**Comments on the SI RIS3 - Version November 2013**

This version needs further significant attention. Unfortunately, improvements are only a few and far too limited to enable a favourable assessment at this stage.

The document can serve as a solid starting point for the development of the RIS3 process. Apart from the quite extensive analytical part (which however still lacks some clarifications of linkages to the suggested prioritisation), the draft RIS3 strategy effectively lacks all the important elements that would demonstrate the existence of a viable RIS3 process. It includes some citations and paragraphs from various existing Slovenian strategic documents related to innovation and industrial policy, but as far as the RIS3 process is concerned, it indicates that there is still a lot to be done before the process and the resulting document should be submitted to the Commission.

The main issues with the draft RIS3 document dated November 2013 are the following:

* **Language: make it understandable**

Language is too often opaque or difficult to understand. This version is really not yet accessible to the public in terms of clarity and consistency of content and messages. The text needs radical editing as in its current form it is not suitable for public dissemination.

* **Stakeholder Process: preparation activities described**

There is unfortunately little linkage between the public consultation process (Annex 1) and the proposed draft RIS3. Public consultation appears very short time spanned and insufficient (12 workshops within roughly 2 months with the final public consultation open for about a month during the summer holidays) – the question of how the same measure would address the two different regions – 1 competitive (W-Slovenia) and 1 cohesion region (E-Slovenia) with the same process and RIS3 document is completely ignored in the document and it appears that the consultation process was not much more explicit on it either.

The overview of the comments of the public consultation should have been given in annex 2. Instead, annex 2 is about identification of RIS3 measures. No annex 3 has been received.

* **Analysis: poorly written which raises many queries**

Given extensive analytical work undertaken in preparation of RIS3, sections 1.1 and 1.2 do not give justice to that work. This should not be done by "cut and paste" of tables from analyses. RIS3 would benefit from original synthesis of analytical results which would summarise all key analytical points in accessible language and considering only policy relevant results. This means taking out irrelevant statistical data and highlight key policy issues.

* **SWOT analysis: stand-alone and poorly related to RIS3**

The SWOT analysis is largely detached from the rest of the text. Analysis (1.1 and 1.2) is largely about structural issues and does not go into institutional or system of innovation issues while SWOT largely focuses on institutional issues. The most important is that the SWOT is not derived from previous analysis and thus appears as *deus ex machina* and stand-alone section without real justification. In order to integrate the SWOT into the text it would be necessary to:

1. Add analysis on institutional issues of RDI in Slovenia which is currently missing in sections 1.1 and 1.2;
2. Link the structural features mentioned in SWOT to tables or sections of analysis.

* **Vision and Rationale: improvement but also queries**

This document contains a new vision which is much better when compared to the old one. Nevertheless it appears to be a copy of the overall vision from other strategic documents.

The background for this vision is not articulate i.e. there is not clear justification for this vision (especially in pages 1 and 2 or before first citation of vision on page2).

There is nothing on the rationale for RIS3: why it is then in the title of this section?

* **Incomplete work on priorities: 27 areas of capacities but no specific areas of application**

The backbone of the Slovenian RIS3 is three horizontal priority areas. These are subdivided into seven subareas which are than further divided into 27 areas of ‘capacities’. It is not clear what it means except that these are areas where presumably Slovenia has capacity to generate some products and services. This is further confirmed by examples of products, services and technologies in these subareas.

This seems logical as RIS3 aims at defining ‘horizontal priorities’ which suggest that areas of application are large number of sectors which indirectly can contribute to resolving ‘societal challenges’. However, user areas listed are very broad and cover many sectors or areas of application. This leaves the reader in an unclear state regarding potential areas of application. Are really these areas of application areas in which Slovenia can potentially have competitive advantage or areas in which Slovenia has potential comparative advantage?

Hence, the question is what is the usefulness of this prioritization? Listing all areas of potential application is not about smart specialization but about support to generic technologies. Although under each priority area we have a list of examples of products and processes and technologies: again these are not defined in terms of specific areas of application but represent generic categories of products, services and technologies. As such they can be applied to any economy in the world ranging from US to Slovenia.

Though seemingly priority work within Slovenian RIS3 seems very specific it actually falls short of specifying specific areas of potential application in which Slovenia has potential comparative advantages. This level of prioritisation cannot help in terms of real programming priorities as any priority anywhere in Slovenia can be easily accommodated.

It would be highly desirable to complete the prioritization process by building on the 27 priority areas of capacities to which very specific areas of application could be attached. This would give a much better approximation of areas of smart specialisation and could be useful for programming purposes.

* **Key guidelines for designing measures and implementation of measures: conceptual confusion or still work in progress?**

Measures are not developed but only criteria for measures so there is no progress in this respect. Implementation of measures criticize calls for proposal approach and pleads for application of Integrated Programmes covering cross-cutting areas depicted in the Matrix. However, the document is silent on how Integrated Programmes could be implemented and does not go into details or even explanation of the idea.

* **Monitoring and evaluation of the implementation of the RIS3**

The indicators to evaluate the efficiency and effectiveness of the RIS3 are six very aggregate indicators which could form one level of evaluation but are far from sufficient to measure all levels of application of RIS3.

* **If RIS3 is horizontal, what about coordination with other policies especially industrial and R&I?**

There is nothing in this version on coordination of RIS3 with other policies.

* **Other missing elements**

Measures for design of the comprehensive programme are not yet developed. The measures that would actually stimulate private investments are unclear. The principle of concentration of resources between national and EU funding is not explained. There are no budgetary resources associated to the prioritised areas.

**Conclusion**

In overall, there are still many unknowns regarding how RIS3 priorities will be supported and implemented.

The RIS3 process as being advocated by the RIS3 guidelines appears to be only in a very initial phase in Slovenia. Considering the early stage of the RIS3 process Slovenian, it seems recommendable for the Slovene authorities to prepare an Action Plan and in the meantime to organise the comprehensive RIS3 process during the next few months.