

1. Although it is noticed, by Draft document, that horizontal issues related to stakeholders (including Environmental CSOs) partnership, like directly mentioned access to information on environmental matters and public participation in the decision making process (p.8), and indirectly addressed through entire document (strengthening *Environmental CSOs* in order to achieve more efficient EU integration process), this is not addressed in SWOT analysis, and further in priorities.

Strengthening Environmental CSOs as the partners in more efficient EU integration (by all means, including knowledge-based activities), have to be added within point 5. of Draft document (as the priority in upcoming period).

2. This Draft documents is prepared assuming that *10-years development* in Environmental Sector remain; however the last year governmental intervention in environmental sector, with noted institutional, human resources and financial changes/cuts, could have much bigger (negative) consequences than anticipated, and this possible scenario is not taken in account. This Draft document is considering these as the "challenges".

E-CSOs (Environmental CSOs) have big concern that Environment Sector, as it is now, will be much bigger problem in EU integration process, than it is anticipated in this Draft NAD.

3. As one of the leading organization in SECO for Environment and Energy, we already sent to EC Delegation our Position related 2013 Progress Report (available at <http://ambassadors-env.com/en/files/2013-Progress-Report-EASD-contribution.pdf> ).