

Appendix 1 List of opinions and comments of authorities involved in the evaluation of documents as well as comments and proposals submitted during the public consultation, together with the manner of their consideration

No.	Authority, institution, person	Part of the Report, to which the comment/conclusion refers (section, subsection, point, page number)	Content of comment/conclusion or a proposed wording	Answer to a comment/conclusion
1	Chief Sanitary Inspector	The Environmental Report	No comments submitted	
2	General Director for Environmental Protection	The Environmental Report: Appendix 1 Methodology and other parts	Description of the Report methodology contained in Appendix 1 requires verification and correction. It was indicated on p. 11, that impact on species and habitats <i>'the Programme is general in nature and does not contain the specified projects but activities only.'</i> This statement is not consistent with the information contained in the Programme and other parts of the Report. The Programme will	The comment has been taken into account. The wording has been corrected.
3	General Director for Environmental Protection	The Environmental Report: Appx. 4 and 5	It would also be advisable to align names of projects in the submitted documentation, so that there were no concerns as to the scope of the planned work. Polish version of the DPI list includes, among others, projects for the <i>przebudowa</i> (reconstruction) of concrete roads, and Annex 4 (in-depth analyses) and 5 (Protected areas that can be significantly affected by investments under the PL - RU Cross-Border Cooperation Programme 2014-2020) use the term <i>'rekonstrukcja'</i> (reconstruction) of roads. The importance of	The comment has been taken into account. The names of measures in the scope of roads have been changed from <i>'rekonstrukcja'</i> to <i>'przebudowa'</i> and to avoid ambiguities measure name from English version of the Report has been given in brackets (reconstruction).

4	General Director for Environmental Protection	The Environmental Report, p. 90, tab. 9 and 10	<p>Assessment of the impact on the components of the environment was carried out based on specific criteria shown in Table 9 on p. 90 of the Report. The criteria included i.a. impact on protected species and habitats, impact on natural habitats, impact on maintaining consistency of the protected areas, and on passable condition of the ecological corridors. Cumulative assessment of the possible impact of each measure on the environment, taking into account the above criteria, is shown in Table 10 (<i>Matrix of relation of environmental elements and investment priorities that are likely to have significant impact on the environment</i>). Despite its schematic view based on the symbols, assertion that 'there is no significant impact of wind energy projects on maintaining consistency between the protected areas, and generally passable condition of the ecological corridors' raises doubts. This issue has not been explained in subsection 5.2. containing details of the environmental impact. It seems that Authors of the Report omitted the issue relating to the impact of wind farms on the migration corridors of birds and bats. The Report should be revised and supplemented in this regard.</p>	The comment has been taken into account. Table 10 and Section 5.2 have been supplemented
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5	General Director for Environmental Protection	Appx. 5	<p>With regard to Appendix 5 to the Report, which presents information on protected areas that may be affected by the investments planned under the Programme, I would like to draw attention to several issues that require correction. The appendix provides i.a. potential threats which may arise from implementation of individual measures. It was clarified, that <i>'The given risks are based on the Standard Data Form of the GDEP'</i> It should be noted that the Appendix recalls both the types of investments that will be implemented in accordance with areas of support specified in the Programme, as well as specific investments indicated on DPI list, and therefore the identification of protected areas has been made only with respect to the group of DPI of known locations. With this in mind it is necessary to verify the source of information on potential risks in relation to measures of unknown location. In addition, it must be emphasised that it is not relevant to take into account threats not related to the implementation of habitats, particularly habitats listed in Annex I of the Habitats Directive, for the protection of which Natura 2000 sites are determined, and valuable habitats located within the boundaries of other protected areas, i.a. coastal habitats, wetlands and meadow areas. The impact of household waste was indicated as a threat, whereas in the case of the impact of the reconstruction of provincial road 512 on the Natura 2000 site Ostoja Warmińska (Warmia Refugium) (PLB280015) the indicated threats included restructuring of farms and change of the agricultural method. It is suggested to present in the above-mentioned Appendix impacts associated with the investment in relation to the identified protected areas, as well as minimisation solutions that will reduce the impact of the projects on the subjects and</p>	<p>The comment has been taken into account. Threats, recommendations and sources have been verified using available sources of information.</p>
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6			<p>Paragraph from p. 104 of the Report requires clarification and reorganisation: <i>'Projects approved for implementation and characterised by constant, negative impacts, in accordance with the applicable EU legislation, must be associated with significant and necessary benefits to other elements of the environment or the economy, and constitute an overriding public interest. In addition, their negative impact should be naturally offset, if possible,'</i> It is imprecisely worded and it is not clear from its content what negative impacts it says about. Due to the fact that the fragment constitutes a part of the Report that says about the impact on water status, it may be presumed that it concerns projects that may result in failure to achieve environmental objectives contained in the river basin management plan. Therefore, in the above paragraph, reference should be made to the derogations set forth in Article 38j of the Act of 18 July 2001 on the Water Law ( Journal of Laws of 2015, item 469 as amended).</p>	<p>The comment has been taken into account. The indicated paragraph has been reorganised and supplemented</p>
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7	General Director for Environmental Protection	The Environmental Report Subsection 9.1, p. 131-133	It is recommended to make the following additions and corrections in the environmental criteria for selection of projects listed in subsection 9.1. Environmental Reports: - the 3rd planning and strategic criterion (p. 131) - addition of a provision according to which project selection will take into account not only conservation plans, but also plans of conservation tasks for the Natura 2000 sites, because currently a lot of areas already have such plans; - the 9th technical and technological criterion (p. 132) - giving the following wording: 'in the case of projects relating to the construction works - using technology works to ensure water and soil protection against pollutants'; - the 2nd natural criterion (p. 133) - due to lack of precision in indicating specific habitats of protected areas, redrafting as follows: 'avoiding transformation and interference in valuable natural habitats, particularly habitats listed in Annex I of the Habitats Directive, for the protection of which Natura 2000 sites are determined, and valuable habitats located within the boundaries of other protected areas, i.a. coastal habitats, wetlands and meadow areas'.	The comment has been taken into account. Criteria have been supplemented acc. to indications
8	Alexander Fedotowskikh (chief@nrd.ru)	The Environmental Report	Cooperation proposal	The comment does not refer to the Report