



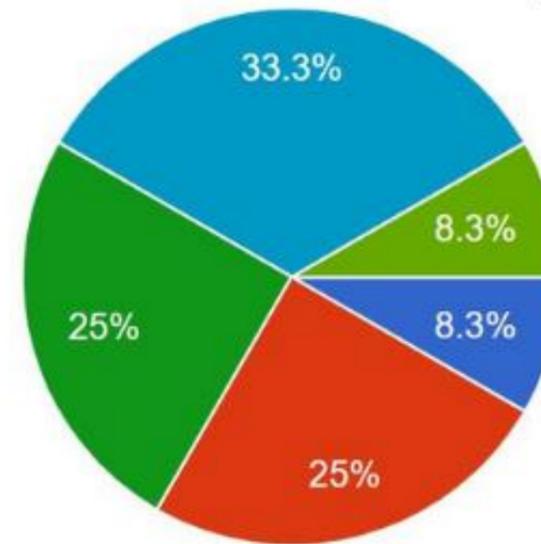
Answers to the comments received during the public hearing.

INTERREG VI-A ESTONIA-LATVIA PROGRAMME 2021-2027

THE PUBLIC HEARING WAS CARRIED OUT FROM 8 NOVEMBER TO 8 DECEMBER 2021.
 THE PROGRAMME AUTHORITIES THANK ALL 12 ORGANIZATIONS WHO SUBMITTED THEIR COMMENTS AND PROPOSALS!

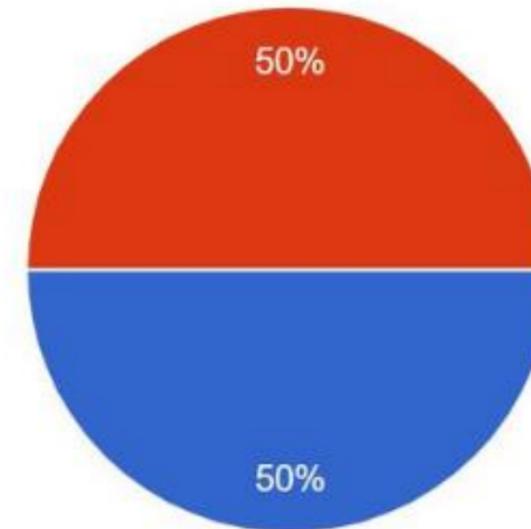
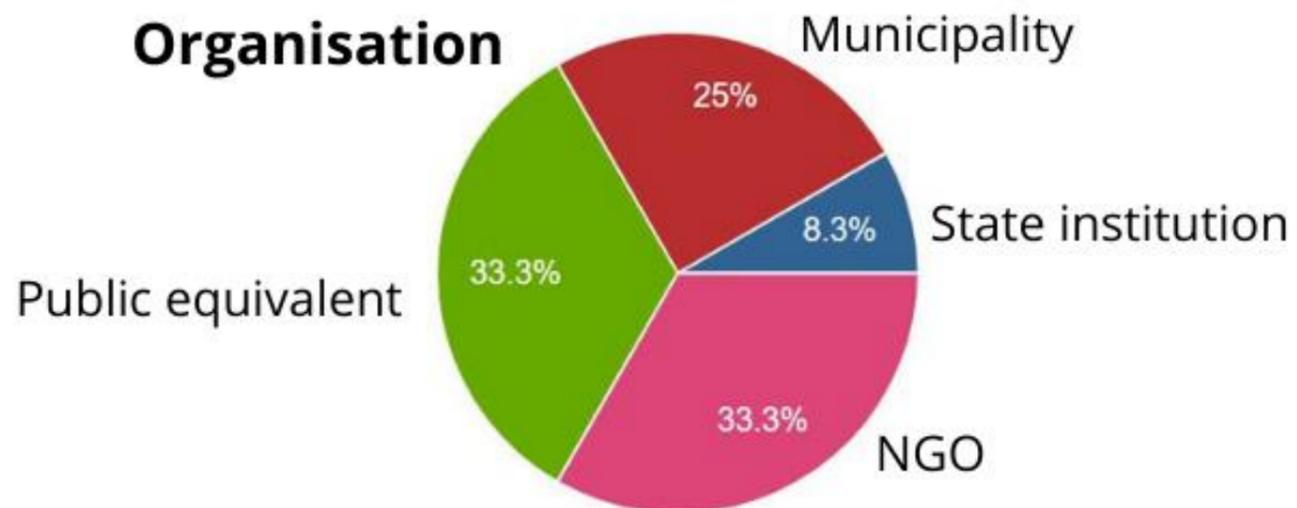


Your region



- Lääne-Eesti
- Lõuna-Eesti
- Kogu Eesti
- Rīga
- Pierīga
- Vidzeme
- Kurzeme
- Visa Latvija
- Other/muu/cits

Organisation



- Yes
- No

Previous experience with the programme

SECTION IN THE DRAFT INTERREG PROGRAMME	COMMENT/PROPOSAL	THE RESPONSE OF THE PROGRAMME	REQUIRES CHANGES TO THE DRAFT INTERREG PROGRAMME
<p>Demographics, territory and cooperation governance. Programme priority 1.</p>	<p><i>Strengthen effective public administration by promoting legal and administrative cooperation and cooperation between citizens, civil society actors and institutions, in particular to remove legal and other obstacles in border regions</i></p> <p>1. <i>Insufficient viability of local government level institutional cooperation practices to address cross-border issues at local level.</i></p> <p>2. <i>There is a lack of cross-border development and action plans at local government level.</i></p> <p>3. <i>The need for and use of regional data local development needs and services</i></p> <p>It is not clear to me - can we, as a municipality, develop an action plan for the development of border areas with an Estonian municipality - will we not be forced to harmonize it in all the ministries, etc.? As a project manager, I am not competent enough to say that we can expand and develop such local plans on both sides of the border. We can advertise each other in the field of tourism, culture, pass on news about public transport, but if to solve something jointly, not sure. We have quite different local governments and needs. What have already been solved by Estonians, Latvians are still trying to solve and vice versa, and topics and areas do not really coincide or are hindered by differences in legislation. Perhaps the indicator to be achieved, however, should be the municipalities that are cooperating and continuing to cooperate after the project, rather than joint plans. Also, after 22.11.2021 information received, it became clear that this could be a small plan, to a small extent, but there is still no certainty that it will be a joint plan that will lead to better cooperation.</p>	<p>This new policy objective – Better Cooperation Governance – is introduced to enhance the cooperation models on local authorities’ level. This is an opportunity to involve different organisations and communities to address cross-border matters that would benefit from coordinated approach.</p> <p>Indeed, as was mentioned at the public seminar on 22 November 2021, the development plans and actions can tackle narrower topics and smaller sphere of life where municipalities can cooperate, to connect and communicate, not all-inclusive territorial and development strategies are expected.</p>	<p>NO</p>
	<p>The programme document could emphasize more the necessities of border areas (e.g., scarce population) and development opportunities; as Riga and surroundings are already quite developed compared to the rest of the area.</p>	<p>The programme priority 1 “More cooperating cross-border regions and development of joint services” focuses primarily on the challenges in the border area. The aim of the programme under the objective ISO1 is to encourage local level initiatives and joint actions to solve relevant legal and administrative issues and development needs of the border area. The main joint challenges identified (Chapter 1.2):</p> <ul style="list-style-type: none"> - The capacity of municipalities in rural and remote border areas to adapt and provide (joint) public services, jobs and a good living environment in the situation of an ageing and decreasing population. - There is a lack of regional data, local cross-border networks, joint strategies and active local municipality level cooperation patterns/habits for tackling the joint socio-economic challenges in the border area. - A lack of municipality-level initiative and capacity for solving local challenges in cross-border cooperation in the border area. <p>Under the programme priority 2 “Jointly and smartly growing businesses” the following limitation is set:</p>	<p>NO</p>

		<p>Partners from the city of Riga and Tallinn must not be the only partners from Latvia and Estonia participating in the projects under the priority 2 and the activities carried out within the projects with participation of the partners from capitals have to contribute to the development of the NUTS 3 border regions (Vidzeme, Kurzeme, Pierīga, West Estonia and South Estonia) of the programme. Purchasing of equipment by the partners from Riga and Tallinn within the projects is only possible in well justified cases with the clear benefit to the rest of the partnership represented by the bordering regions (e.g., for the purposes of technology transfer or stimulus for innovation in production). Total cumulative budget of the partners from Riga and Tallinn together under PO1 may not exceed 20% of the total allocated budget of the priority 2.</p> <p>Under the programme priority 3 “Sustainable and resilient programme area” the following limitation is set:</p> <p>Under this priority all investments should be concentrated into the NUTS 3 border regions of Vidzeme, Kurzeme, Pierīga, West Estonia and South Estonia. Public sector and NGO institutions from the city of Riga and Tallinn can participate in the projects as partners through passing on the know-how and best practices of the capital cities in order the knowledge would reach also to the border regions.</p>	
	The long-standing traditions of the Valga-Valka twin city are intertwined into large joint events, such as: joint large fairs, song and dance festivals, joint sports competitions, joint celebrations, etc. Families are of special nationalities: one of the spouses is Estonian, the other Latvian; children of one family study in different countries: one in Estonia, the other in Latvia; interests are reciprocally visited.	It is good to learn that the long-standing cooperation exists. This comment is considered as a statement that describes the current situation and does not lead to changes in the draft IP.	NO
	As no investment in infrastructure is planned for Priority 1, 1.36 MEUR of the funding could be transferred to Priority 5 in order to better support the cross-border tourism offer by co-financing the programme. For example, in Valka-Valga, it is the construction of a continuation of a bicycle lane for a bicycle lane that has already been built from Valga to the intersection of Parka - Varoņa Street, building along Varoņu Street from Parka Street to Zāģezers. Lake Zāģezers is popular among inhabitants and guests of both cities.	The development of the cross-border tourism products and services are seen wider than single objects, they must be based on the cultural and natural heritage, include the element of social inclusion and accessibility to all groups of society. All ideas that will be submitted to the programme must match the intervention logic and objectives of the programme. More detailed requirements for the project ideas and guidance will be provided in the programme manual.	NO
Economy and entrepreneurship. Programme priority 2.	<p>2.3.4. <i>Main target groups</i> <i>Reference: Article 17 (3) (e) (iii), Article 17 (9) of the Interreg Regulation.</i> <i>(c) (iv) Companies capable of developing products, companies with and without experience in cross-border cooperation with other companies and support institutions; companies that are ready for product development and innovation, but do not have the resources to participate directly and need an umbrella or support organization to ensure the availability of cross-border knowledge transfer; business support and R&D organizations, planning regions, clusters, development and competence centers, who are ready to support, advise and train companies in innovation and product development.</i></p> <p>Maybe it is also possible to add local business development specialists / business support centers in municipalities (municipalities)? Because SMEs need to be highly addressed, motivated, supported and encouraged to take part in markets, go beyond their usual</p>	<p>The umbrella organisations that support businesses are eligible partners, if their role and activities in the project match the objective of the programme to enhance the knowledge transfer, innovation, and SME growth.</p> <p>The programme supports the type of activities where there is justified need for cross-border cooperation. The activities that support SMEs in terms of infrastructure or professional guidance to start off their business would not fit with the programme focus, which is to support innovation of the products and services, digital and green transfer. All participating SMEs must demonstrate by the end of the project the results that are in line with the programme objectives.</p>	NO

	<p>business plans and are often done in their municipalities by a business specialist who pushes, cheers up and encourages them, organizes experience trips, participation in fairs, etc. activities. After some small entrepreneurs has taken some actions, have been involved, some others got encouraged and dares to take part.</p> <p>Will it be possible to support POP UP-type activities - from the project to cover the rental of premises (temporarily) and / or the furnishing / equipment of premises, so that SMEs can try their business idea and if it goes away, look for opportunities themselves and if not, nothing, at least there was an attempt (we had this experience from the German Urbact project and would like to use it further)?</p>		
	Reciprocal visits are made to trade and leisure establishments	All planned activities must contribute to the objectives of the project and programme.	NO
Nature and biodiversity. Programme Priority 3.	There is a lot of travel around Valka to relax and play sports in Otepää, and people around Valga very often travel to enjoy the nature of Valka and the nearest places. There is no family near Valga who would not have visited Sigulda to admire nature, to see the ruins of Turaida (Okasroosikese) castle. Strenči's past is closely linked to our region. Beautiful landscapes on the banks of the river Gauja - these are just some of the impressions that are definitely worth experiencing.	The improved or new tourism products and services must be based on the natural and cultural heritage. The scope of text in the programme document is limited and the list of the nature and heritage values there is not exhaustive. The proposed sites can be potentially be relevant if they are included in the cross-border products and if they fit the general aim of the programme and project.	NO
Mobility and commuting. Programme priority 4.	<p>Complete and correct the wording as follows: The program area has a major transport route Via Baltica, which connects the region and the Baltic States from south to north. In addition, the road sections modernized with the investments of the European Union Interreg project, for example in 2013. a 34-kilometer road section between Kilingi-Nõmme and Mazsalaca has been completed. There have been cross-border bus services between several Estonian and Latvian cities, which ceased operations in the early 1990s due to the establishment of state borders. Although their restoration has been on the agenda on several occasions, regular connections have not yet been restored due to complex bureaucratic and organizational challenges and socio-economic and demographic considerations.</p> <p>The main common problems related to mobility and commuting are: Add a third point: - Public bus routes in border counties end near the borders of both countries and are uncoordinated, so there is no possibility of cross-border mobility using public transport.</p>	<p>The text under the programme priority 4: Better connected programme area is supplemented with the reference to Via Baltica, the 2013 example (and road constructions from the 2007-2013) was already included in the text.</p> <p>The element of data gathering and service development to re-establish the cross-border bus lines is potentially eligible activity under ISO1.</p>	YES
	<p>Complete and correct the wording as follows: The program area has a major transport route, Via Baltica, which connects the region and the Baltic States from south to north. In addition, modernized road sections with investments from the European Union's Interreg project. There have been cross-border bus services between several Estonian and Latvian cities, which ceased operations in the early 1990s due to the establishment of state borders.</p> <p>The main common challenges related to mobility and commuting are: Add a third point: - Public bus services in border counties end near the borders of both countries and are uncoordinated, so there is no possibility of cross-border mobility using public transport.</p>	<p>The text under programme priority 4: Better connected programme area is supplemented with the reference to Via Baltica, the 2013 example (and road constructions from the 2007-2013) was already included in the text.</p> <p>The element of data gathering and service development to re-establish the cross-border bus lines is potentially eligible activity under ISO1.</p>	YES

<p><i>The Joint Working Group has identified and prioritized six sections of the national roadmap for cross - border co - operation: V372 / 23113 Gaujiena - Lejaskrogs / Taheva - Valga, crossing the border in Valga County and Smiltene County, 25108 Tsooru - Krabi, 25189 Varstu - Tagakolga, 25112 Rõuge-Vaste-Roosa and 25177 Tsistre-Misso-Rammuka in Võru County.</i></p> <p>Why is the only road mentioned in the territory of LV being V372, why are the other five roads only on the Estonian side and not connecting the two territories? The road section V831 Veclaicene highway (Bārdaskrogs) -Korneti-Krabi was also planned to be included as an important section in the cross-border context, besides the Korneti-Krabi section is without asphalt, but the Veclaicene highway-Korneti asphalt is in poor condition and needs to be restored. Given that Veclaicene Parish and Korneti are in the territory of Protected landscape area "Veclaicene", which also adjoins the Estonian recreational routes and trails, the section of the road is also important for the development of tourism and cooperation. Inhabitants of Veclaicene have been active friends with Estonians for a very long time, regularly having joint events both in winter and summer - Ilgāja fish, Midsummer celebration, etc. thus, a good road will only lead to more active and closer friendship and development in the region.</p>	<p>The road sections under programme priority 4: Better connected programme area are selected by the joint working group and experts from the transport experts of both countries. The selection considers the national prioritization of the roads (for construction), limited funds of the programme and co-financing capacity of the countries.</p>	<p>NO</p>
<p>Although it is understandable, that the roads in the border area are of most importance for the living conditions of local inhabitants and visitors; given the increase of road construction costs, as well as the overall development of the Interreg programmes, it would be good to see that the programme is financing not just a "pure" construction of the roads (which often-times overlaps with the duties of states/municipalities), but pioneer innovative solutions (Pilot Action?) e.g. roads made from (partly) re-usable materials or other technological innovations. Also, it would be advisable to foresee solutions for micro-mobility (e.g., cyclist/pedestrian lanes along the roads), smart power solutions (e.g. dimmable lights, where needed, innovative road crossing solutions etc.). Also, often municipalities have already developed/adopted similar solutions or created technical projects/plans for the road/parallel mobility sections (that might have been also out-dated, but still relevant), thus inclusion of those plans in the programme documents as requirement for the construction, would further benefit the commuting in the border area, and demonstrate the innovative nature and involvement.</p>	<p>The element of data gathering and service development to re-establish the cross-border bus lines is potentially eligible activity under ISO1.</p>	<p>YES</p>
<p>Commuting between the two cities (Valga-Valka) has always taken place in the distant past. Riga-Valga train traffic operates twice a day in both directions, there is a definite need for an extension to Tartu. So far, no agreement has been reached between the relevant ministries and agencies. Due to the lack of interest of the authorities, it has not been possible to restore well-functioning public transport connections in the past, the reason given is the financing of the part crossing the state borders. Excessive bureaucracy has stifled all good ideas! Public bus routes in the border counties end near the borders of both countries and are uncoordinated, which means that there is no possibility of cross-border mobility using public transport.</p>	<p>The railway connection and matching schedules is outside the scope of the Estonia-Latvia programme. Establishing the inner-city bus line in Valga-Valka is in the competence of the relevant local authorities.</p>	<p>NO</p>
<p>The main common challenges related to mobility and commuting are: In the direction of Latvia, the Murati bus stop was also built by the Transport Authority, which is not used by any bus today, but which would be used for international regular transport.</p>	<p>The element of data gathering and service development to re-establish the cross-border bus lines is potentially eligible activity under ISO1.</p>	<p>NO</p>

Tourism. Programme priority 5.	Will there really be no investment in infrastructure? It could be difficult to provide accessibility with any other innovative method without an infrastructure element. There are, of course, other groups as well, but people with disabilities, families with young children, the elderly - everyone usually has slightly higher expectations for the availability of a quality infrastructure service - paths, footbridges, exits, incl. facilities, etc.	The investments that are part of the improved or created cross-border heritage-based tourism products/services are eligible. The details and possible limits, e.g., amount per tourism object or site) and the nature of the investment will be described in the programme manual. Although the focus is on the accessibility of the tourism experience for all groups of society, the programme is not designed for filling the gaps in missing basic infrastructure such as wheelchair ramps or accessible (designated) toilets. More guidance will be provided in the programme manual.	NO
	It would be beneficial, if all the previous work (projects) completed within the previous programme periods, would have the possibility to be continued/merged/developed/improved further, as a lot of work/experience has been obtained while implementing the projects.	The achievements, including the products and services, of the 2007-2013 and 2014-2020 programming period are expected to demonstrate the financial and institutional and durability ensured by the involved and designated organisations. The new and improved products and services created in the new programme should not repeat the implemented activities but bring new/added value through social inclusion and innovation.	NO
	The movement of tourists between the two countries using the twin city of Valga-Valka has become more active since the year. Trikāta's handmade chocolate shop and wonderful workshop are actively visited. For decades, the residents of Valga have been using Lake Veski near the city of Valka for swimming, sports, recreation, etc.	N/A	NO
Chapter 1.3. Justification for the selection of policy objectives and the Interreg specific objectives	1) It is very confusing to see that throughout the program there are references to: - the richness of forest resources, including ecosystems and biodiversity, - the role of agriculture and forestry in employment, - depopulation outside cities, at the same time, the justification for choosing priorities states the exact opposite: <i>Due to the loss of biodiversity, nature is unable to provide ecosystem services that are essential to us, such as clean water, air, food and natural resources</i> - a clear lie in the context of Latvia and Estonia! <i>Agricultural intensification and deforestation are causing serious risks to biodiversity in the program area due to increase in nutrients / harmful substances and man-made activities.</i> - then do we have depopulation, or is the anthropogenic pressure on the environment increasing? The impact of forestry must be assessed over a period of at least 100 years, where various indicators, including biodiversity in a particular area, have been a variable for decades. I would like to point out the significant risks of filling in the "need for green theses" in this way in the project, as there will be few public or private institutions that will sign under such slogans.	The wording in the comments does not exactly match with that of the IP draft. The description of the current situation in relation to the nature and biodiversity acknowledges the clean air, water and natural values that the people and visitors in the programme area enjoy, but also brings out the risks and challenges that are identified by different assessment of the status and aspects of nature (please see the Preliminary Estimate of the strategic environmental assessment https://estlat.eu/en/2021-2027/programming-process): The main joint challenges related to the nature and biodiversity: - Unsatisfactory condition of the water bodies and coastal waters due to nutrient overload; - Loss of biodiversity due to the pollution, poorly coordinated (joint) resource management; - Lack of common approach for managing and ensuring the sustainability of the green networks; - Decline in the quality of the ecosystem services, especially in terms of habitat provision and supporting cultural services, such as recreational benefits. The programme has chosen to address these challenges with certain targeted activities.	NO
	PO3 By enhancing mobility in a better connected Europe. Add to last column (Reason for selection):	The element of data gathering and service development to re-establish the cross-border bus lines is potentially eligible activity under ISO1.	NO

	4. The lack of cross-border public bus services impairs the mobility and quality of life of people in border areas and their access to goods, services, leisure, social and tourism facilities and jobs.		
	PO3 By enhancing mobility in a better connected Europe. Add to last column (Reason for selection): 4. The lack of cross-border public bus services impairs the mobility and quality of life of people in border areas and their access to goods, services, leisure, social and tourism facilities and jobs. By enhancing mobility in a better connected Europe. Modernization of public transport funding rules and establishment of cross-border GP funding rules at political level.	The element of data gathering and service development to re-establish the cross-border bus lines is potentially eligible activity under ISO1.	NO
	As indicated in the text of the program, Latvia and Estonia share a common water body - the Gulf of Riga. The ecosystem of the Gulf of Riga is closely linked to the coast and its natural values as a coastal tourism potential. The program also emphasizes: <i>"In both countries there are differences in the definition of conditions for the protection and use of similar elements of green infrastructure in spatial plans. The operation of green infrastructure, especially in border areas, is at risk due to incompatible planning areas. A harmonized scientific basis for land-use planning decisions is needed from a biodiversity perspective. "</i> Therefore, for the Nature and Biodiversity strand / Priority "Sustainable and Resilient Program Area", we propose to include among the activities envisaged (Chapter 2.4.2) actions to promote harmonized approaches to the research and management of marine and coastal green infrastructure	In case the aim of the organisations is to develop cooperation and joint management mechanisms of resources in the border area, ISO1 could be considered. Under the programme priority 3: Sustainable and resilient programme area , the focus is (as the indicators reflect) on the pilot activities and solutions that target specific challenges. Those pilot activities and solutions can be, and in some cases – should be, based on the research, but research separately will not be supported. The programme encourages to develop pilot activities and solutions also based on the research and management plans developed in the 2014-2020 programme under SO2.1 (please see 'supported projects' at https://estlat.eu/en/estlat-results , under water management).	NO
Chapter 2. Indicative activities and indicators	2.5.2. Add type of indicative actions: - Cross-border extension of public bus routes and harmonization of timetables. 2.5.3. Add output indicator: Cross-border public bus service mileage per month, Unit: km, Intermediate (2024) 12 000 (Pärnu County), Final destination (2029) 12 000 Add result indicator: Passengers per month, Baseline 0, Reference year 2021, Final target (2029) 12,000 (Pärnu County). The overall aim to adopt indicators similar of those of Interreg Europe (e.g. Action Plans, Pilot Actions) is a very welcome step, and would further help to align the regional policy development.	The element of data gathering and service development to re-establish the cross-border bus lines is potentially eligible activity under ISO1. The proposed indicator is too specific and will not be included in the IP: the ISO1 is a priority for developing the joint services and provision mechanisms, however, the investments are not foreseen.	NO
	Operation of public transport connecting the two cities (Valga-Valka) via public bus lines. The aim is to develop the connection of border residential areas and centres through bus traffic, approximately the distance travelled to Latvia could be about 50 000 line kilometers per year.	Directly supporting the operational costs for the bus line(s) is not in line with the programme intervention logic and focus. The development of the joint services is eligible under programme priority 1 More cooperating cross-border regions and development of joint services (no funds for big investments).	NO
	Add output indicator: Mileage of cross-border public bus routes per month, Unit: km, Intermediate (2024) 6935 (Võrumaa), Final destination (2029) 6935 Add result indicator: Number of drivers per month, Starting level 0, Reference year 2021, Final target (2029) 6935 (Võrumaa).	The proposed indicator is too specific and will not be included in the IP: the ISO1 is a priority for developing the joint services and provision mechanisms, however, the investments are not foreseen. In addition, the planning and development of joint services, gathering relevant data and piloting the activities in the field of public transport is eligible under ISO1.	NO

	<p>In paragraph 2.4.2., add indicative activity "Actions aimed at safeguarding, maintaining and restoring of ecosystems and protection and preservation of cross-border biodiversity and key species"; replace "Restoration of species habitats, re-introduction of species (for example freshwater pearl mussel)" with "Restoration and management of species and habitats, including re-introduction of species (for example freshwater pearl mussel) and taking into account implementation of Prioritized Action Framework (PAF); replace "Joint actions for tackling the cross-border challenges in the programme area such as pollution in shared water bodies, managing cross-border green networks, developing nature objects for recreational purposes and sustainable nature tourism, consideration of biodiversity at different levels of planning, etc." with "Joint actions for tackling the cross-border challenges in the programme area such as pollution in shared water bodies, research on and management cross-border green networks, developing nature objects for recreational purposes and sustainable nature tourism, consideration of biodiversity at different levels of planning, development and implementation of solutions for new infrastructure (animal tunnels, pass ways) to avoid fragmentation of animal populations, development and implementation of eco-friendly approaches to manage the sides of roads and railways, creating new buffer zones and managing landscape elements important for species and habitats."</p> <p>Or add "Development and implementation of solutions for new infrastructure (animal tunnels, pass ways) to avoid fragmentation of animal populations, development and implementation of eco-friendly approaches to manage the sides of roads and railways, creating new buffer zones and managing landscape elements important for species and habitats" to the paragraph 2.5.2.</p> <p>In paragraph 2.6.2., add "Developing, maintaining and improving the existing tourism infrastructure"; "Development of electronic visitor monitoring system"; and "General awareness rising, including development of nature education centres or improvement of existing ones"</p>	<p>The proposal for the 2.4.2 is in line with the intervention logic of the programme and aim of the policy objective.</p> <p>The funds under the PO3 for the local road sections (2.5.2) are limited for the reconstruction of the pavement only.</p> <p>The proposed activities for the programme priority 5 More accessible and sustainable cross-border tourism experience potentially fit under the expected activities if they are in line with the general aim of the priority and objectives of the concrete project.</p>	<p>YES</p> <p>NO</p> <p>NO</p>
<p>Chapter 4. The actions taken to involve the relevant programme partners</p>	<p>Given the rather small programme area, it is understandable that the relevant programme partners, will most probably also be involved, at some capacity, at programme 2021-2027. However, the possibilities of fully state-funded partners (e.g., Ministries, their subsidiaries, municipalities, state-funded universities etc.) to successfully participate at the projects - from application to implementation and reporting, and the financing and administrative capacity available to other non-state applicants is very contrasting. Thus, if possible, some support for projects consisting from non-state partners could be foreseen (e.g. partial pre-financing before starting the project, introduction of lump sums (similar to Interreg Europe 5th call projects - for Phase 2), administrative and legal support option free-of-charge by programme/Ministry to assist projects, where partners have little/no previous experience).</p> <p>Involve relevant local authorities as well as large companies (in terms of our cities).</p>	<p>This proposal will be considered and decided in the programme manual.</p> <p>All types of legal entities are eligible partners under relevant programme priorities.</p>	<p>NO</p> <p>NO</p>
	<p>Please do not change the logo in the middle of the program and do not change the publicity requirements too often - it is difficult to always keep track of it and it is something that</p>	<p>We agree that any guidance, rules and requirements should be changed as little as possible during the implementation, especially if there are financial implications. There will be common Interreg brand used by all relevant</p>	<p>NO</p>

Chapter 5. Approach to communication and visibility	everyone checks, but ordinary people often do not follow its nuances, while PR people tear their hair. My family members never even notice those logos at all, except me.	programmes, as we expect that the visibility guidelines (developed according the relevant regulation) remain unchanged during the programming period.	
	It is understandable that Interreg programmes want full visibility to every activity/event/object that is financed, but more flexibility should also be given to what information should/could be posted e.g., for objects in nature. As an example, if someone sees that Programme has supported a project worth 1M EUR, next to a renovated bench, which might have cost 500 EUR, the effect could be quite opposite, if it is not explained how much exactly the individual item cost, where else the investments have been made etc.).	The project partners will be advised to use the project budget reasonably.	NO
Any other comments and proposals.	If Võru, Valga and Viljandi counties also plan cross-border public bus services, the similar output and result indicators provided by them should probably be added to those of Pärnu County and Estonia as a whole should be treated in this way.	The proposed indicator is too specific and will not be included in the IP: the ISO1 is a priority for developing the joint services and provision mechanisms, however, the investments are not foreseen.	NO
	If Pärnu, Valga and Viljandi counties also plan cross-border public bus services, the similar output and result indicators presented by them should probably be added to those of Võrumaa and Estonia should be treated in this way	In addition, the planning and development of joint services, gathering relevant data and piloting the activities in the field of public transport is eligible under ISO1.	
	To envisage funding in the amount of 1.6 million EURO as a priority funding for Valka - Valga as the only Estonian - Latvian cross-border town, for which funding for this programme is planned for the establishment of the co-creation space. The idea is to create a unique place in both Valka and Valga, where young, creative entrepreneurs work and live together for a certain period of time. It would be a place of co-creation for craftsmen, entrepreneurs and artists. They would form a common community between Latvians and Estonians. This would stimulate innovation and local entrepreneurship. On the Valka side, it is planned to create a co-creation space in the building owned by Valka municipality in Tälavas Street 12 (on the bank of the Pedele River), and in Valga in the building owned by Valga Municipality at Riia Street 5 (located in the Valka-Valga centre).	Under the policy objective 1, programme priority 2 Jointly and smartly growing businesses the programme supports the cooperation between SMEs and other supporting organisations with the purpose of enhancing the knowledge transfer and innovation that leads to the growth of businesses. The programme has chosen this specific focus that is line with the concept and meaning of this policy objective. The investments in the project would be eligible if they are essential for supporting the innovation in relation to the production and processes. The programme does not consider supporting the basic infrastructure to start or operate the (daily) business.	NO
	There has historically been a bus line connection between the city of Viljandi and Valmiera, but the fact that the operation of such a line has not been economically viable has become fatal. information was provided by Viljandimaa Public Transport Center. Kaupo Kase kaupo.kase@viljandimaa.ee	The proposed indicator is too specific and will not be included in the IP: the ISO1 is a priority for developing the joint services and provision mechanisms, however, the investments are not foreseen. In addition, the planning and development of joint services, gathering relevant data and piloting the activities in the field of public transport is eligible under ISO1.	YES
	Valka municipality and Valga parish administration request the possibility to determine the project idea as a priority and allocate funding: 1. Jointly and smartly growing businesses - co-creation space development Our idea is to create a unique place in both Valka and Valga, where young, creative entrepreneurs work and live together for a certain period of time. It would be a place of co-creation for craftsmen, entrepreneurs and artists. They would form a common community between Latvians and Estonians. This would stimulate innovation and local entrepreneurship. On the Valka side, it is planned to create a co-creation space in the building owned by Valka municipality in Tälavas Street 12 (on the bank of the Pedele River), and in Valga in the building owned by Valga Municipality in Riia Street 5 (located in the	1. Under the policy objective 1, programme priority 2 Jointly and smartly growing businesses the programme supports the cooperation between SMEs and other supporting organisations with the purpose of enhancing the knowledge transfer and innovation that leads to the growth of businesses. The programme has chosen this specific focus that is line with the concept and meaning of this policy objective. The investments in the project would be eligible if they are essential for supporting the innovation in relation to the production and processes. The programme does not consider supporting the basic infrastructure to start or operate the (daily) business.	NO

	<p>Valka-Valga centre). In addition to the fact that both buildings have premises for business and living, one of the conditions for receiving support would be that the representatives of both parties are mixed. Perhaps this idea should be leveraged from other programs to create a project that both countries can be proud of internationally. Indicative project funding required EUR 1.9 million.</p> <p>2. Sustainable tourism: On the Valka side, a pedestrian and bicycle path would be created next to the Pedele River (on the left bank) from the Ausekļa Street bridge to the Sēlijas Street bridge to form a further connection from the Estonian side to our open-air stage. Next, it is planned to create a bicycle path from Varoņu Street to Valka "Zāģezers". As "Zāģezers" is very popular among Estonians and also important for our locals, there is a great demand from the residents of both cities and it would be great if a common bicycle path from Estonia to the lake had been created. Indicative required project financing 2.1 million EUR.</p> <p>3. Sustainable and resilient programme area: 3.1. It is planned to clean the Pedele River from the Ausekļa Street Bridge to the Sēlijas Street Bridge (on the Valka side the Pedeles River is cleaned only in the section from the Sēlijas Street Bridge to the Ramsi Bridge) and the Estonian side plans to clean the second Pedele flood, which was planned for 2014-2020. will be excluded from the current project due to high costs. Indicative required project financing 0.8 million EUR.</p> <p>3.2. Establishment of a joint blue network (blue infrastructure) in the Twin City of Valka-Valga. Solutions would be found in the initial development phase, but in the second phase it is planned to implement the proposed actions in certain areas. Natural rainwater harvesting areas would be set up in certain areas, well thought out and adapted to the existing landscape. The aim is to reduce the problems associated with the inability of rainwater pipes to absorb large amounts of rainwater, and to try to divert this rainwater to saturate the surrounding soil. Natural rainwater harvesting sites would add value to the urban environment. Indicative required project financing 1.6 million EUR.</p>	<ol style="list-style-type: none"> 2. The development of the cross-border tourism products and services are seen in wider scope than single objects, they must be based on the cultural and natural heritage, include the element of social inclusion and accessibility to all groups of society. All ideas that will be submitted to the programme must match to the intervention logic and objectives of the programme. More detailed requirements to the project ideas and guidance will be provided in the programme manual. 3. The matter is communicated directly with the project partners of the project "Valga-Valka recreational area". The aim is to resolve this and find solutions in the framework of the 2014-2020 as it is related to the output and result indicators of the current programme. 4. The idea might be relevant under the programme priority "Sustainable and resilient programme area". The application must meet all the criteria for the cooperation, partnership, activities fitting with the intervention logic and fulfilment of the programme indicators. More detailed requirements to the project ideas and guidance will be provided in the programme manual. 	
	<p>Although the text of the programme states that priority is being given granted to groups and organizations at higher risk of exclusion, such as people with disabilities, seniors, young people and others. We want to call for the involvement of young people, youth organizations and organizations working with young people in the development of initiatives, and to promote the absorption of funding among grassroot organizations so that they can implement local initiatives with a cross-border impact.</p>	<p>The proposed target group can be involved under ISO1 and other priorities, if it is line with the specific focus and objective of the project and intervention logic of the programme.</p>	<p>NO</p>