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Italia-Slovenija

INTERREG VI-A ITALY-SLOVENIA 2021-2027

**STRATEGIC ENVIRONMENTAL
ASSESSMENT**

**REPLIES TO SCOPING
COMMENTS**

**Annex 1 to Strategic Environmental
Assessment for the Interreg VI-A Italy-Slovenia
2021-2027 Programme**

April 2022

Amendments after public consultations

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Contracting Authority:

**Autonomous Region Friuli Venezia Giulia
Central Directorate for Finance
Accounting Unit**
via del Lavatoio 1, I-34132 Trieste, Italy



Contracting Authority Representative:
Laura Comelli (adg.italaslo@regione.fvg.it)

Service Provider:

Archidata Srl
Via Fabio Filzi 27, 20124 Milano, Italy



Service Provider Representative:
Marina De Nigris (denigris@archidata.it)

SEA Team Key Experts:
Francesco Silvestri (fsilvestri@eco-eco.it)
Klemen Strmšnik (klemen.strmsnik@zavita.si)

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Reply to Scoping comments of the Interreg VI-A Italy-Slovenia 2021-2027 Programme

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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 to environmental issues and weaknesses, monitoring results included;	The issue has been considered in the Scoping Report, and it is the root of ER, transversely to all chapters	

		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 prescriptions and recommendations by Environmental authorities	The remark has been addressed in ER, Chapter 3 with respect to prescriptions 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"> • Carrying capacity studies should be prepared prior to development of projects for important nature protected areas in order to reduce increased tourism flow pressures. • 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). 	The remark has been noted and was addressed in the Environmental Report in Chapter 6.	<p>NOTED:</p> <p>To be integrated within the existing actions relating to PO2 SO7</p>
		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.	/