

ITALY-ALBANIA-MONTENEGRO 2021-27 TASK FORCE

Written procedure

Approval of the follow-up to the observations by the EU Commission

The Task Force acknowledges the observations submitted by the EU Commission to the Member State on the text of the programme and the follow-up proposed by the Managing Authority/Joint Secretariat.

Consequently, the Task Force approves the text of the follow-up, the programme and the updated annexes and gives the mandate to the Managing Authority to submit it to the EU Commission for adoption.

With note Ares(2022)3545774 dated 10/05/2022 the EU Commission sent the observations, in compliance with Article 18(1) and (2) of the Interreg Regulation (EU) 2021/1059.

In this table, we list the specific comments and suggestions made by the EU Commission with a proposed feedback and follow-up:

COMMENT BY THE EU COMMISSION	PROPOSED FOLLOW-UP
GENERAL 1. The draft programme states that the form of support will be granted for every specific objective and does not contain justification for the chosen forms of support, as required by Article 22(3)(b) CPR and Article 17(3)(c) ETC. While we understand that the nature and size of the planned operations allow for a very limited use of forms other than grants, a justification should be included in the programme. Given the size of the financial envelope, the specificities of the Interreg programme and the limited experience with financial instruments, the Commission has no objections if the programming authorities choose to use only grants. The lack of justification is nonetheless surprising, given that the reply from the Italy-Albania-Montenegro Task Force shows that both grants and financial instruments were considered: "intermediate organizations... which should be in the position to manage these [financial] instruments on behalf of the programme bodies, have not sufficient experience, thus it would imply unproportionally high management costs for the programme, a severe risk and a very long starting phase after programme approval, which would lead to severe delays and de-commitment." The programming authorities are therefore requested to justify all forms of	1a. As the number of characters allowed in the justifications sections is limited, it is not possible to enter the justification into those sections, therefore it is provided in this document, which is going to be annexed to the programme. In each S.O justification section the reference -see annex 9 (1) shall be added. JUSTIFICATION FOR THE FORM OF SUPPORT <i>Given the size of the financial envelope, the specificities of the multinational environment of Interreg and the specificities of the Pre-Accession countries involved, where intermediate organizations, which would be in charge of managing the financial instruments (FIs) on behalf of the programme bodies, have no or not sufficient experience and capacity, this would imply unproportionally high management costs for the programme, high risks of failure, as well as long time to establish new and unknown financial instruments, thus a very long starting phase after programme approval, which would lead to severe delays and decommitment risks for the programme. In addition, given the nature of foreseen beneficiaries, being exclusively public</i>

<p>support, whether grant or financial instrument in the programming period of 2021-27.</p>	<p><i>authorities, bodies governed by public law, non-profit organizations, while enterprises are not directly supported, grants to finance actions, which would not happen otherwise, are the most suitable form of support. For these reasons, the programme authorities decided to opt only for grants as a form of support.</i></p> <p><i>In any case, programme authorities expect project beneficiaries to investigate or test possibilities to introduce innovative forms of support (such as innovative financial instruments for the benefit of enterprises e.g. such as those of the 2014-2020 project 3C4SME), which may be introduced in future programming periods. Furthermore, and as a preliminary stage to introduce a new mind-set in the use of FIs, within the scope of S.O. 5.1 Governance, programme authorities encourage beneficiaries to develop dedicated capacity building actions, in order to strengthen the skills of the public sector in the use of FIs.</i></p>
<p>2. In its previous comments, the Commission underscored that “When referring to ‘migration’ and ‘migrants’, the terminology used in the programme should be carefully used, distinguishing where relevant ‘immigrants’, ‘migrants’, ‘returning migrants’ and ‘vulnerable groups’”. The programming authorities addressed such a comment by replacing the term “migrants” with “vulnerable groups”. This now brings ambiguity in some parts of the programme. Therefore, we ask the programming authorities to use only the term “migrants” when such a target group is relevant for the proposed activities. We also invite the programming authorities to further identify the potential complementarities with the AMIF Regulation (EU) 2021/1147 as regards to migrants. For this purpose, the programming authorities can usefully refer to the “Toolkit on the use of EU funds for the integration of people with a migrant background 2021-27” when drafting measures concerning this target group.</p>	<p>2a. The programme authorities encourage beneficiaries to address specific vulnerable groups, especially in P.A. 4.</p> <p>As highlighted in the territorial analysis, a cross-cutting objective of the programme is to <u>avoid emigration</u> (migration of citizens from the programme area), while ensuring a <u>sustainable development of the Programme area</u>, for the benefit its citizens, who still decide to migrate to other EU and non-EU areas (emigrants). Therefore, for its citizens (incl. potential emigrants) the Programme intends to offer better and new opportunities, exactly in order for them to decide to stay or to return to the programme area.</p> <p>The target group “immigrants”, instead, does not emerge as a group having joint, homogeneous and specific needs across the cross-border territories concerned. Moreover, there is no relevant route of immigrants or refugees between the two shores of the Southern Adriatic of the programme area, because the existing significant routes are from Africa to the EU, passing through southern Italy, and from the middle east to the EU, passing through the Balkans and thus not the South Adriatic maritime border. Furthermore, the type of migrants passing through the two IPA countries and those passing through the two regions of Southern Italy, as well as those, who remain, are indeed heterogeneous, in terms of origin,</p>

	<p>destination, cultural backgrounds, skills, intentions to settle down, chances in the labour markets and so are their needs, therefore the cross-border character of potential joint project activities on this theme seem to be limited.</p> <p>Therefore, the programme authorities suggest to avoid introducing the more precise term “migrants”, as being currently only partially relevant in the cross-border cooperation context, while keeping the wider concept of “vulnerable social group”, which indeed include also emigrants and immigrants, in order to enable beneficiary to also target them with specific actions, also in order to face future joint needs related to this target group, which are not known at the time of programme submission.</p>
<p>METHODOLOGY</p> <p>3. The programme is using solely Interreg common output and result indicators (4 output and 2 result indicators) which are assigned to the selected SOs on the basis of their relevance to the planned groups of actions. The justification of selection and the links between the output and result indicator are somewhat clear.</p>	3a. n.a.
<p>4. More clarity is nevertheless needed in relation to the actions/cluster of actions planned, the output and result indicators and the financial planning. We recommend introducing a table which clarifies the links between indicators, types of envisaged actions/clusters of actions and financial details. We have developed an example in this sense (in order to clearly see whether the proposed indicators ensure a high coverage of the financial allocation). This is further detailed in the SWD on performance, monitoring and evaluation. The specific template for the table is in Annex 2 to the SWD: https://ec.europa.eu/regional_policy/sources/docgener/evaluation/pdf/performance2127/performance2127_swd.pdf</p>	<p>4a. Add - in annex 1</p> <p>Methodology summary table in compliance with annex 2 of the Commission Staff Working Document SWD(2021) 198 final</p>
<p>5. Please find as well some recommendations and clarification in relation to the selection of indicators:</p> <p>a. One of the group of actions to be funded is Innovative experimental applications; for this cluster of actions, the Interreg common indicator RCO84 Pilot actions developed jointly and implemented in projects would be relevant; its use would also be logically linked to the common result indicators RCR79 and RCR104 already used by the programme.</p>	<p>5.a.a. The innovative experimental applications are not conceived as a project global output per se, as this would mean that the entire partnership together is implementing a series of other actions, which together lead to the innovative experimental application (final project output), while usually in Interreg projects innovative experimental applications are just one functional part of the whole project, which are usually developed by only one/two beneficiaries, thus intended as an action, which contribute to the achievement of the global project output. For this reason, it is not advisable to add these indicators.</p>

	<p>In the explanation of the action “innovative experimental application” in annex 1 add:</p> <p>The innovative experimental applications are not conceived as project output, but as actions part of other project actions, which together contribute to the achievement of the global project output, thus a tool necessary to reach the global output and not as the project output as such, therefore additional RCO 84 e RCR 79 and 104 are not used.</p>
b. We also invite the programming authorities to consider the introduction of RCO84 in the specific objectives (SOs) where innovative experimental applications are expected.	5.b.a. See above 5.a.
c. Specific objective (SO) 1.3: from the description of the actions in the programme document, it appears that the beneficiaries of the support will be micro, small and medium enterprises (direct support through vouchers and non-financial support are planned); we recommend the introduction of RCO01, RCO02 and RCO04 (in terms of target calculation, RCO01=RCO02+RCO04-duplicated enterprises) to better reflect the envisaged support to SMEs.	5.c.a. <u>MSMEs are not admitted as beneficiaries</u> of the programme, but only public authorities, bodies governed by public law and non-profit private organizations. MSMEs are target groups of the beneficiaries, therefore beneficiaries might use non-financial support to MSMEs, such as e.g., innovation vouchers. In our context financial instruments are still unknown (not applied), and it cannot be forecasted with sufficient precision how many of these may be implemented by beneficiaries. This means that this type of support is only an action part of a series of actions, which together contribute to the achievement of the global project output. Therefore, it is not advisable to add this new indicator.
d. SO 3.2: the selected indicators and the description of the soft type of actions planned do not seem to be linked to the selected intervention field 108 Multimodal transport (TEN-T). The programming authorities are therefore invited to clarify this and, if necessary, amend the list of selected indicators. The calculation of the targets takes into account the experience from the 2014-2020 programming period in terms of estimated number of projects that could be funded in the 2021-2027 period. One project is expected to contribute with 1 unit to RCO116 and RCO83. For each specific objective, the targets for RCO116 and RCO83 are then calculated by multiplying the total number of expected projects with the share of the budget of the specific objective.	<p>5.d.a. See observations no. 24 and 39.</p> <p>Add text in annex 1:</p> <p>The outputs and results of Interreg operations together contribute globally to the field of intervention. This means that, for example, in the specific objective 3.1 Intermodality or in the specific objective 4.2 Inclusive tourism, RCO116 and RCO83 and the corresponding RCRs are only “tools” having the final goal to enhance the “multimodal transport (TEN-T)” or the “Promotion of cultural heritage”, which are selected as the most suitable intervention fields for these S.O.s. Beneficiaries, while reaching RCO116 and RCO83 and the corresponding RCRs through the project actions, globally contribute to the multimodal transport or the promotion of cultural heritage. Given the limited financial resources of the Interreg programme, the multi-national dimension of cooperation actions, the soft nature of its interventions and the heterogeneous type of actions within the same operation, which</p>

	<p>potentially cover several different fields at the same time, it is clear that impacts on a selected intervention field may be captured only globally. Using several fields would only be a purely artificial selection, which would not reflect on the real added value of the impacts of the Interreg operations. Accordingly, the contribution of Interreg operations to a variety of intervention fields within the same S.O. may not be measured in a meaningful way, but they may be captured only globally.</p> <p>For this reason, only the most suitable intervention field for each specific objective was selected.</p>
<p>e. In the case of RCO85 and RCO87, the calculation is made by taking the outputs from the 2014-2020 programme linked to the full budget of the 2014-2020 programme and applying the financial share of the relevant SOs. However, this approach is not fully clear for the indicator RCO85 which counts the participation in training (as it is currently presented, we have a unit cost of more than 100,000 EUR/participant to training). It would be more realistic to calculate a unit cost/participant from 2014- 2020 and then apply it to the corresponding estimated budget for training in SO 4.2. The calculation of the 6% milestones from the 2029 target value is clear (based on the assumptions linked to the number of small projects that will be finalised by the end of 2024).</p>	<p>5.e.a. As the 2014-2020 capacity building activities occurred in all priority axis (no specific axis was allocated to skills, unlike 2021-2027) and precise data on costs per participant in these activities may not be extracted from the monitoring system (the total cost is aggregated in different work packages, budget lines and expenditures items, according to very diverse partner and project contexts), it is not advisable to use the total programme budget as a parameter, instead for RCO85 the total number of participants of 2014-2020 projects is used, assuming that at least the same number of trainees is reached also in 2021-2027 projects, also considering that these will be mostly the results of projects in one S.O., i.e. 4.1 Skills.</p> <p>Specify in annex 1 and calculate targets (total target 800 trainees) accordingly:</p> <p>As the data on the cost of single capacity building activities in 2014-2020 projects cannot be extracted from the monitoring system, as the data was aggregated, and the capacity building activities occurred in all priority axes, and not in a single priority axis, the budget allocation may not be used as a parameter, instead the number of trainees expected for 2021-2027 is assumed to be at least equal to the number of 2014-2020.</p>
<p>f. The baselines for the result indicators should be 0, unless the planned investments in 2021-2027 are a direct continuation of the projects funded in the 2014-2020 period. The assumptions made for the calculation of targets for result indicators are clear. In line with Article 17(1)(b) CPR, the methodology document should integrate a section related to “Data quality assurance “. The programming authorities should therefore confirm</p>	<p>5.f.a. Add in annex 1:</p> <p>As the programme strategic choices widely build on the 2014-2020 programme, it is assumed that the planned investments in 2021-2027 are a direct or indirect continuation of the projects funded in 2014-2020 period, therefore the baseline is calculated on the basis of the 2014-2020 achieved results.</p>

<p>in the methodological document, using the following sentence, that "When drafting the methodological document it was ensured that the data underpinning the indicator baselines, milestones, and targets were taken from a reliable source (e.g. the monitoring system or official statistics). Whenever this was not the case, the necessary steps were taken to ensure the quality of the data".</p>	<p>IMPORTANT NOTICE:</p> <p>When drafting the methodological document, it was ensured that the data underpinning the indicator baselines, milestones, and targets were taken from a reliable source (e.g. the monitoring system or official statistics). Whenever this was not the case, the necessary steps were taken to ensure the quality of the data.</p>
<p>COMPLEMENTARITIES WITH EU FUNDING INSTRUMENTS</p> <p>6. The paragraphe on the complementarity and synergies with EU-wide programmes should also mention complementarities and synergies with Erasmus+, Seal of Excellence, Digital Europe Programme or Connecting Europe Facility 2 Digital. It should be also indicated which cross border cooperation Interreg programmes and IPA IPA CBC programmes are overlapping with Interreg IPA South Adriatic.</p>	<p>6.a. Add in 1.1.:</p> <p>Synergies and complementarities at project level are going to be monitored through specific focus also with Erasmus+, Seal of Excellence, Digital Europe Programme or Connecting Europe Facility 2 Digital.</p> <p>- , especially Interreg (ADRION, MED, Danube, IT-HR, GR-IT, Interreg Europe) and Interreg IPA and ENI (GR-AL, HR-BiH-ME, EuroMed). .</p> <p>Complementarity with transnational programmes covering the same area is based on: the territorial governance level focused (i.e. NUTS II for transnational, NUTS III for CBC), and the focus of the interventions (i.e. land/maritime policy-making for transnational, practice-oriented maritime interventions for CBC).</p> <p>- (specifically AL-MK, AL-XK, AL-ME, ME-RS, ME-XK)</p>
<p>7. Regarding Digital Europe Programme and Connecting Europe Facility 2 Digital, the Commission encourages seeking specific complementarities, for what concerns data, in particular with the forthcoming deployment of European Data Spaces, as planned in the EU Data Strategy communication. Data Spaces aim to offer a secure and trusted means to make available data, for both the private and public sector, based upon voluntary agreements or legal obligations where such obligations are in force. In particular we wish to mention the Tourism Data Space, but other ones could still be of interest to some actions included in this proposed programme. The Data Spaces will be deployed with the support of the Digital Europe programme from 2021 onwards. In this perspective, it is also recommended to include in the requirements for actions to be supported by this programme the obligation that, where relevant, datasets resulting from the action should be made available as open data under the conditions defined in the Open Data Directive (Directive (EU)2019/1024 of</p>	<p>7.a. Add in 2.1.1.1 for S.O. 5.1 Governance:</p> <p>In particular, within this S.O., beneficiaries are going to be encouraged to work on complementarities and synergies with the Digital Europe Programme and Connecting Europe Facility 2 Digital, for what concerns data, in particular with the forthcoming deployment of European Data Spaces, as planned in the EU Data Strategy communication, and in the view of making data available to both the private and public sector, based upon voluntary agreements or legal obligations, in secure ways. A particular attention may be paid to the Tourism Data Space. Datasets resulting from the action should be made available as open data under the conditions defined in the Open Data Directive (Directive (EU)2019/1024 of 20/6/2019) as "high value datasets".</p>

<p>20/6/2019) as “high value datasets”, i.e.: a) available free of charge; b) machine readable; c) provided via APIs; d) provided as a bulk download, where relevant.</p>	
<p>8. The programming authorities are also invited to support the development and usage of AI-based language technologies among SMEs, public authorities and academia in the South Adriatic programme area. The South Adriatic programme highlights the importance of cross-border cooperation and the high number of SMEs in the tourism sector. Moreover, the Programme states that English, as a programme language, will be used, but targeted communication in national languages may be needed. Thus, South Adriatic programme area should note that the Commission has recently granted all European Union SMEs, public authorities and academia access to its own automatic translation service, eTranslation (https://ec.europa.eu/cefdigital/wiki/display/CEFDIGITAL/eTranslation), covering not only all EU official languages but also Russian, Turkish, Chinese, Japanese and Arabic. eTranslation, as well as a few more basic language tools, are available at https://language-tools.ec.europa.eu/ both to SMEs and public administrations at the local, regional or national level.</p>	<p>8.a. Add in 2.1.1.1 for S.O. 1.1 SMEs:</p> <p>In particular for this S.O., the beneficiaries are going to be encouraged to use and promote AI-based language technologies among SMEs, public authorities and universities/research centres of the South Adriatic programme area, such as the EU automatic translation service, eTranslation e.g.</p>
<p>SECTION 1 JOINT PROGRAMME STRATEGY: MAIN DEVELOPMENT CHALLENGES AND POLICY RESPONSES Reference: points (a), (b) and (c) of Article 17(3), points (a) and (b) of Article 17(9) ETC</p> <p>9. Several policy priorities outlined in the programme overlap with policy areas addressed by Italy’s National Recovery and Resilience Plan (NRRP). A non- exhaustive list includes: a clean energy transition, green and blue investments, circular economy, climate adaptation and risk management, mobility and regional connectivity. As the Recovery and Resilience Facility and the NRRP are currently not mentioned in the text of the Joint Programme Strategy, we suggest to include a reference to the need to ensure that any risk of double funding in the areas of intervention of the NRRP is avoided, in accordance with article 22 of Regulation (EU) 2021/241 of the European Parliament and of the Council of 12 February 2021 establishing the Recovery and Resilience Facility and with the principle of sound financial management.</p>	<p>9.a. Add in 1.1</p> <p>In compliance with article 22 of Regulation (EU) 2021/241, beneficiaries are going to be required to avoid overlapping and ensure complementarities with the actions financed through Italy’s National Recovery and Resilience Plan (NRRP) and the Recovery and Resilience Facility, especially in priorities shared with these instruments, such as clean energy transition, green and blue investments, circular economy, climate adaptation and risk management, mobility and regional connectivity.</p>
<p>10. Environmental pressures are well presented (biodiversity, water, waste (including marine litter), climate change and risk) although there is little empirical data included (e.g., on the number of protected sites (EU & other designations) which could help in framing</p>	<p>10.a. The indicators in the context of Interreg cooperation programmes <u>may not be framed on the number of protected sites</u>, as suggested, because of the <u>limited financial envelope and</u></p>

<p>indicators. The DNSH principle is not mentioned at all in section 1 (it is mentioned elsewhere - p.34, p.45, p.55, p.65, p.75, p.85, p.95, p.105), but the DNSH principle should pervade through the whole programme and not just for single priorities.</p>	<p><u>focus on soft cooperation measures</u> of Interreg programmes.</p> <p>In 2.1.1.1 of all S.O.s replace the sentence “The objectives of the programme take into account the “do no significant harm” principle” with</p> <p>“As the “do no significant harm” principle (DNSH) pervades the implementation of the whole programme in all actions of all S.O.s, in compliance with Regulation (EU) No 2020/852, this is a leading principle for the beneficiaries, which will be monitored throughout all phases of programme implementation.”.</p> <p>And add the same sentence in the 1.1., 1.22</p>
<p>11. The text could benefit from including more statistical data to support the identification of common needs, challenges and target groups under each of the identified thematic areas related to PO4. While women, elderly and youth are clearly identified throughout the section, little is mentioned on the specific needs of people with disabilities, people in isolated areas or other social groups at risk of poverty and social exclusion in terms of access to employment, education, health and social care, culture and other social services.</p>	<p>11.a. One of the gaps highlighted for the pre-accession countries is the lack of consistent data, including data related to PO4 target groups. Therefore it is suggested to add in 1.2, par. 1.4. :</p> <p>In all Specific Objectives of the Programme, beneficiaries are also encouraged to collect consistent data across the countries concerned, in order to more effectively assess and address needs of specific vulnerable groups, such as people with disabilities, people in isolated areas or other social groups at risk of poverty and social exclusion, in term of access to employment, education, health and social care, culture and other social services.</p>
<p>12. As underscored in the general comments, there should be some reference to migrants as a target groups throughout the programme, since there is the detailed description of migrants in the territorial analysis.</p>	<p>12.a. See observation no. 2</p>
<p>13. Besides a reference to widening wealth gap between urban and rural areas in the beginning of the section, the programme makes no other references to such gap and specific territorial needs in accessing social services under the thematic areas. The programme text could benefit from including disaggregated data per social groups and per territories if available to contribute to the identification of such target groups.</p>	<p>13.a. See observation no. 11</p>
<p>14. We welcome the indication that the programme will actively promote the rights under the EU Charter of Fundamental Rights under PO1 and PO4. However, this applicability to all the programmes of the Charter as well as other horizontal principles as per Article 9 CPR should be explicitly stated in the text. More specifically, the grounds on non-discrimination should also include religion or belief, disability and sexual orientation in line with Article 9(3). This commitment should also cover all</p>	<p>14.a. Change in 1.1, par. 1.4 like this</p> <p>Additionally, projects in all priority axes, are expected to also actively promote the rights of the Charter of Fundamental Rights of the EU, in compliance with article 9 of the CPR Regulation (EU) 2021/1060, and accordingly rights of dignity, freedom, equality, solidarity, citizens rights and justice, and their specifications, i.e. equality between men and women and prevention of any</p>

of the stages of the preparation and implementation of the programme.	<p>discrimination based on gender, age, nationality, ethnicity, health conditions (including disability), equality and non-discrimination, religion or belief and sexual orientation. Specific criteria are going to be applied at the stage of project selection, monitoring and evaluation.</p> <p>Add in 2.1.1.1 of S.O. 4.1: to gender, age, ethnicity, health conditions (including disability), equality and non-discrimination, religion or belief and sexual orientation</p>
15. As concerns the justification for RSO4.2, we welcome the focus on increasing skills for specific citizens groups or economic sectors. However, the programme should make clear that the focus should be in strengthening equal access to education and training, rather than having separate training for specific groups to avoid developing, as the latter risks providing lower quality services and sustaining or even aggravating the disadvantaged position of marginalized groups. The needs of marginalised communities can be addressed by a combination of targeted (direct) and inclusive mainstream actions. The aim of targeted actions is to provide additional support to promote effective equal access for marginalised communities to rights and mainstream services. This combined approach should be reflected in the justification for RSO4.2 and in the dedicated priority in section 2.	<p>15.a. Change in 1.3, S.O. 4.1 Vulnerable social groups, such as young, NEETs, unemployed over 40 y-o, disabled, women, citizens of isolated areas, etc., would largely benefit from training opportunities, both in terms of equal access to streamlined education/training, and targeted quality training. And add in 2.1.1.1, S.O. 4.1 Targeted training opportunities and equal access to streamlined education/training should address in particular vulnerable social groups. Beneficiaries are required to make sure that training specifically targeted to vulnerable groups does not have the side effect of marginalising those groups, who should also benefit from equal access to streamlined education/training.</p>
16. As concerns support for tourism and culture sectors, the employment rates in these sectors could be added to the text to convey more clearly the strategic position of the sectors in supporting access to employment. Furthermore, the text should also include a reflection on the digital and green transition needs, which is not explicitly mentioned in the text nor in the territorial analysis. Taking into account how the programme will use the support for the transformation of the sector, providing such reflection would strengthen the sectors' capacity to drive economic development, social inclusion and social innovation and other identified socio-economic challenges in the programme area.	<p>16.a. See observation no. 11 on the gaps of data in pre-accession countries. Moreover, the situation captured by available data in the EU does not fully reflect yet on the impacts of the recent and on-going crisis either. In addition, the programme has a seven years perspective and thus must allow for sufficient flexibility to address new challenges and threats, beyond those based on the available statistical data.</p> <p>However, we may stress the concept with a sentence in 1.1. : As thoroughly explained in all chapters of this Programme (see digitalisation and sustainability), the objectives of the EU digital and green transition strategies must guide the beneficiaries through all actions in all Specific Objectives.</p>
SECTION 2 PRIORITIES Reference: points (d) and (e) of Article 17(3) ETC	17.a. n.a.

<p>2.1. Priority: PA 1 - A smarter South Adriatic programme area, by promoting innovative and smart economic transformation</p> <p>17. There are good emphasizes on the role of SMEs for promoting circular economy approaches, and for waste management/prevention (p.33).</p>	
<p>2.1. Priority: PA 2 - A greener South Adriatic programme area, by promoting clean and fair energy transition, green and blue investment, the circular economy, climate adaptation and risk management</p> <p>2.1.1. Specific objective: RSO2.1. Promoting energy efficiency and reducing greenhouse gas emissions</p> <p>18. Despite recognising the effective use of the potential of renewable energy sources among the challenges, no concrete action is taken to address this. The programme mentions fostering investments of renewable energy and the importance of the diversification of renewable energy sources, but a concrete reference to action could be made for example in the specific objective RSO2.1 on energy efficiency.</p>	<p>18.a. It is proposed to add the promotion of diversified renewable resources, but through soft measures (linked to the limited resources available in this S.O.), which are typical actions for Interreg programmes, instead of major infrastructural investments as such. Anyway, projects are expected to develop pilot actions on renewable resources.</p> <p>Add to 2.1.1.1. S.O. 2.3: Typically, cooperation projects are required to implement soft measures, e.g. shared models, innovative applications/ instruments, common approaches, plans and strategies, energy communities, etc., aimed at enhancing energy efficiency, as well as the use of diversified renewable resources.</p>
<p>19. The description on p.45 is too short and not clear enough. Will renewable energy sources be promoted or only energy efficiency measures? If biomass is used then attention must be paid to this particular matter.</p>	<p>19.a. See previous observation no. 18.</p>
<p>2.1.1. Specific objective: RSO2.4. Promoting climate change adaptation and disaster risk prevention, resilience taking into account ecosystem based approaches</p> <p>20. The short description (p.55) covers significant issues (coastal zone management; natural and made-made risks).</p>	<p>20.a. n.a.</p>
<p>2.1.1. Specific objective: RSO2.7. Enhancing protection and preservation of nature, biodiversity and green infrastructure, including in urban areas, and reducing all forms of pollution</p> <p>21. The short description (p.65) mentions that investments in waste and sewage may be carried out to support the adoption of EU environmental rules by Western Balkans' Green agenda which is really welcomed. There is also mention (p.65) of green public procurement being applied; this should be a transversal application across all priorities and not only for one specific objective.</p>	<p>21.a. Move the text on green public procurement from 2.1.1.1 S.O. 2.2 to 1.1 programme strategy, as to apply it to all specific objectives:</p> <p>Actions like Green Public Procurement, nature-based solutions, lifecycle costing criteria, standards going beyond regulatory requirements, avoiding negative environmental impacts will be encouraged already at the stage of project selection in all Specific Objectives.</p>
<p>22. It should also be noted that the focus of SO 2.7 is on enhancing protection and preservation of nature, biodiversity and green infrastructure, and reducing</p>	<p>22.a. Correct. It is proposed to specify that the final goal of the actions must be protecting biodiversity and reducing pollution, while</p>

<p>pollution. Actions promoting circular economy should be included under SO 2.6, while water management should be covered under SO 2.5.</p>	<p>implementing actions also related to circular economy and effective water management, i.e. e.g. if a single action is introducing a model of waste recycling in a natural area rich in biodiversity, the recycling action as such shall be only functional and contributing to the achievement of the final goal of protecting biodiversity.</p> <p>Change in 2.1.1.1 S.O. 2.2:</p> <p>Still within the final goal of protecting natural habitats and reducing pollution and only functionally to this final goal, actions also related to circular economy or an effective water management & monitoring, incl. waste and sewage, may be carried out.</p>
<p>2.1. Priority: PA 3 - A more connected South Adriatic programme area by enhancing mobility and regional connectivity</p> <p>23. Sustainable urban mobility measures are not foreseen in the programme. We recommend the programming authorities to re-assess any possible support to planning and capacity building in the participating countries. Cities in Albania and Montenegro would greatly benefit from support to prepare/update their Sustainable Urban Mobility Plans and develop the data gathering of urban mobility indicators to establish a baseline for interventions and set reasonable targets for these programmes. We recommend using the sustainable urban mobility</p>	<p>23.a. Add in 2.1.1.1. S.O. 3.1:</p> <p>For a sustainable local and urban mobility, actions are encouraged aiming at preparing / updating Sustainable Urban Mobility Plans of the cities of the area, based on evidence of data on urban mobility indicators (incl. baseline and targets).</p>
<p>24. There is mention of soft investments in air, road, maritime and rail transport. Given that the programme has been screened out from the SEA Directive it must be clearly stated that these are soft investments only (p.75); this is not clear as on p.82 12.1 M€ is allocated to code108 multimodal transport (TEN T).</p>	<p>24.a. See observation 5.d. and 39</p> <p>There is no possibility to add comments in the table for the fields of intervention, therefore we explain in annex 1 methodology for indicators. In any case, we believe that the programme must be read, interpreted and applied as a whole, therefore the Fields of intervention sections must be interpreted in the light of the whole programme and in compliance with the soft nature of cooperation actions. Infrastructural investments are not typical of Interreg operations and the financial envelope is too limited for this. Anyway, and in line with the Interreg operation “philosophy”, projects are expected to develop pilot actions on multimodal transport.</p>
<p>2.1. Priority: PA 4 - A more social South Adriatic programme area</p> <p>2.1.1. Specific objective: RSO4.2. Improving equal access to inclusive and quality services in education, training and lifelong learning through developing</p>	<p>25.a. See comment 15.a, in particular sentence: Beneficiaries are required to make sure that training specifically targeted to vulnerable group does not have the side effect of marginalising those group, who should also benefit of equal access to streamlined education/training.</p>

<p>accessible infrastructure, including by fostering resilience for distance and on-line education and training</p> <p>25. As mentioned above, the programme should combine inclusive mainstream actions and targeted actions to provide additional support to promote effective equal access for marginalised communities to rights and mainstream services. It could be slightly further detailed how the programme foresees these target approached to be carried out. Are there any particular actions that will be taken to address the challenges in acing mainstream quality training that people in rural and remote areas face, considering the increasing wealth gap between territories and the an outward migration away from inner and rural areas? In order to ensure that actions do not lead to segregated separate services for the different vulnerable groups, the programme should include a commitment towards desegregation.</p>	
<p>26. Despite indicating the higher-than-average early leaving school rates in all territories, the programme does not indicate why it has decided to prioritise support for adult learning rather than also focusing on tackling this issue in primary and secondary education, where part of the cause of the issue may lay.</p>	<p>26.a. In the programme it is explicitly mentioned that NEETs, young unemployed, as well as elderlies and unemployed adults should be addressed as a target group by beneficiaries. Given the limited financial envelope of the programme and of S.O. 4.1, the different educational systems concerned, and the soft nature of multi-national cooperation actions, not focused on educational systems, as such, it is not possible for the cooperation programme to measure immediate impacts on the causes of early leaving school rates, which may be addressed by beneficiaries with specific actions, such as e.g. joint awareness raising campaigns involving youth and specifically schools in the three countries etc., which will be certainly encouraged during project selection.</p>
<p>27. In addition to the support for improvement of professional, entrepreneurial and digital skills, the programme could consider also supporting green and sustainability skills, skills required for the green economy and society.</p>	<p>27.a. add in 2.1.1.1 S.O. 4.1. , green and sustainability skills, required for the green economy,</p>
<p>28. In addition to the statements regarding the application of the Charter, the grounds for non-discrimination should also include religion or belief, disability and sexual orientation in line with Article 9(3).</p>	<p>28.a see observation 14</p>
<p>29. Hospitalised persons are identified as a target group under RSO4.2. Yet the needs of the group at least in education and training are not clarified elsewhere in the programme. Can the authorities clarify who they refer to as “hospitalised persons” and how will the programme support them? The list of target groups should also</p>	<p>29.a Hospitalised persons are mentioned as part of the “vulnerable social groups”, specifically in connection with “disabled persons”. This means, that specific targeted support may be provided by the beneficiaries, with training actions targeted to disabled / hospitalised persons, who</p>

<p>include NEET, unemployed over 40, women and population in isolated areas, as these are groups identified in the justification for the support under RSO4.2 in section 1.</p>	<p>may need to build new / special competences to be integrated or re-integrated in the labour market and in the society, e.g. after a long-term sick leave. Add in 2.1.1.3 S.O. 4.1 and 4.2: NEET, unemployed over 40, women and population in isolated areas,...</p>
<p>30. Developing green skills could be mentioned on p.85.</p>	<p>30.a See observation no. 27</p>
<p>2.1.1. Specific objective: RSO4.6. Enhancing the role of culture and sustainable tourism in economic development, social inclusion and social innovation 31. Despite the programme identified seasonality of tourism as one of the main challenges, the text offers little information on how this will be tackled under RSO4.6. It is also not clear from the text how the programme intends to support the diversification of the tourism product at destination level given the highly seasonal nature of the existing tourism offer in the programme area. Will the activities focused on developing more sustainable, diversified, strategically valorised management of cultural and natural assets also be linked to the support for sustainable tourism or will there be similar efforts targeting the tourism sector? The investments in lesser-known destinations with high tourism potential and addressing the issue of seasonality are key actions to strengthen the resilience of the tourism sector. Clarifying these will allow the programme to clearly indicate how this will be achieved and fulfil the aim of the transition to sustainable and inclusive tourism addressing any challenges related to the impact of the COVID-19 pandemic crisis on the sector.</p>	<p>31.a Partially already covered, but we may stress in 2.1.1.1 S.O. 4.2 Actions proposed by beneficiaries should be focused also on developing more sustainable, inclusive, diversified, strategically valorised management of cultural and natural assets, while valorising lesser-known destinations with high tourism potential, and supporting the provision of touristic services all year-round, in order to decrease seasonality and increase resilience of the tourism sector. By doing this, the impacts of the recent crises on the touristic sector may be mitigated.</p>
<p>32. We welcome projects on cultural heritage to be supported under PO4. In this context it is recommended that the Programme makes full use of all funding possibilities at European, national and regional level to accelerate the digitisation and preservation efforts in the area of cultural heritage. This also includes participation of cultural and tourism sectors in the upcoming data spaces on cultural heritage and tourism. The Recommendation on a common European data space on cultural heritage was adopted in November 2021. It encourages Member States to set up or update their digital strategy for cultural heritage, which should set clear digitisation and digital preservation goals aiming at higher quality. To guide Member States, digitisation targets have been set for 2030 with intermediate targets for 2025. Specifically, by 2030, Member States are encouraged to digitise in 3D all monuments and sites that are at high risk of degradation and 50% of those that</p>	<p>32.a Partially already covered, but we may stress in 2.1.1.1. S.O. 4.2: The actions may focus on enhancing digitalisation, especially taking stock of the upcoming data spaces on cultural heritage and tourism, skills, especially digital skills of cultural, creative and touristic operators, capacity building,...</p>

are highly frequented by tourists. By 2025, Member States should digitise 40% of the overall 2030 targets. Finally, the Recommendation encourages Member States to assess the digital skills gap in the sector and set objectives to upskill and reskill cultural heritage professionals.	
33. In complementarity to the foreseen actions on digitalisation, has the programme considered also actions supporting the green transition of the tourism and culture sector?	33.a Already covered, but we may stress in 2.1.1.1. S.O. 4.2: The management of cultural and natural assets shall become more sustainable, in compliance with the green transition principles , more diversified...
34. How will actions on skills development under this RSO be delineated from the sectoral support for tourism and culture under RSO4.2? From which programme will ESF interventions come that will complement these actions?	34.a It shall be noted that beneficiaries are required to exploit synergies and complementarities with the actions of the ESF Regional programmes in Puglia and Molise, as well as the corresponding IPA national programmes IN ALL specific objectives not only in 4.2, as specified in the programme strategy, chapter 1.1. However, we may stress in 2.1.1.1. S.O. 4.1&4.2, if required by the Commission: Complementarities with the ESF Regional and corresponding IPA national programmes should be addressed by beneficiaries, while not overlapping with precisely the same training activities, but complementing them, with training activities with a cross-border cooperation focus.
35. How is the support for tourism and culture under this RSO will be delineated and coordinated with support under other RSOs outside of the area of training as the territorial analysis recommended the support to be cross-cutting?	35.a Please check the annex 1 on the methodology of indicators, where the type of actions expected are declined for all Specific Objectives, including 4.2, with a cross-cutting approach. Interreg projects never focus on training being the only or the main action / output of an operation, but they always include cooperation actions such as e.g. common models, joint plans/strategies, joint agreements, etc. which together contribute to the global output of the project.
36. We recommended incorporating the same text on the applicability of horizontal principles as presented in RSO4.2 to ensure coherence.	36.a It is not clear, where this should be incorporated, however, please check observation 14, the horizontal principles must be applied to all Specific Objectives, according to observation 14, and not only in P.A. 4. This seems contradictory.
37. We invite the programme authorities to also consider the use of the RC077 (number of tourism/culture sits supported) and RCR77 ((Visitors of cultural and tourism sites supported) if applicable.	37.a In Interreg projects the increase of visitors in touristic / cultural sites is functional to a wider objective and output foreseen by the operations. This means, that the outputs to be measured in Interreg projects MUST necessarily go beyond the increase of number of visitors to touristic/natural

	<p>sites, which as such should contribute to the global output of the project, being “Joint solutions”, “Joint plans/strategies” implemented through the cooperation. RCO77 and RCR77, therefore, would not capture the specificities of the Interreg projects in a meaningful way. It is therefore not advisable to add this indicator.</p>
38. The list of target groups should also include NEET, unemployed over 40, women and population in isolated areas, as these are groups identified in the justification for the support.	38.a Correct, see observation 29.
39. Intervention field only cover the support for cultural sector. We recommend the additional use of intervention field 165 - Protection, development and promotion of public tourism assets and tourism services.	39.a See also observations no. 5.d. and 24. Accordingly, add in annex 1 methodology for indicators.
40. According to a recent ECA report, there is a need to ensure the effectiveness and financial sustainability of the ERDF investments in cultural sites through diversification of and increased reliance on own revenue sources. The programme should therefore encourage the use of private funds and improving the financial self-sustainability of supported cultural sites to safeguard cultural heritage. This should include steps to generate some revenue to support the activity developed in the renovated heritage or cultural sites that receive ERDF support by, for example, diversifying the use and including revenue-generating activities generated either directly by the site, or indirectly as economic gain for the region. The finality is to avoid investing in the renovation of cultural sites that would be then remain unused or abandoned.	<p>40.a It shall be noted that it is an IPA, not ERDF investment. Sustainability of the investments is already covered as an underlying principle, but we may stress it in 2.1.1.1, S.O. 4.1, if required by the Commission:</p> <p>Sustainability of investments in cultural sites is going to be a key requirement, to be monitored in all phases of programme implementation, therefore beneficiaries are expected to explain/provide evidence on how the investment is going to be self-sustained after the project end, also for instance developing models of institutional partnership i.e. public-private.</p>
41. Any ERDF interventions that have an impact on cultural heritage should be in accordance to best practice for which the references of the “EUROPEAN QUALITY PRINCIPLES for EU-funded Interventions with potential impact upon Cultural Heritage” (drafted by ICOMOS under the Commission mandate of the European Year of Cultural Heritage 2018) can enrich these considerations including for the New European Bauhaus.	<p>41. It shall be noted that it is an IPA, not ERDF investment. These principles shall be included in all specific objective, not only 4.2. Indeed, the Bauhaus principles were included in the programme strategy. However, we may stress it in 2.1.1.1 S.O. 4.2, if required by the Commission:</p> <p>In case of potential impacts upon cultural heritage, beneficiaries are required to apply the European Quality Principles for EU-funded Interventions with potential impact upon Cultural Heritage (EYCH 2018).</p>
<p>SECTION 3 FINANCING PLAN</p> <p>Reference: point (f) of Article 17(3) ETC</p> <p>42. The total EU funds of the programme are 67 M€. In terms of biodiversity 11% is foreseen (code 079) which is well above the MFF targets.</p>	42.a n.a.
43. Table 7 is in line with the ETC Master Table communicated to the Member States. All amounts are in full Euros.	43.a. n.a.

44. Table 8: The total EU support corresponds to the total EU support in the Master table. The maximum co-financing rate (checked to 10 digits) is respected. However, to be revised: a. The table contains decimals. All amounts have to be in full Euros.	44.a.a. See revised table 8
b. The share of the TA needs to be maximum 10% (checked to 10 digits) before applying the top-up of 500,000 €. Currently the rate before top-up is 10.1977264979%.	44.a.b. See revised table 8
45. In addition to the flat rate TA of 10%, this programme receives an increase of technical assistance of 500,000 €, in line with Article 27(4) ETC. These extra 500,000 € need to be reflected in the TA amounts in table 8. We propose to use the tool developed by Interact to integrate the additional TA of 500,000 € into table 8.	45. See revised table 8
46. Please provide also additional information as to how the technical assistance will be used to strengthen capacity building by sending an additional document.	46.a See annex 10 newly developed
SECTION 4 PARTNERSHIP Reference: point (g) of Article 17(3) ETC 47. In the extended partnership meeting, how were relevant bodies representing civil society, such as, non-governmental organisations, and bodies responsible for promoting social inclusion, fundamental rights, rights of persons with disabilities, gender equality and non-discrimination involved?	47.a Specify and stress in section 4: Relevant bodies representing civil society, NGOs, and responsible for promoting social inclusion, fundamental rights, incl. of persons with disabilities, and gender equality and non-discrimination, were invited to all public consultations & several of them participated in the extended partnership meeting. Programme authorities applied equal treatment & transparency principles, thus any input provided by representatives of these groups was included in the analysis.
48. An SEA screening out decisions has been made. It should be confirmed that this screening also covers the requirements of the Habitats Directive (Article 6.3) as well as answering the point raised for Priority 3 on transport.	Throughout the whole text of the Programme SEA screening it is outlined: 1) Compliance with the Habitat directive The programme does not foresee activities related to investments or infrastructures in Natura 2000. In case of soft activities supported by the programme and having potential effects in Natura 2000 sites, specific selection criteria will be defined in compliance with the Habitat Directive, article 6. The action will be eligible only if it contributes to the protection objective of the Natura 2000 sites (article 6.1) and is conformed to the activities or measures in the management plan in force. Selection criteria compliant with the EU and national normative in the field, including Habitat directive, will be used in the calls for proposal and approved by the monitoring committee. 2) Soft investments

	<p>Soft investments are defined as investments in small equipment, pilots, small-scaled investments, with no relevant environmental material impacts in terms of soil consumption, emissions in air and water and waste production. Moreover, soft investments should explicitly contribute to the environmental and sustainable objectives of the area in compliance with the objectives of the European Green Deal, i.e., circular economy, zero pollution, reduction of GHG emissions.</p>
<p>SECTION 5 APPROACH TO COMMUNICATION AND VISIBILITY FOR THE INTERREG PROGRAMME</p> <p>Reference: point (h) of Article 17(3) ETC</p> <p>49. The chapter should include confirmation that the programme's website will be linked to the single website portal providing access to all programmes of the partner Member States, as requested by Article 46(b) CPR.</p>	<p>As specified in ANNEX 06 – Extended version of chapter 5 “Approach to communication and visibility for the Interreg programme”</p> <p>“In compliance with art. 46 (b) of the CPR Regulation, the Programme Managing Authorities will provide data, related to all financed operations, to the Italian Ministry of Finance, in order to feed into the web platform https://opencoesione.gov.it/it/, where all programmes are included.”</p> <p>We may stress: In addition, the programme website will include a link to the web platform providing access to all programmes of the partner Member States.</p>
<p>50. Regarding the budget dedicated to communication actions: please express a clearer figure and compare it to the total budget of the programme to ensure that at least 0.3% of the total programme budget will be dedicated to communication, especially in view of the planned communication activities.</p>	<p>As specified in ANNEX 06 – Extended version of chapter 5 “Approach to communication and visibility for the Interreg programme”, we may more precisely express, as we know the total budget:</p> <p>“A budget corresponding to approx. 1 % of the programme budget i.e. 810 000 € (external 460 000 € + staff 350 000 €) is dedicated to communication activities. The resources will be spread for the duration of the programme, with a peak in the initial, intermediate and final phases.”</p>
<p>51. Is the budget sufficient to achieve the objectives for a territory that covers 3 (or more) languages? Are regional/country specific aspects taken into account (e.g. proper choice of channels etc)? How will the communication activities be managed cross-country and language wise?</p>	<p>The Programme's official language is English, and all official communications (internal and external) are carried out in English. So, the budget is sufficient to achieve the objectives for the programme area. In addition to this, the National Authorities will carry out communication actions</p>

	in local language, to cover specific regional aspects and involve the whole community.
52. In accordance with Article 36(1) ETC, a communication officer for the programme should be identified.	As specified in ANNEX 06 – Extended version of chapter 5 “Approach to communication and visibility for the Interreg programme” “The Managing Authority will appoint a Communication Officer, who will be in charge of all communication & visibility actions, and will work closely with the National Communication Coordinator, under the supervision of the JMC.” The current communication officer, Ms. Iliana Inglese, is appointed until 31/12/2023, therefore she will also take care of the transition, while setting up the new programme communication strategy and plan.
53. There is no specific mention of a dedicated communication approach to Operations of Strategic Importance (Appendix 3) and to operations whose budget exceeds 5 M€. Please include such info in the revised version.	It shall be noted that in the Programme most likely no operation is going to exceed 5 M€ (in 2014-2020 only one project exceeded this amount). However, as specified in ANNEX 06 – Extended version of chapter 5 “Approach to communication and visibility for the Interreg programme” “Operations of strategic importance financed through the programme, will benefit from special communication measures, carried out jointly by project partners, programme staff, national and regional authorities and relevant stakeholders, in order to create a cross communication network and give maximum visibility to their support.”
54. Please insert also the channel names of your social media accounts and which concrete target groups and actions you have per channel.	As specified in ANNEX 06 – Extended version of chapter 5 “Approach to communication and visibility for the Interreg programme” “As for social media, the following channels will be used: FACEBOOK, INSTAGRAM, TWITTER, YOUTUBE, LINKEDIN. Depending on new IT developments the social media mix may evolve over the Programme life cycle; priority will be given to the media which can bring Europe closer to citizens.” We may specify: As for social media, the following channels will be used, with dedicated actions for each target group: FACEBOOK (general public / storytelling); INSTAGRAM (youth / photo-stories); TWITTER (media, professionals / live blogging); YOUTUBE (general public / video communications); LINKEDIN (professionals / group discussions).

<p>55. It might be advisable to include at least the main and most prominent benchmarks/outputs on which communication activities are focused on into this section, albeit that the section makes reference to an "annex" on p.121 which was part of the uploaded documents. More relevant indicators would be listed there.</p>	<p>As specified in ANNEX 06 – Extended version of chapter 5 “Approach to communication and visibility for the Interreg programme”</p> <p>“All communication & visibility actions will be evaluated on a regular basis, using external & internal evaluators. Data will come from monitoring system, surveys, focus groups, interviews, website analytics, social media metrics, press monitoring, desk analysis. A detailed set of quantitative & qualitative indicators will be defined, to evaluate all communication actions and improve their performance. * Evaluation of the communication strategy will be part of the programme evaluation”</p> <p>We can add:</p> <p>*These set of indicators will be specified in the Programme Communication Strategy & Plan and in the Monitoring and Evaluation Plan.</p>
<p>SECTION 7 IMPLEMENTING PROVISIONS</p> <p>Reference: point (a) of Article 17(6) ETC</p> <p>56. We could not find any reference to e-Cohesion. Following Article 69(8) of CPR and Article 32(1) of Interreg Regulation, please confirm whether the programme has set up a system to ensure that all exchanges between beneficiaries and all the programme authorities are carried out by means of electronic data exchange in accordance with Annex XIV of the CPR.</p>	<p>56.a. Correct. The MA has decided to commit to develop and use the JeMS system, which is being developed by Interact for the benefit of Interreg programmes. Our programme is one of the few programmes defining the specifications in the core group. Therefore, add in 7.3 text:</p> <p>in acc. Art. 69(8) & Annex XIV of CPR and Article 32(1) of ETC Reg, MA adhered to JeMS by Interact (part of core group) i.e. all data exchanges between beneficiaries & programme through electronic means.</p>
<p>APPENDIXES – LIST OF PLANNED OPERATIONS OF STRATEGIC IMPORTANCE WITH A TIMETABLE</p> <p>57. The numbering of the annexes should be consistent with the template set out in Annex of ETC, where relevant: a. Annex 1 - Union contribution based on unit costs, lump sums and flat rates (Article 94 CPR)</p> <p>b. Annex 3 - List of planned operations of strategic importance with a timetable (Article 17(3) ETC)</p>	<p>57.a Not clear how the appendixes 1 and 3 are named annexes. We used “annex” instead of appendixes (used in the template) for all additional annexes added to the programme. To comply with this request, our Annex 1 may be renamed with Annex1a (in order to keep the consistent numbering of all other annexes we added), Annex 2 and Annex 3 with Annex3a and Annex 2a.</p>

Interreg IPA South Adriatic 2021-2027 Programme - Observations by the European Commission - Closure of the Written Procedure WP220530

1 messaggio

Joint Secretariat <js@italy-albania-montenegro.eu>

31 maggio 2022 10:32

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Dear Members of the 2021-27 Task Force,

In compliance with articles 4 and 5 of the Rules of Procedure of the 2021-27 Task Force, we inform you that the written procedure is closed.

We remind you that the written procedure files are stored in the Task Force shared drive at:

<https://drive.google.com/drive/folders/1un8jP6-GupVrMjF3t8MKqOWMMwcMZJGo?usp=sharing>

Thank you very much in advance for your cooperation and please do not hesitate to contact us for questions or clarifications you may need.

Best regards,

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Inviato: martedì 24 maggio 2022 07:36

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Cc: 'Gilles.KITTEL@ec.europa.eu' <Gilles.KITTEL@ec.europa.eu>; 'ma@italy-albania-montenegro.eu' <ma@italy-albania-montenegro.eu>; 'crescenzo.marino@regione.puglia.it' <crescenzo.marino@regione.puglia.it>; 'm.novello.js@regione.puglia.it' <m.novello.js@regione.puglia.it>; 'js@italy-albania-montenegro.eu' <js@italy-albania-montenegro.eu>; 'a.mezini.js@regione.puglia.it' <a.mezini.js@regione.puglia.it>; 'a.agrosi.js@regione.puglia.it' <a.agrosi.js@regione.puglia.it>; 'a.losacco.js@regione.puglia.it' <a.losacco.js@regione.puglia.it>; 'c.campanile.js@regione.puglia.it' <c.campanile.js@regione.puglia.it>; 'd.marciano.js@regione.puglia.it' <d.marciano.js@regione.puglia.it>; 'i.inglese.js@regione.puglia.it' <i.inglese.js@regione.puglia.it>; 'js@italy-albania-montenegro.eu' <js@italy-albania-montenegro.eu>; 's.depascalis@regione.puglia.it' <s.depascalis@regione.puglia.it>; 'e.caroli@regione.puglia.it' <e.caroli@regione.puglia.it>; 'g.musaico@regione.puglia.it' <g.musaico@regione.puglia.it>; 'm.depascale@regione.puglia.it' <m.depascale@regione.puglia.it>; 'f.errico.adg@regione.puglia.it' <f.errico.adg@regione.puglia.it>; 'f.carabellese.adg@regione.puglia.it' <f.carabellese.adg@regione.puglia.it>

Oggetto: Interreg IPA South Adriatic 2021-2027 Programme - Observations by the European Commission - Launch of the Written Procedure WP220530

Dear Members of the 2021-27 Task Force,

following up on the observations received from the European Commission, in order to submit the modified programme text on time for the next IPA committee (June) and in compliance with the articles 4 and 5 of the Rules of Procedure of the 2021-27 Task Force, we kindly ask for your approval of the text of the attached written procedure.

For minor suggestions, typo corrections or stylistic improvements, you may use the file:

https://docs.google.com/document/d/1cAAm5_3PHrQ9btUVaEzn6v3lsjsTiIP66sKzX5LLzsE/edit?usp=sharing

For your convenience, the written procedure files are stored in the Task Force shared drive:

<https://drive.google.com/drive/folders/1un8jP6-GupVrMjF3t8MKqOWMMwcMZJGo?usp=sharing>

The text of the written procedure is considered agreed, if no member of the Task Force has objected in writing, **within 5 working days, i.e. 30 May 2022.**

Thank you very much in advance for your cooperation and please do not hesitate to contact us for questions or clarifications you may need.

Best regards,

Joint Secretariat

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EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR REGIONAL AND URBAN POLICY
Director General

Brussels,
regio.d.1(2022)3689652/GK/

Subject: Commission observations

**Ref.: Operational programme:
- 2021TC16IPCB008 (Interreg VI-A) IPA Italy Albania Montenegro (South
Adriatic) Programme 2021-2027**

Please note that all correspondence should mention the reference and the registration numbers in the top right-hand corner of this letter.

Dear Ambassador,

Following the constructive informal dialogue with your authorities throughout the last year, the European Commission formally received the Interreg IPA South Adriatic programme 2021-2027 on 7 February 2022.

In accordance with Article 18(1) and (2) of the Interreg Regulation, the Commission has assessed the programme and has made some observations. We would like to ask your authorities to consider these observations and revise the programme accordingly.

The observations are set out in the annex. Where needed, we will also be pleased to meet with your authorities to discuss them in further detail.

Mr. Jean-Pierre Halkin and his unit remains at your disposal for any assistance you may deem necessary. Until then I want to wish you, your colleagues and your family the best in these challenging times.

Yours sincerely,

Marc Lemaître

His Excellency
Ambassador Pietro Benassi
Rappresentanza Permanente d'Italia presso l'Unione europea
Rue du Marteau 9
1000 Bruxelles

Annex: Commission observations on 2021TC16IPCB008 (Interreg VI-A)
IPA Italy Albania Montenegro (South Adriatic) Programme 2021-
2027

Copy: Mr. Crescenzo Antonio Marino, Head of the Managing Authority,
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Mr. Paolo Galletta, Mr. Antonio Verrico, Agenzia per la Coesione
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Mr. Gabriele Annis, Mr. Gianfranco Bergantino, Ministero degli
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Relazioni Esterne dell'Unione Europea Direzione Generale per
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Ms. Luisa Bavaro, Certifying Authority

Ms I. Juhansone, Secretary-General, European Commission

ANNEX

Commission observations on 2021TC16IPCB008 (Interreg VI-A) IPA Italy Albania Montenegro (South Adriatic) Programme 2021-2027

The following observations are made in reference to article 17 and 18 of the Regulation (EU) 2021/1059¹ (hereafter “ETC”), article 3 of the Regulation (EU) 2021/1058², and articles 6, 8 and 9 of the Regulation (EU) 2021/1060³ (hereafter CPR”). The observations are presented following the structure of the programme as laid out in the Interreg regulation.

Italy, on behalf of the Member State participating in the programme, is asked to provide to the Commission the necessary additional information and, where appropriate, revise the programme within two weeks following the receipt of these observations.

GENERAL

1. The draft programme states that the form of support will be grants for every specific objectives and does not contain justification for the chosen forms of support, as required by Article 22(3)(b) CPR and Article 17(3)(c) ETC. While we understand that the nature and size of the planned operations allow for a very limited use of forms other than grants, a justification should be included in the programme. Given the size of the financial envelope, the specificities of Interreg programme and the limited experience with financial instruments, the Commission has no objections if the programming authorities choose to use only grants. The lack of justification is nonetheless surprising, given that the reply from the Italy-Albania-Montenegro Task Force shows that both grants and financial instruments were considered: *"intermediate organisations... which should be in the position to manage these [financial] instruments on behalf of the programme bodies, have not sufficient experience, thus it would imply*

¹ Regulation (EU) 2021/1059 of the European Parliament and of the Council of 24 June 2021 on specific provisions for the European territorial cooperation goal (Interreg) supported by the European Regional Development Fund and external financing instruments.

² Regulation (EU) 2021/1058 of the European Parliament and of the Council of 24 June 2021 on the European Regional Development Fund and on the Cohesion Fund.

³ Regulation (EU) 2021/1060 of the European Parliament and of the Council of 24 June 2021 laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, the Just Transition Fund and the European Maritime, Fisheries and Aquaculture Fund and financial rules for those and for the Asylum, Migration and Integration Fund, the Internal Security Fund and the Instrument for Financial Support for Border Management and Visa Policy.

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unproportionally high management costs for the programme, a severe risk and a very long starting phase after programme approval, which would lead to severe delays and de-commitment." The programming authorities are therefore requested to justify all forms of support, whether grant or financial instrument in the programming period of 2021-27.

2. In its previous comments, the Commission underscored that *"When referring to 'migration' and 'migrants', the terminology used in the programme should be carefully used, distinguishing where relevant 'immigrants', 'migrants', 'returning migrants' and 'vulnerable groups'"*. The programming authorities addressed such a comment by replacing the term "migrants" with "vulnerable groups". This now brings ambiguity in some parts of the programme. Therefore, we ask the programming authorities to use only the term "migrants" when such a target group is relevant for the proposed activities. We also invite the programming authorities to further identify the potential complementarities with the AMIF Regulation (EU) 2021/1147 as regards to migrants. For this purpose, the programming authorities can usefully refer to the "Toolkit on the use of EU funds for the integration of people with a migrant background 2021-27" when drafting measures concerning this target group.

METHODOLOGY

3. The programme is using solely Interreg common output and result indicators (4 output and 2 result indicators) which are assigned to the selected SOs on the basis of their relevance to the planned groups of actions. The justification of selection and the links between the output and result indicator are somewhat clear.
4. More clarity is nevertheless needed in relation to the actions/cluster of actions planned, the output and result indicators and the financial planning. We recommend introducing a table which clarifies the links between indicators, types of envisaged actions/clusters of actions and financial details. We have developed an example in this sense (in order to clearly see whether the proposed indicators ensure a high coverage of the financial allocation). This is further detailed in the SWD on performance, monitoring and evaluation. The specific template for the table is in Annex 2 to the SWD:

https://ec.europa.eu/regional_policy/sources/docgener/evaluation/pdf/performance2127/performance2127_swd.pdf

5. Please find as well some recommendations and clarification in relation to the selection of indicators:
 - a. One of the group of actions to be funded is Innovative experimental applications; for this cluster of actions, the Interreg common indicator RCO84 Pilot actions developed jointly and implemented in projects would be relevant; its use would also be logically linked to the common result indicators RCR79 and RCR104 already used by the programme.
 - b. We also invite the programming authorities to consider the introduction of RCO84 in the specific objectives (SOs) where innovative experimental applications are expected.

- c. Specific objective (SO) 1.3: from the description of the actions in the programme document, it appears that the beneficiaries of the support will be micro, small and medium enterprises (direct support through vouchers and non-financial support are planned); we recommend the introduction of RCO01, RCO02 and RCO04 (in terms of target calculation, $RCO01=RCO02+RCO04$ -duplicated enterprises) to better reflect the envisaged support to SMEs.
- d. SO 3.2: the selected indicators and the description of the soft type of actions planned do not seem to be linked to the selected intervention field 108 Multimodal transport (TEN-T). The programming authorities are therefore invited to clarify this and, if necessary amend the list of selected indicators. The calculation of the targets takes into account the experience from the 2014-2020 programming period in terms of estimated number of projects that could be funded in the 2021-2027 period. One project is expected to contribute with 1 unit to RCO116 and RCO83. For each specific objective, the targets for RCO116 and RCO83 are then calculated by multiplying the total number of expected projects with the share of the budget of the specific objective.
- e. In the case of RCO85 and RCO87, the calculation is made by taking the outputs from the 2014-2020 programme linked to the full budget of the 2014-2020 programme and applying the financial share of the relevant SOs. However, this approach is not fully clear for the indicator RCO85 which counts the participations in trainings (as it is currently presented, we have a unit cost of more than 100,000 EUR/participant to training). It would be more realistic to calculate a unit cost/participant from 2014-2020 and then apply it to the corresponding estimated budget for trainings in SO 4.2. The calculation of the 6% milestones from the 2029 target value is clear (based on the assumptions linked to the number of small projects that will be finalised by end of 2024).
- f. The baselines for the result indicators should be 0, unless the planned investments in 2021-2027 are a direct continuation of the projects funded in 2014-2020 period. The assumptions made for the calculation of targets for result indicators are clear. In line with Article 17(1)(b) CPR, the methodology document should integrate a section related to "Data quality assurance". The programming authorities should therefore confirm in the methodological document, using the following sentence, that *"When drafting the methodological document it was ensured that the data underpinning the indicator baselines, milestones, and targets were taken from a reliable source (e.g. the monitoring system or official statistics). Whenever this was not the case, the necessary steps were taken to ensure the quality of the data"*.

COMPLEMENTARITIES WITH EU FUNDING INSTRUMENTS

- 6. The paragraphe on the complementarity and synergies with EU-wide programmes should also mention complementarities and synergies with Erasmus+, Seal of Excellence, Digital Europe Programme or Connecting Europe Facility 2 Digital. It should be also indicated which cross border cooperation Interreg programmes and IPA IPA CBC programmes are overlapping with Interreg IPA South Adriatic.

7. Regarding Digital Europe Programme and Connecting Europe Facility 2 Digital, the Commission encourages seeking specific complementarities, for what concerns data, in particular with the forthcoming deployment of European Data Spaces, as planned in the EU Data Strategy communication. Data Spaces aim to offer a secure and trusted mean to make available data, for both the private and public sector, based upon voluntary agreements or legal obligations where such obligations are in force. In particular we wish to mention the Tourism Data Space, but other ones could still be of interest to some actions included in this proposed programme. The Data Spaces will be deployed with the support of the Digital Europe programme from 2021 onwards. In this perspective, it is also recommended to include in the requirements for actions to be supported by this programme the obligation that, where relevant, datasets resulting from the action should be made available as open data under the conditions defined in the Open Data Directive (Directive (EU)2019/1024 of 20/6/2019) as “high value datasets”, i.e.: a) available free of charge; b) machine readable; c) provided via APIs; d) provided as a bulk download, where relevant.
8. The programming authorities are also invited to support the development and usage of AI-based language technologies among SMEs, public authorities and academia in the South Adriatic programme area. The South Adriatic programme highlights the importance of cross-border cooperation and the high number of SMEs in the tourism sector. Moreover, the Programme states that English, as programme language, will be used, but targeted communication in national languages may be needed. Thus, South Adriatic programme area should note that the Commission has recently granted all European Union SMEs, public authorities and academia access to its own automatic translation service, eTranslation (<https://ec.europa.eu/cefdigital/wiki/display/CEFDIGITAL/eTranslation>), covering not only all EU official languages but also Russian, Turkish, Chinese, Japanese and Arabic. eTranslation, as well as a few more basic language tools, are available at <https://language-tools.ec.europa.eu/> both to SMEs and public administrations at the local, regional or national level.

SECTION 1

JOINT PROGRAMME STRATEGY: MAIN DEVELOPMENT CHALLENGES AND POLICY RESPONSES

Reference: points (a), (b) and (c) of Article 17(3), points (a) and (b) of Article 17(9) ETC

9. Several policy priorities outlined in the programme overlap with policy areas addressed by Italy’s National Recovery and Resilience Plan (NRRP). A non-exhaustive list includes: a clean energy transition, green and blue investments, circular economy, climate adaptation and risk management, mobility and regional connectivity. As the Recovery and Resilience Facility and the NRRP are currently not mentioned in the text of the Joint Programme Strategy, we suggest to include a reference to the need to ensure that any risk of double funding in the areas of intervention of the NRRP is avoided, in accordance with article 22 of Regulation (EU) 2021/241 of the European Parliament and of the Council of 12 February 2021 establishing the Recovery and Resilience Facility and with the principle of sound financial management.

10. Environmental pressures are well presented (biodiversity, water, waste (including marine litter), climate change and risk) although there is little empirical data included (e.g., on the number of protected sites (EU & other designations) which could help in framing indicators. The DNSH principle is not mentioned at all in section 1 (it is mentioned elsewhere - p.34, p.45, p.55, p.65, p.75, p.85, p.95, p.105), but the DNSH principle should pervade through the whole programme and not just for single priorities.
11. The text could benefit from including more statistical data to support the identification of common needs, challenges and target groups under each of the identified thematic areas related to PO4. While women, elderly and youth are clearly identified throughout the section, little is mentioned on the specific needs of people with disabilities, people in isolated areas or other social groups at risk of poverty and social exclusion in term of access to employment, education, health and social care, culture and other social services.
12. As underscored in the general comments, there should be some reference to migrants as a target groups throughout the programme, since there is the detailed description of migrants in the territorial analysis.
13. Besides a reference to widening wealth gap between urban and rural areas in the beginning of the section, the programme makes no other references to such gap and specific territorial needs in accessing social services under the thematic areas. The programme text could benefit from including disaggregated data per social groups and per territories if available to contribute to the identification of such target groups.
14. We welcome the indication that the programme will actively promote the rights under the EU Charter of Fundamental Rights under PO1 and PO4. However, this applicability to all the programme of the Charter as well as other horizontal principles as per Article 9 CPR should be explicitly stated in the text. More specifically, the grounds on non-discrimination should also include religion or belief, disability and sexual orientation in line with Article 9(3). This commitment should also cover all of the stages of the preparation and implementation of the programme.
15. As concerns the justification for RSO4.2, we welcome the focus on increasing skills for specific citizens groups or economic sectors. However, the programme should make clear that the focus should be in strengthening equal access to education and training, rather than having separate trainings for specific groups to avoid developing, as the latter risks providing lower quality services and sustaining or even aggravating the disadvantaged position of marginalized groups. The needs of marginalised communities can be addressed by a combination of targeted (direct) and inclusive mainstream actions. The aim of targeted actions is to provide additional support to promote effective equal access for marginalised communities to rights and mainstream services. This combined approach should be reflected in the justification for RSO4.2 and in the dedicated priority in section 2.
16. As concerns support for tourism and culture sectors, the employment rates in these sectors could be added to the text to convey more clearly the strategic position of the sectors in supporting access to employment. Furthermore, the text

should also include a reflection on the digital and green transition needs, which is not explicitly mentioned in the text nor in the territorial analysis. Taking into account how the programme will use the support for the transformation of the sector, providing such reflection would strengthen the sectors' capacity to drive economic development, social inclusion and social innovation and other identified socio-economic challenges in the programme area.

SECTION 2 PRIORITIES

Reference: points (d) and (e) of Article 17(3) ETC

2.1. Priority: PA 1 - A smarter South Adriatic programme area, by promoting innovative and smart economic transformation

17. There are good emphasises on the role of SMEs for promoting circular economy approaches, and for waste management/prevention (p.33).

2.1. Priority: PA 2 - A greener South Adriatic programme area, by promoting clean and fair energy transition, green and blue investment, the circular economy, climate adaptation and risk management

2.1.1. Specific objective: RSO2.1. Promoting energy efficiency and reducing greenhouse gas emissions

18. Despite recognising the effective use of the potential of renewable energy sources among the challenges, no concrete action is taken to address this. The programme mentions fostering investments of renewable energy and the importance of the diversification of renewable energy sources, but a concrete reference to action could be made for example in the specific objective RSO2.1 on energy efficiency.
19. The description on p.45 is too short and not clear enough. Will renewable energy sources be promoted or only energy efficiency measures? If biomass is used then attention must be paid to this particular matter.

2.1.1. Specific objective: RSO2.4. Promoting climate change adaptation and disaster risk prevention, resilience taking into account eco-system based approaches

20. The short description (p.55) covers significant issues (coastal zone management; natural and made-made risks).

2.1.1. Specific objective: RSO2.7. Enhancing protection and preservation of nature, biodiversity and green infrastructure, including in urban areas, and reducing all forms of pollution

21. The short description (p.65) mentions that investments in waste and sewage may be carried out to support the adoption of EU environmental rules by Western Balkans' Green agenda which is really welcomed. There is also mention (p.65) of green public procurement being applied; this should be a transversal application across all priorities and not only for one specific objective.

22. It should also be noted that the focus of SO 2.7 is on enhancing protection and preservation of nature, biodiversity and green infrastructure, and reducing pollution. Actions promoting circular economy should be included under SO 2.6, while water management should be covered under SO 2.5.

2.1. Priority: PA 3 - A more connected South Adriatic programme area by enhancing mobility and regional connectivity

23. Sustainable urban mobility measures are not foreseen in the programme. We recommend the programming authorities to re-assess any possible support to planning and capacity building in the participating countries. Cities in Albania and Montenegro would greatly benefit from support to prepare/update their Sustainable Urban Mobility Plans and develop the data gathering of urban mobility indicators to establish a baseline for interventions and set reasonable targets for these programmes. We recommend using the sustainable urban mobility indicators prepared by the Commission: https://transport.ec.europa.eu/transport-themes/clean-transport-urban-transport/sumi_en. Exchanges and sharing experience between the three countries should be facilitated so Albanian and Montenegrin cities could also benefit from the vast experience of Italian cities.
24. There is mention of soft investments in air, road, maritime and rail transport. Given that the programme has been screened out from the SEA Directive it must be clearly stated that these are soft investments only (p.75); this is not clear as on p.82 12.1 M€ is allocated to code108 multimodal transport (TEN T).

2.1. Priority: PA 4 - A more social South Adriatic programme area

2.1.1. Specific objective: RSO4.2. Improving equal access to inclusive and quality services in education, training and lifelong learning through developing accessible infrastructure, including by fostering resilience for distance and on-line education and training

25. As mentioned above, the programme should combine inclusive mainstream actions and targeted actions to provide additional support to promote effective equal access for marginalised communities to rights and mainstream services. It could be slightly further detailed how the programme foresees these target approached to be carried out. Are there any particular actions that will be taken to address the challenges in achieving mainstream quality training that people in rural and remote areas face, considering the increasing wealth gap between territories and the outward migration away from inner and rural areas? In order to ensure that actions do not lead to segregated separate services for the different vulnerable groups, the programme should include a commitment towards desegregation.
26. Despite indicating the higher-than-average early leaving school rates in all territories, the programme does not indicate why it has decided to prioritise support for adult learning rather than also focusing on tackling this issue in primary and secondary education, where part of the cause of the issue may lay.

27. In addition to the support for improvement of professional, entrepreneurial and digital skills, the programme could consider also supporting green and sustainability skills, skills required for the green economy and society.
28. In addition to the statements regarding the application of the Charter, the grounds for non-discrimination should also include religion or belief, disability and sexual orientation in line with Article 9(3).
29. Hospitalised persons are identified as a target group under RSO4.2. Yet the needs of the group at least in education and training are not clarified elsewhere in the programme. Can the authorities clarify who they refer to as “hospitalised persons” and how will the programme support them? The list of target groups should also include NEET, unemployed over 40, women and population in isolated areas, as these are groups identified in the justification for the support under RSO4.2 in section 1.
30. Developing green skills could be mentioned on p.85.

2.1.1. Specific objective: RSO4.6. Enhancing the role of culture and sustainable tourism in economic development, social inclusion and social innovation

31. Despite the programme identified seasonality of tourism as one of the main challenges, the text offers little information on how this will be tackled under RSO4.6. It is also not clear from the text how the programme intends to support the diversification of the tourism product at destination level given the highly seasonal nature of the existing tourism offer in the programme area. Will the activities focused on developing more sustainable, diversified, strategically valorised management of cultural and natural assets also be linked to the support for sustainable tourism or will there be similar efforts targeting the tourism sector? The investments in lesser-known destinations with high tourism potential and addressing the issue of seasonality are key actions to strengthen the resilience of the tourism sector. Clarifying these will allow the programme to clearly indicate how this will be achieved and fulfil the aim of the transition to sustainable and inclusive tourism addressing any challenges related to the impact of the COVID-19 pandemic crisis on the sector.
32. We welcome projects on cultural heritage to be supported under PO4. In this context it is recommended that the Programme makes full use of all funding possibilities at European, national and regional level to accelerate the digitisation and preservation efforts in the area of cultural heritage. This also includes participation of cultural and tourism sectors in the upcoming data spaces on cultural heritage and tourism. The Recommendation on a common European data space on cultural heritage was adopted in November 2021. It encourages Member States to set up or update their digital strategy for cultural heritage, which should set clear digitisation and digital preservation goals aiming at higher quality. To guide Member States, digitisation targets have been set for 2030 with intermediate targets for 2025. Specifically, by 2030, Member States are encouraged to digitise in 3D all monuments and sites that are at high risk of degradation and 50% of those that are highly frequented by tourists. By 2025, Member States should digitise 40% of the overall 2030 targets. Finally, the Recommendation encourages Member States to assess the digital skills gap in the sector and set objectives to upskill and reskill cultural heritage professionals.

33. In complementarity to the foreseen actions on digitalisation, has the programme considered also actions supporting the green transition of the tourism and culture sector?
34. How will actions on skills development under this RSO be delineated from the sectoral support for tourism and culture under RSO4.2? From which programme will ESF interventions come that will complement these actions?
35. How is the support for tourism and culture under this RSO will be delineated and coordinated with support under other RSOs outside of the area of training as the territorial analysis recommended the support to be cross-cutting?
36. We recommended incorporating the same text on the applicability of horizontal principles as presented in RSO4.2 to ensure coherence.
37. We invite the programme authorities to also consider the use of the RC077 (number of tourism/culture sites supported) and RCR77 ((Visitors of cultural and tourism sites supported) if applicable.
38. The list of target groups should also include NEET, unemployed over 40, women and population in isolated areas, as these are groups identified in the justification for the support.
39. Intervention field only cover the support for cultural sector. We recommend the additional use of intervention field 165 - Protection, development and promotion of public tourism assets and tourism services.
40. According to a recent ECA report, there is a need to ensure the effectiveness and financial sustainability of the ERDF investments in cultural sites through diversification of and increased reliance on own revenue sources. The programme should therefore encourage the use of private funds and improving the financial self-sustainability of supported cultural sites to safeguard cultural heritage. This should include steps to generate some revenue to support the activity developed in the renovated heritage or cultural sites that receive ERDF support by, for example, diversifying the use and including revenue-generating activities generated either directly by the site, or indirectly as economic gain for the region. The finality is to avoid investing in the renovation of cultural sites that would be then remain unused or abandoned.
41. Any ERDF interventions that have an impact on cultural heritage should be in accordance to best practice for which the references of the “EUROPEAN QUALITY PRINCIPLES for EU-funded Interventions with potential impact upon Cultural Heritage” (drafted by ICOMOS under the Commission mandate of the European Year of Cultural Heritage 2018) can enrich these considerations including for the New European Bauhaus.

SECTION 3 FINANCING PLAN

Reference: point (f) of Article 17(3) ETC

42. The total EU funds of the programme are 67 M€. In terms of biodiversity 11% is foreseen (code 079) which is well above the MFF targets.

43. Table 7 is in line with the ETC Master Table communicated to the Member States. All amounts are in full Euros.
44. Table 8: The total EU support corresponds to the total EU support in the Master table. The maximum co-financing rate (checked to 10 digits) is respected. However, to be revised:
- a. The table contains decimals. All amounts have to be in full Euros.
 - b. The share of the TA needs to be maximum 10% (checked to 10 digits) before applying the top-up of 500,000 €. Currently the rate before top-up is 10.1977264979%.
45. In addition to the flat rate TA of 10%, this programme receives an increase of technical assistance of 500,000 €, in line with Article 27(4) ETC. These extra 500,000 € need to be reflected in the TA amounts in table 8. We propose to use the tool developed by Interact to integrate the additional TA of 500,000 € into table 8.
46. Please provide also additional information as to how the technical assistance will be used to strengthen capacity building by sending an additional document.

SECTION 4 PARTNERSHIP

Reference: point (g) of Article 17(3) ETC

47. In the extended partnership meeting, how were relevant bodies representing civil society, such as, non-governmental organisations, and bodies responsible for promoting social inclusion, fundamental rights, rights of persons with disabilities, gender equality and non-discrimination involved?
48. An SEA screening out decisions has been made. It should be confirmed that this screening also covers the requirements of the Habitats Directive (Article 6.3) as well as answering the point raised for Priority 3 on transport.

SECTION 5 APPROACH TO COMMUNICATION AND VISIBILITY FOR THE INTERREG PROGRAMME

Reference: point (h) of Article 17(3) ETC

49. The chapter should include confirmation that the programme's website will be linked to the single website portal providing access to all programmes of the partner Member States, as requested by Article 46(b) CPR.
50. Regarding the budget dedicated to communication actions: please express a clearer figure and compare it to the total budget of the programme to ensure that at least 0.3% of the total programme budget will be dedicated to communication, especially in view of the planned communication activities.
51. Is the budget sufficient to achieve the objectives for a territory that covers 3 (or more) languages? Are regional/country specific aspects taken into account (e.g. proper choice of channels etc)? How will the communication activities be managed cross-country and language wise?

52. In accordance with Article 36(1) ETC, a communication officer for the programme should be identified.
53. There is no specific mention of a dedicated communication approach to Operations of Strategic Importance (Appendix 3) and to operations whose budget exceeds 5 M€. Please include such info in the revised version.
54. Please insert also the channel names of your social media accounts and which concrete target groups and actions you have per channel.
55. It might be advisable to include at least the main and most prominent benchmarks/outputs on which communication activities are focused on into this section, albeit that the section makes reference to an "annex" on p.121 which was part of the uploaded documents. More relevant indicators would be listed there.

SECTION 7 IMPLEMENTING PROVISIONS

Reference: point (a) of Article 17(6) ETC

56. We could not find any reference to e-Cohesion. Following Article 69(8) of CPR and Article 32(1) of Interreg Regulation, please confirm whether the programme has set up a system to ensure that all exchanges between beneficiaries and all the programme authorities are carried out by means of electronic data exchange in accordance with Annex XIV of the CPR.

APPENDIXES – LIST OF PLANNED OPERATIONS OF STRATEGIC IMPORTANCE WITH A TIMETABLE

57. The numbering of the annexes should be consistent with the template set out in Annex of ETC, where relevant:
 - a. Annex 1 - Union contribution based on unit costs, lump sums and flat rates (Article 94 CPR)
 - b. Annex 3 - List of planned operations of strategic importance with a timetable (Article 17(3) ETC)