

INTERREG VI-A ROMANIA-BULGARIA PROGRAMME

DO NO SIGNIFICANT HARM

A detailed analysis of the types of actions included in the Interreg VI-A Romania-Bulgaria Programme carried out. Thus, the types of actions have been assessed as compatible with the DNSH principle since they are not expected to have any significant negative environmental impact due to their nature.

According to Article 17 of the Taxonomy Regulation¹, taking into account the life cycle of the products and services provided by an economic activity, including evidence from existing life-cycle assessments, that economic activity shall be considered to significantly harm.

This Article defines what constitutes ‘significant harm’ for the six environmental objectives² covered by the Taxonomy Regulation:

- 1) An activity is considered to do significant harm to climate change mitigation if it leads to significant greenhouse gas (GHG) emissions;
- 2) An activity is considered to do significant harm to climate change adaptation if it 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) An activity is considered to do significant harm to the sustainable use and protection of water and marine resources if it 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) An activity is considered to do significant harm to the circular economy, including waste prevention and recycling, if it leads to significant inefficiencies in the use of materials or in the direct or indirect use of natural resources, or if it significantly increases the generation, incineration or disposal of waste, or if the long-term disposal of waste may cause significant and long-term environmental harm;
- 5) An activity is considered to do significant harm to pollution prevention and control if it leads to a significant increase in emissions of pollutants into air, water or land;
- 6) An activity is considered to do significant harm to the protection and restoration of biodiversity and ecosystems if it is significantly detrimental to the good condition and resilience of ecosystems, or detrimental to the conservation status of habitats and species, including those of Union interest.

This shall be achieved by assessing the types of actions defined in the programme with respect to their potential to do significant harm to the environmental objectives.

The evaluation of the Interreg VI-A Programme to establish compatibility with the DNSH principle will be done in two steps:

Step 1: Filter the six environmental objectives to identify those that require a substantive assessment

A checklist will be completed to identify which environmental objective (s) of the 6 require a substantive assessment of the measures according to the DNSH principle, and the reason why a substantive assessment of the measures is not required will also be motivate.

¹ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:32020R0852>

² Commission explanatory note APPLICATION OF THE “DO NO SIGNIFICANT HARM” PRINCIPLE UNDER COHESION POLICY. EGESIF_21-0025-00 27/09/2021

Methodology: The table below describes the 6 environmental objectives and their coding, based on which all types of actions of the programme are evaluated.

Table no. 1 Environmental objectives - DNSH principle

Codes	Environmental objectives
DNSH 1	Climate change mitigation
DNSH 2	Climate change adaptation
DNSH 3	The sustainable use and protection of water and marine resources
DNSH 4	The circular economy, including waste prevention and recycling
DNSH 5	Pollution prevention and control to air, water or land
DNSH 6	The protection and restoration of biodiversity and ecosystems

Step 2: Provide a substantive DNSH assessment for those environmental objectives that require it

As a second step, for each measure of the plan to perform a substantive DNSH assessment for those environmental objectives selected with a 'yes' under Step 1. Part 2 of the checklist compiles, for each of the six objectives, the questions corresponding to the legal requirements of the DNSH assessment.

It is necessary to confirm that the answer is 'no' and to provide a substantive explanation and justification for their reasoning based on the appropriate questions.

Methodology: Carrying out a DNSH background assessment for those environmental objectives that require it. For each action the below questions will be answered (for those environmental objectives identified in Part 1 as requiring a substantive assessment, where the answer was "yes").

Table Error! No text of specified style in document.-1 Substantive DNSH assessment - Questions

Codes	Question
Q 1	Climate change mitigation: Is the measure expected to lead to significant GHG emissions?
Q 2	Climate change adaptation: Is the measure expected to lead to an increased adverse impact of the current climate and the expected future climate, on the measure itself or on people, nature or assets?
Q 3	The sustainable use and protection of water and marine resources: Is the measure expected to be detrimental: (i) to the good status or the good ecological potential of bodies of water, including surface water and groundwater; or (ii) to the good environmental status of marine waters?
Q 4	The transition to a circular economy, including waste prevention and recycling: Is the measure expected to: (i) lead to a significant increase in the generation, incineration or disposal of waste, with the exception of the incineration of non-recyclable hazardous waste; or (ii) lead to significant inefficiencies in the direct or indirect use of any natural resource ³ at any stage of its life cycle which are not

³ Natural resources comprise energy, materials, metals, water, biomass, air and land.



	minimized by adequate measures ⁴ ; or (iii) cause significant and long-term harm to the environment in respect to the circular economy ⁵
Q 5	Pollution prevention and control: Is the measure expected to lead to a significant increase in the emissions of pollutants ⁶ into air, water or land?
Q 6	The protection and restoration of biodiversity and ecosystems: Is the measure expected to be: (i) significantly detrimental to the good condition and resilience of ecosystems ⁷ ; or (ii) detrimental to the conservation status of habitats and species, including those of Union interest?

⁴ For instance, inefficiencies can be minimized by significantly increasing the durability, reparability, upgradability and reusability of products or by significantly reducing resources through the design and choice of materials, facilitating repurposing, disassembly and deconstruction, in particular to reduce the use of building materials and promote the reuse of building materials. Additionally, transitioning to ‘product-as-a-service business models and circular value chains with the aim of keeping products, components and materials at their highest utility and value for as long as possible. This also comprises a significant reduction in the content of hazardous substance in materials and products, including by replacing them with safer alternatives. This further includes significantly reducing food waste in the production, processing, manufacturing or distribution of food

⁵ Please refer to Recital 27 of the Taxonomy Regulation for more information on the circular economy objective

⁶ Pollutant means a substance, vibration, heat, noise, light or other contaminant present in air, water or land which may be harmful to human health or the environment.

⁷ In line with Article 2(16) of the Taxonomy Regulation, “‘good condition’ means, in relation to an ecosystem, that the ecosystem is in good physical, chemical and biological condition or of a good physical, chemical and biological quality with self-reproduction or self-restoration capability, in which species composition, ecosystem structure and ecological functions are not impaired”.

Priority 1 A well connected region

SO 3.2 Developing and enhancing sustainable, climate resilient, intelligent and intermodal national, regional and local mobility, including improved access to TEN-T and cross-border mobility

A1	<p>Actions enhancing rail connectivity and mobility across the Danube</p> <ul style="list-style-type: none"> - Elaboration of feasibility studies for the electrification and digitalization of the railway infrastructure; - Designing and implementing sustainable transport tools and solutions for better connectivity and mobility in the cross-border area, for the railway transport, including, but not limited to: safety, territorial deployment, reliability, efficiency, real-time knowledge of schedules, traffic and ticketing etc.; - Identifying and addressing the missing links and bottlenecks in rail and river crossing infrastructure: studies, strategies, joint solutions, joint tools etc.; - Improving and expanding rail transport: studies regarding traffic safety, awareness campaigns, connectivity/mobility studies for understanding freight and passenger flows, commuting etc.; - Designing and implementing integrated solutions for supporting mobility and connectivity in time of crisis; - Designing and implementing sustainable transport solutions for better connectivity and mobility in the area; - Modernization, upgrading and expanding the rail infrastructure: <ul style="list-style-type: none"> • Works for railway modernization (including electrification of the railway lines and introduction of the ERTMS / ETCS railway signaling system); • Works for modernization, reconstruction and construction of railway stops and stations.
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Please indicate which of the environmental objectives below require a substantive DNSH assessment of the measure	Yes	No	Justification if 'No' has been selected
Climate change mitigation		x	It is estimated that the set of actions will not have a significant foreseeable impact on the environmental objective of climate change mitigation, taking into account both the direct effects during implementation and the indirect primary effects over the lifetime of the investment. The process of modernizing and electrifying the railway line will help mitigate the effects of climate change by providing an environmentally friendly transport option. The use of electricity in the transport sector is being promoted and can therefore be seen as an investment that will support the transition to a climate-neutral economy.
Climate change adaptation	x		
The sustainable use and protection of water and marine resources	x		
The circular economy, including waste prevention and recycling	x		
Pollution prevention and control to air, water or land	x		
The protection and restoration of biodiversity and ecosystems	x		

Questions	No	Substantive justification
<p><i>Climate change adaptation:</i> Is the measure expected to lead to an increased adverse impact of the current climate and the expected future climate, on the measure itself or on people, nature or assets?</p>	x	<p>Climate change can lead to a number of changes in weather conditions that could affect both the design and modernization of the railway line and its operation.</p> <p>Mainly, railway infrastructure projects are sensitive to the following climate risks:</p> <ul style="list-style-type: none"> - High temperatures during the summer, with possible effect on the deformation of the lines, the wear of the rolling stock, the increased instability of the embankments, the overheating of the rolling stock; - Low winter temperatures / ice, with possible effect on catenary freezing; - Extreme rainfall: infrastructure damage due to floods and / or landslides, washing of structures, destabilization of land; - Extreme storms: damage to signaling infrastructure, power cables, etc. <p>Climate change adaptation is part of the project preparation process, as well as part of the EIA assessment. As a result, adaptation measures are incorporated in the projects to be implemented.</p>
<p><i>The sustainable use and protection of water and marine resources:</i> Is the measure expected to be detrimental:</p> <p>(i) to the good status or the good ecological potential of bodies of water, including surface water and groundwater; or</p> <p>(ii) to the good environmental status of marine waters?</p>	x	<p>During the EIA procedures for the proposed projects, if requested by the legal provisions, the environmental competent authorities will decide if an impact assessment on water bodies will be necessary. Considering the types of actions included in the programme, it is not likely that they will lead to a potential significant impact on surface and/or groundwater bodies.</p> <p>Considering that the set of actions will mainly involve electrification and modernization works on the existing infrastructure, it is considered that the implementation and operation of the works will not lead to the deterioration of water bodies status and/or will not prevent the improvement of water bodies status, in accordance with the provisions of Directive 2000/60/EC establishing a framework for Community action in the field of water policy.</p> <p>At the stage of execution works, the constructors will be imposed conditions so as to exclude any possibility of adverse effects on environmental factors and, in particular, on water, soil and subsoil, air. Good management of the works, the provision of clear management measures for all materials used, proper storage, in accordance with specific rules, regular training of all workers on site will ensure the elimination of the negative effects.</p>

Questions	No	Substantive justification
<p><i>The transition to a circular economy, including waste prevention and recycling:</i> Is the measure expected to:</p> <p>(i) lead to a significant increase in the generation, incineration or disposal of waste, with the exception of the incineration of non-recyclable hazardous waste; or (ii) lead to significant inefficiencies in the direct or indirect use of any natural resource at any stage of its life cycle which are not minimized by adequate measures; or (iii) cause significant and long-term harm to the environment in respect to the circular economy</p>	x	<p>It is estimated that construction and installation waste will come from the following stages:</p> <ul style="list-style-type: none"> - in the construction stage; - during the operation stage; - at the end of the lifetime of the project. <p>The waste management at all stages will be carried out in line with the objectives of reducing the amount of waste generated and maximizing reuse and recycling, respectively in line with the objectives of the general waste management framework at national level (according to Romanian and Bulgarian legislation). The waste records will be kept in accordance with national laws.</p> <p>With regard to recoverable waste resulting from the execution of the works, the constructors shall ensure that at least 70% (by weight) of non-hazardous waste from construction and demolition (excluding natural materials as defined in category 17 05 04 - earth and gravel other than those referred to in category 17 05 03 of the European list of wastes established by Commission Decision 2000/532/EC) and generated on site will be prepared or sorted for reuse, recycling and other material recovery operations, including landfill operations using waste to replace other materials, in accordance with the waste hierarchy and the EU Protocol on Construction and Demolition Waste Management.</p> <p>During the operation stage, waste from maintenance activities will be primarily related to current repairs to signaling equipment, telecommunications, electrification and the railway itself and will generate mostly metal waste, broken stone and wood, which will be managed similarly to waste generated during the construction period. Also, the waste resulting from the activities to be carried out in the railway stations will be separately collected, recycled, recovered or disposed of at authorised facilities, and contracts will be concluded with authorized operators.</p> <p>The proposed types of actions will not lead to a significant increase in the generation, incineration or disposal of waste and will not prevent the objectives related to the circular economy.</p>
<p><i>Pollution prevention and control:</i> Is the measure expected to lead to a</p>	x	<p>The electrification of railway has a direct contribution to decrease the pollutants emissions resulting from transportation infrastructure.</p>

Questions	No	Substantive justification
significant increase in the emissions of pollutants into air, water or land?		<p>Where appropriate, taking into account the sensitivity of the affected area, in particular as regards the size of the affected population, noise and vibration generated by the use of the infrastructure shall be mitigated by the introduction of sound absorbing panels or other measures and shall comply with Directive 2002/49/EC.</p> <p>Measures shall be taken also to reduce noise, dust and pollutant emissions during construction or maintenance works.</p>
<p><i>The protection and restoration of biodiversity and ecosystems:</i> Is the measure expected to be:</p> <p>(i) significantly detrimental to the good condition and resilience of ecosystems; or</p> <p>(ii) detrimental to the conservation status of habitats and species, including those of Union interest?</p>	x	<p>Once the railway lines that will be subjected to the electrification process will be known, the impact of the works on the protected natural areas will be analysed, according to the legislation in force in Romania and Bulgaria.</p> <p>As the works envisaged in this investment project will be carried out on the current railway site, it is expected that the construction works will not affect: arable land and cultivated land with a moderate to high level of soil fertility and underground biodiversity, land that is recognized as having a high biodiversity value and land that serves as a habitat for community and/or national interest species (flora and fauna), forest land (whether or not covered by trees).</p> <p>The modernization works may lead to an increased risk for collision and electrocution for wildlife, particularly birds. Measures to avoid and reduce the risk for collision and electrocution will be implemented, particularly in the areas where Natura 2000 sites and species are most likely to be affected. Such measures will also be implemented in areas where ecological corridors are intersected by railway infrastructure.</p>

The types of actions have been assessed as compatible with the DNSH principle, since they have been assessed as compatible under the RRF DNSH technical guidance.

A2	<p>Actions improving the navigation conditions and safety on the Danube and Black Sea in order to enhance the mobility and connectivity in the cross-border area</p> <ul style="list-style-type: none"> - Reducing administrative burden and other types of bottlenecks: studies, analyses, solutions, tools; - Developing and implementing joint co-ordinated strategies, tools and pilot applications to improve the navigation conditions on Danube and Black Sea (e. g, joint feasibility studies, engineering planning documents, morphological and hydrodynamic studies in establishing the sediment accumulation conditions etc.); - Developing and implementing integrated measures to improve the navigation conditions for the common sector of the Danube and the Black Sea in the cross-border area (e.g., integrating the marking systems on Danube, equipment, signaling etc.).
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Please indicate which of the environmental objectives below require a substantive DNSH assessment of the measure	Yes	No	Justification if 'No' has been selected
Climate change mitigation		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.
Climate change adaptation		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.
The sustainable use and protection of water and marine resources	x		

Please indicate which of the environmental objectives below require a substantive DNSH assessment of the measure	Yes	No	Justification if 'No' has been selected
The circular economy, including waste prevention and recycling		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.
Pollution prevention and control to air, water or land		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.
The protection and restoration of biodiversity and ecosystems	x		

Questions	No	Substantive justification
<p><i>The sustainable use and protection of water and marine resources:</i> Is the measure expected to be detrimental:</p> <p>(i) to the good status or the good ecological potential of bodies of water, including surface water and groundwater; or</p> <p>(ii) to the good environmental status of marine waters?</p>	x	<p>The proposed signaling works are not expected to lead to the deterioration of the surface and groundwater bodies or marine water status, as they do not require extensive construction works and they do not involve discharges into the water bodies. They will also not affect water protection areas. The interventions will not generate accidental spills that could affect the water bodies status, nor the quality of drinking water or bathing water.</p>

Questions	No	Substantive justification
<p><i>The protection and restoration of biodiversity and ecosystems:</i> Is the measure expected to be:</p> <p>(i) significantly detrimental to the good condition and resilience of ecosystems; or</p> <p>(ii) detrimental to the conservation status of habitats and species, including those of Union interest?</p>	x	<p>Navigation can have negative impacts on Danube’s biodiversity, particularly on rare species and species with reduced populations. However, all interventions will be implemented in accordance with the legal requirements, set by:</p> <ul style="list-style-type: none"> • conducting the EIA procedure, if requested by the legal provisions; • implementing all the measures required by the Management plans of the Natura 2000 sites potentially affected by the projects. <p>No dredging or hydrotechnical works will be implemented..</p>

The types of actions have been assessed as compatible with the DNSH principle, since they have been assessed as compatible under the RRF DNSH technical guidance.

Priority 2 A greener region

SO 2.4. Promoting climate change adaptation and disaster risk prevention, resilience, taking into account ecosystem-based approaches

A3	<p>The disaster risk prevention and resilience taking into account ecosystem-based approaches</p> <ul style="list-style-type: none"> - Improving risk prevention and intervention capacity in the cross-border region, by developing joint operational centers and joint intervention plans; - Increasing the capacity of intervention and reaction through investments in equipment and vehicles, IT systems etc.; - Developing common training curricula and deployment of joint exercises, including the voluntary response services; - Improving cross-border coordination and capacity for adaptation to climate change and its associated risks (floods, fires, hydrological droughts, pollution); - Developing joint methodologies for risk assessment and risk monitoring in the cross-border area (risk of floods, including torrential floods, risk of drought).
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Please indicate which of the environmental objectives below require a substantive DNSH assessment of the measure	Yes	No	Justification if 'No' has been selected
Climate change mitigation		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.
Climate change adaptation		x	<p>The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.</p> <p>The proposed set of actions contributes directly to climate change adaptation by enforcing the capacity for intervention for climate change associated risks.</p>
The sustainable use and protection of water and marine resources		x	<p>The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.</p> <p>The actions propose interventions aiming at increasing intervention capacity, developing training curricula and joint methodologies for risk assessment and therefor with little or no effects on water bodies.</p>
The circular economy, including waste prevention and recycling		x	<p>The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.</p> <p>The actions propose interventions aiming at increasing intervention capacity, developing training curricula and joint methodologies for risk assessment with insignificant contribution to waste generation.</p>

Please indicate which of the environmental objectives below require a substantive DNSH assessment of the measure	Yes	No	Justification if 'No' has been selected
Pollution prevention and control to air, water or land		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective. The proposed action cannot lead to significant pollution sources and emission.
The protection and restoration of biodiversity and ecosystems		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.

The types of actions have been assessed as compatible with the DNSH principle, since they are not expected to have any significant negative environmental impact due to their nature.

A4	<p>Climate change adaptation actions (Ecosystem-based disaster risk reduction (Eco-DRR) solutions)</p> <ul style="list-style-type: none"> - Supporting behavioural change, by raising awareness, building networks of communities and stakeholders and implementing educational activities on how to adapt to the negative effects of the climate change, especially among the local communities, the tourism sectors and forest owners; - Developing joint methods and tools to improve the planning, decision-making and intervention capacity of relevant stakeholders, including public engagement, in the adaptation to climate change (e.g., identification, assessment of needs, designing and implementing joint cross-border strategies, action plans, procedures, methodologies, policies, tools, monitoring systems etc.); - Developing methods and tools to support adaptation planning and decision-making on climate change adaptation measures;
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	<ul style="list-style-type: none"> - Identifying, assessing and reducing the negative implications of climate change on socio-economic activities in the area (e.g., development and implementation of joint strategies, tools, plans, solutions, joint support activity); - Implementing joint ecosystem-based measures for climate change adaptation, for example: <ul style="list-style-type: none"> o Reforestation, conservation and forest protection measures, including implementing community-based forest monitoring systems related to climate change; o Preventing and reversing desertification through integrated management of land and water (e.g., protecting the vegetative cover, planting trees, establishing seed banks, enriching the soil with nutrients, reintroducing selected species, building green "buffer areas"); o Supporting water and land management through green solutions (for example: swales, creek restoration and nature scaping, green solutions for drainage systems, naturalized storm-water ponds, etc.).
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Please indicate which of the environmental objectives below require a substantive DNSH assessment of the measure	Yes	No	Justification if 'No' has been selected
Climate change mitigation		x	The action contributes to the environmental objective, pursuant to the Taxonomy Regulation, and as such is considered compliant with DNSH for the relevant objective.
Climate change adaptation		x	The action contributes substantially to the environmental objective, pursuant to the Taxonomy Regulation, and as such is considered compliant with DNSH for the relevant objective.
The sustainable use and protection of water and marine resources		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.

Please indicate which of the environmental objectives below require a substantive DNSH assessment of the measure	Yes	No	Justification if 'No' has been selected
The circular economy, including waste prevention and recycling		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.
Pollution prevention and control to air, water or land		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.
The protection and restoration of biodiversity and ecosystems		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.

The types of actions have been assessed as compatible with the DNSH principle, since they are not expected to have any significant negative environmental impact due to their nature.

Priority 2 A greener region

SO 2.7. Enhancing protection and preservation of nature, biodiversity and green infrastructure, including in urban areas, and reducing all forms of pollution

A5	<p>Reducing all types of pollution by supporting investments in monitoring and data collection on air, soil and water pollution</p> <p>Improving pollution control by supporting investments in monitoring and data collection on air, soil and water pollution, particularly in urban areas, including through setting up tools for measuring the air, soil and water quality and providing real-time data (e.g., networks of sensors and applications and platforms to allow reporting by the public).</p>
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Please indicate which of the environmental objectives below require a substantive DNSH assessment of the measure	Yes	No	Justification if 'No' has been selected
Climate change mitigation		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.
Climate change adaptation		x	The measure has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.
The sustainable use and protection of water and marine resources		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.
The circular economy, including waste prevention and recycling		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the action across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.
Pollution prevention and control to air, water or land		x	The action contributes substantially to the environmental objective, pursuant to the Taxonomy Regulation, and as such is considered compliant with DNSH for the relevant objective.
The protection and restoration of biodiversity and ecosystems		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the action across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective

The types of actions have been assessed as compatible with the DNSH principle, since they are not expected to have any significant negative environmental impact due to their nature.

A6	<p>Supporting the development of green infrastructures, including by developing and protecting green areas in human settlements and raising awareness of the benefits of green spaces</p> <p>Protection and restoration of nature and biodiversity, located within and near settlements through appropriate joint solutions, including through the creation of ecological corridors, new green bridges, access eco- passages, / green infrastructure, etc.or ecoducts, etc. to reconnect artificially fragmented natural areas;</p> <ul style="list-style-type: none"> - Developing green infrastructures and supporting biodiversity and protecting nature in human settlements, including by: roofing and facade greening, gardening, promoting green eco-friendly solutions for replacing pesticides and herbicides in urban areas etc.; - Developing green areas, including connections between green spaces (urban parks, green sport facilities, forests, riverbank greens).
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Please indicate which of the environmental objectives below require a substantive DNSH assessment of the measure	Yes	No	Justification if 'No' has been selected
Climate change mitigation		x	The action contributes to the environmental objective, pursuant to the Taxonomy Regulation, and as such is considered compliant with DNSH for the relevant objective.
Climate change adaptation		x	The action contributes to the environmental objective, pursuant to the Taxonomy Regulation, and as such is considered compliant with DNSH for the relevant objective.
The sustainable use and protection of water and marine resources		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the action across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.
The circular economy, including waste prevention and recycling		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the action across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.

Please indicate which of the environmental objectives below require a substantive DNSH assessment of the measure	Yes	No	Justification if 'No' has been selected
Pollution prevention and control to air, water or land		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the action across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.
The protection and restoration of biodiversity and ecosystems		x	The action contributes substantially to the environmental objective, pursuant to the Taxonomy Regulation, and as such is considered compliant with DNSH for the relevant objective.

The types of actions have been assessed as compatible with the DNSH principle, since they are not expected to have any significant negative environmental impact due to their nature.

A7	<p>Enhancing biodiversity conservation, recovery and sustainable use and protection of natural heritage, including Natura 2000 and RAMSAR sites</p> <ul style="list-style-type: none"> - Promoting, facilitating and encouraging citizens engagement in protecting biodiversity, including its conservation and sustainable use; - Conservation of biodiversity and habitats through application of best practices from government agencies, research institutes, non-governmental organizations, as well as active participation of civil society; - Supporting data collection and information sharing in respect to biodiversity between the two sides of the border; <p>Joint evaluation, enhancement and promotion of ecosystem services on local and regional level in a cross-border context;</p> <ul style="list-style-type: none"> - Developing ecosystem services to support biodiversity and reduce pollution; - Sharing good practices and implementing eco-friendly and innovative solutions that address invasive alien species and strengthen sustainable environment management practices (e.g., pollinator-friendly management, management of water bodies, forests etc.);
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	<ul style="list-style-type: none"> - Supporting the establishment of seed banks, restocking of soil organic matter and organisms that promote higher plant establishment and growth, and reintroduction of selected species; - Raising awareness of the benefits of green spaces, including in urban areas, encouraging local actions for greener settlements and rehabilitation of brownfields, driving behavioural change in respect to enhancing nature and biodiversity protection and preservation, and reducing pollution.
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Please indicate which of the environmental objectives below require a substantive DNSH assessment of the measure	Yes	No	Justification if 'No' has been selected
Climate change mitigation		x	The actions are compatible with the DNSH principle, as it contributes to climate change mitigation.
Climate change adaptation		x	The actions are compatible with the DNSH principle, because alternatives are offered and help to adapt to the effects of climate change.
The sustainable use and protection of water and marine resources		x	There is no incompatibility with the DNSH principle. Actions contribute to increasing and retaining rainwater in cities, as well as reducing the contamination of water bodies with pesticides and herbicides.
The circular economy, including waste prevention and recycling		x	The implementation of the set of actions will not adversely affect the environment objective of the transition to the circular economy, including the prevention and recycling of waste.
Pollution prevention and control to air, water or land		x	The set of actions is compatible with the DNSH principle. Actions make a positive contribution to pollution prevention and control.
The protection and restoration of biodiversity and ecosystems		x	The set of actions is compatible with the DNSH principle contributing to the protection and the restoration of biodiversity and ecosystems.

The types of actions have been assessed as compatible with the DNSH principle, since they are not expected to have any significant negative environmental impact due to their nature.

Priority 3 An educated region

SO 4.2. Improving equal access to inclusive and quality services in education, training and lifelong learning through developing accessible infrastructure, including by fostering resilience for distance and on-line education and training

A8	<ul style="list-style-type: none"> - Development of extensive and structured language-learning schemes, as a vector for building trust across the border, for creating the basis for future exchanges and also as an employment-boosting factor; - Development of joint cross-border education and training schemes - on-site in areas where accessibility is not a hindrance or online, using digitized learning tools and methods, if physical presence is not an option.
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Please indicate which of the environmental objectives below require a substantive DNSH assessment of the measure	Yes	No	Justification if 'No' has been selected
Climate change mitigation		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.
Climate change adaptation		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.
The sustainable use and protection of water and marine resources		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.
The circular economy, including waste prevention and recycling		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.

Please indicate which of the environmental objectives below require a substantive DNSH assessment of the measure	Yes	No	Justification if 'No' has been selected
Pollution prevention and control to air, water or land		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.
The protection and restoration of biodiversity and ecosystems		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.

The types of actions have been assessed as compatible with the DNSH principle, since they are not expected to have any significant negative environmental impact due to their nature.

A9	<ul style="list-style-type: none"> - Development of cross-border internship or placements and student exchange programmes for young graduates/students; - Development of joint initiatives supporting adult education and learning (LLL), including facilitating learning mobility; - Development of partnerships between secondary and higher education establishments and businesses, in order to improve the market orientation and the quality aspect of education and offer young students the possibility to train and/or study on the other side of the border. Long-term exchanges are particularly envisaged.
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Please indicate which of the environmental objectives below require a substantive DNSH assessment of the measure	Yes	No	Justification if 'No' has been selected
Climate change mitigation		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.
Climate change adaptation		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.
The sustainable use and protection of water and marine resources		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.
The circular economy, including waste prevention and recycling		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.
Pollution prevention and control to air, water or land		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.
The protection and restoration of biodiversity and ecosystems		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.

The types of actions have been assessed as compatible with the DNSH principle, since they are not expected to have any significant negative environmental impact due to their nature.

A10	<ul style="list-style-type: none"> - Development of partnerships between education and training institutions and stakeholders, at all education levels (early to tertiary), to support mutual learning and exchange of practices between teachers and trainers on both sides of the border; - Development of joint initiatives and actions to support access to quality inclusive education and training, including LLL, to vulnerable or marginalized groups, including disabled persons, SEN ('Special educational needs' is a legal definition and refers to children with learning problems or disabilities that make it harder for them to learn than most children the same age), Roma ethnic group etc. - Joint measures for improving the link between the labour market and the education and training system.
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Please indicate which of the environmental objectives below require a substantive DNSH assessment of the measure	Yes	No	Justification if 'No' has been selected
Climate change mitigation		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.
Climate change adaptation		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.
The sustainable use and protection of water and marine resources		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.
The circular economy, including waste prevention and recycling		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.

Please indicate which of the environmental objectives below require a substantive DNSH assessment of the measure	Yes	No	Justification if 'No' has been selected
Pollution prevention and control to air, water or land		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.
The protection and restoration of biodiversity and ecosystems		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.

The types of actions have been assessed as compatible with the DNSH principle, since they are not expected to have any significant negative environmental impact due to their nature.

A11	<ul style="list-style-type: none"> - Investments in the infrastructure of educational facilities (e.g., learning spaces such as classrooms, labs, libraries, workshops, gyms, outdoor learning spaces but also other facilities) for all education levels and educational activities (including remedial and after-school), technical and vocational training and LLL etc.; special attention will be given to promoting accessible and inclusive learning for all persons; - Investments in ensuring proper endowment for joint learning facilities with focus on digitalization: equipment, tools, etc., especially those that support the development of practical and/or digital skills and remote learning, such as computers, videoconferencing/distance education equipment VR learning etc.
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Please indicate which of the environmental objectives below require a substantive DNSH assessment of the measure	Yes	No	Justification if 'No' has been selected
Climate change mitigation	x		
Climate change adaptation		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.
The sustainable use and protection of water and marine resources		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.
The circular economy, including waste prevention and recycling	x		
Pollution prevention and control to air, water or land		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.
The protection and restoration of biodiversity and ecosystems		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.

Questions	No	Substantive justification
<i>Climate change mitigation:</i> Is the measure expected to lead to significant GHG emissions?	x	During the implementation period of the investments in the educational infrastructure, all the legal provisions will be respected in order not to generate an increase in GHG emissions.

Questions	No	Substantive justification
		<p>The proposed investments focus on digitalization, thus using low-energy equipment, which contribute to GHG emissions reduction.</p> <p>The proposed actions do not have a significant negative impact on the environmental objective.</p>
<p><i>The transition to a circular economy, including waste prevention and recycling:</i></p> <p>Is the measure expected to: (i) lead to a significant increase in the generation, incineration or disposal of waste, with the exception of the incineration of non-recyclable hazardous waste; or (ii) lead to significant inefficiencies in the direct or indirect use of any natural resource at any stage of its life cycle which are not minimized by adequate measures; or (iii) cause significant and long-term harm to the environment in respect to the circular economy</p>	x	<p>The actions generate waste, but not in significant quantities. During the implementation and operation stages, the waste legislation (including the provisions for different waste streams) in force will be respected.</p>

The types of actions have been assessed as compatible with the DNSH principle, since they have been assessed as compatible under the RRF DNSH technical guidance.

Priority 4 An integrated region

SO 5.2 Fostering the integrated and inclusive social, economic and environmental local development, culture, natural heritage, sustainable tourism and security, in areas other than urban areas

A12	<p>Developing the EuroVelo 6 cycling route</p> <ul style="list-style-type: none"> - Developing the necessary cycling infrastructure, including safety measures, first aid and service points, signaling etc. Priority will be given to projects ensuring connection to tourist attractions - cultural, natural heritage sites and to other means of transport. Connecting infrastructure (incl. new reconstruction or modernization of relevant road sections) is also considered, , in duly justified cases and in line with the list of operations; - Ensuring road safety for the sections overlapping the EuroVelo Route, in view of complying with standards related to traffic signaling systems and/or additional development of infrastructure dedicated to cyclists and pedestrians, such as tunnels, bypasses, bridges, overpasses and walkways and protected cycling paths; - Ensuring effective connections with and access to and from other means of transport, including ports and rail stations - adapting infrastructure; - Ensuring availability of public transportation in connection to the cycling route; - Ensuring appropriate services along the EuroVelo Route, such as: accommodation, food, drink and rest and recreation areas, services including Bike Pit-Stops, information, bookable offers, other assistance; - Ensuring communication and information, online and along the route, including mobile/e-applications for cyclists, etc.
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Please indicate which of the environmental objectives below require a substantive DNSH assessment of the measure	Yes	No	Justification if 'No' has been selected
Climate change mitigation		x	Given that the set of actions supports climate change mitigation, it is compatible with the DNSH principle.

Please indicate which of the environmental objectives below require a substantive DNSH assessment of the measure	Yes	No	Justification if 'No' has been selected
Climate change adaptation	x		
The sustainable use and protection of water and marine resources		x	The set of actions does not have a significant foreseeable impact on the environmental objective. No risks of environmental degradation related to water quality protection and water stress are identified.
The circular economy, including waste prevention and recycling	x		
Pollution prevention and control to air, water or land		x	The implementation of the set of actions does not involve the generation of air, water and soil pollution.
The protection and restoration of biodiversity and ecosystems	x		

Questions	No	Substantive justification
<i>Climate change adaptation:</i> Is the measure expected to lead to an increased adverse impact of the current climate and the expected future climate, on the measure itself or on people, nature or assets?	X	The action will be implemented in different areas that could be vulnerable to various risks associated with the effects of climate change, which is why an analysis will be carried out to identify these areas. The actions involve improving mobility conditions leading to increased use of clean means of transport. The implementation will not lead to an increased adverse impact of the current climate and the expected future climate.
<i>The transition to a circular economy, including waste</i>	x	The implementation of the actions will not generate a significant quantity of waste.

Questions	No	Substantive justification
<p><i>prevention and recycling:</i> Is the measure expected to:</p> <ul style="list-style-type: none"> (iii) lead to a significant increase in the generation, incineration or disposal of waste, with the exception of the incineration of non-recyclable hazardous waste; or (ii) lead to significant inefficiencies in the direct or indirect use of any natural resource at any stage of its life cycle which are not minimized by adequate measures; or (iii) cause significant and long-term harm to the environment in respect to the circular economy 		<p>The applicable legislation in the field will be respected in all stages of the implementation of the action.</p> <p>Regarding the degree of use of natural resources, the actions may lead to changes in land use, but to a small extent.</p>
<p><i>The protection and restoration of biodiversity and ecosystems:</i> Is the measure expected to be: (i) significantly detrimental to the good condition and resilience of ecosystems; or (ii) detrimental to</p>	X	<p>EuroVelo 6 cycling route is intersecting several Natura 2000 sites. The route will be developed along the existing road infrastructure. The implementation of the action may lead to the occupation of small areas of natural habitats. Based on the legal requirements, an EIA procedure will be conducted for the proposed project. Within the EIA procedure, the potential impact on Natura 2000 will also be assessed in line with the Site-Specific Conservation Objectives of the Natura 2000 sites. The design of the project</p>

Questions	No	Substantive justification
the conservation status of habitats and species, including those of Union interest?		will incorporate avoidance mitigation measures in order to exclude any potential significant impacts on Natura 2000 sites.

The types of actions have been assessed as compatible with the DNSH principle, since they have been assessed as compatible under the RRF DNSH technical guidance.

A13	<p>Supporting tourism activities, connected sectors and industries</p> <ul style="list-style-type: none"> - Investments in economic competitiveness of local businesses including, but not limited to: construction/ modernization of productive facilities; supply of relevant equipment; adoption of digital technologies etc; - Set-up of natural sites for economic use: trails / paths, waste disposal, security, signaling, camp sites, other open-air attractions etc; - Supporting sites with tourist potential: construction, modernization/restauration of castles, fortresses, churches, monasteries, palaces, archaeological sites, private/public museums, libraries, art collections/galleries, exhibitions places, wineries, agro-farms (e.g.; lavender farms/fields; roses farms/fields, traditional oil factories, sheepfolds), adventure parks, open air attractions etc; - Creating common historical, natural and cultural heritage products and services, expanding and improving services, targeting new markets and creating jobs in the cross-border area, including by setting up on-site and on-line shops, especially for traditional / local products (local food, bread, wine, cheese, rose, lavender, honey etc.);, including the related tourist infrastructure, access and links to the tourist sites; - Support for local and regional actors to valorise potentially valuable touristic objectives /sites / experiences, including by creating sustainable tourism trails, or developing quality labels for excellence in services, promoting and marketing the touristic offer etc. taking advantage of social media trends - such as “insta-tourism”, is also encouraged; - Training of staff, particularly digital skills.
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Please indicate which of the environmental objectives below require a substantive DNSH assessment of the measure	Yes	No	Justification if 'No' has been selected
Climate change mitigation		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.
Climate change adaptation		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.
The sustainable use and protection of water and marine resources		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.
The circular economy, including waste prevention and recycling	x		
Pollution prevention and control to air, water or land	x		
The protection and restoration of biodiversity and ecosystems	x		

Questions	No	Substantive justification
<i>The transition to a circular economy, including waste</i>	x	The action will generate waste, but not in significant quantities. Waste management plans will be prepared for each project in order to assure the minimisation of waste quantities and also to assure an adequate management of construction and demolition waste.

Questions	No	Substantive justification
<p><i>prevention and recycling:</i> Is the measure expected to:</p> <p>(i) lead to a significant increase in the generation, incineration or disposal of waste, with the exception of the incineration of non-recyclable hazardous waste; or (ii) lead to significant inefficiencies in the direct or indirect use of any natural resource at any stage of its life cycle which are not minimized by adequate measures; or</p> <p>(iii) cause significant and long-term harm to the environment in respect to the circular economy</p>		
<p><i>Pollution prevention and control:</i> Is the measure expected to lead to a significant increase in the emissions of pollutants into air, water or land?</p>	x	<p>The actions supported by the programme will generate air pollutants during the construction stage, as well as an increase in air pollutants due to the expected increase of road traffic generated by the tourists in the rehabilitated touristic destinations. Mass concentration of the emitted pollutants is expected to be insignificant.</p>
<p><i>The protection and restoration of biodiversity and ecosystems:</i> Is the measure expected to be:</p> <p>(i) significantly detrimental to the good condition and resilience of ecosystems; or</p>	x	<p>The implementation of the action may lead to the occupation of small areas of natural habitats. Considering that most of the interventions are dedicated to rehabilitation works, it is not expected to result in a significant impact on biodiversity. However, measures were proposed in order to ensure a non-significant impact on birds and bats, which are usually the most exposed species to rehabilitation works.</p>

Questions	No	Substantive justification
(ii) detrimental to the conservation status of habitats and species, including those of Union interest?		

The types of actions have been assessed as compatible with the DNSH principle, since they have been assessed as compatible under the RRF DNSH technical guidance.

A14	Support for implementing the integrated territorial strategy - Developing the stakeholders 'capacity to implement the integrated territorial strategy; - Support for implementing and monitoring the integrated territorial strategy
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Please indicate which of the environmental objectives below require a substantive DNSH assessment of the measure	Yes	No	Justification if 'No' has been selected
Climate change mitigation		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.
Climate change adaptation		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.

Please indicate which of the environmental objectives below require a substantive DNSH assessment of the measure	Yes	No	Justification if 'No' has been selected
The sustainable use and protection of water and marine resources		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.
The circular economy, including waste prevention and recycling		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.
Pollution prevention and control to air, water or land		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.
The protection and restoration of biodiversity and ecosystems		x	The action has no or an insignificant foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.

The types of actions have been assessed as compatible with the DNSH principle, since they are not expected to have any significant negative environmental impact due to their nature.