Preparation of Strategic Environmental Assessment Report for the Interreg VI-A IPA Croatia-Bosnia and Herzegovina-Montenegro

## ASSESSMENT OF DNSH CRITERIA AGAINST THE REQUIREMENTS OF THE TAXONOMY REGULATION

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# **EKOINVEST**

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Managing Authority:	Ministry of Regional Dev	Ministry of Regional Development and European Union Funds						
SEA Practitioner:	Eko Invest d.o.o., Draško	vićeva 50, 10 000 Zagreb						
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Team Leader:	Nenad Mikulić, PhD	Nenad Mikulić, PhD						
Authors: EKO INVEST d.o.o.	Nenad Mikulić, PhD chem.tech., B.Sc.civ.eng.	Mill."						
	Marina Stenek, B.Sc.biol.eng., univ.spec.tech.	Mohila Stekek						
	Vesna Marčec Popović, B.Sc.chem. and biol.	Venu Moria: Poporic'						
	Martina Cvitković, mag. geog.	Cutkouic						
	Danijela Đaković, mag.ing.silv.	Janipla Autoris						
	Margareta Androić, mag.ing.prosp.arch.	Judron						



Director

Jal. r

Bojana Nardi

#### 1. INTRODUCTION

The European Green deal is the European Commission's roadmap of the major policy and legislative proposals required to make Europe carbon-neutral by 2050. Its guiding principle is that EU's economy should become sustainable and that sustainable objectives are further moved to the core of EU policy. It proposes a Renewed Sustainable Finance Strategy to ensure that the EU's financial systems support the transition of businesses towards sustainability in the context of recovery. The principle of 'do no harm' underpins the European Green Deal, which includes a green oath that requires future European Commission initiatives to uphold this principle.

In its communication of 8 March 2018, the Commission published its action plan on financing sustainable growth, launching an ambitious and comprehensive strategy on sustainable finance, imposing a number of regulatory requirements on asset managers. One of the objectives set out in that action plan is to reorient capital flows towards sustainable investment in order to achieve sustainable and inclusive growth. The establishment of a unified classification system for sustainable activities is the most important and urgent action envisaged by the action plan. Given the systemic nature of global environmental challenges, there is a need for a systemic and forward-looking approach to environmental sustainability that addresses growing negative trends, such as climate change, the loss of biodiversity, the global overconsumption of resources, food scarcity, ozone depletion, ocean acidification, the deterioration of the fresh water system, and land system change as well as the appearance of new threats, such as hazardous chemicals and their combined effects. The criteria for determining whether an economic activity qualifies as environmentally sustainable should be harmonized at Union level in order to remove barriers to the functioning of the internal market with regard to raising funds for sustainability projects, and to prevent the future emergence of barriers to such projects.

The Taxonomy Regulation provides a framework to classify a Sustainable Investment. By directing financial flows into sustainable actions and integrating the criteria and factors to be considered for a product or action to be deemed 'environmentally sustainable' into business decision-making, the financial sector has the potential to support, change and even form sustainable systems.

The Taxonomy Regulation sets out a list of economic activities with performance criteria for their contribution to six environmental objectives, namely:

- 1. Climate change mitigation
- 2. Climate change adaptation
- 3. Sustainable use and protection of water and marine resources
- 4. Transition to a circular economy
- 5. Pollution prevention, control and protection
- 6. Restoration of biodiversity and ecosystems (the "Environmental Objectives")

Apart from contributing substantially to one of the environmental objectives, activities must also comply with each of the following criteria:

- No Significant Harm: The activity does not significantly harm any of the Environmental Objectives
- Technical Screening Criteria: The activity must comply with technical screening criteria for each relevant Environmental Objective

• Minimum Social and Governance Safeguards: The activity must comply with minimum social and governance contained in the Taxonomy Regulation.

In order to be eligible for financing under cohesion policy, the projects have to comply with relevant EU environmental legislation and carry out a Strategic Environmental Assessment based on the requirements of the SEA Directive; however, such provisions do not necessarily mean that all actions proposed within the Programme comply with the DNSH principle. Therefore, a separate assessment has to be carried out during the programming phase to screen out potentially harmful actions so that the Commission may assess the compliance of the programme with the DNSH objectives prior to its endorsement. If risks to compliance with the DNSH principle is encountered, mitigation measures are to be implemented to prevent significant harm as regards six environmental objectives above, or actions should be removed from the Programme.

The criteria in assessing significant harm to an environmental objective is as follows:

- (1) Climate Change Mitigation the activity leads to significant greenhouse gas emissions due to its own performance or increased emissions of other actions
- (2) Climate Change Adaptation the activity leads to an increased adverse impact of the current climate and the expected future climate, on the activity itself or on people, nature or assets.
- (3) The Sustainable Use and Protection of Water and Marine Resources the activity is detrimental to the good status or the good ecological potential of bodies of water, including surface water and groundwater or to the good environmental status of marine waters.
- (4) Circular Economy Including Waste Prevention and Recycling the leads to significant inefficiencies in the use of materials or in the direct or indirect use of natural resources such as non-renewable energy sources, raw materials, water and land at one or more stages of the life cycle of products, including in terms of durability, reparability, upgradability, reusability or recyclability of products; leads to a significant increase in the generation, incineration or disposal of waste, with the exception of the incineration of non-recyclable hazardous waste; or the long-term disposal of waste may cause significant and long-term harm to the environment.
- (5) Pollution Prevention and Control the activity leads to a significant increase in the emissions of pollutants into air, water or land, as compared with the situation before the activity started
- (6) The Protection and Restoration of Biodiversity and Ecosystems activity is significantly detrimental to the good condition and resilience of ecosystems; or detrimental to the conservation status of habitats and species, Including those of EU interest.

In this assessment, the direct and indirect impacts of an action were taken into consideration, as well as the life cycle of activities, especially for technological processes. Given the general nature of the Programme and proposed activities, Technical screening criteria published under the Delegated

Regulation no. (EU) 2021/2139 of 4 June 2021 were referred to in order to emphasize and screen-out potentially hazardous practices from the Programme. A simplified approach was employed for actions with an insignificant impact or no impact on the environmental objectives in view of offering a brief description and justification and at the same time focusing the assessment on objectives which may be significantly impacted. While environmental impact assessments conducted for actions or their parts as per the national legislation do not automatically entail the compliance with the DNSH, they ensure acceptability of the proposed development for the environment, identification and mitigation of likely significant impacts and have therefore been taken into account as minimum requirements, along with fulfilment of legislative requirements.

#### 2. ASSESSMENT OF PROGRAMME ACTIONS AGAINST DNSH CRITERIA

Table below analyses contribution of the Interreg VI-A IPA Croatia-Bosnia and Herzegovina-Montenegro to the taxonomy criteria and environmental objectives, as well as their compliance with the Do No Significant Harm principle. Since the nature of the Programme is rather abstract and allows only for generalized assessment of actions, the analysis has been conducted also taking into consideration Technical Screening Criteria under the Regulation EU 2021/2139 of 4 June supplementing Regulation EU 2020/852 of the European Parliament and of the Council by establishing technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to climate change mitigation or climate change adaptation and for determining whether that economic activity causes no significant harm to any of the other environmental objectives and Updated Technical Criteria.

Table 1. Contribution of Programme's actions to the environmental objective	es and DNSH
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	Climate change mitigation	Climate change adaptation	Sustainable use and protection of water and marine resources	Transition to circular economy	Pollution prevention, control and protection	Restoration of biodiversity and ecosystems	
PA1 – Cooperating for smarter programme area; Financial allocation - 22% SO 1.1 - Developing and enhancing research and innovation capacities and the uptake of advanced technologies							
1. Supporting cross-border innovation and technology based on smart specialization approach and improving cooperation between research institutions, SMEs, public							



The action substantially contributes to climate change mitigation objective and may be considered enabling in that it directly aims at redirecting business processes towards green solutions using innovative services and smart specialisation approach to technological advancement which reduces environmental footprint and greenhouse emissions. Only solutions corresponding to the best performance in the sector or industry will be supported by the Programme.

The action regards efforts to increase energy efficiency, or develop solutions for GHG emission reduction, with no physical impacts. Any potential risks to the good status or good ecological potential of bodies of water, or environmental status of marine waters, emissions of pollutants to air, water or soil or potential risks to the good condition or resilience of ecosystems from the researched products or solutions will be evaluated and addressed.

The action will therefore not lead to increased risks of climate-change related disasters, adverse impacts on good status of surface or groundwater bodies, or be detrimental to the conservation status of biodiversity and ecosystems.

2. Strengthening and modernising business support services (including small scale infrastructure, preferring nature-based solutions) that could help with: trainings,			
marketing, developing and or implementing new services/products, using ICT and new			
technologies, implementing innovative solutions in business organisation and processes (blockchain, big data, cloud			
computing, Internet of Things, advanced manufacturing, robotics, artificial intelligence, cybersecurity, etc.)			

The action contributes to climate change mitigation objective in that it directly aims at redirecting business processes towards green solutions using innovative services and smart specialisation approach to technological advancement which reduces environmental footprint and greenhouse emissions. The action includes data processing, hosting and related activities. Only solutions corresponding to the best performance in the sector or industry will be supported by the Programme.

The equipment used will not contain restricted substances exceeding maximum values. Waste management plan will be adopted to ensure maximum recycling at the end of life of electrical and electronic equipment, including agreements with recycling partners which will be reflected in financial projections of offers.

The action regards limited physical impacts from construction, and will not lead to increased risks of climatechange related disasters, adverse impacts on good status of surface or groundwater bodies, cause pollution of the environment, or be detrimental to the conservation status of biodiversity and ecosystems.

3. Accelerating innovation and technology	
transfer (e.g. blue and green economy,	
circular economy, agriculture, food	
production, fisheries and aquaculture,	
climate change, renewable resources, smart	
manufacturing, biodiversity, skills	

	Climate change mitigation	Climate change adaptation	Sustainable use and protection of water and marine resources	Transition to circular economy	Pollution prevention, control and protection	Restoration of biodiversity and ecosystems
development for smart specialization.						
The action contributes to climate change mitig processes towards green solutions which reduc supports bio, green and circular economy th manufacture, which creates space for decrease The proposed technologies will belong on the minimize resource consumption in other secto Any potential risks to water status, circular evaluated and addressed, as well as significant or resilience of ecosystems.	ces enviror rough inn e of emissi e low carb rs (agricul economy	nmental fo lovations i lons of vari lon techno ture, food v objective	otprint and g n agriculture ious pollutan logy list and production, r s from the	reenhous and foo ts. will inclu manufact proposed	e emission d producti de applica ure etc.). solutions	s. It also on, and tions to will be
4. Supporting pilot lines, early product validation, certification, advanced manufacturing capabilities including via science – business collaboration						
The action substantially contributes to climate redirecting business processes towards green approach to technological advancement which Certification should be expanded to include services. Moreover, the potential of products of their further use in supported economic sep production of low-carbon technologies.	solutions reduces e proof of derived the	using inno environme sustainable rough the F	ovative servic ntal footprint y manufactur Programme s	es and sr and gree red produ hould be	mart special mhouse en ucts or pe assessed a	alisation nissions. rformed s well as
5. Pilot actions aimed at transferring good practices on green economy trends and standards						
The action indirectly contributes to climate mi therefore it may be considered enabling. The actions will not lead to increased risks of status of surface or groundwater bodies, or b ecosystems.	f climate-c	hange rela	ated disaster	s, adverse	e impacts	on good
6. Enhancing support services for SMEs and entrepreneurs to improve their access to research and technological innovations						
The action indirectly contributes to climate mi therefore it may be considered enabling . The actions will therefore not lead to increased on good status of surface or groundwater bodi biodiversity and ecosystems.	d risks of c	limate-cha	inge related o	disasters,	adverse in	

	Climate change mitigation	Climate change adaptation	Sustainable use and protection of water and marine resources	Transition to circular economy	Pollution prevention, control and protection	Restoration of biodiversity and ecosystems
7. Enhancing transfer and upscaling of proven green solutions to reduce the environmental footprint of production processes and open up green business opportunities						
The action substantially contributes to climate change mitigation objective in that it directly aims at redirecting business processes towards green solutions using innovative services and smart specialisation approach to technological advancement which reduces environmental footprint and greenhouse emissions. Proven green solutions regard solutions, processes, technologies, business models and other products dedicated to reduction and avoidance of GHG emissions which have been demonstrated in a relevant environment. For development status of the activity, Technology Readiness Level will apply. It also supports bio, green and circular economy and production processes which decreases environmental footprint and emissions of various pollutants. Proven green solutions will include low carbon technology or will enable GHG emissions in other sectors by their implementation, use alternative fuels, generate or use renewable energy, and take into consideration transport emissions. Reducing environmental footprint includes reduction of waste, reduced energy consumption and increase of use of renewable energy, reduced water consumption and emissions into the air through optimization of production processes for which reason the action will not lead to increased risks of climate-change related disasters, adverse impacts on good status of surface or groundwater bodies, result in harmful emissions or						
<ul> <li>be detrimental to the conservation status of b</li> <li>8. Improving capacities and integration of innovative solutions using ICT for public sector needs</li> </ul>	iodiversity	and ecosy	stems.			
The action strongly depends on electricity and its mitigation potential should be achieved through high energy efficiency standards, rather than low carbon footprint. Digitalisation solutions should therefore be directed towards data driven solutions of GHG emission reduction, and solutions for resource efficiency. Low or zero emissions can be achieved by sourcing electricity from renewable sources, be it grid or site. The action regards efforts to increase energy efficiency, or develop solutions for GHG emission reduction, they are mostly based on small scale data processing and storage, with no physical impacts, and thus will not lead to increased risks of climate-change related disasters, adverse impacts on good status of surface or groundwater bodies, or be detrimental to the conservation status of biodiversity and ecosystems.						
9. Supporting the establishment of Living Labs, test-beds and ecosystems to promote development and actual use of innovative solutions			<u> </u>			
The action indirectly contributes to climate cl innovative solutions which reduce environmer The due to its nature, it will not lead to increas on good status of surface or groundwater bodie and ecosystems.	ntal footpr sed risks o	int and gre f climate-c	enhouse emis hange related	sions. disaster	s, adverse	impacts



	Climate change mitigation	Climate change adaptation	Sustainable use and protection of water and marine resources	Transition to circular economy	Pollution prevention, control and protection	Restoration of biodiversity and ecosystems
10. Supporting cooperation of public authorities in development, implementation and monitoring of smart specialisations strategies and other policy tools for development of innovative economy						
The action indirectly contributes to climate mi The actions will therefore not lead to increase on good status of surface or groundwater bod biodiversity and ecosystems.	d risks of c	limate-cha	inge related d	isasters,	adverse in	
11. Establishing connections and long-term cooperation between research institution especially in joint capacity building for innovation and technology transfer to businesses						
The action indirectly contributes to climate mitigation, but covers no physical impacts on the environment. The actions will therefore not lead to increased risks of climate-change related disasters, adverse impacts on good status of surface or groundwater bodies, or be detrimental to the conservation status of biodiversity and ecosystems.						
SO 1.3 - Enhancing sustainable growth and co productive investments	mpetitive	11233 01 514			- <b>SIVILS</b> , IIIC	idding by
1. Supporting local SMEs to face challenges related to their size, limited resources (such as skills and finance) or industry and market conditions						
The action presents no physical impacts on the climate change mitigation or to be considered market proposed will have better performance result in overall net GHG emissions reduction of Any potential risks to water status, circular evaluated and addressed, as well as significant or resilience of ecosystems.	l enabling, e than the over their economy	the result best com life cycle. objective	s of the activit mercially avai s from the p	ies or so lable tec roposed	olutions bro hnologies solutions	ought to and will will be
2. Improving the capacity of micro and small entrepreneurs such as family farms regarding marketing, branding, e-business, competitiveness including education and training in entrepreneurship skills						
In order to be considered as delivering substate emissions from land and animal management carry out activities on land deemed to be of hi	t, increase	removal c				



	Climate change mitigation	Climate change adaptation	Sustainable use and protection of water and marine resources	Transition to circular economy	Pollution prevention, control and protection	Restoration of biodiversity and ecosystems
Agriculture has the potential to supply biomast biobased materials for industry, construction a cycles than food and feed, and thus contribut emissions from fossil fuels, and enable mitigat Any potential risks to water status, circular evaluated and addressed, as well as significant or resilience of ecosystems. 3. Developing and supporting existing business clusters and networks of SMEs in applying ICT, inovation and new technologies to develop and promote common products	nd packag te to long ion throug economy	ing and bio er-term rei h other ac objective	penergy. Biom moval of carb tivities. s from the p	aterial ca on. Bioer proposed	an have lon nergy can solutions	nger life- displace will be
for local cross-border and international market The action presents no physical impacts on the climate change mitigation or to be considered market proposed will have better performance result in overall net GHG emissions reduction of Any potential risks to water status, circular evaluated and addressed, as well as significant or resilience of ecosystems. 4. Implementing joint pilot actions to introduce product and/or process innovations	enabling, te than the over their economy	the result best com life cycle. objective	s of the activit mercially avai s from the p	ties or so lable tec proposed	lutions bro hnologies solutions	ought to and will will be
The action substantially contributes to mitig activities or solutions brought to market prope available technologies and will result in overall deliver innovative technologies, processes and their GHG emissions. Any potential risks to water status, circular evaluated and addressed, as well as significant or resilience of ecosystems.	osed will ha net GHG I products economy	ave better emissions i that allow v objective	performance reduction over enabling actives from the p	than the r their life vities sub proposed	best comn e cycle. The stantially r solutions	nercially e results educing will be
5. Supporting actions related to development of innovative products and services (e.g. patents, industrial design, trademark and innovation etc.)						
The action substantially contributes to mitig activities or solutions brought to market proper available technologies and will result in overall deliver innovative technologies, processes and their GHG emissions. The researched techn information on its GHG emissions, or permit demonstration site providing the GHG emission	osed will ha net GHG products nology wil ts obtaine	ave better emissions i that allow I include d from co	performance reduction over enabling activ patents not mpetent auth	than the r their life vities sub older the	best comn e cycle. The stantially r an 10 yea	nercially e results educing urs with



	Climate change mitigation	Climate change adaptation	Sustainable use and protection of water and marine resources	Transition to circular economy	Pollution prevention, control and protection	Restoration of biodiversity and ecosystems	
Any potential risks to water status, circular evaluated and addressed, as well as significant or resilience of ecosystems.							
6. Promoting and introducing (international) certifications and standards of existing and new products and services							
The action substantially contributes to clim certification covers production and chain of cu- imported products. New and existing products carbon emissions throughout the lifecycle. E building regulations and standards may be use Any potential risks to water status, circular evaluated and addressed, as well as significant or resilience of ecosystems.	stody (trac s and servi stablished ed as altern economy	eability th ces will pro schemes native proc objective	rough the supp esent proof of as "green-bui of of eligibility. es from the p	oly chain minimis ilding"co roposed	) for both I ed energy ertification solutions	ocal and use and is or EU will be	
7. Cross-border development, adaptation and exchange of best practices in digitisation and application of new technologies, processes, products or services to be directly used by the enterprises							
The action substantially contributes to mitigation, or may be considered enabling. The results of the activities or solutions brought to market proposed will have better performance than the best commercially available technologies and will result in overall net GHG emissions reduction over their life cycle. The results deliver innovative technologies, processes and products that allow enabling activities substantially reducing their GHG emissions. The researched technology will include patents not older than 10 years with information on its GHG emissions, or permits obtained from competent authority for operation of the demonstration site providing the GHG emission reduction potential. Any potential risks to water status, circular economy objectives from the proposed solutions will be evaluated and addressed, as well as significant increase in emissions or potential risks to the good condition or resilience of ecosystems.							
PA2 – Cooperating for greener and climate ch	ange resil	ient progra	amme area; F	inancial a	allocation	- 43%	
SO 2.1 - Promoting energy efficiency and redu	ucing gree	nhouse ga	s emissions				
1. Developing and implementing joint pilot and demonstration actions on innovative technologies, measures and solutions in the field of energy management (collection of integrated data and the interoperability of data through digital technologies) and reducing greenhouse gas emissions (e.g.							

monitoring of air quality and other	Climate change mitigation	Climate change adaptation	Sustainable use and protection of water and marine resources	Transition to circular economy	Pollution prevention, control and protection	Restoration of biodiversity and ecosystems
parameters in public buildings on a larger scale) and use of RES (e.g.demo centres/plants)						
The action contributes to climate change mitigation through planning, monitoring and controlling energy- associated processes with the aim to preserve energy resources and energy cost savings, reducing greenhouse gas emissions, and protecting the environment. Action should also include use of innovative technology for energy saving and necessary reinforcement or extension of the grid. Increased access to electricity will further help decarbonisation by allowing consumers to switch to low-carbon energy. The equipment used will not contain restricted substances exceeding maximum values. Waste management plan will be adopted to ensure maximum recycling at the end of life of electrical and electronic equipment, including agreements with recycling partners which will be reflected in financial projections of offers. The action regards limited physical impacts from construction, and will not lead to increased risks of climate- change related disasters, adverse impacts on good status of surface or groundwater bodies, cause pollution of the environment, or be detrimental to the conservation status of biodiversity and ecosystems.						
2. Investments in measures and actions that increase energy efficiency and improve the integration of sustainable energy sources in different sectors including small scale infrastructure preferring nature-based solutions						
The action contributes to climate change mitigated reducing greenhouse gas emissions, and incressame time reducing consumption and emission completed with consideration of use of RES or sources will not be supported. Green building proposals. The action supports transition to a net-zero systems, energy efficiency solutions, energy penergy efficient lightning and other equipment Integration of RES will include climate change events, flooding, resilience to future temperate also handle the problem of substances of high to the use of RES, forest-derived products have 80% of timber products used, have to be eith forests. The action will not lead to increased risks of eemissions of pollutants, but depending on the arise from construction activities, which will procedures carried out at the project level.	easing the ons conne clean mob certificatio emissions olant cons t the impa ge adapta ure increas concern in ve to be c ner recycle climate-ch e type of R	capacities cted with pility and tr pon is support s economy truction, ir cts of whice tion measures tion measures ange relat considered, ange relat ES method	for use of ren new construct ansport. Integ orted as altern natellation of the mainly rega ures, taking in onsumption. Me materials such as well as such as well as such of its integra	retion. The ration of native pr clude he fans, cor rd constr nto const Moreove as asbes stainable from sus nor to lo tion, neg	energy, an e action sh traditiona oof of eligi eating and npressors, ruction. ideration v r, the activ stos. In ada e material. stainably m ng-term in gative impa	d at the nould be l energy ibility of cooling pumps, weather ities will aptation At least nanaged ccreased ucts may

	Climate change mitigation	Climate change adaptation	Sustainable use and protection of water and marine resources	Transition to circular economy	Pollution prevention, control and protection	Restoration of biodiversity and ecosystems
3. Promoting pilot actions in the public						
buildings sector which are in line with the						
Renovation Wave and the EU Green Deal.						
Cross-sectoral nexus approach should be						
emphasized by integrating buildings energy						
and seismic retrofit						

The action substantially contributes to climate change mitigation and transition to circular economy through the increased use of RES, reducing greenhouse gas emissions, and increasing the capacities for use of renewable energy in the existing public buildings.

The action will result in replacement of windows and doors, walling, roofing, insulation, household appliances, implement energy-efficiency light sources, and heating and hot water systems etc.

Water fittings will ensure maximum water flows for hand basins, showers, WCs and urinals thus ensuring sustainable use of water.

Where applicable, the action will assess the availability and use techniques that support reuse and use of secondary raw materials, high-durability design and recyclability, waste management that prioritises recycling over disposal and traceability of materials used. At least 70% of non-hazardous construction and demolition waste generated at the construction site will be prepared for reuse, recycling and other material recovery, including backfilling using waste as substitute for other materials. BATs will be implemented for removal and safe handling of hazardous substances.

The action will not generate any kind of pollution, and as it will be implemented in built areas and regard existing structures, it will have no effect on biodiversity.

4. Joint incentives and pilot projects to			
encourage and ensure a strategic approach			
to energy efficiency (e.g. developing SECAP)			

The action contributes to climate change mitigation as it aims at reducing greenhouse gas emissions, and in turn increasing the capacities for use of renewable energy. Integration of traditional energy sources will not be supported. Green building certification is supported as alternative proof of eligibility of proposals.

The action supports transition to a net-zero emissions economy, and may include heating and cooling systems, energy efficiency solutions, installation of fans, compressors, pumps, energy efficient lightning and other equipment the impacts of which are localised and mainly regard construction.

Integration of RES will include climate change adaptation measures, taking into consideration weather events, flooding, resilience to future temperature increase, water consumption. Moreover, the actions will also handle the problem of substances of high concern in building materials such as asbestos. In adaptation to the use of RES, forest-derived products have to be considered, as well as sustainable material. At least 80% of timber products used, have to be either recycled or reused or sourced from sustainably managed forests.

The action also includes opportunity to substantial contribution to climate adaptation through integration of climate adaptation issues into strategic documents. Climate adaptation activities may include physical and non-physical solutions that substantially reduce the most important physical climate risks. In order to identify physical climate risks, vulnerability assessment will be conducted through screening, vulnerability assessment and assessment of adaptation solutions that can reduce identified physical climate risks. In assessing vulnerability and selection of adaptation solutions, the most recent climate data will be used. The action will not lead to increased risks of climate-change related disasters, nor to long-term increased

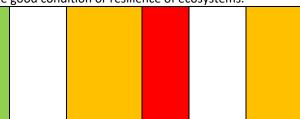
	Climate change mitigation	Climate change adaptation	Sustainable use and protection of water and marine resources	Transition to circular economy	Pollution prevention, control and protection	Restoration of biodiversity and ecosystems
emissions of pollutants, adverse impacts on go to the conservation status of biodiversity and o			or groundwate	er bodies	, or be detr	imental
5. Strengthening the cross-border cooperation and transfer of knowledge in the region through exchange of experience, information (awareness raising) and capacity building through online and in-situ trainings to improve skills in the field of energy efficiency						
The action contributes indirectly to climate chan It builds on the other actions proposed within of climate-change related disasters, adverse increase in hazardous pollutant emissions, or ecosystems. Any potential risks to water stat will be evaluated and addressed, as well as si condition or resilience of ecosystems.	this SO and impacts c be detrimo us, circula	d due to its on good st ental to th r economy	s nature, it wil atus of surfac e conservation v objectives fro	ce or gro n status o om the p	oundwater of biodiver proposed s	bodies, sity and olutions
6. Implementing pilot actions to test innovative and climate-neutral solutions through e.g. taking up and exploiting R&D results for the energy efficient renovation and heating and cooling of buildings (including cultural heritage buildings)						
The action contributes to climate change miti the capacities for use of renewable energy, a connected with new construction and retrof supported. Green building certification is supp The action supports transition to a net-zero technologies, heating and cooling systems, e pumps, energy efficient lightning and other eq construction and retrofitting. Integration of RES will include climate change events, flooding, resilience to future temperate also handle the problem of substances of high circular economy, forest-derived products have least 80% of timber products used, have to be efforests. The action will not lead to increased risks of emissions of pollutants, adverse impacts on go to the conservation status of biodiversity and efforests.	and at the itting. Inte- orted as a o emission nergy effic uipment t ge adapta ure increa concern i ve to be co ither recyc climate-ch od status	e same tim egration o Iternative ns econom ciency solu he impacts tion meass ase, water n building posidered, cled or reus ange relat of surface o	ne reducing co f traditional e proof of eligib ny, and may utions, installa of which are l ures, taking in consumption. materials such as well as oth sed or sourced ed disasters, n	ensumpt energy so ility of pr include tion of f ocalised nto cons Moreov n as asbe ter susta I from su	ion and er purces will roposals. renewable ans, comp and mainly ideration w er, the action stos. In su inable mat stainably m ng-term in	nissions not be energy ressors, y regard weather ons will pport of erial. At nanaged creased
7. Improving energy demand management and fostering behavioural changes of consumers for reducing energy consumption						

	Climate change mitigation	Climate change adaptation	Sustainable use and protection of water and marine resources	Transition to circular economy	Pollution prevention, control and protection	Restoration of biodiversity and ecosystems
and a resource-efficient and sustainable use of energy						

The action contributes indirectly to climate change mitigation (enabling) through change of consumer behaviour. It will result in loss reduction and energy savings.

The due to its nature, it will not lead to increased risks of climate-change related disasters, adverse impacts on good status of surface or groundwater bodies, increase in hazardous pollutant emissions, or be detrimental to the conservation status of biodiversity and ecosystems. Any potential risks to water status, circular economy objectives from the proposed solutions will be evaluated and addressed, as well as significant increase in emissions or potential risks to the good condition or resilience of ecosystems.

8. Promoting the production and use of advanced biofuels (produced from non-food crops, such as cellulosic biofuels and waste biomass) as well as other renewable energy sources (solar, geothermal energy, wind, etc.)



The action substantially contributes to climate change mitigation.

Manufacture and use of biofuels can deliver mitigation benefits, but if implemented incorrectly may even have negative impacts. The eligibility criteria are thus designed to restrict the use of advanced bioenergy feedstocks and ensure sustainable biomass production practices.

Production of energy from biomass may lead to emissions into the air, water, and increase waste management requirements, for which reason their planning should take into consideration air quality at the location and the application of BATs BREFs. All emissions will be assessed within environmental assessment procedures and will not exceed limit values. Likewise, used biomass will not be derived from deforestation or forest degradation or waste since any activity leading to significant increase in incineration is not considered as eligible, and harms circular economy, for which reason waste biomass has to be omitted from the action. High carbon stock land will not be converted for the purposes of agricultural production of crops. Biomass will not be derived from agricultural land that was converted from forest or pasture.

The activity also includes construction or operation of electricity generation facilities using solar energy which will not incur impacts on other environmental objectives. Use of wind power will not include offshore generation as there are currently no applicable legal regulations or guidelines to be applied.

The use of hydropower, including its refurbishment to enhance energy generation or storage potential, shall comply with implementation of measures directed to reduce adverse impacts on water and protected habitats and species directly dependent on water. Such measures regard ensurance of downstream and upstream fish migration, minimum ecological flow and sediment flow, and habitat protection and enhancement measures. They are regularly identified and prescribed within Environmental Impact Assessments and Appropriate Assessments for developments at or near NATURA 2000 sites.

New hydropower plants will comply with cumulative impact assessment results, assessing the impacts on the status of water bodies within the same river basin and on protected habitats and species, based on recent, comprehensive and accurate data. Cumulative impact assessment will take into consideration other existing or planned infrastructure in the river basin. Impact assessment will show that the plant will not lead to deterioration of good status of water body, or such deterioration will not be significant, and is deemed justified by a detailed cost-benefit assessment (demonstrating overriding public interest). In addition, compensatory measures are implemented to ensure restoration of continuity prior to execution of the

	Climate change mitigation	Climate change adaptation	Sustainable use and protection of water and marine resources	Transition to circular economy	Pollution prevention, control and protection	Restoration of biodiversity and ecosystems
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#### project.

Geothermal energy exploitation will comply with the measures for abatement of hazardous emissions and exceedance of limit values.

As regards the renewable energy technologies which will be used, the Programme shall support reuse and use of secondary raw materials and reused components, design for high durability, recyclability, waste management that prioritises recycling over disposal and traceability of substances and materials used. Any location is covered with a waste management plat which ensures maximum reuse or recycling at the end of life in accordance with the waste hierarchy.

All activities will respect applicable norms and regulations to limit the impact of electromagnetic radiation on human health and will not use PCBs polychlorinated biphenyl.

All solutions should provide for storage of electricity which will substantially contribute to climate change adaptation.

Negative impacts will carefully be examined within Environmental Impact Assessments and Appropriate Assessments for developments at or near NATURA 2000 sites.

The action will not lead to increased risks of climate-change related disasters, adverse impacts on good status of surface or groundwater bodies, increase in hazardous pollutant emissions, or be detrimental to the conservation status of biodiversity and ecosystems. Any potential risks to water status, circular economy objectives from the proposed solutions will be evaluated and addressed, as well as significant increase in emissions or potential risks to the good condition or resilience of ecosystems.

## SO 2.4 - Promoting climate change adaptation and disaster risk prevention, resilience, taking into account eco-system based approaches

1. Development and introduction of joint climate change adaptation, disaster prevention and first response plans, as well as solutions and systems for monitoring, prevention and management of potential risks (e.g. floods, wildfires, landslides, droughts, sea pollution, earthquakes, invasive alien species etc.).

The action strongly contributes to climate change adaptation by preparation of the existing systems to the changes already taking place, and planning of new ones with adaptation solutions which substantially reduce the risk and improve the security of people, nature and assets. Climate proofing will also ensure elimination of traditional harmful practices with long-term positive effects on the biodiversity. In order to identify physical climate risks, vulnerability assessment will be conducted through screening, vulnerability assessment and assessing vulnerability and selection of adaptation solutions, the most recent climate data will be used. Risk preventions solutions regarding traditional construction activities may however result in degradation of aquatic and riparian areas and ecosystems, for which reason nature based solutions should be prioritized.

Such developments will be carefully examined through environmental assessment procedures carried out at the project level.

Given the absolute fire danger in the southern part of the Programme territory, the action may include rehabilitation and restoration of forests including reforestation and natural forest regeneration after fire events. The activity implies no change of land and occurs on degraded land, and substantially contributes to climate change mitigation. The establishment of forest management system is to be ensured by implementation of the national forest management system as required by legislation.

The action will not lead to increased emissions of any kind, nor will it lead to the increased use or degradation of water or sea quality. The action will result in increase of sustainable supply of primary forest biomass suitable for manufacturing wood based products with long term circularity, but in the long term.

The activity does not include use of chemicals and pesticides, while the disaster prevention and first response plans should include prevention and cleaning up measures in case of pollution of water and soil.

The action does not include conversion of habitats, or loss of biodiversity with high conservation value.

2.Encouraging intersectoral/interstate				
cooperation in risk prevention and rapid				
response management through				
development and implementation of joint				
protocols, procedures, approaches and				
measures, such as infrastructure, response				
vehicles, equipment, shelters, etc.	1			

The action contributes to climate change adaptation by development of infrastructure and protocols for the purposes of risk prevention and response management. In order to identify physical climate risks, vulnerability assessment will be conducted through screening, vulnerability assessment and assessment of adaptation solutions that can reduce identified physical climate risks. In assessing vulnerability and selection of adaptation solutions, the most recent climate data will be used.

Action should also comprise non-life insurance activities against climate related hazards as an important part of adaptation measures.

The action includes small scale infrastructure construction and low possibility of actual physical impacts, and will therefore not lead to increased emissions of any kind, nor will it lead to the increased use of waste or use of natural resources as non-renewable resources. Any potential risks to water status, circular economy objectives from the proposed solutions will be evaluated and addressed, as well as significant increase in emissions or potential risks to the good condition or resilience of ecosystems.

3. Strengthening of institutional and expert						
capacities and raising awareness to address						
environmental issues, climate change and						
disaster risks reduction (e.g. workshops,						
methodologies, protocols, educational						
materials, joint training for civil protection						
units).						
The action indirectly supports climate change adaptation objective, but does not include actual physical						

impacts, and will therefore not lead to increased emissions of any kind, nor will it lead to the increased use of waste or use of natural resources as non-renewable resources.

4. Establishment of joint emergency centres,			
including small-scale infrastructure			

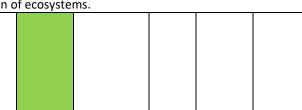
	Climate change mitigation	Climate change adaptation	Sustainable use and protection of water and marine resources	Transition to circular economy	Pollution prevention, control and protection	Restoration of biodiversity and ecosystems
preferring nature-based solutions						
The action indirectly supports climate change impacts, and will therefore not lead to increas of waste or use of natural resources as non-re vulnerability assessment will be conducted the adaptation solutions that can reduce identified of adaptation solutions, the most recent clima	ed emission newable r rough screa I physical o	ons of any esources. I eening, vul climate risk	kind, nor will i n order to ide nerability asse	t lead to ntify phy ssment a	the increa vsical clima and assess	sed use te risks, ment of
5. Development of cross-border risk assessment and disaster risk strategies for cross-border hazards such as forest fires, landslides, floods and relative sea-level change, invasive alien species directly threatening biodiversity and ecosystems						
The action substantially contributes to climate protocols for the purposes of risk prevention a Such assessments will always use state-of-the available science for vulnerability and risk ana IPCC. Action should also comprise non-life insurance of adaptation measures. Proposed strategies s strengthening to extreme weather events, forecasting equipment, relocation of valuabl planning. The action has low possibility of actual physic production and use, and the GHG emission technology or products will not exceed limits s Any potential risks to water, circular econom addressed. The action will not lead to the in renewable resources. 6. Exchanging knowledge and good practices on eco-system based climate change	nd cross-l -art clima lysis and r activities hould incl future ir e assets f al impacts s generat pecified b y, emissio	border resp te projection methodolog against clin ude adapta forease of from flood s, it is not u ed in the y national ns to the a	oonse manage ons and asses gies in accord nate related ha ation to infrase temperature plains, waterp undertaken fo projected lif regulations. air, water and	ment. sment of ance wit azards as tructure , floods proofing, r the pur e-cycle of soil will	impacts, t th the mos an import in view of , monitori but also rpose of fo of the res	the best t recent ant part physical ng and physical essil fuel earched ted and
adaptation measures and implementing pilot actions for protection and restoration towards resilient eco-systems, e.g. rivers, wetlands and sea, cross-border connectivity of habitats, agro-forestry, biodiversity, landscapes, climate proofing, modelling and forecasting						

	Climate change mitigation	Climate change adaptation	Sustainable use and protection of water and marine resources		Pollution prevention, control and protection	Restoration of biodiversity and ecosystems
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The action indirectly contributes to climate change adaptation by preparation of the existing systems to the changes already taking place, and planning of new ones with adaptation solutions which substantially reduce the risk and improve the security of people, nature and assets. Climate proofing will also ensure elimination of traditional harmful practices with long-term positive effects on the biodiversity.

The action is operational and relies on exchange of knowledge, and its results will not lead to other increased emissions, harmful pollutions, degradation of ecosystems nor will it lead to the increased use of natural resources as non-renewable resources, or degradation of ecosystems.

7. Testing integrated climate-adaptation solutions in pilot actions, which combine technological, ecological, social, cultural, governance and financial aspects taking into account good practices available at local, regional, national or European level



The action indirectly contributes to climate change adaptation by preparation of the existing systems to the changes already taking place, and planning of new ones with adaptation solutions which substantially reduce the risk and improve the security of people, nature and assets. Climate proofing will also ensure elimination of traditional harmful practices with long-term positive effects on the biodiversity. Action should also comprise non-life insurance activities against climate related hazards as an important part of adaptation measures.

The action may cover a wide variety of solutions, for which reason the criteria elaborated for other actions within the same specific objective will be applicable.

8. Increasing climate resilience of critical infrastructure and cultural/natural heritage sites through improved risk preparedness and risk management plans



The action substantially contributes to climate change adaptation by reducing the risk of negative impacts on physical assets or the environment related from climate change of the existing systems to the changes already taking place, and planning of new ones with adaptation solutions which substantially reduce the risk and improve the security of people, nature and assets. Apart from improvement of risk preparedness and management plans, SEA proposed expanding the action to integration of disaster risk reduction concerns at the planning level, so as to achieve "climate-proof" development. As regards natural heritage sites, activities covered should include building resilience of forests to climate change and maintain forest carbon stocks and sinks, including afforestation, reforestation, restoration/rehabilitation etc.

In order to identify physical climate risks, vulnerability assessment will be conducted through screening, vulnerability assessment and assessment of adaptation solutions that can reduce identified physical climate risks. In assessing vulnerability and selection of adaptation solutions, the most recent climate data will be used.

The action will not lead to increased emissions of any kind, nor will it lead to the increased use of waste or use of natural resources as non-renewable resources.

9. Integrating climate change aspects into			
water management strategies on local,			
regional and interregional level (considering			
e.g. water quality, flooding, rainwater			
management and water retention, water			
scarcity, drinking water supply including			

	Climate change mitigation	Climate change adaptation	Sustainable use and protection of water and marine resources	Transition to circular economy	Pollution prevention, control and protection	Restoration of biodiversity and ecosystems
smart water pricing, groundwater, forecasting)						

The action aims at supporting mitigation and adaptation objectives. Mitigation effect of water collection, supply, treatment is a result of the efficiency of the process itself for which reason additional investments are needed. Water management should also include waste-water collection and treatment.

Construction, extension and operation of water collection, treatment and supply will comply with technical criteria for energy consumption of 0.5 kWh per m3 of produced water supply or lower. Leakage level will be calculated across the extent of water supply network where the works are carried out.

Renewal of water supply will contribute to climate change mitigation through reduction of average energy consumption by at least 20%, including abstraction and treatment and by reducing leakage level by at least 20%.

Waste water treatment plants may consider energy generation within the own system, and measures decreasing energy consumption. Direct GHG emissions assessment will be performed for every construction and extension of a WWTP or WWTP with a collection system. Wastewater treated for use in agricultural irrigation will be subject to risk management actions and measures to avoid adverse environmental impacts. Any discharges to natural receptors will be in accordance with national provisions and maximum permissible pollutant levels. Excessive storm water overflows from waste water collection systems, separate storm water collection systems, retention tanks etc. will be avoided by appropriate measures, preferring nature based solutions.

Sewage sludge is used in accordance with national legislation.

Potential harmful effects regard increased water abstraction with consequential negative impacts on ecosystems. However, water management is fairly regulated sector covered by operational programmes, which have undergone environmental assessments, so negative impacts of expansion and reconstruction of water-supply and sewerage systems is not expected.

Waste-water treatment will further improve water body status in addition to achieving reductions of GHG emissions in comparison with the discharge of wastewater without treatment. Anaerobic digestion of sewage sludge may be installed, as it reduced GHG emissions through capture and utilization of generated biogas, especially if used directly for generation of electricity or heat. In case of implementation of anaerobic digestion, emissions to air, soil and water have to be within limit values defined by national legislation.

In order to identify physical climate risks, vulnerability assessment will be conducted through screening, vulnerability assessment and assessment of adaptation solutions that can reduce identified physical climate risks. In assessing vulnerability and selection of adaptation solutions, the most recent climate data will be used.

The action will not lead to other increased emissions, harmful pollutions, degradation of ecosystems nor will it lead to the increased use of natural resources as non-renewable resources.

10. Sharing knowledge and	developing			
solutions for climate proofing the	agricultural			
and forestry sectors to incr	ease their			
resilience towards e.g. droughts	, outbreaks			
of pests, invasion of alien species	5			

The action contributes to climate change adaptation by climate proofing development of agricultural and forestry sectors.

Agricultural activities area both a sink and a source of GHG emissions, for which reason the operations supported will seek to reduce existing emissions generated by the sector, increase removal of carbon from

the atmosphere and its storage, and will not take place on "high carbon stock land". Agriculture moreover may contribute to mitigation as it supplies biomass to be used for energy production, but also in manufacture of biomaterials, and consequently to circular economy. Activities should therefore use residues and byproducts of the production of crops to reduce demand for primary resources. It also enables use of renewable energy. Crops which are less susceptible to climate-related changes (temperature, moisture.) should be used, as well as irrigation systems implemented.

Negative impacts on water resources are likely through use of pesticides and fertilizers and increased water demands in general production. Production systems should therefore have to prevent nutrient runoff and leaching. However, the area is proclaimed as sensitive to nutrient and increased protection measures are employed, while the territory is covered with appropriate water management plans, for which reason the action will not pose risk to water resource quality or quantity.

Activities covered should include building resilience of forests to climate change and maintain forest carbon stocks and sinks, including "greening activities" such as afforestation, reforestation, restoration/rehabilitation of degraded forests, sustainable forest management etc. Deforestation should also be dealt with intersectorally, since it is often the consequence of agricultural or urban expansion (land conversion). Only operations which maintain or increase the existing carbon stocks and maintain or improve the capacity of forests to deliver multiple services will be supported. Climate mitigation enabling activities to be supported include forest based products (such as wood-based raw materials).

Mitigation activities in the forestry focus on maintenance and increase of the forest carbon sink, and reducing and avoiding GHG emissions from activities. Adaptation provides synergy with mitigation, as both objectives result in maintained or increased carbon sinks.

The action will not lead to increased emissions of any kind, nor will it lead to the increased use of waste or use of natural resources as non-renewable resources. The action will not pose risks to water quality or consumption, especially as the Programme territory is covered with appropriate water management plans. The action does not pose any risk to ecosystems, and in protected areas will be conducted in line with protection measures in force. By enhancing resilience of forests and support of forest services, positive impacts may be expected on water-dependent ecosystems.

11. Developing solutions for strengthening eco-system services for human health and wellbeing to support social resilience and counteracting socio-economic impacts of climate change



The action contributes to climate change adaptation by strengthening ecosystem services, aiming at substantially reducing the risk and improve the security of people, nature and assets. Climate proofing will also ensure elimination of traditional harmful practices with ling-term positive effects on the biodiversity. Any developments will be carefully examined through environmental assessment and appropriate assessment procedures carried out at the project level.

In order to identify physical climate risks, vulnerability assessment will be conducted through screening, vulnerability assessment and assessment of adaptation solutions that can reduce identified physical climate risks. In assessing vulnerability and selection of adaptation solutions, the most recent climate data will be used.

The activities will not lead to increased emissions of any kind, nor will it lead to the increased use of waste or use of natural resources as non-renewable resources.

	Climate change mitigation	Climate change adaptation	Sustainable use and protection of water and marine resources	Transition to circular economy	Pollution prevention, control and protection	Restoration of biodiversity and ecosystems
SO 2.6 - Promoting the transition to a circular	r and reso	urce efficie	ent economy			
1. Developing and implementing approaches and solutions for limiting landfilling of all types of waste and retaining their value (as future resources) in the economic cycle						
of non-hazardous waste aimed at preparing for in waste storages and transfer facilities with separately collected. Anaerobic digestion of sewage sludge with accompanied with monitoring and continger produce emissions exceeding the emission treatment of waste. Digestate components for Facilities for composting of separately collecter as fertilise or soil improver will comply with th Material recovery of non-hazardous waste or hazardous waste in to secondary raw materia production processes. Landfill gas may be utilized on landfills provide are permanently closed and is not taking in landfill gas collection and utilization facilities a With implementation of the said criteria, the a protection of water and marine resources, Po biodiversity and ecosystems. Any potential of proposed solutions will be evaluated and adder risks to the good condition or resilience of eco 2. Increasing awareness of policy makers and stakeholders about environmental and economic opportunities of a circular economy and improving their capacity for the practical implementation of circular economy approaches in different sectors (such as electronics, construction and buildings, textiles, plastics, packaging, food, agriculture, forestry and wood industry) Action substantially contributes to climate c	other wa other wa new plans for levels as: r use as fer e EU Direct onverts at al which a d they are further b irre subject activities w ollution pro- risks to wa ressed, as isystems	ste or mat liting proc for minimi sociated v rtiliser will e with the tives regu least 50% re suitable not opene iodegradal to control vill not hav evention, o ater status well as sign	terial of differ duction of bio zation of met vith the BAT- comply with r resulting proc lating the use of processed of processed of processed of substitut and after 8 July 2 ole waste. Me and monitoring the harmful effect control and pr s, circular eco	ent prop ogas or hane lea AEL ran hational r duction a of fertilis I separat ion of pr 2020, and ethane e ng proce ects on Si otection nomy ol	erties and chemicals kage and ges for ar egulations nd use of o ers. ely collect imary mat that such missions f dures. ustainable , or Restor pjectives f	I will be will not naerobic compost ed non- erials in landfills rom the use and ration of rom the

hierarchy. Any potential risks to water status, circular economy objectives from the proposed solutions will be evaluated and addressed, as well as significant increase in emissions or potential risks to the good condition



	Climate change mitigation	Climate change adaptation	Sustainable use and protection of water and marine resources	Transition to circular economy	Pollution prevention, control and protection	Restoration of biodiversity and ecosystems	
or resilience of ecosystems							
3. Developing and implementing joint pilot and demonstration actions that closely involve citizens (e.g. good practices in separate waste collection and waste re-use, pilot testing of repair, reuse and refurbish approaches etc.) in order to foster behavioural changes, higher acceptance of more sustainable products and resource- efficient consumption and production patterns							
Action substantially contributes to climate change mitigation and circular economy. It includes separate collection of waste at source and transport of non-hazardous waste in single or comingled fractions and preparing them for reuse or recycling. Such waste will not be mixed in waste storages and transfer facilities with other waste or material with different properties. The activity will result with at least 50% of the processed separately collected non-hazardous waste into secondary raw material that is suitable for substitution of primary raw materials in the production processes. Any potential risks to water status will be evaluated and addressed, as well as significant increase in emissions or potential risks to the good condition or resilience of ecosystems. 4. Improving waste management policies and competences of the public sector, including the prevention, processing and recycling of							
communal (e.g. recovery of organic waste, including nutrients from municipal wastewater) and industrial waste							
Action substantially contributes to climate cha It includes separate collection of waste at a comingled fractions and preparing them for storages and transfer facilities with other wast with at least 50% of the processed separately that is suitable for substitution of primary raw this programme will refer to industrial biowast Any potential risks to water status will be evalu emissions or potential risks to the good conditi	source an reuse or e or mate collected materials re. The act uated and	d transpor recycling. rial with di non-hazar in the prod ion should addressed	rt of non-haz Such waste w fferent proper dous waste in luction proces also cover col , as well as sig	ardous vill not k ties. The to secor ses. Indu nstructic	be mixed i e activity w ndary raw ustrial wast on waste.	n waste iill result material e within	
5. Developing and testing solutions that support the recovery and reuse of raw materials							



	Climate change mitigation	Climate change adaptation	Sustainable use and protection of water and marine resources	Transition to circular economy	Pollution prevention, control and protection	Restoration of biodiversity and ecosystems
Action substantially contributes to climate cha The activity will result with at least 50% of th secondary raw material that is suitable for subs Any potential risks to water status will be e emissions or potential risks to the good condit	ne process stitution or evaluated	sed separa f primary ra and addre	tely collected aw materials in essed, as well	non-haz n the pro	duction pro	ocesses.
6. Fostering and testing digital solutions for the circular economy including applications and services (such as product passports, resource mapping, tracing systems and consumer information)						
Action substantially contributes to climate cha The activity will result increased traceability of Any potential risks to water status will be of emissions or potential risks to the good condit PA3 – Cooperating for healthier and more inc	material evaluated	used and th and addre lience of e	hus its sustain essed, as wel cosystems.	able proo	ificant incr	ease in
SO 4.5 – Ensuring equal access to health care primary care, and promoting the transition f	e and fost	ering resili	ence of healtl	n system	s, includin	
1. Development and implementation of ICT solutions and (pilot) actions to support digitalization in health care.						
The action strongly depends on electricity ar energy efficiency standards, rather than low of directed towards data driven solutions of GHG Low or zero emissions can be achieved by sour	carbon foo emission	otprint. Dig reduction,	italisation sol and solutions	utions sh for reso	ould there urce efficie	fore be ncy.
The action regards small scale data processing to increased risks of climate-change related groundwater bodies, or be detrimental to the	l disasters	s, adverse	impacts on	good sta	itus of sur	
2. Improving health care and access to long- term care for vulnerable groups, with focus on elderly, children and disabled persons						
The action regards operational and organizational social measure with no physical impacts, and thus will not lead to increased risks of climate-change related disasters, adverse impacts on good status of surface or groundwater bodies, or be detrimental to the conservation status of biodiversity and ecosystems.						
3. Improving the accessibility and effectiveness of cross-border public health care services by investing in telemedicine, diagnostics, mobile clinics and mobile assets, including small scale infrastructure preferring nature-based solutions						



	Climate change mitigation	Climate change adaptation	and marine resources	Sustainable use and protection of water	Transition to circular economy	Pollution prevention, control and protection	Restoration of biodiversity and ecosystems
Potential for mitigation is low, as the action rephysical impacts, and thus will not lead to i impacts on good status of surface or groundwe biodiversity and ecosystems.	ncreased	risks of cli	imate-c	hange	related	disasters,	adverse
4. Transfer of knowledge through exchange of experience, awareness raising, lifelong learning, education and training programmes, and capacity building through online and in-situ trainings to improve skills in the field of health care and enhance the delivery of primary care and family-based and community-based care services.							
The action ensures investments into health accessible, especially through implementation There will be no direct contribution to environ adverse or harmful effects on them either as c action.	of ICT solution	utions. jectives, b	ut its in	npleme	entation	will have n	0
5. Developing and implementing joint activities/solutions to promote healthy lifestyles and active and healthy ageing, disease prevention							
The action ensures investments into health accessible, especially through implementation There will be no direct contribution to environ or harmful effects on them either as compared	of ICT solution of ICT solution of ICT solution of the solutio	utions. ectives, bu uation bef	t its im ore the	plemer implei	ntation w mentatic	ill have no	adverse tion.
PA4 – Cooperating for more sustainable and s 17% SO 4.6 - Enhancing the role of culture and su and social innovation							
1. Developing and implementing joint (pilot) actions to support diversification and sustainability of the tourism by investing in lesser-known destinations and diverse forms of tourism (cultural, rural, agro, active, health tourism etc.) including small-scale infrastructure preferring nature-based solutions							
Seen as tourism is a major source of emission have substantial contribution to climate miti- adoption of green concepts and developmen mitigation through efficient use of energy s transport. By development of innovative soluti it will not negatively affect biodiversity conser The action will not lead to increased risks of clim	gation by nt of susta ources an ions and su vation.	decrease of inability o d transitio upport of a	of touri f the s n and lternati	sm gei ector. suppoi	nerated There is rt of alte s invasive	emissions also pote ernative m e forms of t	through ntial for odes of tourism,



	Climate change mitigation	Climate change adaptation	Sustainable use and protection of water and marine resources	Transition to circular economy	Pollution prevention, control and protection	Restoration of biodiversity and ecosystems
of surface or groundwater bodies or lead to the The action does not however address the use of activities which will surely bring about increa legislation and local waste management strate Any potential risks to water status will be e emissions or potential risks to the good conditi	of natural eased ger gies and p evaluated	resources neration o plans is a m and addre	or materials ir f waste. The ninimum requi essed, as wel	n develop complia rement.	nce with	national
2. Developing and implementing innovative solutions and creating smart destinations (e.g. through digitalisation and creative industries), and new services and products for specific targeted market segments such as seniors, young people or people with disabilities including small scale infrastructure preferring nature-based solutions						
Solutions         The action does not contribute substantially to any environmental objective.         The action will not lead to increased risks of climate-change related disasters, adverse impacts on good status of surface or groundwater bodies or lead to the increase in the emissions of pollutants or deterioration of ecosystems.         Any potential risks to water status will be evaluated and addressed, as well as significant increase in emissions or potential risks to the good condition or resilience of ecosystems.         3. Development and implementation of						
measures to protect, develop and promote sustainable cultural heritage and cultural services, public tourism assets and tourism services including investments in physical regeneration and security of public spaces in the scope of their inclusion in the touristic and/or cultural circuit Seen as tourism is a major source of emissions	s through	transport	and energy co	onsumpti	ion, the ac	tion will
have moderate contribution to climate mitigation of green concepts and developmen mitigation through efficient use of energy sour alternative, less invasive forms of tourism, it w The action will not lead to increased risks of clim of surface or groundwater bodies or lead to the The action does not however address the use of activities which will surely bring about incr legislation and local waste management strates Any potential risks to water status will be e emissions or potential risks to the good conditi	ation by o t of susta rces. By d ill not neg nate-chan e increase of natural reased ge gies and p evaluated	decrease of inability of evelopment atively affor ge related in the em resources neration of olans is a m and addre	of tourism gen of the sector. Int of innovative ect biodiversit disasters, advention issions of poll or materials in of waste. The hinimum requi essed, as wel	nerated There is ve solution y conser erse impo utants. n develop complia rement.	emissions also poter ons and survation. acts on goo oment of proneer with	through ntial for pport of od status roposed national
4. Support of social innovation in tourism and culture - development of existing or new tourism and culture businesses						



	Climate change mitigation	Climate change adaptation	Sustainable use and protection of water and marine resources	Transition to circular economy	Pollution prevention, control and protection	Restoration of biodiversity and ecosystems	
Seen as tourism is a major source of emissions through transport and energy consumption, the action will have moderate contribution to climate mitigation by decrease of tourism generated emissions through adoption of green concepts and development of sustainability of the sector. There is also potential for mitigation through efficient use of energy sources. By development of innovative solutions and support of alternative, less invasive forms of tourism, it will not negatively affect biodiversity conservation. The action will not lead to increased risks of climate-change related disasters, adverse impacts on good status of surface or groundwater bodies or lead to the increase in the emissions of pollutants. The action does not however address the use of natural resources or materials in development of proposed activities which will surely bring about increased generation of waste. The compliance with national legislation and local waste management strategies and plans is a minimum requirement. Any potential risks to the good condition or resilience of ecosystems.							
5. Protection, development and promotion of natural heritage and eco-tourism including Natura 2000 sites							
Seen as tourism is a major source of emissions through transport and energy consumption, the action will have moderate contribution to climate mitigation by decrease of tourism generated emissions through adoption of green concepts and development of sustainability of the sector. There is also potential for mitigation through efficient use of energy sources. By development of innovative solutions and support of alternative, less invasive forms of tourism, it will not negatively affect biodiversity conservation. The action will not lead to increased risks of climate-change related disasters, adverse impacts on good status of surface or groundwater bodies or lead to the increase in the emissions of pollutants. The action does not however address the use of natural resources or materials in development of proposed activities which will surely bring about increased generation of waste. The compliance with national legislation and local waste management strategies and plans is a minimum requirement. Any potential risks to water status will be evaluated and addressed, as well as significant increase in							
emissions or potential risks to the good condit 6. Integration of existing tourist products into cross-border thematic routes, products or destinations and their further advancement	ion or resi	lience of e	cosystems.				
The action does not contribute substantially to any environmental objective. The action will not lead to increased risks of climate-change related disasters, adverse impacts on good status of surface or groundwater bodies or lead to the increase in the emissions of pollutants or deterioration of ecosystems. Any potential risks to water status will be evaluated and addressed, as well as significant increase in emissions or potential risks to the good condition or resilience of ecosystems.							
7. Capacity building for innovation in tourism and cultural heritage, focusing on recovery and resilience, and sustainable development of new or upgrading of existing cross-border tourism products, product diversification to adapt to new trends and needs							



	Climate change mitigation	Climate change adaptation	Sustainable use and protection of water and marine resources	Transition to circular economy	Pollution prevention, control and protection	Restoration of biodiversity and ecosystems
The action indirectly contributes to climate chate to the second			-			
weather events, and increase of safety, future	increase	of tempera	iture, floods, r	-	-	
waterproofing, but green infrastructure and g						
The action will not lead to increased risks of status of surface or groundwater bodies or lead		-			-	-
of ecosystems. Any potential risks to water s				-		
increase in emissions or potential risks to the					-	
8. Adoption of green concepts and standards						
in cross-border tourist products and services						
and sustainable use of culture and tourist						
potentials of the border regions			 	 		
The action supports climate mitigation in the use of green concepts and standards in tourist products, but						
is not expected to lead to increased risks of climate-change related disasters, adverse impacts on good status						
of surface or groundwater bodies or lead to the increase in the emissions of pollutants or deterioration of						

#### 3. ASSESSMENT FINDINGS

The analysis shows that the Programme was developed with the purpose of stimulating regional growth in the Programme territory in conformity with the global policies regarding the issues of climate change mitigation and adaptation solutions, but of low contribution to other environmental objectives. It is understandable since the Programme supports mostly non-structural cooperation actions with small-scale infrastructure development, focusing mostly on integration of new technologies and digitalization across sectors, change of behaviour, capacity building and education.

ecosystems. Any potential risks to water status will be evaluated and addressed, as well as significant

increase in emissions or potential risks to the good condition or resilience of ecosystems.

Likelihood of adverse impact occurrence is therefore low, and may be mitigated or completely avoided through application of protection measures proposed by the SEA, and mitigation measures resulting from this analysis which sought to elaborate on the description of actions in sufficient detail to ensure that they are DNSH compatible. The said mitigation measures have been also been integrated in the SEA findings.

Participating countries are responsible for implementation of the said principle not only during programming, but also during the implementation of the approved Programme. This assessment therefore also provides more in-depth guidelines for screening of individual project proposals, which may be used by participating countries in verification of their compliance with the DNSH principle and EU environmental law. Participating countries will therefore conduct further assessment at project level and will select for implementation only those operations that fully fall within the scope of the

Programme actions elaborated in conformity with the results of the SEA and this assessment and these additional screening criteria.

Environmental Impact Assessment has to be carried out in accordance with the EU Directives and national legislation, as well as Appropriate Assessment in compliance with the provisions of the EU Biodiversity Strategy, The Birds and Habitats Directives and applicable national legislation for sites at or near NATURA 2000 network.

#### 4. PROPOSAL OF TECHNICAL CRITERIA TO BE IMPLEMENTED AT PROJECT LEVEL

Apart from protection and enhancement measures integrated in the Programme for the purpose of mitigating likely negative impacts on the environment, i.e. SEA objectives formed as a result of the SEA procedure, the measures undertaken to avoid any significant harm to environmental objectives as per Taxonomy Regulation, and observance of applicable national regulations and environmental procedures, which ensure environmental sustainability and compliance of the Programme, there is a possibility to include a set of technical measures at tender and project development level which will ensure compliance of the applied solutions with the Taxonomy Regulation, screen out potentially ineligible projects and facilitate their funding.

The applicable technical criteria to be considered in the project screening phase are given in the Table below:

#### **Table 2**. Environmental protection and enhancement measures at project screening level

Programme Priority	SPECIFIC OBJECTIVES	Proposed measures and guidelines regarding the further implementation of the Programme
P1 - Smart investments in research, innovation and competitive entrepreneurship	SO 1.1 - Developing and enhancing research and innovation capacities and the uptake of advanced technologies	<ol> <li>Only solutions corresponding to the best performance in the sector or industry will be supported by the Programme. (1, 2)</li> <li>The equipment used will not contain restricted substances exceeding maximum values. (2)</li> <li>Waste management plan will be adopted to ensure maximum recycling at the end of life of electrical and electronic equipment, including agreements with recycling partners which will be reflected in financial projections of offers. (2)</li> <li>The proposed technologies will belong on the low carbon technology list and will include applications to minimize resource consumption in other sectors (agriculture, food production, manufacture etc.). (3)</li> <li>Certification should be expanded to include proof of sustainably manufactured products or performed services. (4)</li> <li>Potential of products derived through the Programme should be assessed as well as their further use in supported economic sectors and certification. (4)</li> <li>Activities covered should result in production of low-carbon technologies. (4)</li> <li>For development status of the activity, Technology Readiness Level will apply. (7)</li> <li>Proven green solutions will include low carbon technology or will enable GHG emissions in other sectors by their implementation, use alternative fuels, generate or use renewable energy, and take into consideration transport emissions. (7)</li> <li>Digitalisation solutions should be directed towards data driven solutions of GHG emission reduction, and solutions for resource efficiency. (8)</li> </ol>
	SO 1.3 - Enhancing sustainable growth and competitiveness of SMEs and job creation in SMEs, including by productive investments	<ol> <li>The results of the activities or solutions brought to market proposed will have better performance than the best commercially available technologies and will result in overall net GHG emissions reduction over their life cycle. (1, 3, 4, 5, 7)</li> <li>The results deliver innovative technologies, processes and products that allow enabling activities substantially reducing their GHG emissions. (4, 5, 7)</li> <li>The researched technology will include patents not older than 10 years with information on its GHG</li> </ol>

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		<ul> <li>emissions, or permits obtained from competent authority for operation of the demonstration site providing the GHG emission reduction potential (5, 7)</li> <li>4. New and existing products and services will present proof of minimised energy use and carbon emissions throughout the lifecycle. (6)</li> <li>5. Established schemes as "green-building" certifications or EU building regulations and standards may be used as alternative proof of eligibility (6)</li> </ul>
P2 - Green investments in environmental protection and efficient risk management	SO 2.1 - Promoting energy efficiency and reducing greenhouse gas emissions	<ol> <li>As regards hydropower exploitation, future projects will involve change of technology, renovation and enhancement of the existing systems, while new hydropower plants are not supported by this Programme (S.O 2.1 – 8)</li> <li>At project level, ensure that experts and skilled operatives are selected for work on traditional buildings/cultural heritage and are included in both project development and implementation phase (S.O 2.1 – 3)</li> <li>Action should also include use of innovative technology for energy saving and necessary reinforcement or extension of the grid. (1)</li> <li>The equipment used will not contain restricted substances exceeding maximum values. (1)</li> <li>Waste management plan will be adopted to ensure maximum recycling at the end of life of electrical and electronic equipment, including agreements with recycling partners which will be reflected in financial projections of offers. (1)</li> <li>Integration of traditional energy sources will not be supported. (2)</li> <li>Green building certification is supported as alternative proof of eligibility of proposals. (2, 4, 6)</li> <li>Integration of RES will include climate change adaptation measures, taking into consideration weather events, flooding, resilience to future temperature increase, water consumption. (2, 4, 6)</li> <li>In adaptation to the use of RES, forest-derived products have to be considered, as well as sustainable material (2, 4)</li> <li>At least 80% of timber products used, have to be either recycled or reused or sourced from sustainably managed forests. (2, 6)</li> <li>Activities will also handle the problem of substances of high concern in building materials such as asbestos (2)</li> </ol>

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		<ol> <li>Water fittings will ensure maximum water flows for hand basins, showers, WCs and urinals thus ensuring sustainable use of water. (3)</li> <li>Where applicable, the action will assess the availability and use techniques that support reuse and use of secondary raw materials, high-durability design and recyclability, waste management that prioritises recycling over disposal and traceability of materials used. (3)</li> <li>At least 70% of non-hazardous construction and demolition waste generated at the construction site will be prepared for reuse, recycling and other material recovery, including backfilling using waste as substitute for other materials. (3)</li> <li>BATS will be implemented for removal and safe handling of hazardous substances. (3)</li> <li>All emissions will be assessed within environmental assessment procedures and will not exceed limit values. (8)</li> <li>Used biomass will not be derived from deforestation or forest degradation practices (8)</li> <li>Biomass derived from waste since is not supported since any activity leading to significant increase in incineration is not considered as eligible, and harms circular economy, for which reason waste biomass has to be omitted from the action. (8)</li> <li>High carbon stock land will not be converted for the purposes of agricultural production of crops. Biomass will not be derived from agricultural land that was converted from forest or pasture (8)</li> <li>Use of wind power will not include offshore generation as there are currently no applicable legal regulations or guidelines to be applied. (8)</li> <li>Measures directed to reduce adverse impacts on water and protected habitats and species dependent on water to be applied regard ensuring of downstream and upstream fish migration, minimum ecological flow and sediment flow, and habitat protection and enhancement measures. They are regularly identified and prescribed within Environmental Impact Assessments and Appropriate Assessments for developments a</li></ol>
		overriding public interest if necessary). In addition, compensatory measures are implemented to ensure restoration of continuity prior to execution of the project. (8)

Programme Priority	SPECIFIC OBJECTIVES	Proposed measures and guidelines regarding the further implementation of the Programme
		<ul> <li>24. Geothermal energy exploitation will comply with the measures for abatement of hazardous emissions and exceedance of limit values. (8)</li> <li>25. Programme shall support reuse and use of secondary raw materials and reused components, design for high durability, recyclability, waste management that prioritises recycling over disposal and traceability of substances and materials used. (8)</li> <li>26. Any location is covered with a waste management plan which ensures maximum reuse or recycling at the end of life in accordance with the waste hierarchy. (8)</li> <li>27. All activities will respect applicable norms and regulations to limit the impact of electromagnetic radiation on human health and will not use PCBs polychlorinated biphenyls. (8)</li> <li>28. All solutions should provide for storage of electricity (8)</li> </ul>
	SO 2.4 - Promoting climate change adaptation and disaster risk prevention, resilience, taking into account eco-system based approaches	<ol> <li>In order to identify physical climate risks, vulnerability assessment will be conducted through screening, vulnerability assessment and assessment of adaptation solutions that can reduce identified physical climate risks (1, 2, 5, 8, 9, 11)</li> <li>In assessing vulnerability and selection of adaptation solutions, the most recent climate data will be used. (1, 2, 5, 8, 9, 11)</li> <li>Action should also comprise non-life insurance activities against climate related hazards as an important part of adaptation measures. (2, 5, 7)</li> <li>Climate proofing will also ensure elimination of traditional harmful practices with long-term positive effects on the biodiversity. (6, 7)</li> <li>In view of natural heritage sites, include building resilience of forests to climate change and maintain forest carbon stocks and sinks, including afforestation, reforestation, restoration/rehabilitation etc. (8)</li> <li>Leakage level will be calculated across the extent of water supply network where the works are carried out. (9)</li> <li>Construction, extension and operation of water collection, treatment and supply will comply with technical criteria for energy consumption (9)</li> <li>Renewal of water supply will contibute to climate change mitigation through reduction of average energy consumption by at least 20%, including abstraction and treatment and by reducing leakage</li> </ol>
		<ul><li>level by at least 20%. (9)</li><li>9. Direct GHG emissions assessment will be performed for every construction and extension of a WWTP or WWTP with a collection system (9)</li></ul>



Programme Priority	SPECIFIC OBJECTIVES	Proposed measures and guidelines regarding the further implementation of the Programme
	SO 2.6 - Promoting the transition to a circular and resource efficient economy	<ol> <li>Wastewater treated for use in agricultural irrigation will be subject to risk management actions and measures to avoid adverse environmental impacts. (9)</li> <li>Any discharges to natural receptors will be in accordance with national provisions and maximum permissible pollutant levels. (9)</li> <li>Excessive storm water overflows from waste water collection systems, separate storm water collection systems, retention tanks etc. will be avoided by appropriate measures, preferring nature-based solutions. (9)</li> <li>Activities should use residues and by-products of the production of crops to reduce demand for primary resources. It also enables use of renewable energy. Crops which are less susceptible to climate-related changes (temperature, moisture.) should be used, as well as irrigation systems implemented. (10)</li> <li>Activities covered should include building resilience of forests to climate change and maintain forest carbon stocks and sinks, including "greening activities" such as afforestation, reforestation, restoration/rehabilitation of degraded forests, sustainable forest management etc. (10)</li> <li>Only operations which maintain or increase the existing carbon stocks and maintain or improve the capacity of forests to deliver multiple services will be supported. Climate mitigation enabling activities to be supported include forest-based products (such as wood-based raw materials). (10)</li> <li>Waste fractions will not be mixed in waste storages and transfer facilities with other waste or material of different properties and will be separately collected. (1, 3, 4)</li> <li>Anaerobic digestion of sewage sludge with the resulting production of biogas or chemicals will be accompanied with monitoring and contingency plans for minimization of materials of thertilisers. (1)</li> <li>Facilities for compositing of separately collected biowaste with the resulting production and use of compost as fertiliser owill comply with the EU Directives regulating the use of</li></ol>

Programme Priority	SPECIFIC OBJECTIVES	Proposed measures and guidelines regarding the further implementation of the Programme
		7. Industrial waste within this programme will refer to industrial biodegradable waste. The action should also cover construction waste. (4)
P3 - Accessible and resilient health services	SO 4.5 - Ensuring equal access to health care and fostering resilience of health systems, including primary care, and promoting the transition from institutional to family-and community-based care	1. Digitalisation solutions should be directed towards data driven solutions of GHG emission reduction, and solutions for resource efficiency. (1)
P4 - Sustainable and inclusive tourism and culture	SO 4.6 - Enhancing the role of culture and sustainable tourism in economic development, social inclusion and social innovation	1. Implementation of actions must be done with precaution and implemented mitigation measures regarding SEA objectives, especially regarding water quality, protection of biodiversity, landscape values and sustainable waste management (S.O $4.6 - 1$ ) 2. Projects must include a preliminary site analysis – contextual environmental analysis that will ensure appropriate implementation of projects into the landscape and cultural heritage, a suitability assessment towards the environment, climate risk assessment and other expert documents as seen in good practice globally (S.O $4.6 - 1$ ) 3. For each tourism product, a management plan for sustainable implementation should be developed to ensure sustainable use of resources, circular economy, minimal impact on environment, social contribution, etc (S.O $4.6 - 5$ ) 5. The compliance with national legislation and waste management strategies and plans is a minimum requirement. (1, 3, 4, 5) 6. Adaptation measures should take into consideration physical strengthening to extreme weather events, and increase of safety, future increase of temperature, floods, monitoring and forecasting, waterproofing, and green infrastructure and green solutions in urban areas. (7)