

**Interreg**



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**Central Baltic Programme**

# **OVERVIEW OF THE CENTRAL BALTIC 2021-2027 PUBLIC HEARINGS FEEDBACK AND JOINT SECRETARIAT'S COMMENTS**

The public hearing webinars were carried out to introduce the new programme document (IP) draft.

Published: May 2022

# Overview of the Central Baltic 2021-2027 public hearings feedback and JS comments

The questionnaire was opened online on the 8th of February (2021) on the Central Baltic programme website. The public hearing webinars were carried out to introduce the new programme document (IP) draft. The survey closed on the 9<sup>th</sup> of April 2021.

The survey included the following questions:

1. Are the chosen challenges and opportunities relevant for the Central Baltic region?
2. Do the chosen priorities properly address the Central Baltic region's challenges and opportunities?
3. What are the main areas of interest for your organisation?
4. Do you have any other comments concerning the new programme?
5. According to your opinion, how well on a scale from 1 to 5 (where 1 is weak and 5 is strong), does the environmental assessment corresponds to the activities described in the programme for:
  - a) PO 1 Business and markets
  - b) PO 2 Environment
  - c) PO 4 Labour market
  - d) ISO Public services and solutions
  - e) From an environmental perspective, if something does not correlate to the activities in the environmental assessment, please describe it below.
6. Do you have suggestions for measures/initiatives to increase potential positive effects in the implementation of the programme (e.g. administrative, criteria, application documents, follow-up, etc.)?
7. Do you have any suggestions for measures/initiatives to mitigate potential negative environmental effects in the implementation of the programme (e.g. administrative, criteria, application documentation)?
8. Do you have comments on the Strategic Environmental Assessment report?
9. The country you are representing
10. Optional: If you wish, you can leave your name, organisation and e-mail address here.

The following overview of the feedback and JS comments includes topics related to intervention logic and programme implementation. The feedback related to SEA report was forwarded to SEA report authors for their consideration.

If the respondents left their contacts to their feedback, it is included below behind each comment as “the name of organisation” and “the country/Åland. The comments which did not include more than 1-2 words (Eg. “yes”, “very much”) and did not indicate to any specific issues were left out.

**Table 1 Survey responses and comments by the Joint Secretariat (JS)**

SURVEY RESPONSES		COMMENTS BY THE JS
	<b>1. Are the chosen challenges and opportunities relevant for the Central Baltic region?</b>	
1	Yes, and it is important to drive information and knowledge sharing among the project initiatives	Comment was taken for information.
2	Yes. The circular economy is very timely theme and indeed should be in CB program as well. I´m glad that the business side is also addressed, and the shift has been from start-up support and development to support growth-oriented companies.	Comment was taken for information.
3	Yes, they are well in line with our national and regional strategies and addresses challenges that are prioritised in most Central Baltic persons minds. Many of the challenges can be universal, but the "marine touch" is focused on the CBR. /RISE (Unit Regional Transformation), Sweden	Comment was taken for information.

4	<p>Biodiversity and nature-based solutions would need more visible role. These are recognised challenges in Environmental Assessment Report and adapted as national development goals at least in Finland. It is difficult to address all these demanding goals and challenges effectively if funding decentralises activities and actors.</p>	<p>During the programme preparation wide range of challenges and problems were identified but because of needs to focus and to find mutual priorities and limited resources available for cross-border cooperation, the choices were made based on countries and regions development priorities.</p> <p>Narrowing down the thematic scope of themes (including challenges) included into Regional analysis was made based on mapping of priority themes for cooperation for member states and regions in spring 2020.</p> <p>Selected intervention themes as programme objectives 3, 4 and 5 have all positive impact on the environment and indirectly to biodiversity.</p> <p>The nature based solutions are certainly relevant for improving the circular economy, decreasing the loads of nutrients, hazardous substances, toxins and plastics.</p>
5	<p>They are relevant but missing the most important value of people's lives, their health and wellbeing.</p>	<p>During the programme preparation wide range of challenges and problems were identified but because of needs to focus and to find mutual priorities and limited resources available for cross-border cooperation, the choices were made based on countries and regions development priorities.</p> <p>The broad themes of “health” and “wellbeing” were not chosen by Central Baltic programme but we believe that Central Baltic joint actions in improving the living environment, work opportunities and business opportunities of the Central Baltic region have clear positive impact on peoples wellbeing and health.</p> <p>Also the programme objective 7 has potentially positive impact on peoples health and wellbeing through jointly developed public services and solutions to serve citizens needs.</p>

6	I am missing safe and prosper BSR perspective in new CB programme /Sweden/	<p>During the programme preparation wide range of challenges and problems were identified but because of needs to focus and to find joint priorities and limited resources available for cross-border cooperation, the choices were made based on countries and regions development priorities.</p> <p>Central Baltic programme has no intention to address the BSR (Baltic Sea Region) scale.</p> <p>Prosper - programme objectives 1,2, 6 and 7 have potential to contribute to the prosperity and security of the Central Baltic region.</p>
7	All the chosen challenges and opportunities are relevant for the CB-region. Unfortunately it is not obvious where education, work practice, apprenticeships, adult learners and youth are supposed to fit in. /Åland Vocational School/	<p>The issues and themes mentioned are well in place and relevant under programme objective 6 (access labour market and competitiveness of less competitive groups of people) scope.</p> <p>Also, the skills development component is in place and relevant for all other intervention themes.</p>
8	All the chosen challenges and opportunities are relevant for the CB region, however it is not obvious where education, work practice, apprenticeships, adult learners and youth are supposed to fit in. /Åland/	<p>The issues and themes mentioned are well in place and relevant under programme objective 6 (access labour market and competitiveness of less competitive groups of people) scope.</p> <p>Also, the skills development component is in place and relevant for all other intervention themes.</p>

The main challenge of our time all over the world - science tells us - is to slow down and reduce the ongoing global warming/lower the greenhouse gas level in the atmosphere and loss of biodiversity. Actions were needed already decades ago, and time is running out.

With the insight of the present situation and projected future with rapidly degraded ecosystems publicly funded projects must reduce or at least, not have a negative impact on the climate and biodiversity. The focus must be on reducing GHG emissions from industries and traffic as well as the emissions from present land use systems and at the same time enhance the carbon sink, while keeping the carbon storage in the land and water ecosystems as well as the biodiversity.

In the Baltic Area forestry and agriculture have a profound impact on climate as well as biodiversity. Science is clear: the GHG emissions from clearcutting practices and short carbon chains of the wood products add to the global warming and will take decades to compensate in new growth. The loss of biodiversity in the boreal forests make the forests vulnerable to pests, fire and other effects of climate change, adding risk to society and the economy in the area.

Our common challenge is to adapt to the long-term production capacity of the ecosystems we rely upon, to fit the "human project" into the planetary boundaries. This means we have to reduce the use of natural resources and energy and strengthen our ecosystems, restore over exploited forests and farmland in all areas, also in the CBA. Land use has to be analyzed in a holistic view of the ecosystems' many functions, including truly long-term (> 300 years) production capacity and opportunities to contribute to reduced global warming and increased biodiversity. Win-win situations have to be sought.

This being said, we believe the challenges are relevant as long as they have the broader scope stated in the headlines of the Specific Objects. It is crucial to see the overall challenges/problems and to work in an ecosystem based, holistic way. It is now crucial to strengthen the ecosystems and make them resilient in order get "help" from nature with both the GHG-levels in the atmosphere and biodiversity loss.

The opportunities to develop a truly sustainable society are very good in the BA with low population pressure, an already high standard of

We agree with overall logic and holistic approach and see that chosen programme objectives for new Central Baltic programme allow member states and regions to work together in addressing these challenges.

Out of 7 chosen programme objectives 3 are specifically addressing these challenges: programme objectives 3 (joint circular economy solutions), 4 (improved coastal and marine environment) and 5 (decreased CO2 emissions).

	<p>living, educated population and full access to top science and good examples from concrete actions already taken. These opportunities should be managed within the CBP with the ambition to make the BA world leading in sustainability. If not here, where? /Föreningen Närsholmen, Sweden/</p>	
10	<p>Haaga-Helia University of Applied Sciences, Helsinki, Finland is currently taking part in 3 Interreg Central Baltic projects and we are very happy to provide some feedback on the upcoming programme.</p> <p>From the point of view of Haaga-Helia UAS our experts are concerned as to the role of Higher Education Institutions. There is a lack of recognition of the role played by HEIs in addressing the challenges as part of the new programme. Haaga-Helia UAS feels that this role should be clarified in more detail.</p> <p>Our experts feel that there needs to be increased awareness and acknowledgement related to the interactions between education stakeholders, requirements of labour markets and the connection to lifelong learning.</p> <p>HEIs form an important role in educating the professionals of the future and in providing the training solutions to do so in order to fulfil the long term goals of the programme.</p> <p>The role of tourism and sustainable tourism also, has been diminished in the current draft of the work programme. However, it continues to be a relevant issue (related to labour, training, effects of COVID-19 etc) in the Central Baltic region and should be addressed more explicitly. Tourism will play an important role in the recovery of the service industry in the region. / Haaga-Helia University of Applied Sciences, Finland/</p>	<p>We see the HEI-s potential role in achieving relevant results in all chosen programme objectives based on their expertise and capacities.</p> <p>We used the logic that specific types of organisations and institutions are not strongly emphasised.</p> <p>Instead the principle of the “partners relevance” for achieving the results of programme objectives is used.</p>

11	<p>I will only comment on the challenges and opportunities that are relevant for my organization (Policy Objective 4) Challenges and opportunities are realistic, some more than others. The mismatch of the skills available and jobs needed in labor market is a huge problem in our region (Åland). Job seekers qualifications don't match the needs of the labor market. Cross border actions and collaborations are of interest for Åland.</p> <p>How to “translate” the competitive skills and future labour market needs into teaching processes could be achieved by planning new forms of education for jobseekers and prioritizing immigrants and disadvantaged people. These group can be seen as a huge unutilized recourse for the labor market. Disadvantaged groups could receive an education that specifically orients then towards profession with a shortage of trained labour.</p> <p>Seniors (senior entrepreneurship) in new business development are an underexploited resource. This recourse could be utilized by promoting entrepreneurship to unemployed jobseekers and financially supporting their entrepreneurship.</p> <p>Challenges in coordinating labour market services across borders for joint labour market (esp. FIN-EST and LAT-EST and FIN-SWE) a joint collaboration for information services could be achieved by providing information with the one roof policy, that means that all the possible information that a cross border jobseeker could want is provided in the same place through a collaboration with different actors.</p> <p>Flexible forms of work are underused and provide lot of new opportunities. You can live in one country but choose to work in another. This opens endless opportunities. /The Åland Authority for Labour Market &amp; Student Services, Åland/</p>	<p>Comment was taken for information.</p> <p>Described challenges and problems are well reflected and in place in the scope of the programme objective 6 - Improved employment opportunities.</p> <p>The coordination and improvement of labour market services can also be targeted within the scope of programme objective 7.</p>
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12	No. Export in the times of global crises (pandemic, climate change, mass distinction of species) can only be considered a backwards looking option, unless it is required that exports are only virtual and involve solutions to the ongoing crises. /FIN/	Based on experience from current Central Baltic programme we see that our region's joint interests are strongly in economic sectors which use modern technologies and develop services and thus also have possibilities to contribute to sustainable development.  This trend is potentially even stronger in new programme period.
13	Yes. Also highlighting the possibilities getting educated labour force to the region is important. It has to be remembered both in view of sustainable innovations as well as in supporting economical balance of our business. The strong emphasis of circular economy is supported in this programme document. / Regional Council of Southwest Finland, Finland/	Comment was taken for information.
14	Yes they are, but the small tourism entrepreneurs are completely forgotten and the cross-border opportunity's the past program has given is now forgotten. /Åland/	Tourism sector is in scope of programme objectives 1 (More exports by Central Baltic SMEs) and 2 (more new Central Baltic scaled-up growth companies) and to some extent there are opportunities also in the context of programme objective 3 (Joint circular economy solutions).
15	Challenges and obstacles are clearly presented, the opportunities for each priorities were difficult to define. Are any clarifications forthcoming? In the form of the table? /Finland/	Into programme document it was agreed to define "challenges and obstacles". But we can use more explanatory texts and illustrations in the materials and presentations for launching the programme later on.
16	We have participated in the preparation of the draft and we are satisfied with the presentation of the draft. / Regional Council of Päijät-Häme, Finland/	Comment was taken for information.

17	<p>Regarding Policy Objective 2 (vii) “enhancing nature protection and biodiversity, green infrastructure in particular in the urban environment, and reducing pollution Improved Central Baltic coastal and marine environment. The challenges and obstacles are related to the poor health of the Baltic Sea due to inflows of nutrients, hazardous substances and toxins into the sea.”</p> <p>The challenge is of indeed great importance. A large part of the problem is found in the sediments. These are to a large extent severely contaminated, and actions are needed. There is a need of actual remediation actions, but also development of methods and strategies to investigate and remediate these in order to improve the Central Baltic coastal and marine environment. Since the sediments are important for the marine environment, but often neglected, contaminated sediments need to be specifically mentioned in order to be given attention in projects. There is still a low level of awareness of the need for remediation actions, and a false belief that the contaminants are generally buried in the sediments and are best left there. Several of the global sustainability goals depend on clean sediments.</p> <p>Under this same PO2, Specific objective (vii), coastal erosion is mentioned in the description, but not specifically added as one of the challenges for the region. Coastal erosion is an important priority for many areas of the Central Baltic and is a challenge also closely related to Specific objective (viii): Promoting sustainable multimodal urban mobility, particularly in improving environmentally friendly access within the archipelago.</p> <p>Extensive shipping and passenger transport have contributed to sediment erosion. Wave action and the speed of ferries have contributed to erosion in several parts of the Stockholm archipelago. Although sediment erosion presents varying challenges in the different parts of the Central Baltic Region due to geology, it is an important cross-border problem that can only be addressed by cross-border cooperation. While the speed of international ferry traffic in specifically the Furusundsleden of the Stockholm archipelago has been reduced to slow down erosion processes, there are still issues regarding</p>	<p>Comment was taken for information.</p> <p>“Sediments as potential source of leakages” was added into the programme objective’s “scope and approach” description - “sea-based load sources such as sediments can also be targeted”</p> <p>Shipping and transport-induced erosion contributes to the load of nutrients etc. but to a small extent. It would not be very cost-effective to address that separately under that programme objective.</p>
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	<p>timing and scheduling of ferry and other shipping traffic between Finland and Sweden that still present a challenge.</p> <p>In general, the programme could more explicitly address lack of common territorial planning in the Central Baltic - including coastal planning where water and land meet. In this way the programme draft could more explicitly address climate adaptation as a territorial, as well as a maritime challenge, as seen in the PA Spatial Planning of the EUSBSR - Contribute to adaptation, mitigation and resilience to climate change in land-based spatial planning process. / Swedish Geotechnical Institute, Sweden/</p>	<p>The erosion as challenge and need for joint planning were added to the text of the introduction to the priority “Environment and resource use”.</p>
18	<p>Yes. For example the identified challenges on low level of R&amp;D investments, weak cooperation between companies, the need to strengthen the regional technology start-ups ecosystem, the mismatch of the skills available and jobs needed in labour market and challenges in climate change and biodiversity are relevant for the Central Baltic Region and also to Kymenlaakso region. Regarding to circular economy, the challenge in Kymenlaakso region is not so much the amount of solid waste and its reuse but increasing the added value of circular economy products deriving from e.g. wood and pulp industry and also creating and implementing different circular economy service and operational models in all sectors. The focus should be also on reducing the use of virgin, unrenovable resources as well as the amount of waste. / Regional Council of Kymenlaakso, Finland/</p>	<p>Comment was taken for information.</p> <p>Proposed programme objective 3 (Joint circular economy solutions) very clearly has that focus and will allow these regional focuses to be targeted by relevant projects.</p>
19	<p>Yes. However, especially with respect to the current global situation, the lack of themes related to the resilience of the societies in the BSR (pandemics, hybrid threats, security of supply, safety and security themes) is a big surprise. /FIN/</p>	<p>During the programme preparation wide range of challenges and problems were identified but because of needs to focus and to find joint priorities and limited resources available for cross-border cooperation, the choices were made based on countries and regions development priorities.</p> <p>Central Baltic programme has no intention to address the BSR (Baltic Sea Region) scale.</p> <p>Programme objectives 1,2, 6 and 7 have potential to contribute to the prosperity and security of the Central Baltic region.</p>

LATVIA's comments on the Central Baltic Programme 2021-2027	
20	<p>Suggestion to supplement 1.2. chapter "Summary of major joint challenges" 1.2.1.subchapter "Introduction" the last sentence of the first paragraph clarifying that Interreg exists since 1990 [4].</p> <p>[4] <a href="https://ec.europa.eu/commission/presscorner/detail/en/STATEMENT_20_207">https://ec.europa.eu/commission/presscorner/detail/en/STATEMENT_20_207</a> /Latvia/</p>
21	<p>1.2.2. subchapter lists "Unused potential in emerging but still weak regional clusters of different economic sectors" as one of the challenges and obstacles, but the bullet points listed below are more of a potential than a challenge. For the sake of consistent approach please consider rephrasing the bullet points as challenges. /Latvia/</p>
22	<p>1.2.3. Central Baltic focus on the environment (PO 2)</p> <p>Taking into account the scale of selected SO(vii) " Enhancing nature protection and biodiversity, green infrastructure in particular in the urban environment, and reducing pollution" not only projects contributing to the eutrophication and pollution reduction of the Baltic Sea, but also projects addressing the Baltic Sea biodiversity loss should be supported within the framework of the programme, contributing to ensuring a favourable conservation status for endangered marine and coastal species and habitats and to the sustainable management of the marine NATURA 2000 network. /Latvia/</p>

The change was made into programme document (IP).

The change was made into programme document (IP).

Following wording was used:

- *Unused potential in emerging but still weak regional clusters of different economic sectors:*

- *to access the new markets*

- *to strengthen regional supply chains*

- *to do product development*

The logic was to choose more narrow focus within broad SO (vii) for Central Baltic joint action allowing to achieve measurable and tangible results. Also, the proposed topics under Priority 2 already indirectly contribute to nature and biodiversity as well.

Programme objective 4 (Improved Central Baltic coastal and marine environment) is clearly targeting the reductions of loads of nutrients, toxins, plastics and hazardous substances.

23	<p>Suggestion in the subchapter 1.2.3 under the specific objective "Promoting sustainable multimodal urban mobility" in the second listed challenge "improving the access to and within the islands and archipelagos in an environmentally friendly way " to add the words "and other remote areas". /Latvia/</p>	<p>As the challenge it has been intention to separately describe specific islands and archipelagos issue.</p> <p>Challenges of "other remote areas" are seen inside of next challenge:</p> <ul style="list-style-type: none"> <li>• <i>The low level of use of mobility solutions with significantly lower CO2 emissions due to economic challenges in many parts of Central Baltic region because of low population density and diverse geography</i></li> </ul>
24	<p>In the subchapter 1.2.4. "Central Baltic focus on the labour market (policy objective 4)" 3rd paragraph please indicate in a footnote the source of information for statistics on the % distribution of teleworkers. /Latvia/</p>	<p>The change was made into programme document (IP).</p> <p>The text was edited, and the numeric citations avoided in IP and left in Regional Analysis document.</p>
25	<p><b>Sentence:</b> The gender pay cap has been narrowing in every country.</p> <p><b>Comment:</b> It cannot be said here that there is a decrease in all countries, although the average in the EU has slightly decreased. As shown by the most current statistics <a href="https://ec.europa.eu/eurostat/statistics-explained/index.php/Gender_pay_gap_statistics">https://ec.europa.eu/eurostat/statistics-explained/index.php/Gender_pay_gap_statistics</a> then in Latvia this difference has grown directly. Please specify the text in accordance with the current data. /Latvia/</p>	<p>The change was made into programme document (IP).</p> <p>The new wording was used as:</p> <p><i>"The gender pay cap has been narrowing in all countries with exception of Latvia".</i></p>
26	<p><b>Sentences:</b> The good development of the employment situation was interrupted by the COVID-19 pandemic. Due to the containment regulations unemployment has increased dramatically in every region of the Central Baltic programme countries.</p> <p><b>Comment:</b> Analysing Eurostat unemployment figures, there should be no question of a dramatic increase. Rather, the indicators tend to grow. Data of January 2021 has not changed, the EU average has not changed at all, increased by 2 -4 percentage points in the corresponding member states. Please correct the wording. /Latvia/</p>	<p>The change was made into programme document (IP).</p> <p>The new was used as:</p> <p><i>"Due to the containment measures unemployment has increased in Central Baltic programme countries and labour market has not fully recovered by the spring 2021".</i></p>

27	<p><b>Sentences:</b> It tends to increase among the more vulnerable groups of society (youth, pre-retirement, retirement, people with special needs, <u>minorities</u>). The crisis has an especially strong impact on sectors such as international tourism, entertainment, creative industries, events, and event organising.</p> <p><b>Comment on word “minorities”:</b> Please specify-whether ethnic minorities, or all/many, or all countries, or for example. Roma, migrants, etc. /Latvia/</p>	Taking into account overall level of generality of the descriptions we proposed not to specify which specific groups are inside “minorities”.
28	<p><b>Sentence:</b> The share of teleworkers rose drastically during pandemic. The proportion of workers who started teleworking because of Covid-19 was 59% in Finland, 42% in Sweden, 36% in Estonia and 32% in Latvia.</p> <p><b>Comment:</b> Please specify what is the data source. /Latvia/</p>	The change was made into programme document (IP). We edited the text and avoided numeric citations in IP and leave all those in Regional Analysis document.
29	<p><b>Sentence:</b> Regardless of this, the <u>flexible forms of working</u> are still underused. To some extent, social care responsibilities still hinder the access of women to the labour market.</p> <p><b>Comment:</b> please mention the types of the flexible forms of working. /Latvia/</p>	Taking into account overall level of generality of the descriptions we proposed not to specify here the “flexible forms of working”.
30	<p><b>Sentence:</b> There is a noticeable amount of cross-border commuting especially between FIN-EST, LAT-EST, and FIN-SWE. This labour movement would benefit from more coordinated joint labour market services. Currently there are no such services in place.</p> <p><b>Comment:</b> Please specify what is meant by this. /Latvia/</p>	Labour market services can be related to information, trainings, benefits etc.
31	<p><b>Sentence:</b> the increase in foreign labour potentially creating tensions in the societies</p> <p><b>Comment:</b> please explain what “tension” means otherwise the thought is not completed. /Latvia/</p>	Tensions can be different but as challenge the generalised expression was used.
32	<p><b>Sentence:</b> • Challenges in coordinating labour market services across borders for joint labour market (esp. FIN-EST and LAT-EST and FIN-SWE)</p> <p><b>Comment:</b> Please specify what this means. /Latvia/</p>	Labour market services can be related to information, trainings, benefits etc.

33	<p><b>Sentence:</b> • Flexible forms of work are underused</p> <p><b>Comment:</b> Please consider the following aspect to be added: at the same time, flexible forms of work should be developed in such a way that they can be applied in the long term, without having a negative impact on the safety and health of employees, social security, future retirement income and future career opportunities, especially for women, and without having a negative impact on work-life balance*.</p> <p>* <a href="https://lzp.gov.lv/wp-content/uploads/2021/03/29_zinojums_21022021_FINAL_c.pdf">https://lzp.gov.lv/wp-content/uploads/2021/03/29_zinojums_21022021_FINAL_c.pdf</a> /Latvia/</p>	Taking into account overall level of generality of the descriptions we did not elaborate it.
34	<p>Please supplement the information presented in the sub-chapter 1.2.5. “Central Baltic focus on public services and solutions (Interreg Specific Objective 1)” with the data on the situation on digital skills and ICT in Latvia and Estonia. Currently the draft Programme document includes information that the societies of the Central Baltic countries are highly digitalized, especially Sweden and Finland. We draw attention to the fact that Latvia has a relatively good digital infrastructure, however, there are problems with the society’s digital skills, and they need to be improved. It has been reported by the Organization for Economic Development (OECD) based on its own assessment.</p> <p>[1] <a href="https://www.oecd.org/latvia/going-digital-in-latvia-8eec1828-en.htm">https://www.oecd.org/latvia/going-digital-in-latvia-8eec1828-en.htm</a> /Latvia/</p>	The wording was changed to leave out countries’ names.

35	<p>Please supplement the information in sub-chapter 1.2.5. “Central Baltic focus on public services and solutions (Interreg Specific Objective 1)” after paragraph “ICTs have become widely available to the public, both in terms of accessibility as well as cost. In Central Baltic country societies are highly digitalised and especially Sweden and Finland when looking at the percentages of households which have internet access and individuals using mobile internet with portable device. Finland and Sweden are also the top two performers of Digital Economy and Society Index.” adding following wording:</p> <p><i>“At the same time there are several groups of people for whom digital solutions can cause significant difficulties, for example, the digital skills of the Latvian population are lower than the European average. <sup>1</sup> Such groups include people with a low level of education or development disabilities, who may have very limited understanding and skills in the use of digital solutions, older people who do not use the Internet and/or have no smartphones, poor people who cannot afford to use devices that allow to use digital services.” /Latvia/</i></p>	The wording was changed to leave out countries’ names.
36	<p>Please supplement paragraph 1 of sub-chapter 1.2.6.”Synergies with macro-regional and sea basin strategies” of the draft Programme document with information that the implementation of the European Union Strategy for the Baltic Sea Region is based on the Action Plan that is regularly updated. Please note that on 17 February, 2021, the European Commission circulated an updated version of the Action Plan. Therefore, please supplement the draft Programme document with a footnote reference to this renewed Action Plan - <a href="https://www.balticsea-region-strategy.eu/action-plan.">https://www.balticsea-region-strategy.eu/action-plan.</a> /Latvia/</p>	The change was made into programme document (IP).

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<sup>1</sup> *The share of Internet users among the population is almost in line with the EU average, however, 52% of Latvians still lack basic digital skills that prevent them from using the Internet effectively, and 19% do not have digital skills at all (2 points more than the EU average)”.Digital Economy and Society Index (DESI), Report on Latvia - 2018, page 5, [lv-desi\\_2018- country-profile\\_eng\\_198F439E-C4CC-EB8B-9F0F9C5926DB70D8\\_52231.pdf](https://www.balticsea-region-strategy.eu/action-plan.) (europa.eu).*



37	<p>Please clarify paragraph 1 of sub-chapter 1.2.6. "Synergies with macro-regional and sea basin strategies" of the draft Programme document, specifying exactly to which seven of the nine sub-objectives of the EUSBSR the Programme contributes. <a href="https://www.balticsea-region-strategy.eu/about/implementation">https://www.balticsea-region-strategy.eu/about/implementation</a></p> <p>1) Please supplement the text in paragraph 3 of the sub-chapter 1.2.7. "Horizontal principles of the Central Baltic Programme":</p> <p>"In addition to the general principle of anti-discrimination the Programme will pay attention to gender equality. An assessment will be made as to the relevance of measures to promote gender equality and their impact on the achievement of the objectives set out in the programme. <del>in the projects, based on the information provided by them.</del> This principle will be considered for all projects and priorities. Gender equality will also be considered in Programme implementation, for example when recruiting staff and in all personnel policy."</p> <p>2) Please clarify the information in paragraph 4 of the sub-chapter 1.2.7. "Horizontal principles of the Central Baltic Programme": <i>"Projects with a negative impact on sustainable development, equal opportunities, antidiscrimination, and gender equality will not be funded."</i> Does it mean if project will not mention anything about the impact on any of horizontal principles, it will not be supported? /Latvia/</p>	<p>Synergies with macro-regional strategies were elaborated in Programme manual.</p> <p>In programme document (IP) document links are indicated under each separate programme objective.</p> <p>The paragraph on horizontal principles was added into programme document (IP).</p> <p>If the project indicates clear negative impact, the project would be rejected. The project can choose between positive-neutral-negative impact. The information is a mandatory field in the future monitoring system and projects must fill in the assessment.</p>
<b>LATVIA's comments on the Central Baltic Programme 2021-2027 - General</b>		
38	<p>Please supplement the draft programme with information that all supported activities will be implemented in accordance with the national strategies, namely in case of Latvia - National Development Plan 2021-2027. /Latvia/</p>	<p>Assumption was that all agreed joint Central Baltic interventions were based on national and regional priorities. But main framework for choosing and implementing the projects is joint Central Baltic programme document for 2021-2027.</p> <p>General assumption is that there are no contradictions between national and Central Baltic priorities. Rather for cross-border cooperation relatively narrow scope of joint priorities is identified.</p>

39	Please supplement the draft programme with information on how it will contribute to reducing the negative consequences of the COVID-19 crisis. /Latvia/	Based on WG and JPC discussions it was agreed that we take longer time perspective and are not dealing with immediate Covid-19 consequences. Discussions led to understanding that certain new aspects appeared in regard challenges and potential intervention themes but in general there is no need to add Covid-19 specific elements and actions to the IP.
40	In view of Environmental Report it is positive to note that an environmental alternative has been foreseen for the implementation of the programme that does not pose a risk on biodiversity and the marine environment and does not contribute to pollution and climate change. It is however suggested that Project selection criteria should be put forward that prioritise funding for projects with the least possible environmental impact, including biodiversity. /Latvia/	It would be assessed on a general level within horizontal principle 'sustainable development'.
41	The programme draft prioritises "increasing the export volumes of SMEs in the Central Baltic region". It would be very important to prioritise not only the volume of exports, but to keep in mind the added value of products and services that the CB region exports, so that we stop exporting low added value goods (wasting our resources). It is therefore suggested to express this priority in the following wording: 'increasing the volume of high value added exports of SMEs in the Central Baltic region'. /Latvia/	We have included the emphasis on "innovative companies" and based on that following sentence: <i>"Innovative companies are defined as companies that are targeting higher value added than the sectoral and regional average."</i>
42	The programme Project prioritises " ...Joint efforts to strengthen and improve employment opportunities on labour market". It must be noted that the word "effort" implies very vague, rather unfathomable actions, so it is proposed to express this priority as "...strengthened and improved employment opportunities in the labour market in the Central Baltic Sea region". /Latvia/	"Joint efforts" are understood as synonyms to "joint actions" and not meant to be "vague category of actions".
43	LV Ministry of Transport proposes to shift the challenge "Lowering of the CO2 emissions of transport systems" mentioned under specific objective (viii): Promoting sustainable multimodal urban mobility from this section to the challenges and obstacles of the specific objective (vii): Enhancing nature protection and biodiversity, green infrastructure in particular in the urban environment, and reducing pollution, making the necessary changes to the descriptive texts of both sections accordingly. /Latvia/	The change was made into programme document (IP). The challenges were updated and made specific objectives' specific.

2. Do the chosen priorities properly address the Central Baltic region's challenges and opportunities?		
44	There are great opportunities in mikro companies in archipelago and rural areas, that are not met by the growth measure (in 5 years) or exports outside EU. This matter is also related to social responsibility and public services, as the region cannot stay competitive if all finances are focused to rural areas focusing on tech and outside EU growth.	The change was made into programme document (IP). More general description of the main target group was used with more precise guidance included into programme manual.
45	Yes bit I lack a strong involvement of youth and youth perspective. / SKUNK, skärgårdsungdomarnas intresse organisation, ABF-Åland/	Youth is relevant target group under programme objective 6 (Improved employment opportunities on labour market).
46	Yes, those are important challenges to deal with. Other major challenges are: Democracy (see what happens in for example Hungary, Poland and USA), integration, and social sustainability as an overall area. Climate change is addressed in 2.1, 2.2 and 2.3, but rather narrowed in - Circular economy is only one part of the solution to the environmental problems, CO2 emission can be improved in many other ways than mobility etc. To connect research results to implementation in reality would be an extra touch to the programme. / RISE (Unit Regional Transformation), Sweden/	During the programme preparation wide range of challenges and problems were identified but because of need to focus and to find joint priorities and limited resources available for cross-border cooperation, the choices were made based on countries and regions development priorities. In regard climate change challenge - the intention was to find specific themes and niches where via cross-border joint action tangible results can be achieved. That has led to the proposed scopes of programme objectives 3,4 and 5. In regard “research results implementation in reality” we agree and used the logic that in all programme objectives’ scopes “the results of research should be used if relevant for achieving real, tangible results”.
47	Look above; more visible role for biodiversity and nature-based solutions needed. These are systemic challenges, and therefore systemic solutions are needed.	The nature based solutions are relevant for improving the circular economy, decreasing the loads of nutrients, hazardous substances, toxins and plastics. Selected intervention themes as programme objectives 3, 4 and 5 have all positive impact on the environment and indirectly to biodiversity.

48	Such important issues as adaptation to the climate change, safe societies and citizens etc are not addressed. /Sweden/	<p>Out of 7 programme objectives 3 are specifically addressing climate change directly or indirectly: programme objectives 3 (joint circular economy solutions), 4 (improved coastal and marine environment) and 5 (decreased CO2 emissions).</p> <p>We see “safe societies and citizens” aspects directly addressed by programme objectives 6 (Improved employment opportunities on labour market) and 7 (Improved public services and solutions for the citizens).</p> <p>Also we see that programme objectives 1,2,3,4,5 indirectly contribute to safe societies as potentially creating preconditions for good jobs and improved living environment.</p>
49	Regarding the water not fully. Because most of the pollutants occur inland and activities must be carried out to reduce pollution at its source as a prevention, not only fight with already polluted sea. You cannot clean the sea but can reduce pollution at its beginning. /University of Latvia, Latvia/	The scope of programme objective 4 (Improved coastal and marine environment) includes potential actions to reduce loads of nutrients, toxins, plastics and hazardous substances on land and on sea.
50	Policy Objective 2 neglects to make any specific mention forest management and protection issues in connection with Baltic Sea or biodiversity protection issues, or in relation to climate change mitigation. This is a major omission and impossible to justify given the key role of timber and forests in the region overall. / Innofor Finland Ltd., Finland/	<p>Selected intervention themes as programme objectives 3, 4 and 5 have all positive impact on the environment and indirectly to biodiversity.</p> <p>The forestry sector can be addressed as one nutrient etc. load source under Priority 2.</p>

51	<p>One major challenge within this region is to provide proper and good education. There is no mention of that in the programme. Where is the focus on education and young people? Adult learners and apprenticeships - important factors today, when work life change a lot and normal/common assignments go mechanised.</p> <p>As it is mentioned in the programme the traditional education is not addressed the entrepreneurial attitude and entrepreneurship sufficiently. For vocational schools it is important that teachers get to work in the sector which they educate students in. Some schools, including my own, doesn't give the teachers this opportunity and I guess it's because it's too expensive. Consequences of this is that the education gets old as the work life develops. I would like to see this as a part of the programme. / Åland Vocational School, Åland/</p>	<p>The skills development is relevant component in strong projects potentially under all programme objectives.</p> <p>The programme objective 6 (Improved employment opportunities on labour market) is devoted to increasing competitiveness of less competitive groups in society via complex joint actions to empower them and develop skills.</p>
52	<p>One major challenge within this region is to provide proper and good education. Education is only mentioned under 1.2.4. Where is the focus on education and young people? Adult learners and apprenticeships - important factors today, when work life change a lot and normal/common assignments go mechanised. /Åland/</p>	<p>The skills development is relevant component in strong projects potentially under all programme objectives.</p> <p>The programme objective 6 (Improved employment opportunities on labour market) is devoted to increasing competitiveness of less competitive groups in society via complex joint actions to empower them and develop skills.</p>

53	<p>Yes, as long as the scope is not narrowed down too much. A more holistic view based on ecological knowledge and insight in the planetary boundaries and the limits of the ecosystems need to be the foundation for the development and a basis for assessment of future projects. Hence the Specific Objective "Enhancing nature protection and biodiversity, green infrastructure in particular in the urban environment, and reducing pollution" should not be limited to only cover the marine part of the Central Baltic Area and the problem with eutrophication. We strongly oppose this limitation of the much wider original objective. The eutrophication of the Baltic Sea is an important issue, of course, but is not the cause of the majority of biodiversity loss in the area and not the only relevant source of pollution.</p> <p>The biodiversity loss in the Central Baltic Area is mainly caused by lack of habitat due to forestry practices leading to monocultures with trees never reaching mature ages. The practices are also damaging to the climate, with a "pay-back" time of carbon stored back into the new growing trees of 30-100 years. Time we do not have. The second main cause of biodiversity loss in the BA is the agricultural system with its monocultures and modern practices, requiring larger fields, draining of wetlands, covered ditches, pesticides and the clearing of the old, traditional and varied agricultural landscape - a process in different stages in the BA countries. The important goal "Enhancing biodiversity" in the most urgent and relevant ways will not be achieved by focusing on the nutrient flow to the Baltic Sea.</p> <p>The land use issues are crucial to biodiversity and there is need for more protected areas, new forestry methods and an agricultural system with much more consideration taken to wildlife and plants. This is obvious when for example considering the effects of these "modern" agriculture practices on pollinators as seen worldwide. Protected areas need to be connected by green infrastructure in both rural and urban areas to maintain their value for biodiversity, as stated in the heading of the SO.</p> <p>So: all in all we definitely believe the scope of the environment objective has to be wide and involve the land ecosystems in the BA. Preferably the future projects should be evaluated for both the expected result for biodiversity and climate, a holistic approach that is absolutely essential to achieve a sustainable future.</p>	<p>During the programme preparation wide range of challenges, problems and priorities were identified but because of need to focus and to find joint priorities and because of limited resources available for cross-border cooperation, the choices were made based on countries and regions development interests.</p> <p>Selected intervention themes as programme objectives 3, 4 and 5 have all positive impact on the environment and indirectly to biodiversity.</p>
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	<p>The Specific objective "Promoting the transition to a circular economy" is also an important objective since the overall use of energy and resources needs to be much reduced to be able to develop a sustainable society. We do understand that the starting point between the countries is different, but as in all work for sustainability the goal must be to reach best practice as soon as possible meaning that the countries or partners with the lowest ambitions/least public involvement in the issue need to frog leap and fast track up to high standard instead of other nations/partners slowing the pace and adjusting to the lowest standard.</p> <p>In this specific case - circular economy - it is very obvious that public engagement in recycling and such personal acts is not enough: after decades of recycling campaigns and increasing recycling the results are disheartening when analyzed for the actual and total effect on the use of raw materials and energy. It is obvious that circular economy at this stage needs to be the goal of the production chain, not the consumers. The consumers, real persons, should not be spending a lot of time trying to recycle trash that has not been design for repair, re-use or even recycling. A study from Sweden has even shown this to be harmful in the sense that individuals spend almost all their engagement and time possible to use for environmental work and involvement on recycling instead of taking much more effective environmental actions with the same amount of time and effort. Also, the recycling campaign... /Föreningen Närsholmen, Sweden/</p>	
54	<p>From the point of view of Haaga-Helia UAS our experts find the following priorities especially related to our actions:</p> <p>2.2 More new CB scaled up growth companies HH is currently leading the NOCCA project which addresses similar topics related to this priority.</p> <p>2.3 CB - Circular economy solutions Integrate the focus related to CE towards service design aspects and sustainable business models.</p> <p>2.6 CB Employment opportunities - labour market Consider work life resilience and its impact on the future labour market. In addition, the role that training and HEIs will play to facilitate this. / Haaga-Helia UAS, Finland/</p>	Comment was taken for information.

55	It does but the central challenges and opportunities for us are the structural unemployment (matching skills with labour market needs) and promoting disadvantage groups to find employment. / The Åland Authority for Labour Market & Student Services, Åland/	Comment was taken for information.
56	The entrepreneurial opportunities are not a priority in this programme for 2021-2027. If one is a small business owner one will put all energy in to getting the business running and getting a profit, for the first years. After some 5-10 years one can think about expanding. So in my opinion there should not be a limit to only include start-ups and new businesses. All companies should have an equal opportunity to prosper in the Central Baltic region. /Åland	2 specific intervention themes were chosen based on different needs and challenges of the target groups: programme objective 1 (More exports by Central Baltic SMEs) for mature companies and programme objective 2 (more new Central Baltic scaled-up growth companies) for relatively new companies with ambition to grow.  The target group description was expanded for programme objective 2.
57	PO4 should address also the importance to further improve the integration of migrants. This challenge is relevant primarily for Finland and Sweden. The inflow of refugees to those countries is expected to increase after covid-19 because of climate change and conflicts. With ageing populations and mismatch on the labour markets the migration is important but the integration is not sufficient. Important to early recognize potential and ease the way to the labour market. Good examples exist in the Baltic Sea Region and good practice can be used in the Central Baltic Programme geography. / Norden Association (EUSBSR Policy Area Coordinator PA Education, Science and Social affairs, Sweden/	Migrants/refugees can be targeted within programme objective 6 (Improved employment opportunities on labour market).
58	If possible, please cross-check, once more, if you could build synergies with the updated EU Industry Strategy (to be published on 27th April 2021): it should identify the industry ecosystems that are most critical for the EU. If this is not feasible, please take into consideration and build synergies with the Industry Alliances (Circular Plastics, Batteries, Clean Hydrogen, Raw Materials....) /VTT, Finland/	The current design of the programme does not exclude in any way exploiting synergies underlined in EU Industry Strategy.



59	<p>The priorities have been chosen based on the promotion of cross-border business, circular economy, water protection, and labour markets and administrative and public service issues, can it be said so. I was thinking that the influences of pandemia or other threats would be more visible in the chosen priorities and that the projects would find more solutions to overcome and recover out of the different crisis. /Finland</p>	<p>The issue of Covid-19 impact was discussed and it was concluded that Central Baltic programme should not focus on immediate consequences alleviation and in longer time perspective there is no need to mention it specifically. However challenges were updated and also some updates were considered to the designs of the programme objectives.</p>
60	<p>In Sweden there is a network between authorities regarding contaminated sediments, since the issue relates to the mandates of not only one authority. Similarly, there should be co-operation between authorities, and stakeholders, also across country boundaries, since the Baltic Sea has been and is still a sink to contaminant inflow and joint efforts and knowledge exchange is needed to restore the harmed environment. It is therefore important to promote and support networking as a priority in both PO2 and ISO1 “institutional capacity of public services” to deal with this challenge.</p> <p>The EUSBSR PA Hazards specifically mentions Per-and poly fluoroalkyl substances (PFAS) and the need to tackle the issue on a macro-regional level, enable knowledge transfer from countries that have come further in the process of developing national actions, capacity building, development of harmonized policy approaches through co-operation in the regional platform PFASeOUT. This type of action could be seen as a priority within the Central Baltic Programme.</p> <p>The priorities for PO2 are quite focused on reduction of CO2 and inflows of hazardous substances. These challenges could also be augmented with a priority related to adapting negative effects of climate change (such as erosion) in an environmentally friendly manner, by exploring, for instance, nature-based solutions in cross-border actions. This would better enable synergies with the EUSBSR PA Ship: Action 2: Support research on emerging thematic challenges related to clean shipping and its impact on the environment and wildlife in the Baltic Sea as well as EUSBSR PA Bio-economy./ Swedish Geotechnical Institute, Sweden/</p>	<p>The issues related to the coordination between authorities can be addressed under programme objective 7.</p> <p>During the programme preparation wide range of challenges and problems were identified but because of needs to focus and to find joint priorities and limited resources available for cross-border cooperation, the choices were made based on countries and regions development priorities.</p>

LATVIA's comments on the Central Baltic Programme 2021-2027 - Programme priorities	
61	<p>Please supplement the Programme document with the information on how the activities mentioned in Section 2 of the Programme document will complement the activities already financed under current EU funding programmes and instruments (Operational Programmes 2014-2020) and future EU funding programmes and instruments ( Operational Programmes 2021-2027, Interreg programmes) within the framework of specific objectives. This information will fit best in Section 1.2. of the Programme document - Complementarity and synergies with other funding programmes and instruments. /Latvia/</p>
62	<p>In the draft Programme document under Priority 2.1. “More exports by Central Baltic SMEs” markets identified for the export are markets outside the EU/EFTA countries. We see the need for expansion of these markets, supporting also those companies, that want to enter the European market. Therefore, the proposal is to define as the priority markets those that are located outside of the Central Baltic region. /Latvia/</p>
63	<p>For the Priority 2.1. “More exports by Central Baltic SMEs” one of the defined result indicator is the concluded agreements related to the new markets. Please note that entering the market and concluding contracts may take longer time and the Project duration may not be sufficient for the contract to be concluded. Therefore we ask to re-evaluate whether to maintain it as a result indicator. /Latvia/</p>

The wording of the section was improved.  
Cooperation with other, geographically overlapping programmes was elaborated in chapter 1.2.

We kept the target markets for programme objective 1 (more exports by Central Baltic SME-s) as outside of EU/EFTA because of sufficient demand proven by current programme to work jointly with more challenging markets outside of EU/EFTA.  
EU/EFTA is free trade area where barriers for entry are relatively low and  
there are many national level and regional export support programmes and activities available.

Based on experience from current period Central Baltic programme with similar joint export focus (specific objective 1.3) we see it realistic to achieve real export deals and document those.  
It is highly possible that more exports will follow after project ends but in setting the target values on programme level and project level we take into consideration what can be achieved during project duration and reasonable time after project has ended.

64	<p>We draw your attention to the fact that for the Programme Priority 2.1. “More exports by Central Baltic SMEs”. and Priority 2.2. “More new Central Baltic scaled-up growth companies” there will likely be same Project beneficiaries, therefore proposal is to combine these priorities into one Priority “Increasing the number of high value-added export and extended growth companies in the Central Baltic SMEs”, thus creating more open competition for the available funding. /Latvia/</p>	<p>2 separate programme objectives are proposed based on different main target groups and the logic how the challenges are best addressed.</p>
65	<p>Please describe cluster-based approach mentioned in the sub-chapter 2.1.1. “Related types of action, and their expected contribution to those specific objectives and to macro-regional strategies and sea-basis strategies, where appropriate”. /Latvia</p>	<p>Taking into account overall level of generality of the descriptions we did not elaborate it in programme document (IP). Cluster based approach is explained in programme manual and guidance materials to potential applicants.</p>
66	<p>Please supplement the list of potential partners with <i>industrial parks</i>. “Potential partners Non-commercial organisations with competence and experience for new business development, product development, internationalisation such as business development organisations, science parks, <i>industrial parks</i>, associations of companies and regional development agencies.” /Latvia/</p>	<p>Industrial parks if having relevant competences are included.</p>
67	<p>Please add to the list of indicative joint actions supported by the 2.3. priority “Central Baltic joint circular economy solutions to reduce the use of virgin materials, reduce waste and increase the reuse of products” also action “Joint product development prototyping activities, cross-border hackathons”. /Latvia/</p>	<p>The change was made into programme document (IP).</p>

68	Under 2.3. priority “Central Baltic joint circular economy solutions to reduce the use of virgin materials, reduce waste and increase the reuse of products” sub-section 2.3.1. as an example indicated key product value chains identified in the EC Circular Economy Action Plan. Please mention that the listed product value chains is non-exhaustive and that activities related to product value chains of other areas not listed in this list are also possible. /Latvia/	The change was made into programme document (IP).
69	Please add to the list of indicative joint actions supported by the 2.4. priority “Decreased CO2 emissions in Central Baltic region by improvements of intermodal mobility” action “ <b>Piloting new mobility solutions</b> ”. /Latvia/	The change was made into programme document (IP).
70	Please consider supplementing wording of the list of potential partners as follows: “Potential partners <b>Public and non-profit</b> organisations and authorities on national, regional and local level, private companies relevant for improving transport nodes/corridors and achieving CO2 reductions.” /Latvia/	The change was made into programme document (IP).

71	<p>Specific objective (vii): Enhancing nature protection and biodiversity, green infrastructure in particular in the urban environment, and reducing pollution and concerning to it priority 2.5. “Improved Central Baltic coastal and marine environment” focuses on eutrophication and pollution problems in the Baltic Sea and approves support for measures to reduce the inflows of nutrients, hazardous substances and toxins into the Baltic sea.</p> <p>Eutrophication and pollution of the Baltic Sea are priority issues. <b>However, the promotion of nature protection and biodiversity in the Baltic Sea and its coastline covers a wider range of current issues.</b> Also according to the HELCOM updated draft of Baltic Sea Action Plan (page 13) “All actions targeting eutrophication, hazardous substances and litter, as well as sea-based activities are critical for improving the state of biodiversity in the Baltic Sea. Given the increasing overall pressures and legacy effects of many human activities in the Baltic Sea, <b>many species and habitats are in urgent need of protection and enhanced conservation actions are needed along with reduction of pressures.</b>”</p> <p><sup>1</sup> Second draft of the updated Baltic Sea Action Plan: <a href="https://portal.helcom.fi/meetings/HELCOM%2042-2021-746/MeetingDocuments/4-3%20Draft%20Updated%20Baltic%20Sea%20Action%20Plan.pdf">https://portal.helcom.fi/meetings/HELCOM%2042-2021-746/MeetingDocuments/4-3%20Draft%20Updated%20Baltic%20Sea%20Action%20Plan.pdf</a></p> <p>Please consider including also this aspect in the draft Programme document. /LAatvia/</p>	<p>The logic was to choose more narrow focus within broad SO (vii) for Central Baltic joint action allowing to achieve measurable and tangible results.</p> <p>Programme objective 4 (Improved Central Baltic coastal and marine environment) is clearly targeting the reductions of loads of nutrients, toxins, plastics and hazardous substances.</p> <p>Selected intervention themes as programme objectives 3, 4 and 5 have all positive impact on the environment and indirectly to biodiversity.</p>
72	<p>Please specify a list of <b>Indicative joint actions supported</b> by 2.5. priority “Improved Central Baltic coastal and marine environment”, including an emphasis on green infrastructure. /Latvia/</p>	<p>Taking into account overall level of generality of the descriptions of Indicative joint actions, the characteristics of specific actions were left out.</p>
73	<p>The result indicator <b>The number improved urban and agricultural runoff sources</b> (priority “Improved Central Baltic coastal and marine environment”) largely requires investments in infrastructure, but the emphasis of the supported activities is mostly on the “soft” activities. It would be necessary to align this result indicator more closely with the supported activities. /Latvia/</p>	<p>Small scale investments are seen inside the projects as relevant for achieving targeted results on decreasing the loads of nutrients, hazardous substances and toxins. Each strong project should include mix of indicative actions and we assess the result indicator realistic but ambitious for our interventions.</p>

74	<p>Add to the list of Indicative joint actions - social entrepreneurship promotion activities.</p> <p>Add to the list of Potential partners also social entrepreneurship organizations.</p> <p>Potential partners: Organisations with competence and experience on labour market, organisations representing employees, employers, public authorities, organisations representing disadvantaged groups, and organisations with competence and experience on entrepreneurship. including in the area of social entrepreneurship. /Latvia/</p>	<p>The more precise descriptions “Indicative joint actions” and “joint elements of the projects” are described in programme manual.</p> <p>The “social entrepreneurship organisations” are covered by more broad definition of “organisations with competence and experience on entrepreneurship”.</p>
75	<p>Please clarify section 2.7. indicating implementation of which of the EUSBSR Policy Areas will be facilitated by the Priority. EUSBSR Action Plan covers a total of 14 policy areas.</p> <p>Please clarify, what is meant by “outside POs 1, 2 and 4” and also the meaning of the abbreviation PSO in Chapter 2.7 Improved Central Baltic public services and solutions for the citizens.</p> <p>Please explain all abbreviations in the Programme document. /Latvia/</p>	<p>The change was made into programme document (IP).</p> <p>The term Programme Specific Objective (PSO) was used in earlier phase of programme preparation.</p>
76	<p>Add to the list of Indicative joint actions supported also “<b>Creation of new and innovative services</b>”. /Latvia/</p>	<p>The change was made into programme document (IP).</p> <p>For 2 different branches of programme objective in programme manual the separate lists of “Indicative joint actions” were defined.</p>
77	<p>What is meant by small-scale projects, what is the amount of funding of the small scale project? Please elaborate more in this section to understand more distinction between small scale project and regular project. /Latvia/</p>	<p>The change was made into programme document (IP).</p>

#### 4. Do you have any other comments concerning the new programme?

78

The EU has adopted climate targets for 2030, which require the EU's total emissions to be reduced by 40% by 2030 compared to 1990. The European Council has also endorsed the goal that the EU will reduce greenhouse gas emissions by 80-95% by 2050.

If the countries of the world continue to emit greenhouse gases at the same rate as we do today, the average temperature in the Nordic countries will have risen by about five degrees by the end of the century. It is during the winters that the biggest change will take place. In the scenario with the greatest climate change, the winters will be up to six degrees warmer than today. In summer, there is a risk that we get more and more prolonged heatwaves, up to 30 days a year in some parts of the region. This also reduces the need for heating our homes, at the same time as the need to cool them down increases.

Studies show that buildings account for about 40 percent of the Nordic region's energy use, which goes to electricity and heating. In the Nordic countries, there is a long tradition of using biofuels for district heating production, which are mainly residues and waste from other activities, for example from forestry, sawmills,

It is of great importance to emphasize the roles of district heating as the important pieces of the puzzle they are in the energy system, for the power issue, for the circular economy, and for society as a whole as a reliable and secure, local energy source. The draft of a new Central Baltic program lacks the perspective of a sustainable and circular future energy supply.

In order to achieve circular economy in the energy sector, it will be important to drive and participate in innovative pilot projects in both heating and cooling through the use of renewable energy sources.

Therefore, the City of Mariehamn advocates that circular economy in the energy sector should become a sub-area in the new Central Baltic program. /Åland/

Energy sector if represented by existing Central Baltic scale product value chain is inside the scope of Programme objective 3 (Joint circular economy solutions) which is also connected to climate targets on a larger scale.

Also building/construction sector is the target area for Central Baltic joint action for identifying and improving circular economy value chains.

79	<p>When you talk about circular economy, I hope that food production is included in the thematic area.</p> <p>With Sweden's recently adopted national food strategy, which includes both innovation and increased domestic food production, among others. The newest systems used (most innovative) can be found in circular economy. So-called RAS system where you will find aquaponic crops, among other things. The systems are in strong demand, but need further push. I do not know what it looks like in other countries with this, but collaborations always increase success is our opinion. Alone is seldom the strongest <i>/comment translated from Swedish language by JS/</i></p>	<p>Yes the scope of programme objective 3 (joint circular economy solutions) includes food production and consumption value chains.</p>
80	<p>Please prolong the set limit for a companies age being let into a growth program. Growth is much slower in small SMEs than in bigger ones, and also older companies might at some age be mature enough to grow - but 5 years seems to be an unrealistic limit.</p>	<p>The change was made into programme document (IP).</p> <p>More general description of the main target group was used with more precise guidance included into programme manual.</p>



81	<p>Chapter 1.2.3</p> <p>lacks water pollution and eutrophication I examples It would be good if not only pollution and eutrophication are written, but that further focus is placed on recycling. We need to recycle our nutrients for a sustainable future and food production.</p> <ul style="list-style-type: none"> <li>- The corona pandemic has affected, possibly hit hard, the trust between our countries. We have built walls and border controls that have not existed for decades or centuries. In such a small region, we MUST work together to find added value and synergy effects. We must cooperate and learn from each other and we must achieve resilience and a sustainable society.</li> <li>- It would be important to engage and involve young people and to develop young people's social skills. Other keywords are trust and cooperation. Social skills as a counterpoint to computer gaming and a life through l pads and phones.</li> <li>- It would be good if recircularity linked to sustainable, resilient and recirculative agriculture was clearly included here with the cross-border benefits an interreg project can provide. That it is included here and that you are not just referred to LBU programs because it is about food. /comment translated from Swedish language by JS/ /SWE/</li> </ul>	<p>In general, we agree with logic and the description of the scope does not restrict the recycling of nutrients.</p> <p>The theme can potentially be seen also under programme objective 3 (joint circular economy solutions) and under programme objective 4 (improved coastal and marine environment), depending on the focus of the project.</p> <p>The programme objective 7 (improved public services and solutions for the citizens) offers good opportunities for that.</p> <p>Young people are clearly emphasised target group under programme objective 6 (Improved employment opportunities on labour market).</p> <p>The circular agriculture is within the scope of programme objective 3 (joint circular economy solutions).</p>
82	<p>There is a lack of youth involvement and youth perspective. There is a need for a clear invitation of that both in the "ordinary projects" that they involve youth and signs of invitation for different kind and youth organisations/movement. Maybe it can be helpful to involve some youth organsiation before decisions of the program. / SKUNK, skärgårdssungdomarnas intresse organisation, ABF-Åland, Åland/</p>	<p>Youth is clearly defined target group for programme objective 6 (Improved employment opportunities on labour market).</p>
83	<p>Too little concern of youth issues. Projects involving youth should be ranked higher.</p>	<p>Youth is clearly defined target group for programme objective 6 (Improved employment opportunities on labour market).</p>
84	<p>In ISO Public services - is the partnership about AUTHORITIES or ORGANISATIONS? /national contact point Åland/</p>	<p>Broader definition of public sector is accepted and is used in programme document (IP).</p>

85	It should be possible to make smaller project over a longer time. /Åland/	<p>The length (duration) of the small projects is set as max 18 months.</p> <p>For all other projects the duration of the project should come from the project approach, logic of activities and planned budgetary resources.</p>
86	In my opinion the programme has a narrow focus and doesn't address the spectrum of the challenges in BSR. /Sweden/	<p>The Central Baltic programme did not aim to address the spectrum of challenges of BSR (Baltic Sea Region).</p> <p>Our intention has been to identify most relevant challenges and priorities for joint action within Central Baltic programme area.</p>

87	<p>Yes.</p> <p>Regarding PO2: Environment: As the electrification of the transport sector evolves reduced CO2-emissions will be an increasingly misleading measure of environmental and sustainability gains, in particular as the program extends over a seven-year-period. In addition to CO2 emissions, motor vehicle traffic gives rise to harmful particles and disturbing noise levels that adversely affect human health. This regardless of energy source. The ground language and barrier effect of motor vehicle traffic, perhaps especially in cities, is another sustainability aspect that is missed when only reduced CO2 emissions are assessed. A more nuanced picture of environmental and sustainability effects would be desirable in the assessment of various projects.</p> <p>We also propose that the program clarifies that the influx of nutrients, toxins and hazardous substances can also come from catchment areas into the Baltic Sea, so that is is not only about direct discharges into the Baltic Sea from various sources without taking a broader perspective.</p> <p>Regarding PO4: Labor market: The result indicator is stated: Number of companies with applied anti-discriminatory policies. The need to work with policies (approaches, working methods and action plans) linked to anti-discrimination also exists in the public sector, e.g. in municipalities. Changing the indicator to: Number of organizations with applied anti-discriminatory policies would therefore be desirable. The sectors where there is a great need for future labour mentioned in the program are in engineering, science and ICT, as well as within the health care and social services sector. Targeting only companies can thus risk disadvantaging the female-dominated sector (in public sector, i.e. organisations) over the more male-dominated sector in engineering, science and ICT (in private sector, i.e. companies). /Sweden/</p>	<p>The issues related to harmful particles emissions can be addressed with the projects under programme objective 4 (Improved coastal and marine environment) and it can be relevant additional result for the projects under programme objective 5 (Decreased CO2 emissions).</p> <p>The catchment areas are included into the scope of programme objective 4.</p> <p>The wording of the result indicator was changed and the “organisations” is used instead of “companies”.</p>
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88	<p>Forests are a central pillar of economic and social life, as well as environmental quality, in the C Baltic Region. No development programme should neglect virtually all aspects of it, as this programme does. Currently the CBR region, especially Finland and Sweden, are experiencing an unprecedented lowering of the average timber manufacturing level, as demand for pulp has sharply increased. As a result, some of the slowest growing timber in the world is being used mostly for products that last a few weeks. Logging is at all time high levels, and many rural landscapes are being devastated, with negative social and environmental consequences. Carbon sinks are being reduced as mature forests are cut down for short-lived products. This trend demands to be reversed. In Estonia and Latvia the situation is somewhat better, but demand for pulpwood in Sweden and Finland drives export demand also in the Baltic States, who are also major exporters of saw timber. /Innofor Finland Ltd, Finland/</p>	<p>The forestry sector can be addressed as one nutrients load source under programme objective 4 (Improved coastal and marine environment).</p>
89	<p>For Policy objective 2, emphasis is put on the poor health of the Baltic Sea due to inflows of nutrients, hazardous substances and toxins into the sea. It is of course important to deal with present-day inflows to mitigate pollution, but it is also important to remember the importance of ‘old discharges’, now present e.g. in contaminated sediments. Such substances include nutrients such as phosphorous and contaminants such as dioxins and mercury. These are substances that are seriously hampering the use of the Baltic Sea blue resources, e.g. due to too high levels of dioxins in fish. Thus, more emphasis should be put on including contaminants already present in the Baltic Sea. In the challenges and objectives listed for PO2, one bullet point mentions “Existing levels and new inflows of nutrients and hazardous substances (including plastics) to the Baltic Sea” (p. 7), thus including the pre-existing contaminants. In the list of indicative joint actions supported, on the other hand, one action is “Joint pilot actions to reduce inflows of nutrients, toxins and hazardous substances” (p. 21), thus the emphasis is put on new inflows. We suggest that the indicative joint action should be broaden to include also pre-existing (already present) contaminants, e.g. in sediments, and that possible pilot actions thus could include also e.g. sediment remediation efforts. /Geological Survey of Sweden, Sweden/</p>	<p>Contaminants already present in sea are also within the scope of programme objective 4.</p>

90	Where does education and learning fit in? /Åland Vocational School, Åland/	<p>Skills development and learning is relevant element in the projects of all programme objectives.</p> <p>More specifically the programme objective 6 (Improved employment opportunities on labour market) is devoted to improving the competitiveness of less competitive people to labour market mainly via training and education.</p>
91	Where does education and learning fit in? Or is it so general that it might fit in just about anywhere in the programme? Education, learning, collaboration and communication. /Åland/	<p>Skills development and learning is relevant element in the projects of all programme objectives.</p> <p>More specifically the programme objective 6 is devoted to improving the competitiveness of less competitive people to labour market</p>
92	There needs to be a strategic, holistic approach when assessing future projects. We would suggest that a score system for projects based on effects on climate and biodiversity should be developed by professional environmental generalists with competence in both climate and biodiversity. A wider approach to the environmental consequences of the programme priorities and suggested projects needs to be taken, for example it should be not only possible but also desirable to create solutions for fossil fuel free transportations/travel when working with nature tourism, a travel intense business. The programme needs to have the overall picture and should not work in narrow sectors/"pipes" when assessing projects, we think. / Föreningen Närsholmen, Sweden/	<p>The basis for assessing the relevance of the projects will be the framework of each programme objective. As on the strategic assessment level all supported projects should contribute to the programme objective's result indicator's target value.</p> <p>3 programme objectives (PO-s 3-5) all contribute directly and indirectly to climate change and biodiversity.</p>
93	The new programme will provide an excellent foundation for the region to grow and prosper in light of the COVID-19 crisis and will provide true practical actions to enhance cooperation between Baltic neighbours. /Haaga-Helia University of Applied Sciences, Helsinki, Finland/	Comment taken for information.
94	How could we receive funding and for what kinds of projects? What would it take to receive funding? / AMS, The Åland Authority for Labour Market & Student Services, Åland/	Information will be published on the programme website and communicated widely when available.

95	<p>Specific objective (viii): Promoting sustainable multimodal urban mobility  The word "urban" should be removed since SO refers to more comprehensive mobility than only urban. The SO focus also on challenges of accessibility of remotely located regions (e.g. islands). Removing the word "urban" in the title, however, do not exclude urban multimodal challenges to be tackled in the project proposals. / University of Turku, Brahea Centre, Centre for Maritime Studies, Finland/</p>	<p>This specific objective description comes from EU regulation.</p>
96	<p>It is important that there is a financing connected to action, like for example flexible wetlands-solutions. /The Government of Åland/</p>	<p>It is possible to carry out such actions under programme objective 4 (Improved coastal and marine environment).</p>
97	<p>There has to be more detailed reference on the role of Higher Education and 'education' as a sector. /Finland/</p>	<p>Skills development and learning is relevant element in the projects of all programme objectives.  More specifically the programme objective 6 (Improved employment opportunities on labour market) is devoted to improving the competitiveness of less competitive people to labour market mainly via training and education.</p>

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We believe that Specific objective (vii): "Enhancing nature protection and biodiversity, green infrastructure in particular in the urban environment, and reducing pollution" is very important since productive and resilient ecosystems are the prerequisite for a sustainable society. We also know that nature is extremely important for recreation and adventures as well as calm and relief from a hectic day to day life in modern society. Our conclusion is that a great effort now has to be made to restore nature and let wildlife return. Degrading forestry and agricultural methods need to be replaced by sustainable alternatives. Considering this, we believe the SO needs to remain full and wide focus of the headline and not be narrowed down to only include the ambition to reduce the flow of nutrients to the Baltic Sea. The forests and agricultural landscape need to be restored in the Baltic area as well as most parts of the world and we hope the CBP will contribute to this urgent goal. We would also like to stress that enhancing biodiversity through ecosystem restoration and rewilding, where nature is let alone, in an era of dramatic climate change is extremely urgent and also recognized by the United Nations by naming 2021-2030 the "Decade of Ecosystem Restoration". / Rewilding Sweden, Sweden/

The intention has been to find specific themes and niches where via cross-border joint action tangible results can be achieved. That has led to the proposed scope of programme objectives 4 (Improved coastal and marine environment).

Selected intervention themes as programme objectives 3, 4 and 5 have all positive impact on the environment and indirectly to biodiversity.

The forestry sector can be addressed as one nutrient etc. load source under programme objective 4 (Improved coastal and marine environment).

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It takes time, planning, strategies, communication, information and consultation to reach the most cost-efficient measures for reduced pollution to the Baltic Sea from industries, agriculture, wastewater treatment plants etc. To limit the Central Baltic projects to projects that need to include physical measures, you will probably reach measures like mussel farming, wetlands, pilot projects and innovative pilot measures. Unfortunately, I believe that you will miss a lot of measures that are cost-efficient and that will decrease the pollution in a long term perspective.

For example:

- Facilitation and consultation to reach polluters with information and plans to decrease the pollution.
- To develop common plans with methods and time tables for reduced pollution together with the polluters.
- Sharing information of values and problems with polluters.

All this takes data, analysing, planning and communication. And methods for reaching forwards towards decreased pollution are most important to develop together with the other countries bordering to the Baltic Sea to be able to reach a common goal and a goal where all countries have contributed according to action plans.

For this, you need to include projects with planning, communication and strategic measures, and not only physical measures. / County Administrative Board, Sweden/

The projects can include physical measures and small size, equipment type investments if relevant for achieving reductions in nutrients, hazardous substances and toxins loads.

The actions on indicative lists are not compulsory. Each project must choose best possible mix of them in logical proportion and sequence.



100	<p>Question concerning output indicators: What is the difference between the indicators ‘Number of participating organisations and companies’ and ‘Organisations cooperating across borders’?</p> <p>Are the ‘Organisations cooperating across borders’ the organisations participating as projects partners, therefore logically also cooperating across borders?</p> <p>Is the definition for the ‘Number of participating organisations and companies’ the companies who participate and benefit from project activities but are not project partners? It is well possible that at least some of those organisations will also cooperate with other organisations across borders.</p> <p>Is it OK if some organisations will be counted twice, if they are meeting both criteria - participating and also cooperating across borders?</p> <p>Question about result indicators for PO 4: Is it expected that each project will contribute to one result indicator (1. Number of people with increased competitiveness on labour market; 2. Number of companies with applied anti-discriminatory policies; 3. Number of people with increased entrepreneurship) or can they address two or even three? Can some persons be counted twice, for example, if project supports less competitive people on labour market and enhances their entrepreneurship skills. Should project calculate the participants towards both result indicators 1 and 3?</p> <p>If at some point during programme implementation becomes evident that some result indicators have been achieved and some not, is it expected to open a Call including PO 4 but allow only project applications that will support a certain result indicator?</p> <p>Question about choosing correct PO: Can public employment services participate as potential partners in both PO 4 ‘Central Baltic efforts to strengthen and improve employment opportunities on labour market’ and PO 5 ‘Improved Central Baltic public services and solutions for the citizens’? For example, if they plan a project to facilitate employment supply and demand across borders and need to solve administrative, regulatory etc. challenges and improve public service for that, how do they choose which PO to apply? Same question might come up with other PSO-s where public organisations are eligible partners. /Other/</p>	<p>The logic of indicators was elaborated in Indicators’ Fiche’s and in Programme manual.</p> <p>The programme specific output indicator ‘Number of participating organisations and companies’ is to include the unique organisations and companies who take part form projects activities.</p> <p>The output indicator ‘Organisations cooperating across borders’ is common Interreg output indicator and would include also the number of project partner organisations.</p> <p>The participating unique organisations will be counted.</p> <p>The different projects are targeting different branches (results) of this programme objective.</p> <p>It is possible to open calls for limited number(s) of programme objectives or for specific parts of programme objectives.</p> <p>The division of work between programme objectives was more precisely described in programme manual.</p>
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101	<p>PO1:</p> <p>The green deal connections are missing in PO1. The green deal is the overarching strategy for the EU funds and it should be the ambition of all support stemming from the ERDF, including Central Baltic, to contribute to the green deal. This is currently not clear enough in the program draft, the ambition to support green transition is very much lacking in PO2 and absent in PO1. Of course the focus in PO1 are support to SMEs, but it need to be aligned with the green transition. If not, we risk having conflicts instead of synergies between PO1 and PO2.</p> <p>Regarding PO1 SO iii, the scope is too narrow. While allegedly open for all sectors, technology-start-ups are given a specific headline and thereby a privileged position. In addition, the fact that clusters are pinpointed might exclude some applicants in sectors that aren't represented in a cluster. As a consequence of the Corona Pandemic, for example, the tourism industry is facing severe challenges and the programme would benefit from either broadening the scope of PO1 or mentioning the tourism industry as one possible sector. This was an important sector which was mentioned in the Swedish regional analysis. As the draft program seems now, tourism is not mentioned to ensure that CB could support the development of the sector. We would like to emphasise the need to clarify the inclusion of tourism SME`s under PO1.</p> <p>The indicator of entering new markets outside the EU is a very ambitious one. For many SMEs, entering new markets within the EU is already a challenge that needs to be addressed. Entering new markets is already ambitious enough to bring value, why outside the EU should not be mandatory. For most of the SMEs in the CB area, only entering new markets within the EU would be a challenge.</p> <p>There are two paragraphs, Competitiveness and Innovation that state that SE and FI are front runners compared to EST and LAT. The balance in these paragraphs needs to revised because otherwise one might get the impression of SE and FI not needing the cooperation that the CB programme offers. That Smart specialisations strategies lack resources</p>	<p>The logic is that all economic sectors are targeted within programme objectives 1 and 2 and there is no priority or preference to green economy sectors.</p> <p>In addition, the issue can be addressed by using horizontal principle towards the projects which have clear negative impact on environment and on sustainable use of resources.</p> <p>Technology start-ups are relevant potential target group, but they are not privileged over other sectors. Relevant is the ambition to grow by potential participating companies.</p> <p>The changes into wording were made to describe the target group companies in more general way.</p> <p>The cluster approach is encouraged, not made obligatory. However, there should be will and capacity of target group companies to work together among themselves and also across borders.</p> <p>It is ambitious but realistic as the experience of current Central Baltic programme proves.</p> <p>Correction was made to programme document (IP) text.</p>
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for implementation in all CB Regions, are not necessarily true and instead the wording should be revised to possibilities of developing implementation of smart specialisation strategies.

PO2:

Specific objective (vii): Enhancing nature protection and biodiversity, green

infrastructure in particular in the urban environment, and reducing pollution

We support the overall priority and we see much of the earlier Swedish input reflected in the draft program. The obstacle and writings in regard to mitigating climate change/decreasing CO2 are very broadly described in the draft. We support this broadness but would like to stress the importance of connecting actions of lowered CO2 emissions to the environmental support of the Baltic sea. As the writings are right now it could be regarded as if actions can be supported that does not have a clear impact on the Baltic Sea. This needs a clarification, if the PSO intends to solely support actions with some sort of connection to the improvement of the Baltic sea environment. All in all, this can make it easier to explain the scope of this PSO for potential project idea owners.

We support the overall suggestion for actions in Specific objective (viii): Promoting sustainable multimodal urban mobility. Through the text we feel that both urban and rural areas could serve as the base for the actions which we feel is important in order to welcome more project ideas that can tackle different elements of the multimodal mobility system. /8 Swedish regions, Sweden/

In programme document we used the similar level of generality for describing the challenges of the most relevant potential themes for joint action. More specific descriptions are used in Regional Analysis and in guidance materials for potential applicants.

There is emphasis on urban multimodal transport systems/areas and transport nodes but urban transport systems/areas are understood as serving also their rural hinterlands.

102	<p>PO4:</p> <p>1.2.4. Central Baltic focus on the labour market (Policy Objective 4)</p> <p>Civil society and the social economy are important actors to include when dealing with the obstacles listed in the description of the PSO. We would like to emphasise that the civil society and the social economy are terms that are incorporated in the text to ensure their inclusion and way of contributing to increase the access to employment for marginalised groups/ less competitive groups.</p> <p>In recent weeks, we can see new studies and statistics in regard to long-term unemployment in Sweden. The most varying number points out 180.000 people as long-term unemployed for more than one year. This is a clear result of the pandemic and the loss of service sector jobs (the tourism, cultural and restaurant/hotel-sector etc.). These new statistics could be added to the program document and we also see that this stresses the need for this priority overall.</p> <p><a href="https://arbetsformedlingen.se/omoss/press/pressmeddelanden?id=A536E56E4AD1A6E0">https://arbetsformedlingen.se/omoss/press/pressmeddelanden?id=A536E56E4AD1A6E0</a></p> <p>Summary;</p> <ul style="list-style-type: none"> <li>• The green deal is absent in PO1</li> <li>• Regarding PO1 SO iii, the scope is too narrow...</li> <li>• Tourism in PO1 is a clear need. This sector needs support and invites many joint projects.</li> <li>• Clarify the support granted under Specific objective (vii). Are only actions with correlation to the Baltic Sea environment supported? Then this should be clarified.</li> <li>• We support the broad range of areas (urban, peripheral, rural) that can be supported under Specific objective (viii).</li> <li>• New statistics for unemployed in Sweden prompts the need for PO4. The new numbers should be included in the program text. /8 Swedish regions, Sweden/</li> </ul>	<p>This emphasis is shared, and employment opportunities are seen equally in all realms - private sector, public sector and civil society.</p> <p>Long term unemployment is described in Regional analysis and identified as challenge. The wordings of challenges were updated based on impacts of Covid-19 pandemic.</p> <p>For the Regional analysis the data was used as latest available by the moment of completion of the document - full year 2019. The impact of Covid was taken into account in updating the challenges of the Central Baltic region.</p>
103	<p>We have a lot of tourism entrepreneurs and we don't see where they fit in to the program. /Åland/</p>	<p>Tourism sector and entrepreneurs are included as target groups for potential projects under programme objectives 1 and 2.</p>

104	<p>Improve the alignment mechanisms between the Programme and the EU Strategy for the Baltic Sea Region. For example, by introducing</p> <ul style="list-style-type: none"> <li>- an interface between JS and relevant PACs with regular exchange,</li> <li>- capacity building for JS/MC/NC/PAC /Norden Association (EUSBSR Policy Area Coordinator PA Education, Science and Social affairs), Sweden/</li> </ul>	<p>Improvements in wording and alignments were made to programme document (IP).</p> <p>The need for establishing good ongoing working communication during programme implementation is recognised.</p>
105	<p>Check the numbering of specific objectives. It is not logical now.</p> <p>How people answered to Qs 5a-5d since there are no field where to respond? /Finland/</p>	<p>The numbering was checked and corrected throughout of document.</p>
106	<p>Please make sure that the examples of targeted/possible partners listed at the end of the different objectives are as inclusive as possible. E.g. "Non-commercial organisations" sounds odd in one of the objectives while "non-profit organisations" would be better.... You mention "umbrella organisations", however do those lists include research organisations (universities, institutes) and cities as well???</p> <p>/VTT, Finland/</p>	<p>Improvements in regard wordings were made to text of programme document (IP).</p> <p>The logic of potential partners lists is to emphasise the "relevance" principle of the any partner towards achieving the results relevant for the programme.</p> <p>The term "umbrella organisation" was changed to more precise "sectoral associations" and "chambers of commerce".</p>
107	<p>When the first call of the new programme is going to be launched?</p>	<p>Information is published on the programme website and communicated widely when available.</p>

108	<p>Comment about the result indicator for Specific objective (viii): Promoting sustainable multimodal urban mobility:</p> <p>In my opinion the number of improved transport nodes and corridors is not relevant and usable indicator for projects improving intermodal rural (and hinterlands) mobility solutions. Because the mobility solutions' development (especially in rural areas) cannot improve the transport corridor as such, it cannot be measured on the exact corridor (unless direct infrastructure development is supported).</p> <p>In my view the current SO would support projects developing different means of transportation and different new mobility solutions supporting transport development. It would include integration of new innovative transportation means in to (urban-) (public-) transportation system (electric cars, bicycles and scooters, walking, autonomous vehicles, car-pooling, etc.). Development of new innovative IT solutions is a crucial element of mentioned activities as well. But to measure the impact of such developments in transport CORRIDOR is not possible. Or applicants will generate very artificial measures and explanations to justify their project's impact on CO2 decrease in some corridor.</p> <p>My proposal for the indicator is: Number of innovative mobility solutions introduced in CB urban and suburban areas. /Central Baltic JS/</p>	<p>The new wording for the result indicator was used and word "corridors" taken away.</p>
109	<p>The horizontal principles of sustainable development (including climate adaptation and mitigation), equal opportunities, anti-discrimination, and gender equality could be more clearly elaborated in the next programme draft to ensure that actions proposed within the programme are able to fully consider these principles. /Swedish Geotechnical Institute, Sweden/</p>	<p>The text on horizontal principles description was improved in programme document (IP).</p>

110	<p>Sustainability being an overarching theme is almost all upcoming EU programmes, it is advisable to make some selection such as has been with the Central Baltic programme. Circular economy and natural environment are quite well selected priorities.</p> <p>However, considering the key role of multi-scale energy solutions in solving the climate challenge as well as the integration of EU energy markets and energy being one of the policy areas of EUSBSR, it is a pity that energy plays hardly any role in the programme. Energy is no longer a large-scale industry business only, but the ongoing energy transition is enabling even households to become producers. /Regional Council of South Karelia, Finland/</p>	Energy sector is seen inside the scope of programme objective 3 (joint circular economy solutions).
<p><b>6. Do you have suggestions for measures/initiatives to increase potential positive effects in the implementation of the programme (e.g. administrative, criteria, application documents, follow-up, etc.)?</b></p>		
111	<p>PO1 should have a third objective on increased productivity in micro enterprises. The improved money flow and resource efficiency, etc, would strengthen regional development in non-urban areas, and these firms - as they are so small and lack extra time and resources - would benefit from cross-border exchange and joint trainings, coaching, study visits and events. Product development and export OUTSIDE the own region is already a big thing for most solo E-s and micro E-s. And they are the absolute majority in numbers in the whole CB area. /Åland/</p>	The Central Baltic 2021-2027 programme identified 2 programme objectives as intervention themes where cross-border value added is strongest and the interests to cooperate overlap most.
112	<p>There is still room for improvement to the ems report system. /Sweden/</p>	The new electronic monitoring system (Jems) system is being developed based on user feedback.
113	<p>It would be nice to know the open call dates really early. It is difficult to create new partnerships if you have the normal limited time frame for preparing the application.</p>	A plan for all calls for the period is published and will be updated if relevant on the website.

114	The projects must receive acceptance from main stakeholder that the results will be used. A lot of experience with projects delivering results that are not interesting or not properly developed and cannot be used without extra work /University of Latvia, Latvia/	<p>The programme objectives are designed in way that results should reach target groups within project duration or reasonable time after project ends.</p> <p>It is unlikely that projects which do not bring clear tangible benefits for target group get financing.</p>
115	We welcome simplifications and appreciate the two-step-application system. /Sweden/	<p>The two-step application process is used for regular projects. Also efforts towards simplification will be continued. Eg. more wide use of simplified cost options (SCO-s).</p>
116	The Central Baltic Programme should: 1. Encourage business programmes seeking to enhance higher level manufacturing of timber in the Central Baltic Region; 2. Encourage programmes that promote non-clear cut forest management (which has a direct effect on the Baltic Sea as well as biodiversity and regional nature tourism possibilities); Cf. answer e) in question 5. above. /Innofor Finland Ltd, FIN/	<p>Within programme objectives 1 and 2 the principle is defined that projects should work with companies which target higher value added of the sector or and/or the region where they operate.</p> <p>Forest management issues can be seen in the scope of programme objective 4.</p>
117	Contact seminars or project tinder in order to find project partners. Handbooks on how to fill put to application document. Application form in cloud version - saves as you go. Easy to make print outs or share with colleagues during writing-period. /Åland Vocational School, Åland/	<p>Comments and recommendations are taken into consideration in the preparation of programme implementation.</p>



118	<p>Firstly we would like to say that the two step application system is very good. Also, the documents like the "Guide for implementation" are very helpful and in general very easily understood. As written above, we believe the evaluation of future projects from an environmental point of view need improvement. An evaluation system considering the projects' effect on multiple resource and environmental parameters, a score system, is needed, see below question 7. We also believe measures need to be taken to increase the participation of civil society in the programme activities. The very difficult demand for liquidity over long periods of time (9 months or more) makes it impossible for many creative presumptive partners to take part in the programme. We understand the risk of making payments in advance but if nothing is done about the demand for liquidity the regional development funds will finance more of the same actions and solutions as before instead of new, innovative actions, we believe. Since a very detailed project budget is demanded by the CBP in the application we actually think advance payments should be possible. / Föreningen Närsholmen, Sweden/</p>	<p>The two-step application process is kept.</p> <p>Guidance materials will be further developed and improved based on the experience of implementing CB 2014-20 and from the feedback received from stakeholders and partners.</p> <p>Unfortunately, the regulations on financial flows between the Commission and programme will not allow pre-payments to projects.</p>
119	<p>Admin feedback Flat rate model has been a great improvement and if possible use in the next programme. Repetition in filling out the forms, EMS could be streamlines between the LPV and PPV. Reporting should be independent of other partners process. More unification of 1st level control process. Focus on the priorities and the large level and not get stuck in the mini details and keep an eye on the bigger picture. Duplication of attachments, consistency in reporting, Period specific reporting, no need to duplicate periods Positive The 40% flat rate model has been good Good contact with the central baltic manager Joint secretariat folks - active in participating and liking social media sources. / Haaga-Helia University of Applied Sciences, Helsinki, Finland/</p>	<p>Efforts towards simplification will be continued. Eg. more wide use of simplified cost options (SCO-s).</p> <p>The new electronic monitoring system (Jems) is being developed based on user feedback.</p> <p>Centralised 1<sup>st</sup> level controls system will be used throughout all countries.</p>
120	<p>Follow ups and assessments for the projects. If a project targeting unemployed is organized there should be follow ups regularly to see if the project has changed the status of the participants. The follow ups could be interviews or polls that measure the wished effects. / AMS, The Åland Authority for Labour Market &amp; Student Services, Åland/</p>	<p>Follow-ups and assessments are foreseen to be used wherever there is need to better understand the results achieved by the projects.</p> <p>In general the rule will be used to report (by projects to JS) the achieved results 1 full year after project ends.</p> <p>Thereafter additional assessments can be undertaken.</p>

121	Pre-payments /FIN/	Unfortunately, the regulations on financial flows between the Commission and programme will not allow pre-payments to projects.
122	There is a need for more speculative and innovative call which are seeking smaller funds. Partnerships between the quadruple helix must be further encouraged. /Finland/	There are no restrictions on the use of quadruple helix partnerships.
123	More distance meeting and smaller travel budgets for projects. Travel is of course needed but it should be considered carefully. / Regional Council of Southwest Finland, Finland/	The sound financial management principle is used by the programme to justify all costs including travel related costs. Covid pandemic has strongly impacted the ways of working and more distance/remote meetings are encouraged by the programme.
124	To be able to open the project report also to WP leaders to contribute. /Sweden/	The principle to include WP leaders into project report creation is acceptable and should be possible to implement using different ways of communication and maintaining lead partner principle.
125	Using clear and understandable indicators to avoid confusion and mistakes. Making all guidance documents available before the first Call is open so that projects know the requirements for implementation and reporting.	Guidance materials will be further developed and improved based on the experience of implementing CB 2014-20 and from the feedback received from stakeholders and partners.
126	Promote alignment with the EU Strategy for the Baltic Sea Region with their flagships providing a macroregional platform for collaboration also after the projects lifetime and a strengthen policy impact of the Programme investments. / Norden Association (EUSBSR Policy Area Coordinator PA Education, Science and Social affairs), Sweden/	The overall design and the selection of programme objectives was planned in line with EUSBSR.
127	Think about scaling-up in practice: could there be vouchers for SMEs so that they can access the services of RDI providers? (I am not thinking about consultants here...). /VTT, Finland/	The scaling-up of target group companies is defined as main result for programme objective 2. For that different activities can be used by the project partners. However, the partners are not allowed to use grants of financial instruments towards target group companies.

128	Very good to continue to keep the programme approachable and simplified to allow for small scale actors to participate! /Swedish Geotechnical Institute, Sweden/	The possibility for smaller partners to participate has been recognised by the programme and it has been taken into account in designing the programme objectives and administrative procedures wherever possible.
129	Cooperation with the South-East Finland Russia CBC programme is recommended during the implementation period. As mentioned in the public hearing programme document there is a significant case for cooperation and Central Baltic regions Kymenlaakso and South Karelia are also partners in the cross-border program. It could be possible to extend impact vice versa through similar topic areas. / Regional Council of South Karelia, Finland/	The coordination mechanisms are planned and will be used during programmes' implementation.
Do you have any suggestions for measures/initiatives to mitigate potential negative environmental effects in the implementation of the programme (e.g. administrative, criteria, application documentation)?		
130	A survey about business climate and cooperation in the southwest region of Finland identifies contributing factors which I believe are important to take into consideration. One is that projects are divided into smaller parts so that even smaller companies can give offers and thrive. As I understand the CB program is now focusing on projects in an organisation level, not suitable for smaller local operators and assemblies. Especially the archipelago region the local engagement has a big effect on the result. I think CB programs can benefit from that. / Kökar hembygdsförening fr, Finland/	In programme objectives 1 and 2 (business development) the Central Baltic programme continues the approach that companies can participate in activities undertaken by professional business development organisations.  Single companies can't apply funding directly from the programme.
131	Can "Klimatväxling" (se for example <a href="https://utveckling.skane.se/utvecklingsomraden/miljo-och-klimat/klimatvaxling-i-skane/kom-igang-med-er-klimatvaxling/#167981">https://utveckling.skane.se/utvecklingsomraden/miljo-och-klimat/klimatvaxling-i-skane/kom-igang-med-er-klimatvaxling/#167981</a> unfortunately in Swedish, but Google translate might help?) be a tool to make project participants be more critical to for example flying, F2F meetings etc?	Different practices and tools to decrease the negative impact to the environment can be used and will be encouraged by the Central Baltic programme.

133	<p>Regarding water pollution it occurs inland and also groundwater should be addressed as they are the main natural process which cleans up the pollution by reducing it (especially nitrates and other nutrients). It should be clearly stated that the applied measure is necessary and will be used afterwards. Often very expensive measures are tested which will never be chosen at country level by governments. / University of Latvia/</p>	<p>Within programme objective 4 the principle is defined that the projects with the direct positive impact to the reduction of emissions are prioritised.</p> <p>Cost effective solutions should always be chosen to achieve the results.</p>
134	<p>I don't see that the programme as such as many potential negative effects as long as it takes a hard look at the business practices of the projects it supports under objective 1. But it would be just as relevant to measure the programme's positive environmental effects. / Innofor Finland Ltd, Finland/</p>	<p>The issue can be addressed by using horizontal principle towards the projects which have clear negative impact on environment and on sustainable use of resources.</p>
135	<p>signature of documents online / Åland Vocational School, Åland/</p>	<p>Electronic signatures will be accepted.</p>
136	<p>A solid knowledge about environmental threats and problems as well as state-of-the-art solutions when assessing project applications would definitely help. A deeper knowledge about ecology is needed in the staff handling the applications. A matrix or score system may be a good idea for the assessment. The score system would include "all" the environmental effects of a project and positive scores would be given when the project plan includes targets for lowering negative effects on climate (including travelling, transports, total energy use, source of energy used etc), minimizing the use of raw materials (especially virgin raw materials) as well as negative impact on local/regional as well as global (raw materials) ecosystems including biodiversity. The assessment of projects needs to have a wider environmental scope, for example, when working to increase tourism one has to consider the climate effects of attracting more visitors and what the project plans to do to reduce this impact. If measures are taken against the negative impact this would give a higher score in an evaluation. Considering that all activities have negative impact of some kind and signing documents ensuring that the applied project have no negative impact as requirement for financing is something that has to belong to the past. / Föreningen Närsholmen, Sweden/</p>	<p>The Joint Secretariat includes the thematic expertise from the thematic fields of programme objectives.</p> <p>All projects will be assessed by using the assessment methodology which follows the main principles of programme objectives and horizontal principles.</p>

137	To minimize the use of paper and utilize digital tools. All administration should be possible to organize without the use of paper. Event that target mobility and promote mobility in the area can also be organized online to mitigate environmental effects. Meetings with different counterparts could be organized online. / AMS, The Åland Authority for Labour Market & Student Services/	The use of online and digital tools and meetings and environment friendly approaches will be encouraged and used by the programme.
138	avoid flying if not possible to ban it; if live meetings/events are organized, only vegetarian/vegan options available. /Finland/	The use of online and digital tools and meetings and environment friendly approaches will be encouraged and used by the programme.
139	To encourage not to purchase any roll-ups for the CB projects - they are really difficult to re-use after the project life span. The posters are more environment-friendly ways to inform on the funding and cross-border cooperation than the roll-ups. /Finland/	Environment friendly approaches will be encouraged and used by the programme. Roll-ups are not required by the programme.
140	A more explicit presentation of the horizontal principles and how proposed actions and projects could integrate these into their proposals. This is especially important for the objectives that are related to enhancing growth and competitiveness and institutional capacity. / Swedish Geotechnical Institute, Sweden/	The use of horizontal principles in the design of projects can be elaborated and illustrated by guidance materials in phase of programme implementation.
141	The criteria for the selected projects should ensure minimizing the negative environmental effects. In the Program draft term "CO2 emissions" is used often (for example Programme document section 2.4.), but it would be better to use the term "greenhouse gas emissions" which covers also other than CO2 emissions (N2O, CH4). /Regional Council of Kymenlaakso, Finland/	The criteria for addressing the potential negative effects to environment will be used. The choice was made to focus Central Baltic programme's joint efforts to CO2 emissions reduction.