

Annex 1.
Reports on the evaluation of the strategy
paper

Interreg VI-A Slovakia - Austria cross-border cooperation Programme - 2021 - 2027

Opinions Slovakia:

**1 Ministry of Transport and Construction of the Slovak Republic List
No. 13364/2022/OSD/9487 of 26.01.2022**

Opinion:

The Ministry of Transport and Construction of the Slovak Republic takes note of the communication in question on the strategy document "Interreg Slovakia - Austria - 2021 - 2027 cross-border cooperation programme" and asks to respect the following comments:

- at page 10 - 11 in the section „Slovenské strategické dokumenty (Slovak Strategy Documents)", we request to add a reference to the valid national cycling strategy approved by the Resolution of the Government of the Slovak Republic No. 223/2013 - „Národná stratégia rozvoja cyklistickej dopravy a cykloturistiky v Slovenskej republike (National Strategy for the Development of Cycling Transport and Cycling in the Slovak Republic"); justification: addition of the basic conceptual and strategic document in the field of development of cycling transport and cycling at national level;
- at page 20 of the Annexes, we request to add a reference to the valid national cycling strategy approved by the Resolution of the Government of the Slovak Republic No. 223/2013, concerning the development of cycling - "National Strategy of Development of Cycling Transport and Cycle Touring in the Slovak Republic"; justification: addition of the basic conceptual and strategic document in the field of development of cycling at national level;
- at page 10 - 11 in the section „Slovenské strategické dokumenty/Slovak Strategy Papers", we request to correct the misspelled name of the strategy document "Strategic Road Transport Development Plan of the Slovak Republic until 2030 - Phase II.", the correct name is "Strategic Plan for The Development of Transport of the Slovak Republic up to 2030 – Phase II.";
- p. 5 part "Type of action 1.1.3 Science education and awareness raising activities" the last paragraph is recommended to add the "Action Plan of the Research and Innovation Strategy for the Smart Specialization of the Slovak Republic 2021 - 2027";
- chapter 2. Basic data on the strategy paper, bulleted 3. Main objectives in point 2. Priority 2: A greener environment is requested to modify the text "... (vii) Strengthening the conservation and conservation of nature, biodiversity and green infrastructure, including in urban areas, and reducing all forms of pollution as follows ...Strengthening the protection and conservation of nature, biodiversity and green infrastructure, including in urban areas, and reducing all forms of pollution";
- we propose to adequately incorporate into the material the possibility and eligibility of projects that can be created on the Dunaj and Morava (Danube and Moravia) waterways, which are also the main boundary line between AT and SK. There is no possibility to finance socio-economic and green projects using waterborne transport throughout the material. According to the European Green Deal, 75% of inland freight

traffic is currently carried out by road. It will be paramount that a substantial part of it is transferred to railways and inland waterways. The Dunaj (Danube) River forms a common border with Austria with a length of 8 km. The Morava (Moravia) River is a tributary of the Dunaj (Danube) in this geographical area and forms a natural border between Austria and Slovakia;

- In Chapter 2. Basic data on the strategy paper, bulleted 3. Main objectives in point 3. Priority 3: More social border, we ask to modify the text "... (vi) Strengthening the role of culture and sustainable tourism in the fields of economic development, social inclusion and social innovation" as follows "... (vi) Strengthening the role of culture, sustainable tourism **and water tourism**, in the fields of economic development, social inclusion and social innovation.", or by adding another new point (vii) "... Strengthening the role of sport and recreational navigation and sustainable water tourism in the fields of economic development, social inclusion and social innovation.';
- We propose addition to the material due to the development of water tourism as a soft form of exploiting the potential of nature and natural assets and its use for the socio-economic development of this area. Water tourism is a very preferred form of tourism in the surrounding countries. While abroad there is a building of facilities for boaters, in the border area of AT and SK it is a neglected and unsupported area, which needs to be changed;
- In Chapter 2. Basic data on the strategy paper, bulleted 6.6. Substantive and timetable for preparation and approval in the Table: Substantive and timetable for preparation we ask to modify the text "... Public consultations and consultations with the institutions and with the Ministry of Environment (SR and AT) on the proposal of the Programme and on the administration of SEA " as follows "... Public consultations and consultations with institutions, with the Ministry of Environment (SR and AT) **and Ministerstvo dopravy a výstavby SR (Sekcia vodnej dopravy)/the Ministry of Transport and Construction of the Slovak Republic (Water Transport Section)** on the draft Programme and on the SEA administration".

Opinion of the Report's processor:

The comments of Ministerstvo dopravy a výstavby SR (the Ministry of Transport and Construction of the Slovak Republic) are fully acceptable and therefore we recommend to Ministerstvo investícií, regionálneho rozvoja a informatizácie Slovenskej republiky - MIRRI SR (Ministry of Investments, Regional Development and Informatization of the Slovak Republic):

- on page 10 - 11 in the section „Slovenské strategické dokumenty (Slovak Strategy Documents)" to add a reference to the valid national cycling strategy approved by the Resolution of the Government of the Slovak Republic No. 223/2013 - „**Národná stratégia rozvoja cyklistickej dopravy a cykloturistiky v Slovenskej**

republike("National Strategy for the Development of Cycling Transport and Cycling in the Slovak Republic"),

- at page 20 of the Annexes to add a reference to the valid national cycling strategy approved by the Government Resolution No.223/2013 Coll., concerning the development of cycling – **"National Strategy of Development of Cycling Transport and Cycle Touring in the Slovak Republic"**,
- on page 10 - 11 in the section "Slovak Strategy Documents" correct the erroneously stated name of the strategy document „Strategický plán rozvoja cestnej dopravy SR do roku 2030 - Fáza II ("Strategic Plan for the Development of Road Transport of the Slovak Republic up to 2030 - Phase II"), the correct name is **„Strategický plán rozvoja dopravy SR do roku 2030 – Fáza II ("Strategic Plan for Transport Development of the Slovak Republic until 2030 – Phase II")** .;
- on page 5, section 5: "Type of action 1.1.3 Science education and awareness raising activities" last paragraph edited the text: "Action Plan of the Research and Innovation Strategy for the Smart Specialization of the Slovak Republic 2021 –2027";
- Act No. 223/2013 Coll. – **„Národná stratégia rozvoja cyklistickej dopravy a cykloturistiky v Slovenskej republike**("National Strategy for the Development of Cycling transport and cycling in the Slovak Republic"),
chapter 2. Basic data on the strategy paper, bulleted 3. Main objectives in point 2. Priority 2: **Greener environment** edit text "... (vii) **Strengthening the conservation and conservation of nature, biodiversity and green infrastructure, including in urban areas, and reducing all forms of pollution**" as follows **"... (vii) Strengthening the protection and conservation of nature, biodiversity and green infrastructure, including in urban areas, and reducing all forms of pollution"**; In this next section of the comments are inaccuracies Priority 2 is Greener border (not Greener Environment) and the proposed change is identical to the original text (red blue highlighting).
- We share the view that it would be appropriate to adequately incorporate into the material the possibility and eligibility of projects that can be created on the Dunaj and Morava (Danube and Moravia) waterways, which are also the main boundary line between AT and SK. We share the view that it would also be appropriate to make room for funding socio-economic and green projects using waterborne transport in the materials. The Dunaj (Danube) River forms a common border with Austria with a length of 8 km. The Morava (Moravia) River is a tributary of the Dunaj (Danube) in this geographical area and forms a natural border between Austria and Slovakia;
- chapter 2. Basic data on the strategy paper, bulleted 3. Main objectives in point 3. Priority 3: More social borders are inclined to add another new point (vii) **".. Strengthening the role of sport and recreational navigation and sustainable water tourism in the fields of economic development, social inclusion and social innovation."**;
- chapter 2. Basic data on the strategy paper, bulleted 6.6. Substantive and timing of preparation and approval in the Table: Substantive and timetable for preparation to consider modifying the text "... Public consultations and consultations with the

institutions and with the Ministry of Environment (SR and AT) on the design of the Programme and on the SEA report as recommended: "... Public consultations and consultations with institutions, with the Ministry of Environment (SR and AT) and the Ministry of Transport and Construction of the Slovak Republic (Water Transport Section) on the draft Programme and on the SEA report".

2 Ministry of Finance of the Slovak Republic Letter No. MF/002770/2022 -523 of 27.01.2022

Opinion:

Subject: Opinion of the certifying authority on the Communication on the strategy document Interreg Slovakia - Austria - 2021-2027 strategy paper.

Following your request for an opinion on the Communication on the Strategy document "Interreg Slovakia - Austria - Austria - 2021 - 2027 cross-border Cooperation Programme", pursuant to Act No. 24/2006 Coll. on Environmental Impact Assessment sent by letter No. 002702/2022/oRPCS of 13.01.2022, we would like to inform you that the certification authority takes note of the submitted document.

At the same time, we submit the following comments on the Annex to the Communication (draft Chapter 2 Interreg VI-A Slovakia-Austria cross-border Cooperation Programme 2021 - 2027):

- In Chapter 2.2, on page 8, under Type of action 2.1.3 Awareness raising activities and capacity building, it is necessary to add the phrase type of action in the first part of the sentence "The aim of the is to raise..." as follows "the aim of the type of action..." in order to ensure the clarity of the sentence,*
- In Chapter 2.4, page 24, under section 2.4.2.1, in the first paragraph concerning the contribution of an activity to a specific objective of building mutual trust, in particular by supporting people-to-people activities, the phrase 'reducing mindset' should be adjusted as follows 'reducing negative mindset' in line with the objective of the activity defined in page 25,*
- In Chapter 2.4, page 23, section 2-4.1.2 and page 25 under section 2.4.2.2, we recommend considering the addition of output indicators and results tracking solutions adopted to meet the objectives of priority axis 4, e.g. the output indicator "Jointly developed solutions" and the result indicator "Solutions taken up or up-scaled by organizations" in relation to the objectives and activities of the priority axis 4 defined in the given chapter. explanation of the non-setting of those indicators.*

Opinion of the Report's processor:

The proposed comments can be accepted. Edited English texts will certainly make the content of the text clearer. The addition of output indicators and results following solutions in order to

meet the objectives of priority axis 4 will certainly only contribute to a higher quality of the forthcoming strategy paper. We recommend that you address this comment.

3 Ministry of Economy of the Slovak Republic letter No. 07440/2022 -3120-07629 of 24.01.2022

Opinion:

Subject: Opinion of the Ministry of Economy of the Slovak Republic on the communication on the submission of the strategy document "Interreg Slovakia - Austria Cross-border Cooperation Programme 2021 – 2027".

*Following your announcement on the presentation of the strategy document "Interreg VI-A Slovakia - Austria 2021 - 2027 cross-border Cooperation Programme " dated 13.1.2022, we would like to inform you that we **do not make any comments on** the document in question.*

Opinion of the Ministry of Economy of the Slovak Republic on the communication on the strategy paper.

Opinion of the Report's processor:

No substantive comments.

4 Ministry of the Interior of the Slovak Republic Letter No. SKR-OOR2- 2022/ 000632-005 of 21.1.2021

Opinion:

Subject: Interreg Slovakia - Austria cross-border cooperation programme - Opinion.

Based on your request dated 13.1.2022 to take the opinion of the Ministry of Interior of the Slovak Republic on the communication on the strategic document "Interreg Slovakia-Austria Cross-Border Cooperation Programme 2021 - 2027", we send you the following:

- The Crisis Management Section of the Ministry of Interior of the Slovak Republic is responsible within the Ministry of Interior of the Slovak Republic for the areas of civil protection, crisis management, humanitarian aid and integrated rescue system. These areas are part of Priority 2: The greener border of the Interreg Slovakia-Austria Border Cooperation Programme 2021-2027 by supporting climate change mitigation and adaptation, risk prevention and management, including preparedness and response to emergencies in the border territory.*

*The proposed activities under the priority Greener Border **are in line with the upcoming updates of strategic materials** - National Strategy of Security Risk Management and Concept of Civil Protection and Crisis Management.*

Opinion of the Report's processor:

No substantive comments.

5 Ministry Agriculture and Rural Development of the Slovak Republic

Letter No. MK-25601/2022-312/1100 of 14.01.2022

Opinion:

Subject: Interreg Slovakia - Austria cross-border Cooperation Programme - Austria - 2021-2027 - opinion on a strategy paper with a national impact.

Following the strategy document "Interreg Slovakia - Austria - 2021 - 2027", the Ministry of Agriculture and Rural Development of the Slovak Republic, as the authority concerned, tells you that **it has no comments** on the document in question.

Opinion of the Report's processor:

No substantive comments.

6 Ministership of the Environment of the Slovak Republic List No. 4508/202-6.31 of 0.02.2022

Opinion:

Subject: **"Interreg Slovakia-Austria cross-border cooperation programme, 2021-2027"** - binding opinion on the Communication on the Strategy Paper.

By letter No. 012139/2022/oRPCS of 13.01.2022, which was delivered to the Ministry of Environment of the Slovak Republic, Section of Nature and Biodiversity Protection, Department of State Administration of Nature and Landscape Protection (hereinafter referred to as "Ministry") on 14.01.2022, you, as the affected body pursuant to § 6(2) of Act No. 24/2006 Coll.- on Environmental Impact Assessment and on Amendments to Certain Acts as Amended (hereinafter referred to as "Act No. 24/2006 Coll."), requested us to an opinion on the Communication on the strategy document "Interreg Slovakia-Austria cross-border Cooperation Programme, 2021-2027" (the Communication).

The Ministry as the competent authority of nature and landscape protection pursuant to Section 65(1)(r) of act No. 543/2002 Coll. on nature and landscape protection, as amended (hereinafter referred to as "Act No. 543/2002 Coll.") after studying the notice, as well as on the basis of the opinion of the State Nature Protection of the Slovak Republic No. ŠOP SR / 104-006 / 2022 of 25.01.2022, issued in accordance with § 9 par. 1 letter w) of Act no. 543/2002 Coll. the following binding opinion on the submitted notification.

The proposal for the Interreg VI-A Slovakia - Austria 2021-2027 cross-border Cooperation Programme is a medium-term strategy document setting out the basic frameworks and priority areas for supporting cross-border activities between Slovakia and Austria in the 2021-2027 programming period. The draft programme shall define the eligible territories and its characteristics, the selection of the main areas of intervention, the eligible priorities and specific objectives, the results and outputs of the projects, the target groups and potential

applicants, and the activities that can be financed from the programme in question by the European Regional Development Fund and the state budget.

The key areas of programme support are:

Priority 1. More innovative borders.

Priority 2. It's going to be greener.

Priority 3. More social borders.

Priority 4. Cooperation between the institutions and the inhabitants of the border.

The eligible territory of the Programme is formed along the Slovak-Austrian national border. On the Slovak side, it includes the territory of the Bratislava Self-Governing Region and Trnava Self-Governing Region.

In the territory concerned there are several protected areas of the national and European system of protected areas with 1st to 5th degrees of protection within the meaning of Act No. 543/2002 Coll. The submitted communication is drawn up briefly and generally, it does not contain information on the scope and location of the projects under preparation. At the same time, the impacts of the strategy paper are not sufficiently identified and evaluated.

The strategy document is subject to mandatory evaluation in accordance with Act No. 543/2002 Coll. Given the general nature of the notification submitted, the impact on protected areas, protected species and habitats cannot be excluded and therefore, in the evaluation report, we request:

- Specify the proposed projects and display their territorial projection.
- To evaluate the impacts on protected areas of the national and European system, on elements of the ÚSES, as well as on other nature protection interests, including cumulative impacts, then propose adequate measures to mitigate them and take into account the results of the impact assessment of other activities and strategy papers pursuant to Act No. 24/2006 Coll..

We recommend to design projects and activities outside protected areas, their protection zones and elements of the ÚSES.

Opinion of the report's processor:

The comment of the Ministry of Environment of the Slovak Republic related to the specification of proposed projects in our opinion, at the time, the creation of a strategic document, is probably not entirely possible. Specific projects will be submitted and subsequently assessed and selected. The comment is irrelevant. The issue of protected areas is addressed in more detail in the **Report on the evaluation of the strategy paper "Interreg Slovakia - Austria cross-border Cooperation Programme - 2021 -2027"**.

7 OÚ Bratislava List No. OU-BN-OSZP1-2022/045623-004 of 26.01.2022

Opinion:

Subject: Opinion on the communication on the submission of the strategy document "Interreg Slovakia - Austria Cross-border Cooperation Programme 2021 - Austria 2021 - 2027" with national impact pursuant to Act No. 24/2006 Coll. on Environmental Impact Assessment and on amendments to certain acts, as amended by letter of the entry number 002702/2022, No. s. 012139/2022/oRPCS of 13.01.2022, you are, for the Bratislava District Office, as a departmental body in matters of impact assessment of strategy papers with national impact pursuant to Section 57(a) of Act No. 24/2006 Coll. on Environmental Impact Assessment and on amendments to certain acts as amended (hereinafter referred to as the "Assessment Act") in conjunction with Section 17(2) of the Act on Assessment in cooperation with the Ministry of Environment of the Slovak Republic, as the authority concerned, they sent for an opinion a communication on the submission of the strategy paper 'Interreg Slovakia - Austria 2021-2027 cross-border Cooperation Programme". According to § 6 para. 2 of the Act on Assessment, the documentation is published on the website of the Ministry of Environment of the Slovak Republic at: <https://www.enviroportal.sk/sk/eia/detail/program-cross-border-interreg-slovakia-Rakusko-2021-2027> and also on the mirri SR website at: <https://www.mirri.gov.sk/aktuality/cko/oznamenie-o-strategickom-dokumente-programcez-border-co-cooperation-interreg-Slovensko-Rakusko-2021-2027>. After being familiar with the notification of the submission of the strategy document "Interreg Slovakia - Austria Cross-border Cooperation Programme 2021 - 2027, we will send you the following opinion according to the Act on Assessment (for the bodies of nature protection, state water administration and waste management of the district office in the seat of the region under the responsibility of the District Office Bratislava), as amended:

- **Nature Protection Authority of the Region**

(letter No OU-BA-OSZP1-2022/045916-004/LAJ of 25.01.2022) According to § 9(1)(w) of the Act No. 543/2002 Coll. on Nature and Landscape Protection, the District Office Bratislava, Department of Environmental Care, Department of Nature Protection and Selected Components of the environment of the Region, as amended (hereinafter referred to as the "OPaK Act") and pursuant to § 3(p) of the Act on Assessment, based on the opinion of the professional organization of nature and landscape protection - State Nature Protection of the Slovak Republic, with its registered office at Tajovský 28B, 974 01 Banská Bystrica (letter No. ŠOP SR/104-005/2022 of 25. 01. 2022), this binding opinion on the relevant communication of the strategy document:

- *Identification of the territory and characteristics of the strategy document Interreg Slovakia - Austria cross-border cooperation Programme, 2021 - 2027 (hereinafter referred to as the "Programme") is focused on the territory of Slovakia – Austria border. On the Slovak side, it includes the territory of the Bratislava Self-Governing Region and Trnava Self-Governing Region. The main objective of the programme*

is to face the most important challenges and overcome the weaknesses typical of the border. Through the implementation of joint cross-border projects, the Programme will implement the policy objectives set out in the relevant EU regulations on the European Regional Development Fund.

The key areas of programme support are:

Priority 1. More innovative borders.

Priority 2. It's going to be greener.

Priority 3. More social borders.

Priority 4. Cooperation between the institutions and the inhabitants of the border.

Assessment of the territory from the point of view of nature protection

In the territory concerned there are several protected areas of the national and European system of protected areas, where different degrees of territorial protection apply within the meaning of the OPaK Act.

Evaluation of the Communication from the point of view of nature protection

The communication submitted on the strategy paper is concise and general, there is no list of activities, their location or territorial projection, the impacts of the strategy paper are not sufficiently identified or evaluated.

Conclusion

Given the general nature of the communication submitted on the strategy paper “Interreg Slovakia-Austria cross-border Cooperation Programme 2021-2027”, it is not possible to take an expert opinion on it, but the impact on protected areas, protected species and habitats cannot be excluded. The strategy paper is subject to mandatory assessment. In view of possible conflicts with nature conservation interests (e.g. flood measures, tourism development, etc.), the evaluation report calls for:

- specify the proposed projects and view their territorial projections,*
- to evaluate the impacts on protected areas of the national and European systems, elements of the ÚSES and also on other nature protection interests, including cumulative impacts, to propose adequate measures to mitigate them, to take into account the results of the impact assessment of other activities and strategy papers under the Act on Assessment.*

Projects and activities are recommended to be designed as a priority outside protected areas, their protection zones and elements of the ÚSES.

Specific regulations as well as other provisions of the OPaK Act remain unaffected by the issuance of this binding opinion.

Opinion of the Report's processor:

The comment of the OÚ Bratislava – The Nature Protection Authority of the Region related to the specification of the proposed projects in our opinion, at the time, the creation of a strategy

document, is probably not quite possible. Specific projects will be submitted and subsequently assessed and selected. The comment is irrelevant. The issue of protected areas is addressed in more detail in the Report on the evaluation of the strategy paper "Interreg Slovakia - Austria cross-border cooperation programme - 2021 - 2027".

State Water Administration Authority of the Region

(letter No. OU-BA-OSZP2-2022/046769/JAJ/-s. dated 18.01.2022) District Office Bratislava, Department of Environmental Care, Department of State Administration of Water and Selected Environmental Compartments of the Region (hereinafter referred to as the "Local Authority") as a material and locally competent state administration body § 4(1) of Act No. 525/2003 Coll. on the State Administration of Environmental Care and on amendments to certain acts as amended and the body of the state water administration pursuant to § 60 para. 1, Point (a) of Act No. 364/2004 Coll. on Waters and on amendments to Act No. 372/1990 Coll. on Offences as amended (hereinafter referred to as the "Water Act") issues the following opinion on the strategy document under the Act on Assessment:

- *The entire programming area is part of the Danube water system, which has a cross-border character (see tributaries of the Danube and Tisza such as Ipeľ, Bodrog powered by Ondava, Laborec and Uh, Slaná, Hornád) The upper and lower sections of rivers form places of shared natural values, aquatic habitats, so we recommend the following measures:*
 1. *Common cross-border solutions are needed in the areas of flood protection, disaster relief, water quality improvement and pollution remediation.*
 2. *At the level of border territories deal with extreme weather conditions that pose a serious hydrological threat, extremely destructive storms, hail, drought with lack of drinking water.*
 3. *In surveys assessing the tourist potential of water bodies, include water and climate sections. Take into account changes in water resources and water quality for decades to come and the impacts of climate change.*
 4. *The next stage of the strategy document must be prepared in accordance with the approved conceptual and planned documents of the Ministry of Environment of the Slovak Republic, to comply with the general provisions of act No. 364/2004 Coll. on Waters and on amendments to the Act no. 372/1990 Coll. on offences as amended, to comply with the provisions of Section 39 of the Water Act, which lays down general conditions for the treatment of pollutants and subsequently decrees of the Ministry of Environment of the Slovak Republic No. laying down details of the treatment of pollutants, the particulars of the emergency plan and the procedure for dealing with exceptional water deterioration. No intervention axis can be identified under the Programme which would lead to a deterioration of either the quantitative or qualitative status of surface water and groundwater. Some of the planned activities are expected to contribute to their improvement.*

Opinion of the Report's processor:

Comments of the OÚ Bratislava - The State Water Administration of the Region can be described as general. They must be agreed, but they are not of fundamental importance.

State Waste Management Authority of the Region

(letter No. OU-BA-OSZP2-2022/049616/POD dated 25.01.2022)

The District Office Bratislava, Department of Environmental Care, Department of State Water Administration and Selected Environmental Compartments of the Region, is not the competent authority pursuant to Section 3(p) of the Act on Assessment in terms of waste management in the case "Interreg Slovakia - Austria Cross-border Cooperation Programme 2021 - 2027".

Opinion of the Report's processor:

There's nothing to comment on.

Major industrial accident prevention authority

No opinion was delivered within the time limit set.

Opinion of the report's processor:

There's nothing to comment on.

Overall conclusion:

The District Office Bratislava, Department of Environmental Care, Nature Protection Department and Selected Components of the Environment of the Region, as the relevant nature and landscape protection authority, in its binding opinion based on the opinion of the professional organization of nature and landscape protection - Štátna ochrana prírody Slovenskej republiky (State Nature Protection of the Slovak Republic), with its registered office at Tajovský 28B, 974 01 Banská Bystrica (letter No. ŠOPSR/1189-026/2021) notes the following: The Interreg Slovakia-Austria cross-border Cooperation Programme 2021 - 2027 (hereinafter referred to as the "Programme") is aimed at the territory of Slovakia – Austria border. On the Slovak side, it includes the territory of the Bratislava Self-Governing Region and Trnava Self-Governing Region. In the territory concerned there are several protected areas of the national and European system of protected areas, where different degrees of territorial protection apply within the meaning of the OPaK Act. The communication submitted on the strategy paper is concise and general, there is no list of activities, their location or territorial projection, the impacts of the strategy paper are not sufficiently identified or evaluated. Given the general nature of the communication submitted on the strategy paper "Interreg Slovakia-Austria cross-border Cooperation Programme , 2021-2027", it is not possible to take an expert opinion on it, but the impact on protected areas, protected species and habitats cannot be excluded. The strategy paper is subject to mandatory assessment. In view of possible conflicts with nature conservation interests (e.g. flood measures, tourism development, etc.), the evaluation report calls for:

- specify the proposed projects and view their territorial projections,*

- to evaluate the impacts on protected areas of the national and European systems, elements of the ÚSES and also on other nature protection interests, including cumulative impacts, to propose adequate measures to mitigate them, to take into account the results of the impact assessment of other activities and strategy papers under the Act on Assessment.

It recommends proposing projects and activities as a priority outside the protected areas, their protection zones and the elements of the ÚSES. Specific regulations as well as other provisions of the OPaK Act remain unaffected by the issuance of this binding opinion. District Office Bratislava, Department of Environmental Care, Department of State Administration of Water and Selected Environmental Compartments of the Region as materially and locally competent state administration body § 4(1) of Act No. 525/2003 Coll. on state administration of environmental care and on amendments to certain acts as amended and the body of the state water administration pursuant to § 60 para. 1, point (a) of Act No. 364/2004 Coll. on Waters and on amendments to Act No. 372/1990 Coll. on Offences as amended (hereinafter referred to as the "Water Act") issues the following opinion on the strategy document according to the Act on Assessment: The whole programming area is part of the Danube water system, which is of a cross-border nature (see tributaries of the Danube and Tisza as Ipel', Bodrog powered by Ondava, Laborec and Uh, Slaná, Hornád). The upper and lower sections of rivers form places of shared natural values, aquatic habitats, therefore recommends the following measures:

- 1. Common cross-border solutions are needed in the areas of flood protection, disaster relief, water quality improvement and pollution remediation.*
- 2. At the level of border territories deal with extreme weather conditions that pose a serious hydrological threat, extremely destructive storms, hail, drought with lack of drinking water.*
- 3. In surveys assessing the tourist potential of water bodies, include water and climate sections. Take into account changes in water resources and water quality for decades to come and the impacts of climate change.*
- 4. The next stage of the strategy document must be prepared in accordance with the approved conceptual and planned documents of the Ministry of Environment of the Slovak Republic, to comply with the general provisions of Act No. 364/2004 Coll. on Waters and on amendments to the Act No. 372/1990 Coll. on offences as amended, to comply with the provisions of Section 39 of the Water Act, which lays down general conditions for the treatment of pollutants and subsequently decrees of the Ministry of Environment of the Slovak Republic Act No. 200/2018 Coll., laying down details of the treatment of pollutants, the particulars of the emergency plan and the procedure for dealing with exceptional water deterioration. No intervention axis can be identified under the Programme, which would lead to a deterioration of either the quantitative or qualitative status of surface water and groundwater. Some of the planned activities are expected to contribute to their improvement.*

The District Office Bratislava, Department of Environmental Care, Department of State Water administration and Selected Environmental Compartments of the Region, is not the competent authority in terms of waste management in the case "Interreg Slovakia - Austria Cross-border Cooperation Programme 2021 - 2027" is the competent authority pursuant to Section 3(p) of the Act on Assessment. Opinion of the District Office Bratislava, Department of Environmental Care, Nature Protection Department and selected environmental compartments of the region competent according to the provisions of § 1 paragraph 1(b) and § 4 paragraph 1 of Act No. 525/2003 Coll. on state administration of environmental care and on amendments to certain acts as amended and pursuant to the provisions of § 23 paragraph 1(c) and § 14 paragraph 4 of Act No. 128/2015 Coll. and amendments to certain acts, as amended, have not been received within the specified period.

Opinion of the report's processor:

*The comment of the OÚ Bratislava - The Nature Protection Authority of the Region related to the specification of the proposed projects in our opinion, at the time, the creation of a strategy document, is probably not quite possible. Specific projects will be submitted and subsequently assessed and selected. The comment is irrelevant. The issue of protected areas is addressed in more detail in **the Report on the evaluation of the strategy paper "Interreg Slovakia - Austria cross-border cooperation Programme - 2021 - 2027"**. We agree with the statement that projects and activities are accepted as a matter of priority outside protected areas, their protection zones and the elements of the ÚSES. Recommendations 1 to 4 should be borne in mind, but at this time they are irrelevant.*

8 OÚ Dunajská Streda List No. OU-DS-OSZP-2022/0059225-002 of 04.02.2022

Opinion:

Subject: Interreg Slovakia - Austria cross-border cooperation Programme 2021-2027.

In accordance with Act No. 24/2006 Coll. on Environmental Impact Assessment and on amendments to certain acts as amended (hereinafter referred to as the "Act") on 13.01.2022, the District Office of Dunajská Streda, the Department of Environmental Care, as the competent state administration body, received a notice on the strategic document "Interreg Slovakia - Austria 2021-2022" strategic document on 13.01.2022.

After studying the above material, the local authority presents you with a comprehensive opinion:

- From the point of view of the protection of environmental compartments, we do not have **any substantive comments** on the submitted communication on the strategy document, subject to complete environmental legislation as well as in the implementation of the proposed measures.*

Waste management must comply with the relevant provisions of Act No. 79/2015 Coll. on Wastes, as amended, as well as the implementing regulations in the field of waste management of the region. In the protected water management area can only be planned and performed activities if more effective protection of surface water and groundwater is ensured, protection of conditions of their formation, occurrence, natural accumulation and restoration of surface and groundwater supplies in accordance with § 3 Act No. 305/2018 Coll. protected areas of natural water accumulation and on amendments to certain laws.

Opinion of the report's processor:

No substantive comments.

9 The Foundation Office of the Slovak Republic Letter No. PUSR-2022/1673-2/5017 of 24.01.2022

Opinion:

Subject: **Interreg Slovakia cross-border Cooperation Programme - Austria 2021-2027-opinion.**

On 13.1.2022, we received your communication on the presentation of a strategy paper with national impact - Interreg Slovakia - Austria cross-border Cooperation Programme - 2021-2027. We also ask to incorporate in this strategy document the fact that Slovakia has a common cross-border UNESCO World Heritage site "Hranice Rímskej ríše - Dunajský Limes (západná časť), Nemecko, Rakúsko, Slovensko a Maďarsko" ("Borders of the Roman Empire - Dunajský Limes (Western Part), Germany, Austria, Slovakia and Hungary") from 30.7.2021. Together with Austria, we are committed to working together in a number of areas to improve the state of conservation, promotion and presentation of this cultural heritage, including raising people's awareness of its values. For this reason, it would be desirable to take this into account and supplement this fact in the strategy paper, at least in the section "Type of action 2.5.3. ...", in the section "Contribution to macro-regional strategies", project: World Heritage Nomination: Frontiers of the Roman Empire - The Danube Limes (western segment) - Management Plan (Germany, Austria Slovakia, Hungary) 2019.

We accept this strategy document **without further comment.**

Opinion of the Report's processor:

No substantive comments. It is recommended to take into account and supplement in the strategy document, at least in the section "Type of action 2.5.3. ...", in the section "Contribution to macro-regional strategies", project: World Heritage Nomination: Frontiers of the Roman Empire - The Danube Limes (western segment) - Management Plan (Germany, Austria Slovakia, Hungary) 2019. This comment can be accepted. The detailed opinion of the report processor on Danube Lines is processed in the Annex Specific Requirements of the Evaluation Report.

10 Public Health Authority of the Slovak Republic Letter No. OHŽP/8258/41000 of 09.09.2021

Opinion:

Subject: Binding opinion on the communication on the submission of a strategy paper with national impact "Interreg Slovakia - Austria cross-border Cooperation Programme 2021-2027".

On 13.01.2022, the Public Health Authority of the Slovak Republic received a request for a written opinion from the Ministry of Investment, Regional Development and Informatization of the Slovak Republic on the submission of a Strategy Document with national impact "Interreg Slovak - Austria cross-border Cooperation Programme, 2021 - 2027", contracting authority of the Ministry of Investment, Regional Development and Informatization of the Slovak Republic, Štefániková 15, 811 05 Bratislava- the Old Town District, which is also the promoter in cooperation with the Ministry of Environment of the Slovak Republic, the Environmental Impact Assessment Section, the Department of Environmental Impact Assessment, the Department of Environmental Impact Assessment.

The Public Health Authority of the Slovak Republic as the competent authority pursuant to § 3(1)(b) of Act No. 355/2007 Coll. on protection, promotion and development of public health and on amendments to certain acts as amended (hereinafter referred to as "Act No. 355/2007 Coll.") regarding the request for a written opinion on the communication on the submission of a strategy document with national impact " Interreg Slovakia - Austria cross-border Cooperation Programme, 2021 - 2027" in the framework of the Environmental Impact Assessment pursuant to Act No. 24/2006 Coll. on Environmental Impact Assessment and on amendments to certain laws (hereinafter referred to as "Act No. 24/2006 Coll.") and pursuant to § 5(4)(n) and § 13(2) of Act No. 355/2007 Coll.

*With the communication on the strategy document with a national impact "Interreg Slovakia- - Austria cross-border Cooperation Programme 2021 - 2027", **it is important to take action.** At the same time, however, we require the following requirements to be incorporated:*

- 1. When carrying out programme activities in the Morava and Dunaj (Moravia and Danube) river basins, respect the protection of water resources intended for the bulk supply of drinking water as well as the scope and regime of activities in their protection zones (water resources (vodný zdroj – VZ)) VZ Sedlačkov ostrov and Sihot'. In this respect, it is desirable to include the objectives of the Health Protocol in the Programme.*
- 2. Pay significant attention to the issue of addressing environmental noise within the urbanisation objectives of the area of interest.*
- 3. Develop activities under the Programme to be designed in terms of enhancing the state of greenery as an effective measure with a positive impact on air quality, influencing human health, preserving biodiversity and aesthetics of the environment.*

4. *In the context of a healthy state of recreation (especially short-term), prefer to build cross-border cycle paths and water tourism.*

Recital:

On 13.01.2022, the Public Health Authority of the Slovak Republic received a notice from the Ministry of Investment, Regional Development and Informatization of the Slovak Republic on the submission of a strategic document with national impact "Interreg Slovakia - Austria cross-border Cooperation Programme 2021 - 2027", contracting authority of the Ministry of Investment, Regional Development and Informatization of the Slovak Republic, which, as a departmental body in matters of impact assessment strategy papers with national impact pursuant to Section 57(a) of Act no. 24/2006 Coll. in conjunction with Section 17(2) of Act no. 24/2006 Coll., in cooperation with the Ministry of Environment of the Slovak Republic, Section of Environmental Impact Assessment, Department of Environmental Impact Assessment, As the central body of the state administration on environmental care pursuant to § 1 para. environmental care and on amendments to certain acts, as amended, requested a written opinion and comments on the communication in question pursuant to Section 6(2) of Act no. 24/2006 Coll..

The main objective of the strategy document in question with a national impact - "Interreg Slovak Republic - Austria cross-border Cooperation Programme 2021 - 2027" is to face the most important challenges and overcome the weaknesses typical of the border. Through the implementation of joint cross-border projects, the Programme will implement the policy objectives set out in the relevant EU regulations on the European Regional Development Fund. The key areas for support for the 2021-2027 Programme are a more innovative environment, greener borders, more social borders, cooperation between the institutions and the inhabitants of the borders. The Programme envisages the implementation of projects aimed at collecting and exchanging data, information and experience necessary to prevent the negative impacts of climate change, implementing joint strategies and action plans to preserve and restore biodiversity and reduce pollution, preserve and restore cultural and natural heritage, etc. The results of projects implemented under the programme can have a positive impact on the health of the population. A negative impact on the health of the population is not expected.

The competent public health authority will comment on the other stages of the processed documentation within the scope of its competence laid down in Section 6 of Act no. 355/2007 Coll..

On the basis of the above and the sub-opinions of the regional public health authorities concerned, this binding opinion is issued.

Opinion of the Report's processor:

The Authority's comments are acceptable and should be borne in mind in particular when assessing the projects submitted. We share the view that, when carrying out programme activities in the Morava and Dunaj (Moravia and Danube) river basins, we respect the protection of water resources intended for the bulk supply of drinking water as well as the

scope and regime of activities in their protection zones (water resources- VZ Sedlačkov ostrov and Sihot'). Both inclusion in the Programme and the objectives of the Health Protocol would certainly make a positive contribution to improving the quality of the whole Programme. The issue of noise is legislative, in our opinion, sufficiently legislatively regulated. Paying attention to the issue of solving environmental noise within the urbanisation intentions of the area of interest is certainly desirable in the permitting stages of the activities carried out, but the Office has a direct impact on this fact. It can be accepted that development activities under the Programme should be proposed in terms of enhancing the state of greenery as an effective measure with a positive impact on air quality, influencing human health, preserving biodiversity and aesthetics of the environment. This should be preferred in the process of assessing the projects submitted. In the context of a healthy state of recreation (especially in the short term), the issue of the preference for the construction of cross-border cycle paths and water tourism is sufficiently taken into account in the project.

Opinions from Austria:

No comments were received on that date.