note has been taken that ‘The monitoring can also address transboundary air pollution concerns –</p>	Noted.

		if suitable proposals that address priority needs are proposed.'	
	On the page 61, impact on air quality is well explained and it is pointed out that, under the programme, limited scale of funding is allocated to interventions under SO 2.2. as well that air quality can be safely managed through EIAs and/or standard environmental permitting processes. However, since other environmental components are described in more details, it is noted that air quality is not adequately explained.	Not accepted. We believe that the impacts are sufficiently described – especially considering the fact that they are not deemed significant.	Noted
	On the page 83 in the chapter 7. Recommended mitigation and enhancement measures, the purpose of the recommendation <i>“Lastly, the Managing Authority for this programme can refuse recommendations on the basis of overriding economic concerns or if the proposed measures cannot be addressed within programme implementation modalities”</i> is not clear given that aim of recommendations is to prevent and mitigate possible impacts. Therefore, the purpose of that recommendation should be explained.	Accepted and incorporated. The explanation is derived from the Article 8 of the SEA Directive and Article 11 of the SEA Protocol which both require that SEA study/report, the opinions or relevant authorities and the public and the results of any transboundary must be taken into account during the preparation of the plan or programme and before its adoption. Neither of these provisions however implies that each and every of these inputs to the proposed plan or programme must be accepted as such requirement could not be always met. An obvious example is, for instance, if the comments obtained cannot be addressed within modalities of the proposed plan or programme implementation. In order not to confuse readers, these explanatory notes have been deleted.	Noted. Almost all recommendations generated within the SEA process were anyway accepted and will be used during the implementation of the proposed Cooperation Programme.

	On the page 24/25 of CP under “PA2” it is necessary to add “reduction of contaminated area due to cross-border pollution”.	Accepted and incorporated within Section 1.5. Assessment of the needs, challenges and potential of the programme area, and Section 1.6. How the cooperation programme will address the needs and challenges of the programme area.	Noted.
Ministry of Agriculture (klasa: 303-03/14-01/159; Urbroj: 525-06/1317-14-3; 18.11.2014)	In the matrix of interactions between proposed Specific Objectives for each of the Priority Axes and their environmental implications the impact on soil and agriculture for SO 2.1. should be marked as “ <i>Potential impacts expected, impacts can be either positive or negative</i> ” (light blue color).	Accepted and incorporated.	Noted.
	In the chapter “Findings regarding Specific Objective 2.2.”, point e. should be amended by exception of locating wind turbines and solar parks on very valuable agricultural soil (P1) and valuable agricultural soil (P2).	Accepted and incorporated.	Noted.
	In the chapter “Findings regarding Specific Objective 2.2.”, points b. and h. are in collision (in point b. priority is given to use of agricultural waste for energy production, which is in collision with statement of the possibility of large-scale promotion of biomass in the point h.)	Not accepted. Large-scale promotion of biomass farming and its potential use for energy production (e.g. combustion processes to generate heat or electricity) may have much more severe adverse impacts than energy production from agricultural waste (e.g. anaerobic digestion of manure and agricultural residues in biogas stations).	Noted.
	In the chapter “Findings regarding Specific Objective 2.2.”, point h. states: “ <i>Biomass farming should not be supported on vulnerable areas under Nitrate Directive, unless such project applications prove that the choice of crops and farming practice will not increase fertilizers and pesticides loads.</i> ” It is not needed to appoint which type of agricultural production is recommended on vulnerable areas due to the facts it is	Accepted. The reference to the mentioned Action Programme (Official Gazette No. 15/2013) was removed.	Noted.

	already prescribed by objective 1. of the Action Program for the protection of waters against pollution caused by nitrates from agricultural sources (Official Gazette No. 15/2013) .		
	Map of the preliminary vulnerable and vulnerable zones is given on the page 34. Ministry points out there is cartogram of vulnerable areas included as part of Decision on the designation of vulnerable areas in the Republic of Croatia (Official Gazette No. 130/12)	Accepted. The cartogram was included into the final version of the SEA study.	Noted.
	On the page 24 following changes should be made: "2. Directorate for forestry, hunting and wood production industry requested that... "	Accepted and incorporated.	Noted.
	On the page 43 following changes should be made: "Forest areas in Croatia in last three decades have constant increase. Total forest area in Croatia in 1986. was 2.061.509 ha, in 1996. it was 2.078.289 ha and in 2006. it was 2.402.782 ha (FRA 2010- Country Report, Croatia). increased dramatically since 1991 when only approximately 33% of the territory was covered with forests. Nowadays, forest coverage amounts roughly 45%, which is to a great extent the Increment in forest area is result of war casualties, mine fields which cover a large portion of the country and also constant demographic changes in terms of the abandonment of rural areas which is the main reason for natural succession of forests over former agricultural lots, and also as result of afforestation. "	Accepted and incorporated.	Noted.
	On the page 44 following changes should be made: "Forests of the programme region (wider area alongside the Danube, Drava and Sava river) are not of a high commercial value, but nevertheless and play major role in water regime regulation, flood prevention and soil conservation. Most of the area alongside these three rivers are covered by floodplain forests with major tree species being willows (<i>Salix</i> sp.), poplars (<i>Populus</i> sp.), black alder (<i>Alnus glutinosa</i>) and narrow-leafed ash (<i>Fraxinus angustifolia</i>). Wider flooding area	Accepted and incorporated.	Noted.

	<i>which is not under heavy influence of flooding, but is influenced nevertheless, is covered by pedunculate oak forests (Quercus robur), which is the most valuable commercial tree species in Croatia. In this region there is the biggest complete pedunculate oak forest (Spačva) in Croatia on the area of 40.000 ha.</i>		
	On the page 44 following changes should be made: <i>“Major pressures on forests in the programme region consist of fragmentation of forests through construction of various linear objects (oil pipelines, roads, power lines etc.), illegal waste dumps, overuse of pesticides and fertilizers in agriculture and insufficient and inappropriate management because of large mine suspected area.”</i>	Accepted and incorporated.	Noted.
	On the page 44 following changes should be made: <i>“MajorOne of the initiative for the improvement of Croatian forests and forestry will be achieved through the realization of the Rural Development Programme...”</i>	Accepted and incorporated.	Noted.
	On the page 63 following changes should be made: <i>“Potential adverse impacts could be associated with hypothetical larger-scale uptake of biomass farming for energetic use that would trigger conversions of other forest land (unstocked forest land)current forest estates.”</i>	Accepted and incorporated.	Noted.
Ministry of Health (Klasa: 351-03/14-01/95M Urbroj: 534-09-1-1-1/4-14-3; 18.11.2014)	No comments.	Noted.	Noted.
Ministry of Culture (Klasa: 910-01/14-	In the chapter 3.9. Cultural heritage, following changes should be made in the sentence <i>“Through the institution and spatial planning work are defined categories: protected, securely protected, proposed for protection, proposed for protection of</i>	Accepted and incorporated.	Noted.

01/0159; Urboj: 523- 03-03-01/1- 14-04; 19.11.2014)	<i>local character and category of recognized cultural heritage.”: terms “protected, securely protected, proposed for protection, proposed for protection of local character and category of recognized cultural heritage.” should be replaced with the following terms: “protected and inscribed in the Register on the List of Protected Cultural Goods, preventatively protected inscribed in the Register on the List of Preventatively Protected Goods, cultural goods protected by the representative bodies of a county, a city or a municipality if it is located on their territory and identified cultural goods”.</i>		
Ministry of Agriculture and Environmental Protection of the Republic of Serbia (Letter No: 350-02-93/14- 16)	We express positive opinion on the SEA Environmental Report based on the fact that it is in line with Articles 12-17 of the Law on SEA (Official Gazette of the Republic of Serbia, no. 135/04 and 88/10). However, in order to conduct SEA procedure in line with the relevant legislation, we recommend to organise SEA public consultations and to prepare related report on the participation of stakeholders.	Noted. SEA consultations in Serbia were open from 22 October 2014 to 19 November 2014. Furthermore, Serbian European Integration Office (SEIO) organised a SEA public consultation meeting in Belgrade on 13 November 2014. Report on the participation of stakeholders is given in Section 5.7 of the Cooperation Programme and this Annex 6 to Cooperation Programme (Response sheet for SEA comments).	Noted. In line with the Decision on the start of Strategic Environmental Assessment for Interreg IPA CBC Croatia – Serbia 2014-2020, the MA will draft a report on the SEA procedure conducted following the closure of SEA procedure for the Programme. Also, the report will be published on relevant website pages.