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**INTERREG VI-A ITALY-SLOVENIA 2021-2027**

**STRATEGIC ENVIRONMENTAL  
ASSESSMENT**

**ENVIRONMENTAL STATEMENT**

**July 2022**

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(The following document provides a proposal of the SEA team for the substantive elements of Environmental Statement that needs to be issued by the MA/JS in accordance with the Article 9 of the SEA Directive)

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# TABLE OF CONTENT

<b>Introduction .....</b>	<b>4</b>
<b>1. The Interreg VI-A Italy-Slovenia 2021-2027 Programme .....</b>	<b>4</b>
<b>2. The SEA process and the assessment methodology.....</b>	<b>6</b>
<b>3. Conclusions of Environmental Report regarding effects of the IP on environment .....</b>	<b>13</b>
<b>4. Consideration of comments obtained through consultations held in accordance with Article 6 of SEA directive .....</b>	<b>14</b>
<b>5. Reasons for choosing the programme as adopted, in the light of the other reasonable alternatives dealt with .....</b>	<b>26</b>
<b>6. Monitoring measures .....</b>	<b>27</b>
<b>7. Reasoned opinion by Authorities .....</b>	<b>28</b>

# Introduction

In parallel to the preparation of the Interreg Italy-Slovenia Programme for the programming period 2021–2027, a Strategic Environmental Assessment (SEA) has been conducted.

The SEA aims to contribute to the integration of environmental considerations and ensure a high level of environmental protection in the preparation and adoption of the programme. The legal basis for such an assessment is the *Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment* ("SEA Directive").

The assignment was performed in an interactive way through regular virtual meetings between the contractor and the Interreg Italy-Slovenia Managing Authority and exchanges on the progress of the SEA with the Interreg Italy-Slovenia 2021-2027 Programming Task Force that elaborates the programme. This SEA is based on the draft programme strategy as outlined in the proposed Interreg Programme (IP).

The mentioned *Directive 2001/42/EC* provides in Article 9 that the plans and programs subjected to SEA, are made available to the public and environmental authorities of the Programme Area. In order to share the results of the environmental assessment, the plan or program must be accompanied by a summary statement explaining:

1. how environmental considerations are been integrated into the plan (namely the Interreg VI-A Italy-Slovenia 2021-2027 Programme) and how it was taken into account, pursuant to *Directive 2001/42/EC*, Article 8, of:
  - the Environmental Report drawn up pursuant to *Directive 2001/42/EC*, Article 5;
  - the opinions expressed pursuant to *Directive 2001/42/EC*, Article 6;
  - the results of the consultations initiated pursuant to *Directive 2001/42/EC*, Article 7;
2. the reasons for which the plan or program adopted was chosen, in light of the possible alternatives that had been identified;
3. the measures adopted with regard to monitoring pursuant to Article 10.

This document, attached to the environmental report, has the purpose of bringing this information to the attention of the public and environmental authorities involved, so that the subjects who have participated in the environmental assessment can verify how the results of the procedure itself have been integrated into the Program.

## 1. The Interreg VI-A Italy-Slovenia 2021-2027 Programme

The Interreg VI-A Italy-Slovenia 2021-2027 Programme (IP) is a programme in the framework of the European Territorial Cooperation (ETC) and funded by the European Regional Development Fund (ERDF). The purpose of such Cross-Border programmes is to support Member States to implement joint projects, address joint challenges and overcome border obstacles.

The Programme area extends over a total surface of 19,841 km<sup>2</sup> and has a total population of approximately 3 million inhabitants. It covers 5 Italian NUTS 3 regions (Venice, Udine, Pordenone, Gorizia and Trieste) and 5 Slovenian NUTS 3 regions (Primorsko-notranjska, Osrednjeslovenska, Gorenjska, Obalno-kraška and Goriska).

The IP highlights six main areas where to intervene to improve the living conditions of all agents and the population of the Programme area. They are: 1. Research and Innovation; 2. Energy, Climate change and Sustainable Development; 3. Labour Market, Human Capital and Linguistic Minorities, Healthcare; 4. Connectivity and Transports; 5. Natural and Cultural heritage and Tourism; 6. Governance.

Priorities (POs) and Specific Objectives (SOs) are described in the next table, along with funding.

Priorities	Specific Objectives	Financial endowment
PO 1 - A more competitive and smarter Europe	SO 1.1 - Developing and enhancing research and innovation capacities and the uptake of advanced technologies	€ 6.439.065,00 (9,7%)
PO 2 - A greener, low-carbon transitioning towards a net zero carbon economy and resilient Europe	SO 2.4 - Promoting climate change adaptation and disaster risk prevention, and resilience, taking into account eco-system based approaches	€ 9.342.721,00 (14,1%)
	SO 2.6 - Promoting the transition to a circular and resource efficient economy	€ 5.294.208,00 (8,0%)
	SO 2.7 - Enhancing protection and preservation of nature, biodiversity and green infrastructure, including in urban areas, and reducing all forms of pollution (also includes the POSEIDONE strategic project)	€ 10.171.344,00 (15,4%)
PO 4 - A more social and inclusive Europe	SO 4.6 - Enhancing the role of culture and sustainable tourism in economic development, social inclusion and social innovation (also includes the ADRIOCYCLETOUR strategic project and another one for the joint management and sustainable development of the Classical Karst Area)	€ 29.853.250,00 (45,0%)
ISO 1 - Better Cooperation Governance	ISO 1 (b) - Enhance efficient public administration by promoting legal and administrative cooperation and cooperation between citizens, civil society actors and institutions, in particular with a view to resolving legal and other obstacles in border regions	€ 3.659.845,00 (5,5%)
	ISO 1 (c) - Build up mutual trust, in particular by encouraging people-to-people actions	€ 1.500.000,00 (2,3%)
<i>Total</i>		<i>€ 66.260.433,00 (100,0%)</i>

The IP will coordinate with the existing priorities under EUSALP and EUSAIR macro-regional strategies to create synergies with regular projects and their flagship projects. Furthermore, IP shows clear complementarity and potential to exploit synergies with other programmes and frameworks like European Green Deal, Alpine space, Adrion, Italy-Austria, Slovenia-Croatia, etc.

IP will also be committed to ensuring the respect of the horizontal principles outlined in the Charter of Fundamental Rights of the European Union including gender equality, non-discrimination, accessibility and sustainable development throughout preparation, implementation, monitoring, reporting and evaluation of projects taking into account the UN Sustainable Development Goals, the Paris Agreement and the "Do No Significant Harm" principle.

With respect to internal coherence, the IP has been designed paying attention to compatibility with other planning documents of Veneto and Friuli Venezia Giulia regions and of Republic of Slovenia: none of the objectives proposed in the IP are in contrast with current legislation and plans of the different regions of the Programme area.

## 2. The SEA process and the assessment methodology

The SEA was conducted in accordance with the *EU Directive 2001/42/EC* and the *SEA Protocol*. The relevant frame for assessments was set up by the environmental aspects outlined in the SEA Directive and the subsequently identified relevant environmental objectives which are potentially impacted by the programme.

The IP has been agreed upon by National delegations, deciding that it is best suited for the needs of the area, and effective within its available budget. Therefore, there were no programme level alternatives of the Interreg Italy-Slovenia 2021-2027 Programme that were considered within this SEA Report. The event of not implementing the programme (i.e. the “zero alternative”) is unlikely. In this situation the baseline conditions of the programme area would remain the same, i.e. the positive and adverse programme implementation impacts would not occur and currently identified trends would most likely continue.

The goal of this particular SEA was to further strengthen environmental considerations in the IP through proposed enhancement measures and to mitigate any identified negative impacts on environment through proposed mitigation measures, which could take form of additionally proposed activities to be supported by the IP or modification of already proposed activities by the IP.

Impacts were assessed on the basis of changes in impact indicators in regard to the state of the environment and the importance of these changes, the level at which environmental protection objectives were taken into account during the IP preparation and other evaluation criteria.

Potential impacts identified in the scoping phase were more precisely defined in the Environmental Report and assessed based on the following impact assessment key:

<b>+2</b>	<b>+1</b>	<b>0</b>	<b>-1</b>	<b>-2</b>	<b>T+</b>	<b>T-</b>
Significant positive impact	Non-significant positive impact	Very limited impact or no impact	Non-significant adverse impact	Significant adverse impact	Transboundary positive impact	Transboundary negative impact

Finally, mitigation and enhancement measure were proposed. The SEA team was engaged early on in the programming process and was able to establish a constructive cooperation with all stakeholders. SEA team was also invited to follow and contribute to Task Force meetings. Subsequently, the SEA team was able to closely monitor the programming process. This resulted in its’ regular inputs at key moments of the programming process.

As a result, a significant number of proposed mitigation measures, enhancement measures and recommendations were already integrated in the final draft version of the IP, reflecting the added value of the SEA in the programming process. The several steps of the SEA process can be summarized as follows:

Steps of the SEA process	Schedule
Kick off meeting	December 2020
Integrating SEA into the programming process timeline	January-May 2021
Scoping and consultations with environmental authorities	June-October 2021

Draft Environmental Report	November 2021-March 2022
Internal revision of the Draft Environmental Report & coordination with the Programming team	March 2022
Final Draft Environmental Report	March 2022
Consultations of responsible Environmental Authorities and the public on Environmental Report	April-May 2022
Approval of the Final Draft of the ER by Responsible Environmental Authorities	June 2022
Documentation of consultations and final Environmental Report	June 2022
Environmental statement and end of the process	July 2022

The scoping processes involving all responsible environmental authorities from the programme area was started in June 2021.

The Environmental Authorities involved at first in the Scoping phase, and then in the ER consultations have been the following:

- Slovenian Water Agency;
- Slovenian Ministry of Agriculture, Forestry and Food, Forestry and Hunting Directorate;
- Slovenian Ministry of Agriculture, Forestry and Food, Agriculture Directorate;
- Slovenian Ministry of Culture, Cultural Heritage Directorate;
- Slovenian Ministry of Health, Public Health Directorate;
- Institute of the Republic of Slovenia for Nature Conservation - Central Unit;
- Slovenian Forest Service;
- Ministero della Cultura, Soprintendenza Archeologia, Belle Arti e Paesaggio per il Comune di Venezia e Laguna;
- Agenzia Regionale per la Prevenzione e Protezione Ambientale del Veneto (ARPAV)
- Agenzia regionale per la protezione dell'Ambiente -ARPA FVG
- Autorità di Bacino distrettuale Alpi Orientali
- Azienda Sanitaria Universitaria Giuliano Isontina (ASUGI) Trieste

Predominantly positive impacts of IP on environment were recognized during the scoping, with three points of concern or potentially negative impact exposed:

- increased pressures to environment due to increased tourism;
- potential negative impact of new small-scale infrastructures;
- potentially adverse impacts on tangible and intangible attributes of cultural and natural heritage.

In both countries a written scoping procedure was carried out and in Slovenia an on-line workshop was also organized. Based on received responses and comments the final version of Scoping Report was prepared in October 2021. The SEA team used the inputs from the scoping procedure to define environmental objectives of the Environmental Report and indicators used to assess impacts of the IP on the environment.

The scoping generated a set of comments and requests, considered then in the ER and summarized in the following table.

SEA for the Interreg VI-A Italy-Slovenia 2021-2027 Programme - Environmental Report

Macroarea	Office	Observation	Reply by SEA experts and acceptance in the ER	Reply by IP experts and acceptance in the IP
FVG	DG Environment, Energy and Sustainable Development, Water management Office	The Environmental issue "Internal, Transition and Marine Waters" should consider even ground waters	The remark has been considered in the ER, Chapter 5, § 5.3	
		Objectives must be supported by actions aimed to reduce ground water withdrawal for civic, industrial and irrigation use		Observation inconsistent with the TF decisions and rejected
	DG Environment, Energy and Sustainable Development, Geologic Office	Sensitive transborder basins such as Classical Kars must be considered	The remark has been considered in the ER, Chapter 5, § 5.3.3	
		Considering the raise in the interest for geological heritage, a new PO and SO on geodiversity protection is strongly suggested		The remark has been integrated in the IP, and it is the object of a Strategic project
		Among the Relevant Environmental Issues, consider "Geodiversity and geological heritage"	The remark has been considered in the ER, Chapter 5, § 5.5.3	
	Public health authority, FVG Region	Identify sustainable measures devoted to contrast the pressures of tourists on the local environmental conditions	The remark has been addressed in the ER, Chapters 6 and 7	
	ARPA FVG	Complete the information framework of the Scoping Report (Table of environmental policies) with some addition	In the final version of the Scoping report the issue has been considered (Table 1, dedicated to the Environmental policy framework.)	
		Suggestion of documents where to find out information to complete the state of the art for Environmental issues	The suggestion has been registered and used in the definition of Chapters 4 and 5	
		Complete the information on the 264 geosites	The remark has been considered in the ER, Chapter 5, § 5.5.3	
		Suggestion for the Environmental Report of SEA to match with more precision potential impacts and Specific Actions, reporting in the ER even the description of criteria and methodology to be used for the selection of grantable projects	The remark is correct, but the IP does not identify a definitive version of Specific Actions (SAs), but just Exemplary actions to be matched precisely with potential impacts. Nonetheless, ER defines potential environmental impacts descending from POs, SOs and exemplary actions, and assesses them (Chapter 6)	
		Draft the ER accordingly with ISPRA guidelines 124/2015 "Operational indications for SEA reporting	The whole SEA procedure follows the Italian legislation and suggested procedure (being the Managing Authority based in Italy). In line with it, the SEA sticks to ISPRA guidelines	
		Consider in the ER the procedure for the elaboration of the Italia-Slovenia IP, and the contribution of the SEA in each phase of the process (Scoping included)	The remark has been considered in Chapters 2 and 3	
		Consider the main results of the previous planning period for the programme (2014-2020), mainly with respect	The issue has been considered in the Scoping Report, and it is the root of ER, transversely to all chapters	



		to environmental issues and weaknesses, monitoring results included;		
		Contemplate the opportunity of designing environmental criteria to be inserted in the calls for the selection of projects	This remark is at the basis of many mitigation and enhancement measures proposed in the ER (Chapter 7)	NOTED: To be addressed in the implementation phase of the Programme
		Ensure the measurability of prospected results through a set of indicators to be defined in the ER	Indicators are considered in Chapter 8	
		Consider in ER alternate scenarios related to the IP and connected environmental sustainability issues, Option zero (i.e. no intervention) included	Accordingly with the SEA Italian legislation and the mentioned ISPRA Guidelines, alternate scenarios have been considered in the ER both without and with IP (Chapter 6)	
		With respect to ER, describe tools and methods that will be put into effect to assess the impacts of the single actions and of the programme as a whole (secondary impacts, cumulated impacts and synergies in the short-, middle- and long-run) during and after the programme implementation	The remark has been considered in the ER, Chapter 2, § 2.3.3	
		The ER and the SEA document must identify mitigation and compensation measures to stop, mitigate or compensate possible negative impacts on the environment due to the programme implementation	The remark has been considered in the ER, Chapter 7	
		Define a monitoring system for both controlling the impacts on the environment due to the programme implementation, and the reaching of set sustainability targets	The remark has been considered in the ER, Chapter 8	
VEN	Organizational Unit SEA and Appropriate Assessment	1. Remark in the ER the role of SEA with respect to IP programme, and deviations from current environmental dynamics and providing instructions on possible options	The remark has been addressed in ER, Chapter 2, § 2.1-2.3	
		2. Consider in the analysis the topics of the Regional Strategy for sustainable development and Agenda 2030	The remark has been addressed in ER, Chapters 4 and 5 with respect to Veneto part of the programme Area	
		3. Consider internal and external coherence of the IP programme with the planning documents for Veneto Region	The remark has been considered in ER, Chapter 6	The remark has been considered by IP experts in defining POs and SOs
		4. For each environmental object, a focus on Veneto territory must be considered, to highlight possible environmental critical issues	The remark has been addressed in ER, Chapter 5 with respect strictly to the programme Area	
		5. Specific chapters on different environmental objects (territory, sustainable development natural risks, air quality, water quality, noise, landscape and cultural landscape, biodiversity, soil and ground, must be considered in the ER, with updated analysis, critical issues, mitigation and compensation measures	The remark has been addressed in ER, Chapters 4 (critical issues), 5 (environmental objects - analysis), and 7 (mitigation measures)	
		6. Consider and assess recommendations and recommendations by Environmental authorities	The remark has been addressed in ER, Chapter 3 with respect to recommendations and recommendations	

			during the scoping phase, and it will be the subject of the final phase of the SEA ("Resolution of any comments from EAs)	
		7. Select concrete actions aimed to expressed objectives		The actions have been included in the final IP in the form of exemplary actions
		8. Consider, describe and assess in the ER the possible alternatives for actions with a potential environmental impact	The remark has been addressed and solved in Chapter 2, § 2.3.2	
		9. With respect to normative, consider the opportunity of Appropriate assessment (VINCA/Dodatek))	The remark has been accepted, and addressed in the Appropriate Assessment Annex	
		10. ER must follow instructions from DPR 152/06 (Italian normative on SEA)	The remark has been accepted and the ER follows forms and contents pointed out by DPR 152/06, article 13 and Annex VI.	
		11. Define a monitoring system for both controlling the impacts on the environment due to the programme implementation, and the reaching of set sustainability targets	The remark has been accepted and addressed in Chapter 8	
SLOVENIA	Institute of the Republic of Slovenia for Nature Conservation	<p>Due to the strategic level of evaluation in this concrete SEA, as well as the fact that such impacts will not be considered on the lower assessment levels, special attention must be put on wider impacts of various sectors – e.g. impacts of increased tourism flows, resulting in increased numbers of visitors and increased pressures on the natural environment. Such impacts should be considered in the Environmental Report and adequate mitigation measures should be proposed. As an example, we present the following mitigation measures recognized in the Environmental Report for the Interreg Slovenia-Austria 2021-2027 Programme:</p> <ul style="list-style-type: none"> <li>• Carrying capacity studies should be prepared prior to development of projects for important nature protected areas in order to reduce increased tourism flow pressures.</li> <li>• Visitor Management Plans should be requested as a part of project application forms for all projects focused on tourism development in biodiversity rich areas (e.g. Natura 2000, protected areas).</li> </ul>	The remark has been noted and was addressed in the Environmental Report in Chapter 6.	NOTED: To be integrated within the existing actions relating to PO2 SO7
		Natural values, especially non-biodiversity related ones, should be added as a specific topic with a specific indicator.	The remark has been noted and was addressed in the Environmental Report in Chapters 5.5.3 and 6.5.	/
		Appropriate Assessment (VINCA/DODATEK) was requested to be prepared, alongside the Environmental Report.	The remark has been noted and Appropriate Assessment (VINCA/DODATEK) was prepared as a special Annex.	/

Ministry of Health & National Institute of Public Health	Airconditioning devices, as a source of noise pollution were pointed out.	The remark has been rejected as the IP will not support installation of air-conditioning devices as a specific activity. Also, the level of IP and subsequently the SEA, is too strategic for this issue to be addressed within the Environmental Report as a specific environmental issue. Nonetheless, the issue of noise pollution was dealt with in chapter 6.7.	/
	Reduction of social inequalities of citizens should be addressed as a specific health issue.	As discussed, and agreed during the on-line scoping workshop, this issue has been addressed directly by the IP.	NOTED: To be integrated within the existing actions relating to PO4 SO6
Ministry of Agriculture, Forestry and Food & Slovenia Forest Service	Forest, its protection regimes and management to be included as a specific environmental topic – also with a clear link to expected climate change issues.	The remark has been noted and was addressed in the Environmental Report in Chapters 5.5.4 and 6.5.	NOTED: To be integrated within the existing actions relating to PO2 SO4
	Agricultural land, loss, degradation and fragmentation to be included as a specific environmental topic.	The remark has been noted and was addressed in the Environmental Report in Chapters 5.4 and 6.4.	/
	Concrete infrastructure projects (e.g. new renewable energy infrastructure) are to be stated and assessed.	The remark has been noted and was addressed in the Environmental Report in Chapter 6.	/
Ministry of Culture	Comments linked to improvement of the content of the chapter 3.2 Relevant Environmental Issues.	The remark has been noted and was addressed in the Environmental Report in Chapters 5.6 and 6.6.	/
	Comments linked to improvement of the content of the chapter 3.3 The logical Framework and methodology for the Scoping phase.	As discussed and agreed during the on-line scoping workshop, this comment is linked to the content of the IP itself and can not be considered a SEA topic at this point.	NOTED: Provided comments will be taken into consideration in the IP content finalization process.
	Cultural heritage to be assessed as a potential for circular economy.	As discussed and agreed during the on-line scoping workshop, this comment is linked to the content of the IP itself and can not be considered a SEA topic at this point.	REJECTED: Observation inconsistent with the TF decisions
Slovenian Water Agency	Comments linked to improvement of the content of the chapter 1. Introduction to Interreg Italia-Slovenija 2021-2027 Programme	A part of the comment was linked to the content of the IP itself and could not be fully considered a SEA topic at this point.  A part of the comment has been noted and was addressed in the Environmental Report in Chapters 5.3 and 6.3.	

		Comments linked to improvement of the content of the chapter 3.2 Relevant Environmental Issues – 3. INTERNAL, TRANSITION AND MARINE WATERS.	A part of the comment was linked to the content of the IP itself and could not be fully considered a SEA topic at this point.  A part of the comment has been noted and was addressed in the Environmental Report in Chapter 4.	
		Comments linked to improvement of the content of the chapter 3.2 Relevant Environmental Issues	A part of the comment has been noted and was addressed in the Environmental Report in Chapter 4.	/
		Comments linked to improvement of the content of the chapter 3.2 Relevant Environmental Issues – Table 1: Environmental Issues and related objectives on international and national levels relevant for the Interreg VI Italia-Slovenija 2021-2027 area:	The remark has been noted and was addressed in the Environmental Report in Chapter 4.	/
		Comments linked to improvement of the content of the chapter 3.3 The logical Framework and methodology for the Scoping phase - Table 4: The environmental impacts identification and assessment table of Interreg VI Italia-Slovenija 2021-2027 Scoping procedure (comments on the scoping scoring methodology and results).	A part of the comment was explained in the Scoping Report.  A part of the comment has been noted and was addressed in the Environmental Report in Chapters 3, 4 and 6.3.	/
	Ministry of the Environment and Spatial Planning - Environment Directorate - Strategic Environmental Assessment Division	No concrete comment, just a collection of all already above-described comments from Slovenian Environmental Authorities.	ALREADY RESOLVED, AS STATED ABOVE.	/

### 3. Conclusions of Environmental Report regarding effects of the IP on environment

Potential impacts identified in the scoping phase were reconsidered and more precisely defined and described. It was concluded that the IP is expected give contribution to many positive impacts on all environmental aspects. However, the following potentially negative impacts have been identified:

- Increased air pollution and higher risk to public health due to higher emission levels of the air pollutants (CO, NMVOC, NO<sub>x</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>) due to increased traffic flows, especially in touristic areas.
- Increased pressures to environment due to increased and dispersed tourism flows (increased energy consumption, increased traffic flows, soil loss and sealing, increased waste production and water pollution, increased natural resources consumption, disruption of flora/fauna in protected areas and Natura 2000).
- Potential negative impact of new infrastructures (soil loss and sealing, hydro-morphological damages to surface waters, fragmentation).
- Diverse impacts on tangible and intangible attributes of cultural and natural heritage due to increased tourism flows and with-it interlinked need for more tourist infrastructure and new tourism products/services.

Impacts were assessed on the basis of changes in impact indicators in regard to of the state of the environment and the importance of these changes, the level at which environmental protection objectives were taken into account during the IP preparation and other evaluation criteria.

As evident from the overview provided below, the IP is clearly oriented towards sustainable development and search for green solutions by design. Since all projects and their potential actions with an “investment character” need to be implemented in line with national level legislation and standards, no potentially significant adverse impact was foreseen even for the realistic worst/case scenario of the IP programme implementation. The transboundary effects of the proposed IP are exclusively positive.

IP SPECIFIC OBJECTIVES	ENVIRONMENTAL ASPECTS														
	Air		Climate			Water		Soil and land use		Biodiversity		Landscape		Pop. and human health	
SO 1.1	0		+1		0		+1		0		0		+1		
SO 2.4	0		+2	T+	+1	-1	+1	-1	+1	-1	+1	-1	+2	T+	
SO 2.6	+1		+1		+1		+1		+1		+1		+1		
SO 2.7	+2		+1		+1	T+	+1		+2		+2		+2		
SO 4.6	+1	-1	+2	-1	T+	+1	-1	-1		+2	-1	+2	-1	+2	-1
ISO 1b	+1	T+	+1		0		0		0		0		+1	T+	
ISO 1c	0		0		0		0		0		+1		+1		

No significant negative impacts have been identified in the SEA for any of seven SOs of the Interreg VI-A Italy-Slovenia 2021-2027 Programme, and only non-significant negative impacts have been identified for two out of seven SOs. Furthermore, the whole IP is plac-

ing a strong emphasis on improving the environmental situation and addressing key environmental and sustainability concerns.

For identified non-significant negative impacts mitigation measures have been foreseen, as well as recommendations for further enhancement of identified positive impacts of the IP. Many of them were already addressed and integrated into the IP, as described in chapter 1.5. Those that remain are:

Proposed mitigation measures	Targeted SO / Environmental aspects
The IP should encourage all applicants applying to SO 2.4 and 4.6 to use “ <i>environmental sustainability by design</i> ” approach through the project selection process. Applicants should explain whether and how their proposed actions take into the consideration potential increase of tourist flows, improvement of the sustainability of their tourism offer and/or contribute to reduction of carbon footprint of their tourism products/services (e.g. new tourism products/services based on sustainable mobility solutions or public transport, systemic efforts to reduce or optimize tourism flows, etc.), as well as effective and sustainable use of natural re-sources or contribute to regeneration of the environment and ecosystem services – for example in the dedicated section of the project application templates. Subsequently, the IP should prefer to co-finance projects with sustainable solutions integrated in project design.	2,4 and 4.6  <i>Air, Climate, Water, Soil, Biodiversity and Natural heritage, Landscape and Cul- tural heritage, Population and hu- man health</i>
Consider and assess the impact of ADRIONCYCLETOUR and Kras/Carso infrastructure on the local water system.	4.6  <i>Water</i>

Proposed enhancement measures and recommendations	Targeted SO / Environmental aspects
The IP should encourage the applicants to consider potential linkages between actions within ISO 1b (non-urban multimodal transport) and SO 4.6 (ADRIONCYCETOUR).	4.6 and ISO 1b  <i>Air, Climate</i>
The following action could be added to SO 2.6 (or any other SO, if considered a better fit from the IP programming team) as an IP enhancement measure: “Promoting business networks embedding climate change mitigation and adaptation (along with other relevant environmental factors) into existing business operations and core corporate decision-making processes (e.g. product development, etc.)”.	2.6  <i>Climate</i>

Finally, following the public consultation phase, a recommendation is proposed with respect to the Landscape and Cultural heritage issue, i.e. that any potential infrastructure projects include the preventive archaeology procedures indicated by both national legislations, as best practice to guarantee the conservation of the state of the sites and assets of archaeological interest.

#### 4. Consideration of comments obtained through consultations held in accordance with Article 6 of SEA directive

**In April 2022 the Environmental Report was prepared and submitted for revision to Responsible Environmental Authorities and the interested public through Public Consultations process, implemented in both countries. To comply with its cross-border character and ensure widest possible outreach to interested public, it contained a non-technical summary of the environmental report – summarizing its conclusions in English, Italian and Slovenian languages. Furthermore, two public presentations of Environmental Report’s conclusions were organized in Slovenia (on 16<sup>th</sup> May 2022) and Italy (19<sup>th</sup> May 2022).**

**According to the Italian procedure for SEA, during the following 45 days comments and opinions have been collected and sent to the proceeding authority (namely, the Managing Authority) and forwarded to SEA and IP team experts.**

**No observations came from the public consultation, based on the sharing of all documents through the website: <https://www.ita-slo.eu/it/programmazione-2021-2027/documenti-programma>, while many comments arose from the mentioned Environmental Authorities (see Section 2).**

**The following table lists those observations and comments, and gives back the responses of the SEA and IP programming teams.**

MACRO-AREA	OFFICE	OBSERVATION	REPLY BY THE SEA TEAM	REPLY BY THE IP TEAM
FVG	Eastern Alps Basin Managing Authority	<p>Implement analysis and assessment of SO 2.4 with planning tools:</p> <ul style="list-style-type: none"> <li>• Flood Risk Management Plan (PGR)</li> <li>• Plan for the hydrogeological structure of the Isonzo, Tagliamento, Piave, Brenta, Bacchiglione rivers;</li> <li>• Plan for the hydrogeological structure of the sub-basin of the Fella river;</li> <li>• Plan for the hydrogeological structure of the catchment area of the Livenza river - First variant;</li> <li>• PAIR - Slizza, drainage basin in the Marano and Grado lagoons, Levante basin</li> </ul> <p>Recall the applications reported in the former PAIs with respect to geological and avalanche risk and insert the PGR for the hydraulic one.</p> <p>Update with the indications and analyses contained in:</p> <ul style="list-style-type: none"> <li>• Water Management Plan of the Eastern Alps District (PdGA)</li> </ul>	<p>ACCEPTED – addressed in the ER</p> <p>The focus of this ER was to assess potential environmental impacts of the Interreg VI Italia-Slovenija 2021-2027 Programme, which represents the funding framework for various projects – potentially also those based on stated Plans.</p> <p>Nonetheless, we emphasize that the relevant suggested topics and issues have been integrated by the ER in § 5.3.1 and 5.7.5</p>	/
		<p>With regard to the impact assessment on IP actions, tourism initiatives with potential pressure on waters must ensure no interference with the environmental objectives assigned to water bodies by PdGA.</p>	<p>NOTED – already addressed in the ER</p> <p>The comment has already been addressed in the first mitigation measure, when stating: <i>“Applicants should explain whether and how their proposed actions take into the consideration potential increase of tourist flows, (...), as well as effective and sustainable use of natural resources.”</i> (see Chapter 7 of the ER).</p>	/
		<p>Being SOs 2.4, 2.6, 2.7 aligned with the concept of cross-border coordination and cooperation of the PdGA (especially with respect to the cross-border basins of the Isonzo and Vipava), it is suggested to insert in the selection of projects reward elements aimed at encouraging such coordination and cooperation.</p>	<p>NOT A SEA TOPIC:</p> <p>This comment is linked to the content of the IP itself and cannot be considered a SEA topic at this point.</p>	<p>All projects to be co-funded by the Programme need to show a cross-border character, as well as coordination and cooperation beyond the border, aspects that will be evaluated in the selection phase as a prerequisite for project approval. This will also be applied to projects related to water management.</p>



Regional public health authority FVG	Tourist incentives have an impact on the environment that must be minimized	NOTED – already addressed in the ER  All stated topics and issues were addressed by the ER, while exposed impact has been additionally addressed in the first mitigation measure (see Chapter 7 of the ER).	/
	The projects must take greater account of the pressures on the environment, specifically air and water pollution	NOTED – already addressed in the ER  All stated topics and issues were addressed by the ER in chapters 5.1, 5.3, 6.1 and 6.3, while mitigation and enhancement measures have been stated in Chapter 7 of the ER.	/
	With reference to air, the reduction of vehicular traffic deriving from tourism remains strategic; it is essential to incentivize access to areas of interest through public transport or vehicles with reduced emissions	NOTED – already addressed in the ER  The comment has already been addressed in the first mitigation measure, when stating: <i>Applicants should explain whether and how their proposed actions take into the consideration potential increase of tourist flows, improvement of the sustainability of their tourism offer and/or contribute to reduction of carbon footprint of their tourism products/services (e.g. new tourism products/services based on sustainable mobility solutions and/or public transport, systemic efforts to reduce or optimize tourism flows, etc.)</i> See Chapter 7 of the ER.	ADRIONCYCLETOUR strategic project will support the EUSAIR cross-pillar idea, contributing to the sustainable development of the Programme area, promoting both sustainable tourism and sustainable mobility. This project will contribute to result indicator: “Number of sites/tourist destinations with increased connectivity to cycle routes”.  Moreover, the IP will promote strategies for multimodal accessibility in view of a better and sustainable connectivity among urban, rural and coastal areas, increasing the offer of cross-border public transport services (land, sea) in favor of residents, commuters, students and tourists. (ISO1b).
	It is a primary strategy to implement the municipal acoustic classification plans and to monitor their fulfilment and compliance	REJECTED  The focus of the ER was to assess potential environmental impacts of the Interreg VI Italia-Slovenija 2021-2027 Programme, which represents the funding framework for various projects. However, concrete implementation plans and/or projects (with exception of IP proposed strategic project) are at this point not known and fully depending on the project selection process.	Noise pollution was not selected as key IP targeted issue.

			Despite the fact that noise pollution was not recognized as a priority topic within the IP, we emphasize that it was addressed by the ER in Chapters 5.7 and 6.7.	
		It is essential to implement policies to reduce the production of solid and urban waste, as both preserving environment and ensuring hygiene and health for the population measures	NOTED - already addressed in the ER  All stated topics and issues were addressed by the IP within the SO2.6 and within the ER in chapters 5.7, 6.7, while mitigation and enhancement measures have been stated in Chapter 7.	The IP addressed the specific topic of reduction of the production of solid and urban waste in SO2.6.
		It is necessary to apply techniques that reduce the flow of tourism on the production of waste and waste water, specifically evaluating the impact of the receiving bodies	NOTED - already addressed in the ER  The focus of this ER was to assess potential environmental impacts of the Interreg VI Italia-Slovenija 2021-2027 Programme, which represents the funding framework for various projects. However, concrete implementation projects (with exception of IP proposed strategic project) are at this point not known and fully depend on the project selection process. Nonetheless, we emphasize that all stated topics and issues were addressed by the ER in Chapters 5.3 and 6.3.  Also, the comment has already been addressed in the first mitigation measure, when stating: <i>"Applicants should explain whether and how their proposed actions take into the consideration potential increase of tourist flows, improvement of the sustainability of their tourism offer and/or contribute to reduction of carbon footprint of their tourism products/services (e.g. new tourism products/services based on sustainable mobility solutions and/or public transport, systemic efforts to reduce or optimize tourism flows, etc.), as well as effective and sustainable use of natural resources and/or contribute to regeneration of the environment and ecosystem services - for example in the dedicated section of the project application templates. Subsequently, the IP should prefer to co-finance projects with sustainable solutions integrated in project design."</i> (see Chapter 7).	/
		It is essential ensuring equal access to primary health care for tourists, implementing the presence of tourist medical clinics in the area	REJECTED  The focus of this ER was to assess potential environmental impacts of the Interreg VI Italia-Slovenija 2021-2027 Programme, which represents the funding framework for various projects. However, concrete implementation plans and/or projects (with exception of IP proposed	Health care was not selected as key IP targeted issue.

			<p>strategic project) are at this point not known and fully depend on the project selection process.</p> <p>Despite the fact that primary health care for tourists was not recognized as a priority topic within the IP, we emphasize, that the health topic was addressed by the ER in Chapters 5.7 and 6.7.</p>	
Regional environmental agency (ARPA FVG)	Essential that the IP implements the proposed mitigation and enhancement measures also in the drafting of the calls (through mandatory indications, limitations, technical specifications and rewarding criteria for projects with a greater environmental value)	<p>NOTED – already addressed in the ER</p> <p>Mitigation measures are compulsory and must be integrated into the IP, while enhancement measures and recommendations depend on decisions made by the Programming team and the Managing Authority, as some of them might be relevant from the environmental point of view, but not feasible due to other reasons.</p>	<p>All mitigation and enhancement measures reported by the SEA team were discussed by the two delegations during the TF meetings and those considered relevant to the Programme were integrated into the IP.</p> <p>The principles of environmental sustainability and DNSH principle will be taken into consideration during the implementation phase of the Programme as stated in section 1.2 of the IP.</p>	
	In order to highlight the reasons that led to the selection of the proposed program alternative (the IP), in terms of financial allocation on the various SOs, it is suggested to report in the ER a summary of the evaluations carried out also in the light of the analysis conducted on the previous Programming (ex-post evaluations), of the results achieved (successes / failures, criticalities or needs emerged, etc.) and of the monitoring data collected	<p>NOTED – already addressed in the ER</p> <p>The focus of this ER was to assess potential environmental impacts of the Interreg VI Italia-Slovenija 2021-2027 Programme, which represents the funding framework for various projects.</p> <p>The IP was developed through an intensive programming process, involving many stakeholders and implemented in several stages. SEA team closely followed the programming process and actively participated in it through providing environmental assessments, as well as mitigation and enhancement measures. These were presented to the Task Force, and the Task Force made programming decisions based on them. This process is described in chapter 1.5. Through this process the final IP version was developed, leaving no room for reasonable and feasible alternatives.</p>	<p>The selection of the SOs of the new Programme is built on the identified challenges stemming from the Territorial and socio-economic analysis based, among others, on the results of the evaluations carried out on the previous Programme. The financial allocation for each SO was based on the inputs from lessons learnt from 2014-2020 programming period, and was decided after discussing different scenarios within TF taking into account the absorption rate of the previous Programme measures.</p>	
	In addition to ensuring control over the significant impacts on the environment deriving from the implementation of approved plans and programs, monitoring also serves to verify the achievement of the sustainability and program objectives set and of unexpected negative impacts (art. 18 TUA).	<p>NOTED – already addressed in the ER</p> <p>The 4 proposed indicators are dealing exactly with the actions for which potential negative effects have been reported..</p>	<p>The IP monitoring plan includes output and result indicators defined in accordance with Art. 17 (1) of the CPR and in line with the Commission Staff Working Document on Performance, monitoring</p>	

		<p>The SEA monitoring proposal of the advanced program, consisting of only 4 indicators, should be revised and integrated, at least for those actions for which potential negative effects (including indirect) have been reported and mitigation measures are required</p>		<p>and evaluation. The methodology for the establishment of the performance framework of the Programme includes: the criteria applied to select indicators; data or evidence used, quality assurance and the calculation method; factors that may influence the achievement of the milestones and targets and how they were taken into account. Result indicators were chosen for each SO in order to measure the achievement of the desired change. Output indicators were linked to one or more exemplary actions in order to catch the main realisations of the projects. Selected indicators and targets have been also revised according to EC observations. Data on indicator forecasts and progress are acquired at the project level via application forms and during regular project implementation monitoring through the periodic progress reports in the joint electronic monitoring system (JeMS).</p>
		<p>It is recommended to pay particular attention to Process Indicators, in order to guarantee the monitoring of the achievement of related targets and in order to ensure the measurability of the effects of the various Actions and of the IP as a whole</p>	<p>NOT A SEA TOPIC:</p> <p>The focus of the ER is to assess potential environmental impacts of the Interreg VI Italia-Slovenija 2021-2027 Programme, which represents the funding framework for various projects, not controlling how the activities necessary to transform inputs into outputs are carried out, as requested to process indicators</p>	
		<p>It is recommended to take into consideration the availability of data needed to feed the system of indicators, also providing in the calls for tenders methods for returning information functional to the completion of the monitoring</p>	<p>NOTED - already addressed in the ER</p> <p>The 4 proposed indicators have already been selected taking into account the availability of data for the monitoring.</p>	
Metropolitan City of Venice	National authority for cultural heritage, Venice and Lagoon section	<p>With regard to cultural and landscape heritage, the plain indication of the environmental sustainability of POs and SOs in terms of directions and criteria, postponing the assessments to the subsequent phases of study, is considered non-exhaustive</p>	<p>NOTED - already addressed in the ER</p> <p>The assessment points out the need for mitigation measures that involves the project level (see § 6.6). Concrete implementation plans and/or projects (with exception of IP proposed strategic project) are at this point not known and fully depend on the project selection process, so that the assessment at the level of Specific Actions can be addressed just with directions and criteria.</p>	/
		<p>With respect to the use of renewable energy, identified among the objectives of territorial and environmental sustainability of the IP, the consideration of possible significant impacts on the environment is considered non-exhaustive. This in partic-</p>	<p>REJECTED</p> <p>The focus of this ER was to assess potential environmental impacts of the Interreg VI Italia-Slovenija 2021-2027 Programme, which represents the funding framework for various projects. However, concrete implementation</p>	<p>Renewable energy was not selected as key IP targeted issue.</p>

		ular in relation to the areas protected by law pursuant to art. 142 and to the landscape assets pursuant to art. 136 of Legislative Decree no. 42/2004	projects (with exception of IP proposed strategic project) are at this point not known and fully depend on the project selection process. In addition, we stress that the IP cites the use of renewable energy, not its production through plants and other infrastructures, as the IP will not fund such investments. In this sense, the SEA experts do not see any potential impact by the IP implementation on the reported assets.	
		The assessment on archaeological assets is considered non-exhaustive, in particular with regard to the preventive archaeology procedure indicated in art. 25 of Legislative Decree 50/2016 as best practice to guarantee the conservation of the state of the sites and assets of archaeological interest, significantly reducing the risk of cost increases and time extensions due to accidental archaeological discoveries. In this sense, a timely application of the aforementioned Legislative Decree's article is recommended.	ACCEPTED – addressed in the ER  Being required by Law, the comment has been considered to generate a new recommendation, strictly related to infrastructures (see Chapter 7 and § 6.6)	/
	Regional environmental agency (ARPA Veneto)	The definition of the logical path between sustainability objectives defined at national level, as well as their relationship with those defined at the regional level (Regional Sustainable Development Strategy - Resolution of the Regional Council No. 80 2020), and the IP objectives/actions are useful in order to verify the contribution of the latter to the objectives of sustainability through appropriate indicators (Article 18 paragraph 3 bis of Legislative Decree 152/06 ss.mm. ii.)	REJECTED  The issue has been addressed in a previous version of the ER and disregarded, due to the willingness to maintain the same level of analysis in both countries. The decision was taken upon the consideration that sustainability objectives defined at the regional level are compatible with sustainability strategies defined at the national one.	/
		Table 4.1 shows the international and national environmental policy frameworks but no specifics are given on the consistency between the objectives of the IP and the objectives of the strategies and sectoral plans at the regional level	REJECTED  The issue has been addressed in a previous version of the ER and disregarded, due to the willingness to maintain the same level of analysis in both countries. The decision was taken upon the consideration that sustainability objectives defined at the regional level are compatible with sustainability strategies defined at the national one.	/
		In chapter 5, it is suggested to refer to more up-to-date data with respect to air, emissions, and water	ACCEPTED – addressed in the ER  The SEA team took care of the comment and updated ER in Chapters 5.1, 5.2 and 5.3	/

		It is suggested to relate the monitoring measures identified for the most sensitive and interested aspects with the IP actions and with the sustainability objectives relevant to the Program in order to verify the contribution to achievement of the same, also using, if necessary, the indicators of output and result provided for by the Regulation itself	ACCEPTED – addressed in the ER  We modified Chapter 8 to take care of the comment.	/
Slovenia	Slovenia Forest Service	It is suggested to mention protected forests and forest reserves in chapter 5.5.4.	ACCEPTED  Chapter 5.5.4. of the ER was updated with requested data.	/
	Institute of the Republic of Slovenia for Nature Conservation	It is suggested to add caves as geological and geomorphological natural values to the table in chapter 5.5.4.	ACCEPTED  Chapter 5.5.4. of the ER was updated with requested data.	/
	Slovenian Water Agency	It was suggested to deal with “flood risk” as a key environmental issue, due to the fact that SO 2.4 targets climate change adaptation – including to floods and other types of protected areas in line with relevant water management legislation.	NOTED – already addressed in the ER  The IP identified “climate change adaptation” (including flood risk reduction) as one of key issues and addressed it through the SO 2.4 and proposed actions to reduce the flood risk. Already in the Scoping phase ER recognized positive impact of the IP on this issue. Nonetheless, ER kept the flood issue in the assessment under the environmental aspect “Population and human health”, as well as assigned an indicator - Number of people affected by flood risk. Subsequently, ER deals with this issue in chapters 5.7 and 6.7.  At the same time, we have to state that focus of this ER was to assess potential environmental impacts of the Interreg VI Italia-Slovenija 2021-2027 Programme, which represents the funding framework for various projects. However, concrete implementation projects (with exception of IP proposed strategic project) are at this point not known and fully depend on the project selection process. Simultaneously, IP clearly states that no major infrastructure will be supported by the IP; all projects must also be prepared in line with all relevant legislation before they will be considered for co-financing.	/
		It was requested to check, if identified trend lined to reduced endangerment from floods is based on correct data and is correctly interpreted.	ACCEPTED – addressed in the ER	/

			SEA team rechecked all data, added additional information on flood areas and reinforced the zero alternative trend based on suggested sources into the ER.	
		It was suggested to include measures and recommendations from relevant national level strategies (e.g. Water Management Plans) into the SEA/IP.	REJECTED  The focus of this ER was to assess potential environmental impacts of the Interreg VI Italia-Slovenija 2021-2027 Programme, which represents the funding framework for various projects.	Water management was not selected as key IP targeted issue.
		It was suggested that the SEA should include more indicators from the water management topic.	REJECTED  The focus of this ER was to assess potential environmental impacts of the Interreg VI Italia-Slovenija 2021-2027 Programme. This means that the ER and indicators were focused on key areas of intervention of this specific IP. Subsequently, indicators relevant to the IP impacts were identified already in the Scoping phase and were confirmed with the Scoping Report. Simply listing more indicators would not contribute in any way to the quality of the ER or its outcomes. Nonetheless, overall flood risk situation (on the level of cross-border area) was described in chapter 5.7 and assessed in chapter 6.7 - both in the context of the assessed IP.	/
		It was suggested that the SEA should list all relevant sectorial strategies on all levels.	ACCEPTED - addressed in the ER  SEA team rechecked all listed sectorial strategies and added most relevant to the list in chapter 4.	/
		Several suggestions for improvement of wording were suggested in several chapters of the ER.	ACCEPTED - addressed in the ER  SEA team rechecked all suggestions and improved ER wording in line with proposals.	/
		It was suggested that the SEA should add a specific environmental objective "Achieving good environmental state of marine waters" and additional indicators.	NOTED - already addressed in the ER  Marine waters are already included in the environmental objective "Protection of surface water against pollutants, harmful substances and hydro -morphological pressures" and are appropriately addressed in chapters 5.3 and 6.3. Indicators relevant to the IP impacts were identified already in the Scoping phase and were confirmed with the Scoping Report. Simply listing more indicators would not contribute in any way to the quality of the ER or its outcomes.	/

	<p>It was suggested to up-date the state of environment in chapter 5.3.1, 5.3.2. and 5.3.3 with the newest available data.</p>	<p>ACCEPTED – addressed in the ER</p> <p>SEA team rechecked and improved the state of environment, as suggested.</p>	/
	<p>It was suggested to re-check identified impacts for environmental impact of “water” and unify them as much as possible.</p> <p>A question why only positive impacts were identified for Ecological and chemical status of surface water bodies, while both positive and negative impacts were recognized for all remaining indicators.</p> <p>Additionally, a question why no change is indicated at Quantitative status of groundwater indicator in table 6.1, if IP is expected to generate more pressures from tourism.</p>	<p>ACCEPTED – addressed in the ER</p> <p>SEA team rechecked all impacts on waters and unified them as much as it was possible.</p> <p>On the other hand, the SEA team rechecked all impacts and reassures SWA that both positive and negative impacts were identified for all indicators related to the topic of waters.</p> <p>Regarding the “no change” for Quantitative status of groundwater – yes, the IP is expected to generate more tourist flows and subsequently more pressures on all resources, including drinking water. However, all groundwater bodies within the programme area are considered to be in good quantitative state and expected increased pressures are not expected in extent that would have the ability to change that status.</p>	
	<p>Explanations regarding scoring for SOs 1.1, ISO 1.b, 2.6, 2.7 and 2.4 were requested.</p>	<p>NOTED – already addressed in the ER</p> <p>In case of SOs 1.1 and ISO 1.b the SEA team assessed that proposed activities are expected to have no or only minimal impacts. Even in case of recognized positive impacts the level of impact was assessed as minimal, thus resulting in the provided score.</p> <p>In case of SOs 2.6 and ISO 2.7 the SEA team assessed that proposed activities are expected to have only minimal negative impacts, while at the same time having nonsignificant positive impacts, thus resulting in the provided score.</p> <p>In case of SO 2.4 nonsignificant negative impact was recognized and subsequently a mitigation measure was proposed. In this case SWA comment is justified, as in table 6.1 no negative impact was indicated. The SEA team corrected this mistake.</p>	
	<p>It was suggested that the mitigation measure linked to impact of potential new cycling infrastructure on the local water system should be expanded to also encompass the Kras/Carso project.</p>	<p>ACCEPTED – addressed in the ER</p> <p>The mitigation measure was expanded to also encompass potential new cycling infrastructure of the Kras/Carso infrastructure.</p>	/





## 5. Reasons for choosing the programme as adopted, in the light of the other reasonable alternatives dealt with

Potential impacts identified in the scoping phase were reconsidered and more precisely defined and described. It was concluded that the IP is expected give contribution to many positive impacts on all environmental aspects, as reported in the following table, where the Zero Alternative is reported in terms of trends (third column), and the contribution of IP in terms of prevalent type of expected impacts (fourth column).

Environmental aspects	Indicators	ZA trends	IP type of impact
Air	Average emission levels of the main air pollutants (NOx, PM10, PM2,5, O3, SO2)	↗ ↔ (IT) ↗ ↔ (SI)	+
Climate	Greenhouse gas emissions	↘ ↔ (IT) ↗ (SI)	+
	Share of renewable energy in gross final energy consumption	↔ (IT) ↗ (SI)	0
	Final energy consumption	↗ (IT) ↗ (SI)	0
Water	Ecological and chemical status of surface water bodies	↘ ↔ (IT) ↘ ↔ (SI)	+
	Chemical status of groundwater bodies	↔ (IT) ↔ (SI)	+
	Quantitative status of groundwater	↔ (IT) ↔ (SI)	0
	Water Exploitation Index	↔ (IT) ↔ (SI)	0
Soil	Land take	↘ (IT) ↘ (SI)	0
	Land use/cover change by categories	↘ (IT) ↘ (SI)	+
	Area of functionally degraded areas	↘ (IT) ↘ (SI)	0
	Quality of soil and soil pollution	↘ (IT) ↔ (SI)	+
Biodiversity	Development of nature protection areas (by categories)	↔ (IT) ↗ (SI)	+
	Favourable condition of species of European interest	↘ (IT) ↘ (SI)	+
	Favourable condition of habitats of European interest	↗ (IT) ↗ (SI)	+
Landscape and cultural heritage	Registered units of cultural heritage	↗ (IT) ↘ (SI)	0
	Intangible cultural heritage	↗ (IT) ↘ (SI)	0
	Extension of protected landscapes	↗ (IT) ↗ (SI)	0
	Risk of agricultural land abandonment	↔ (IT) ↘ (SI)	0
	Landscape fragmentation	↘ (IT) ↘ (SI)	+
	Number of people exposed to air pollution	↗ ↔ (IT) ↗ (SI)	+

Human health and well-being	Population exposed to excessive noise levels	↔ ↓ (IT) ↗ (SI)	+
	Generated solid waste per capita	↓ (IT) ↓ (SI)	+
	Selected solid waste	↗ (IT) ↗ (SI)	+
	'Equivalent personnel' for every thousand 'equivalent patients'	↔ ↓ (IT) ↓ (SI)	0
	Number of people affected by flood risk	↔ ↓ (IT) ↗ (SI)	+

Most of the effects generated by the implementation of the IP are of a potential and immaterial nature, not directly dependent on the actions that the program could initiate, and with a limited impact on the environmental objects, which are influenced by other kind of actions activated in the area.

The analysis was carried out schematically, indicating the absence of impact with the value "0" and the type of foreseen impact with the value "-" or "+" in case of respectively negative (i.e. detrimental to environmental quality) or positive (the opposite) effect.

The table highlights how a "non-implementation" of the IP (namely the Zero Alternative) could have potential negative effects on various environmental objects, especially on the ecological status of water bodies, land use and soil pollution, landscape fragmentation, and generation of solid waste.

Nonetheless, the real contribution of the IP is the support to sustainable development. In this sense, the non-implementation of the IP would imply the orientation of development policies towards the pursuit of environmental objectives set at local, regional, national and European level.

## 6. Monitoring measures

Article 10 of the SEA directive specifies that monitoring measures shall be prescribed in the context of an SEA, if significant negative impacts can be identified. Such monitoring measures shall allow to identify unforeseen adverse effects at an early stage and take mitigating action.

No significant negative impacts have been identified in the SEA for any of 7 SOs of the Interreg VI-A Italy-Slovenia 2021-2027 Programme, and only non-significant negative impacts have been identified for 2 out of 7 SOs. Furthermore, the whole IP is placing a strong emphasis on improving the environmental situation and addressing key environmental and sustainability concerns. For identified minor negative impacts mitigation measures were foreseen, as well as recommendations for further enhancement of identified positive impacts of the IP. Many of them were already addressed and integrated into the IP, as described in chapter 1.4. Those that remain are presented in chapter 7. Subsequently, no mandatory monitoring measures are necessary to be implemented.

However, to measure the enhancement of the IP impact and to ensure coherence with assessments of the SEA we recommend monitoring measures that are linked to the most

sensitive and mostly affected aspects. They are also designed with administrative burden in mind, thus allowing for an overview of potential developments for sensitive aspects, without placing a disproportionate burden on programme authorities or projects:

- Number of the studies of the carrying capacity of the protected areas, prepared as a part of supported projects.
- Number of visitor management plans in protected areas, prepared as a part of supported projects.
- Number of newly developed sustainable tourism products/services/activities, developed as a part of supported projects.
- Number of sustainable mobility/accessibility strategies targeting tourists as one of key target groups, developed as a part of supported projects.

We also recommend that the monitoring of possible environmental effects is ideally reflected throughout the project cycle as follows:

**Project application and contracting phase:**

- Consideration of possible environmental effects as a horizontal issue during the application phase (quality assessment and project selection);
- Involvement of external experts with the necessary environmental expertise for the quality assessment of project applications;
- Explanations and self-assessment of possible environmental effects in the application form (based on guiding questions);
- Obligation to comply with the relevant EU and national environmental legislation is embedded in the Subsidy Contract.

**Project implementation phase:**

- Monitoring of project progress and implementation at different stages of the project life cycle
- On-the-spot checks of project pilot investments conducted by the MA/JS including the compliance with environmental regulatory requirements (if required, involving also external experts).

**Project closure phase:**

- Reporting on environmental sustainability of the projects (if applicable, including the adherence to relevant EU and national environmental regulations).

If this recommendation is respected, the MA/JS will simultaneously be able to execute the proposed monitoring, collect values for all proposed indicators, as well as adequately implement proposed mitigation measures and recommendations.

## **7. Reasoned opinion by SEA authorities**

The SEA competent authorities, namely the Slovenian Ministry for Environment and Spatial Planning of the Republic of Slovenia, the SEA Department of Friuli Venezia Giulia, and the SEA Department of Veneto, have collected by the elicited Environmental Authorities all observations, comments, suggestions and clarification requests listed in previous Section 4.

**The overall perception on the adequacy of the Environmental Report and the acceptability of the environmental impact of the IP by all three authorities is favourable, and these judgements have been transmitted to the competent authorities for final deliberations, which have been the following.**

**The Ministry of the Environment and Spatial Planning Issues of the Republic of Slovenia, after having examined all the material and on the basis of the opinions of the ministries and organisations, in accordance with Article 42 of the Environmental Protection Act, presented the following conclusions:**

- the Environmental Assessment has been prepared in accordance with the Environmental Assessment Regulation. The Environmental Assessment adequately identifies, describes and evaluates the environmental impacts of the implementation of the Program and provides mitigation measures; however, there are some shortcomings in the environmental report, which are of a technical nature and do not alter the assessment of the impacts on the environment individual components. The shortcomings concern nature protection, forests and the assessment of impacts on water.**
- The Commission considers that the Environmental Assessment is adequate and can be circulated.**

**In accordance with Article 42 of the Environmental Protection Act-1 – ZVO-1 and Article 20 of the Environmental Assessment Regulation, the Ministry of the Environment and Spatial Planning issues of the Republic of Slovenia shall also give an opinion on the acceptability of the environmental impacts of the plan implementation.**

**On the basis of the documentation received and of the opinions of the ministries and other organisations, the Ministry has concluded that the impacts of the implementation of Interreg Italy - Slovenia 2021-2027 on the environment are acceptable, taking into account mitigation measures set out in the Environmental Report. The implementation of the Interreg Italy - Slovenia 2021-2027 Programme is allowed and environmentally acceptable only if the mitigation measures set out in the Environmental Assessment are taken into account. Monitoring shall be carried out in accordance with the Environmental Report. The plan promoter shall inform the Ministry with the results of the monitoring within five years of the plan adoption.**

**The Governement of Autonomous Region of Friuli Venezia Giulia, agreeing with the contents of the preliminary report of the Regional Environmental Assessments Service, and therefore, considering that the Interreg VI-A Italy-Slovenia 2021-2027 does not cause significant negative effects on the environment, provided that the requirements contained in the aforementioned Preliminary Report of the Environmental Assessment Service are taken into account, unanimously deliberates the approval of the SEA and impact assessment procedure of the proposed Interreg VI-A Italy-Slovenia 2021-2027 cross-border cooperation program (Deliberation 941 of 23<sup>rd</sup> June 2022), provided that the following recommendations are met by the Managing Authority of Interreg VI-A Italy-Slovenia 2021-2027.**

- 1. The ER must be integrated with modalities of transposition of comments and opinions by environmental authorities during the Scoping phase**
- 2. In order to ensure a sustainable implementation of the IP from an environmental point of**

view, guidelines, selection criteria, environmental rewards for projects that envisage actions for sustainability or "exclusionary criteria "in the event of environmental constraints or criticalities, must be considered; when defining the methodology and criteria used for project selection, the mitigation measures and improvement measures and the recommendations provided in the ER (Ch. 7 "Proposed mitigation and enhancement measures") relating to the various SO must be incorporated. In relation to the possible impact on habitats and species of community interest, any conditions for admissibility must be specified a priori (e.g. prohibition of reduction of certain habitats of community interest, specific management indications of the habitats, the need to introduce mitigation measures, etc.) deriving from the conservation measures or management plans in force in the Natura 2000 network.

3. The possible inclusion in SO 2.6 of the action proposed in Ch. 7 ("Proposed mitigation and enhancement measures") of the ER and defined as: "Promote commercial networks that incorporate mitigation and adaptation to climate change (together with other factors relevant environmental issues) in existing commercial operations and in the decision-making processes of the central body (for example product development, etc.)." must be verified
4. As foreseen in Chapter 8 of the ER, a specific Environmental Monitoring Plan must be prepared by the Managing Authority before the launch of the 1st call for tenders in agreement with the Environmental Authorities of the program. The environmental monitoring plan must take into account the recommendations for the definition of environmental monitoring indicators proposed by ARPA FVG. The proposed system of indicators will have to be revised and integrated with contribution, process and context indicators designed to measure the progress of the Program impact and ensure its consistency with the SEA assessments. The environmental monitoring plan must provide for the responsibilities and coordination scheme of the contact persons, the reporting time schedule and the final set of indicators chosen in accordance with the provisions of art. 18 of Legislative Decree 152/2006 as recently updated; it is recommended to provide for the methods of collecting the information functional to the feeding of the process and contribution indicators already in the preparation of the calls for tenders. It will also be useful to have a dedicated monitoring team to support the Managing Authority which, considering the monitoring needs of the Program and SEA, guides the setting of the various calls and deals with the systemization of the information collected in order to to guarantee the tightness of the monitoring system;
5. Pursuant to the DGR n. 871/ 2020, for the designation of the Regional Environmental Authority for the programming of Structural Funds 2021-2027, appropriate forms of collaboration must be activated with the aforementioned Authorities, in order to ensure the correct integration of the environmental component in the implementation phase of the Program. During the evaluation phase of the project proposals, suitable evaluation of the environmental aspects must be guaranteed, also in relation to the fulfillment of the requirements and criteria referred to in previous prescriptions, through the presence of qualified personnel.
6. During the evaluation phase of the project proposals, both internal and external coherence must be verified and guaranteed in relation to territorial, landscape and sector planning at the relevant higher level.
7. With regard to the Appropriate Assessment, in the subsequent stages of implementation of the Interreg VI-A Italy - Slovenia cooperation program 2021-2027, the assessment pursuant to art. 5 and 6 of Presidential Decree 357/1997 and subsequent amendments ii. (level I screening or level II appropriate) of internal, neighboring or external projects and interventions that may involve functional interference on habitats and species of community interest.

**The Managing Authority of Interreg VI-A Italy-Slovenia 2021-2027 received the recommendations and commits to the following actions**

- 1. The recommendation has already been considered and incorporated in Annex I of the Final version of the ER;**
- 2. The recommendation will be considered in the respective criteria of the call for tenders' design and project selection;**
- 3. The recommendation has been considered and verified during the definition of the IP. In fact, this action proposed as an enhancement measure by the SEA team, was discussed during the 23 Task Force meeting and the delegations decided not to include it in the IP as similar actions targeting SMEs have already been included within SO 1.1.**
- 4. The recommendation will be considered during the implementation phase and the proposed monitoring measures will be implemented by the MA in agreement with regional EAs; the text of the calls will mention the list of environmental indicators to be considered when submitting a project; the subsidy contract will specify the information to be provided and other obligations to be fulfilled by the beneficiaries in order to comply with the environmental monitoring system.**
- 5. The recommendation will be considered before the launch of the call for tenders' phase;**
- 6. Internal and external coherence will be assessed and verified during IP implementation;**
- 7. The recommendation was already considered, and it will be taken into account by the MA during the whole implementation phase;**

**The Regional Commission for SEA of Veneto expressed a favourable opinion in relation to the SEA procedure and the Appropriate Assessment of the proposed Interreg VI-A Italy-Slovenia 2021-2027 IP, provided that the following requirements are complied:**

- 1. the ER must be integrated with indications and recommendations by Environmental Authorities during the Consultation phase;**
- 2. In order to ensure a sustainable implementation of the IP from an environmental point of view, guidelines, selection criteria, environmental rewards for projects that envisage actions for sustainability or "exclusionary criteria "in the event of environmental constraints or criticalities, must be considered;**
- 3. When defining the methodology and criteria used for project selection, the mitigation measures and improvement measures and the recommendations provided in the ER (Ch. 7 "Proposed mitigation and enhancement measures") relating to the various SO must be considered;**
- 4. The possible inclusion in SO 2.6 of the action proposed in Ch. 7 ("Proposed mitigation and enhancement measures") of the ER and defined as: "Promote commercial networks that incorporate mitigation and adaptation to climate change (together with other factors relevant environmental issues) in existing commercial operations and in the decision-making processes of the central body (for example product development, etc.)" must be verified;**
- 5. As foreseen in the ER, a specific Environmental Monitoring Plan must be prepared by the Managing Authority before the launch of the 1st call for tenders in agreement with the Environmental Authorities of the program. The environmental monitoring plan must provide for the responsibilities and coordination scheme of the contact persons, the reporting time schedule and the final set of indicators chosen in accordance with the provisions of art. 18 of Legislative Decree 152/2006 as recently updated; it is recommended to provide for the methods of collecting the information functional to the feeding of the process and contribution indicators already in the preparation of the calls for tenders. It**

will also be useful to have a dedicated monitoring team to support the Managing Authority which, considering the monitoring needs of the Program and SEA, guides the setting of the various calls and deals with the systemization of the information collected in order to to guarantee the tightness of the monitoring system;

6. If modifications to the strategy or to the planned actions are produced during the IP implementation phase, they must be subject to SEA eligibility assessment, accordingly to Decree 152/2006 Part II and subsequent amendments and additions;
7. The Environmental Statement must be drafted pursuant to Art. 17 of Decree 152/2006 Part II and subsequent amendments and additions, illustrating how the environmental observations have been integrated in the IP, how the results of public consultation have been taken into account in the ER, and finally why the current IP have been elicited with respect to potential alternatives;
8. The final approval must be published accordingly to the methods provided by the law in force, with the indication of the physical place where to inspect the approved IP and the annexed documentation;
9. For the sake of an effective environmental governance of the IP, appropriate tasks and roles for the Environmental Authorities must be defined. Furthermore, during the evaluation phase of the proposals, suitable evaluation of the environmental aspects must be guaranteed, also in relation to the fulfillment of the requirements and criteria referred to in previous prescriptions, through the presence of qualified personnel;
10. All the recommendations indicated in the Technical Report 150/2022 on the Appropriate Assessment must be transposed, both before the IP is launched and during the implementation phase;
11. During the evaluation phase of the project proposals, both internal and external coherence must be verified and guaranteed in relation to territorial, landscape and sector planning at the relevant higher level;
12. All the selected project in the implementation phase must be necessarily made consistent with the existing Regional plans, coordinating objectives with the contents of the new Veneto Regional Territorial Plan for Coordination of the activities, approved by Regional Government Decree 107/2020, including the Recognition Atlas for Landscape Areas, and with in force sectoral planning, considering even the consultation of the Masterplan for the Venice Lagoon and Territory.

**The Managing Authority of Interreg VI-A Italy-Slovenia 2021-2027 received the recommendations and commits to the following actions**

1. The recommendation has already been considered and incorporated in Annex I to the Final version of the ER;
2. The recommendation will be considered in the respective criteria of the call for tenders' design and project selection;
3. The recommendation will be considered in the respective criteria of the call for tenders' design and project selection;
4. The recommendation has been considered and verified during the definition of the IP. In fact, this action proposed as an enhancement measure by the SEA team, was discussed during the 23 Task Force meeting and the delegations decided not to include it in the IP as similar actions targeting SMEs have already been included within SO 1.1.
5. The recommendation will be considered during the implementation phase and the proposed monitoring measures will be implemented by the MA in agreement with regional EAs; the text of the calls will mention the list of environmental indicators to be considered



**when submitting a project; the subsidy contract will specify the information to be provided and other obligations to be fulfilled by the beneficiaries in order to comply with the environmental monitoring system.**

- 6. The recommendation will be considered during the implementation phase of the IP;**
- 7. The recommendation has already been considered, and the present document is following the mentioned Article 17 of Decree 152/2006;**
- 8. The recommendation will be considered and the physical place for the IP and its annexes consultation will be communicated in an official way;**
- 9. The Environmental Authorities and dedicated environmental personnel will be involved in the proposals evaluation;**
- 10. All the recommendations of Technical Report 150/2022 are consistent with the Appropriate Assessment document, and they will be considered in next phases of the IP;**
- 11. Internal and external coherence will be assessed and verified during IP implementation;**
- 12. For projects placed in the Veneto Programme Area, the same coherence will be assessed and verified with respect to the mentioned plans.**