



Interreg



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the European Union

Slovenia – Croatia



## VERIFICATION OF COMPLIANCE WITH THE „DO NO SIGNIFICANT HARM PRINCIPLE “



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Project: Verification of compliance with the „Do No Significant Harm principle“,  
Interreg Programme Slovenia-Croatia 2021-2027

Contract no.: C1541-21P473003 (Client) - P53/2021 (Contractor)

Project no: 295/2021

Key word: DNSH | IP | Slovenia | Croatia

Date: 07. 03. 2022

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## ACRONYMS

ERDF	European Regional Development Fund
EC	European Commission
ESI	European structural and investment funds
EU	European Union
DNHS	Do no significant harm
IP	Interreg Programme
SEA	Strategic Environmental Assessment
SO	Specific objectives
ISO	Interreg Specific Objectives

## 1. CONTENT AND METHOD

For each ERDF programme article 9 (4) of the “Common Provisions Regulation” for ESI funds in the 2021-2027 period (Regulation (EU) 2021/1060) prescribes the need to verify the compliance with the “do no significant harm” (DNSH) principle. “Significant” as per the guidance provided by the European Commission (“Commission explanatory note: Application of the “do no significant harm” principle under cohesion policy during programming”) is to be understood in line with the EU Taxonomy Regulation (Regulation (EU) 2020/852). The EC further encourages to make use of the assessment methodology prescribed for the assessment in the frame of the Recovery and Resilience Facility (Regulation (EU) 2021/241).

This assessment was done for the Interreg Programme Slovenia-Croatia 2021-2027 programming period and is based on the most recent available version of the programme (Interreg programme Slovenia-Croatia 2021-2027, Draft version 3, 31 January 2022). The methodology is based on the “Commission Notice Technical guidance on the application of ‘do no significant harm’ under the Recovery and Resilience Facility Regulation 2021/C 58/01” and the practical application in the context of the Recovery and Resilience plans of Slovenia and Croatia. The assessment follows the 2-step checklist approach suggested by the technical guidance for first simplified and where necessary detailed descriptions of likely impacts. Where possible, assessments already provided by the SEA have been used as input for the assessment of similar environmental objectives in the DNSH-assessment.

The Interreg Programme does not yet define concrete projects and their location, but provides the framework and thematic orientation and is the basis for later selection of projects. Due to this abstract, “strategic” nature of the programme, the assessment is made on a qualitative basis. This approach is coherent both with the Commission explanatory note as well as with the approach followed for the DNSH assessment under the RRF.

Thematic focus points, as well as budget made available within the programme, are defined on the level of the specific objectives, and types of action under a specific objective which are usually closely linked to each other. The assessment as per the guidance documents is carried out on the level of “types of actions”.

The general focus of the Interreg Programme is laid on positive environmental impacts, thus also creating positive impacts on most environmental objectives to be assessed for the DNSH-principle. The qualitative argumentation below, therefore, lists positive impacts, however, those are not considered to balance out negative impacts. Both potential positive and potential negative impacts are presented side by side.

## 2. ASSESSMENT

### 2.1. Priority 1: A green and adaptive region

#### 2.1.1. Strengthening of risk preparedness and response capacities in the cross-border area

This specific objective aims to enhance the preparedness of local communities and responsiveness of rescue response units by joint training and unified equipment, the establishment of joint protocols (concrete and comprehensive plans), and co-ordination mechanisms so that units from both countries will be able to jointly respond to the same disaster and adapt to different climate change-related and other shared risks along the entire cross-border area, including the capacity building of different target groups to protect against shared risks.

Additional support will be provided to local communities in the cross-border territories by identifying and increasing awareness on required responsiveness and solutions for effective climate adaptation needs. Activities will boost joint cross-border cooperation on multidisciplinary climate change adaptation measures for an integrated approach towards climate adaptation measures.

#### Types of action under the SO:

- Strengthening of risk preparedness and response capacities in the cross-border area
- Increasing the resilience to climate change effects in the programme area

Possible cooperation actions under *Type of actions 1 Strengthening of risk preparedness and response capacities in the cross-border area* can include exchange and harmonisation of data, risk mapping, joint protocols, the establishment of information flows, development of cross-border response units (including rescue plans, protocols, and mechanisms of civil protection), development and enhancement of early warning and response systems, awareness-raising and education of inhabitants on climate risk adaptation on how to act during different climate change-related and other disasters, training, capacity building and equipping of disaster response units and organisations and supporting cross-border capacity building, the establishment of cross border tools for the target groups in the cross-border area (particularly youth and children) for protection against shared threats.

Under *Type of actions 2 Increasing the resilience to climate change effects in the programme area* possible actions are: preparing and coordinating cross-sectoral integrated cross-border climate adaptation action plans, pilot and/or demonstration activities focused on strengthening the resilience of the cross-border area, supporting the elaboration of inclusive (interdisciplinary) cross-border spatial planning background documents responding to identified climate threats; capacity building focused on the sustainable implementation of defined action plans on regional/local level and introduction and development of nature-based solutions for integrated

water management by considering ecosystem restoration, natural water retention measures and other green (or blue) infrastructure measures that reduce flood risk threats.

Compliance of supported actions under the SO with the principle of “do no significant harm”

The programme will support mostly “soft actions” that do not harm the environmental objectives:

- Climate change mitigation
- Climate change adaptation
- The sustainable use and protection for water and marine resources
- The circular economy, including waste prevention and recycling
- Pollution prevention and control to air, water or land
- The protection and restoration of biodiversity and ecosystems

In case supported actions will also include small-scale infrastructure and the acquisition of necessary equipment and tools for implementation of pilot actions (i.e., under the implementation of cross-border pilot actions focused on strengthening resilience), these actions could have a local direct negative impact on the environment (flora, fauna, habitats, biodiversity, protected areas and Natura 2000 areas, geodiversity and landscape diversity; soil and land use, cultural heritage and landscape, water bodies status; air, material assets, raw materials, and resources, human health and well-being) in the implementation phase (due to needed construction works). Besides, risk prevention may prioritise reducing the vulnerability of human settlements to environmental hazards. Measures may therefore be partial to the detriment of the environment in some areas to achieve this human protection level or resilient objective in some areas rather than improving the ecosystem.

Nevertheless, the SO takes into account the ecosystem approach, which means that the preservation of the environment and people’s health from potential harm or permanent damage is already to some extent embedded in the specific objective. All actions also must comply with environmental as well as spatial legislation – taking into account spatial plans for which a SEA was already carried out. Given the envisaged scope of these interventions (pilot projects) and the mandatory compliance with environmental legal and spatial frameworks, less significant negative impacts can be expected during implementation.

No large-scale construction with potentially significant negative impacts is foreseen in the context of the programme.

Expected negative impacts are generally minor due to the nature of small-scale construction activities (if any) to be implemented. They are mostly connected to construction activities themselves as well as soil sealing related to that. Depending on the actual site impacts on landscape or protected species are possible as well. However, for all interventions within protected areas including natural values environmental permits have to be obtained therefore no significant negative impacts on nature are expected. Actions must also comply with environmental as well as spatial legislation – taking into account spatial plans for which a SEA was already carried out.



The detailed assessment of the types of actions is outlined in the tables below.

Table 1: Assessment of the type of action 'Strengthening of risk preparedness and response capacities in the cross-border area' under SO 1.1

Please indicate which of the environmental objectives below are likely to be negatively affected by the measure, taking into account its life cycle.	Significant harm		Detailed justification based on evidence if "No" has been selected?
	Yes	No	
Climate change mitigation		X	The type of action supported due to it's purpose, content and soft nature of activities has no foreseeable significant negative impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. No activities which likely lead to an increase in GHG are foreseen. As such this action is considered compliant with DNSH for the relevant objective.
Climate change adaptation		X	The type of action supported due to it's purpose, content and soft nature of activities has no foreseeable significant negative impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. No activities which likely lead to an increased risk related to climate change adaption are foreseen. The foreseen activities are actually intended to achieve positive impacts on climate change adaptation through the strengthening of risk preparedness and response capacities in the cross-border area. As such this action is considered compliant with DNSH for the relevant objective.
The sustainable use and protection for water and marine resources		X	The types of actions supported due to it's purpose, content and soft nature of activities have no foreseeable significant negative impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. No adverse effects to the sustainable use and protection of water and marine resources are to be expected. As such this action is considered compliant with DNSH for the relevant objective.
The circular economy, including waste prevention and recycling		X	The type of action supported due to it's purpose, content and soft nature of activities has no foreseeable significant negative impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. No increase in waste creation or adverse effects to the circular economy is to be expected. As such this action is considered compliant with DNSH for the relevant objective.
Pollution prevention and control to air, water or land		X	The type of action supported due to it's purpose, content and soft nature of activities has no foreseeable

Please indicate which of the environmental objectives below are likely to be negatively affected by the measure, taking into account its life cycle.	Significant harm		Detailed justification based on evidence if "No" has been selected?
	Yes	No	
			impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. No adverse effects to air, water or land pollution are to be expected. As such this action is considered compliant with DNSH for the relevant objective.
The protection and restoration of biodiversity and ecosystems		X	The type of action supported due to it's purpose, content and soft nature of activities has no foreseeable impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. No adverse effects on biodiversity and ecosystems are to be expected. As such this action is considered compliant with DNSH for the relevant objective.

Table 2: Assessment of the type of action 'Increasing the resilience to climate change effects in the programme area' under SO 1.2

Please indicate which of the environmental objectives below are likely to be negatively affected by the measure, taking into account its life cycle.	Significant harm		Detailed justification based on evidence if "No" has been selected?
	Yes	No	
Climate change mitigation		X	The type of action supported due to it's purpose, content and mostly soft nature of activities has no foreseeable significant impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. Possible pilot actions on the field (related e.g. to introduction and development of nature-based solutions for integrated water management by considering ecosystem restoration, natural water retention measures and other green (or blue) infrastructure measures that reduce flood risk threats) will not lead to an increase in significant GHG. As such this action is considered compliant with DNSH for the relevant objective.
Climate change adaptation		X	The type of action supported due to it's purpose, content and mostly soft nature of activities has no foreseeable significant negative impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. No activities which likely lead to an increased risk related to climate change adaption are foreseen. The foreseen activities

Please indicate which of the environmental objectives below are likely to be negatively affected by the measure, taking into account its life cycle.	Significant harm		Detailed justification based on evidence if "No" has been selected?
	Yes	No	
			are actually intended to achieve positive impacts on climate change adaptation through increasing the resilience to climate-change effects. As such this action is considered compliant with DNSH for the relevant objective.
The sustainable use and protection for water and marine resources		X	The type of action supported due to it's purpose, content and mostly soft nature of activities has no foreseeable significant impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. No significant adverse effects to the sustainable use and protection of water and marine resources are to be expected. Possible pilot actions on the field (related e.g. t reduction of flood risk threats) will be nature-based solutions for integrated water management by considering ecosystem restoration, natural water retention measures and other green (or blue) infrastructure measures and will therefore not have a significant negative impact on the relevant objective. In addition, any spatial actions have to obtain an environmental permit (if required) and all other required permits. As such this action is considered compliant with DNSH for the relevant objective.
The circular economy, including waste prevention and recycling		X	The type of action supported due to it's purpose, content and mostly soft nature of activities has no foreseeable impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. Waste creation in the context of pilot activities is expected to be minor due to the small-scale and nature-based nature of those activities and therefore do not lead to significant negative harm on the environmental objective. As such this action is considered compliant with DNSH for the relevant objective.
Pollution prevention and control to air, water or land		X	The type of action supported due to it's purpose, content and mostly soft nature of activities has no foreseeable significant impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. Pollution in the context of construction activities is expected to be negligible as activities, in general, will be smaller-scale and nature-based. Existing legislation regarding air, water and land protection have to be regarded and further environmental assessment procedures (e.g. SEA for spatial plans which limit construction zones in sensitive

Please indicate which of the environmental objectives below are likely to be negatively affected by the measure, taking into account its life cycle.	Significant harm		Detailed justification based on evidence if "No" has been selected?
	Yes	No	
			areas) are in place. As such this group is considered compliant with DNSH for the relevant objective. As such this action is considered compliant with DNSH for the relevant objective.
The protection and restoration of biodiversity and ecosystems		X	The type of action supported due to it's purpose, content and mostly soft nature of activities has no foreseeable significant impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. Possible pilot actions on the field (related e.g. t reduction of flood risk threats) will be nature-based solutions for integrated water management by considering ecosystem restoration, natural water retention measures and other green (or blue) infrastructure measures and will therefore not have a significant negative impact on the relevant objective. In addition, any spatial actions have to obtain an environmental permit (if required) and all other required permits. As such this action is considered compliant with DNSH for the relevant objective.

### 2.1.2. Specific objective 1.2: Enhancing protection and preservation of natural biodiversity, and green infrastructure, including in urban areas, and reducing all forms of pollution

The specific objective aims to enhance, develop, or introduce green infrastructure as strategically planned network of natural and semi-natural areas with other environmental features designed and managed to deliver a wide range of ecosystem services, particularly addressing biodiversity loss as a key environmental threat in the programme area. Cross-border cooperation for improved protection, restoration, and management of the environment will be boosted (incl. Natura 2000 and other protected areas and areas of ecological importance). Actions will be focused on mitigation of impacting threats (e.g., pollution, climate change, invasive species, biodiversity loss, habitat fragmentation) and good cross-border landscape management as the key to improving biodiversity in the programme area.

#### Types of action under the SO:

- Strategically planned green infrastructure for the provision of environmental and socio-economic benefits
- Improved protection and preservation of endangered habitats, species, and landscapes in the programme area

*Type of action 1 Strategically planned green infrastructure for the provision of environmental and socio-economic benefits* aims to develop, promote, and introduce green infrastructure solutions. Possible actions include:

- enhancing cross-border cooperation and knowledge exchange for inclusive and holistic spatial planning by fostering participative process, for integration of green infrastructure on a regional scale, relying on (but not limiting to) Natura 2000 network as its backbone, aiming to support habitat connectivity, prevent degradation and support delivery of ecosystem services.
- supporting cross-border pilot activities for introducing and managing green infrastructure, and enhancing and raising awareness on the provision of multiple ecosystem services in the cross-border area (e.g., the establishment of pilot green infrastructure, promotion of environmental education, sustainable resource management, etc).

*Type of action 2 Improved protection and preservation of endangered habitats, species, and landscapes in the programme areas* shall ensure:

- Joint sustainable cross-border management of nature to improve the conservation status of species and habitat types in poor or declining condition. Actions shall include knowledge exchange and better coordination of relevant stakeholders, cross-border pilot actions to demonstrate possible solutions and engagement and education of citizens and local organisations from different sectors. Joint actions for planning and managing of natural landscapes across the border, particularly involving (but not limited to) Natura 2000 and other protected areas.
- Cross-border actions to improve protection, management, and implementation of joint measures against invasive species.
- Coordinated cross-border actions for the protection of the threatened communities within ecosystems that support ecosystem services in the programme area (e.g., pollinators, large carnivores and others, have a special role in the community of species).

#### Compliance of supported actions under the SO with the principle of “do no significant harm”

The listed type of actions are intended to preserve and promote the development of green infrastructure and to protect and preserve nature and as such do not have a significant negative impact on the environmental objectives:

- Climate change mitigation
- Climate change adaptation
- The sustainable use and protection for water and marine resources
- The circular economy, including waste prevention and recycling
- Pollution prevention and control to air, water or land
- The protection and restoration of biodiversity and ecosystems.

In case of cross-border management of nature-related actions will also include small-scale pilot actions which require earth or other invasive works, these actions could have a potential local and small scale direct negative impact on all aspects of the environment in the implementation phase. Expected negative impacts are generally minor. All actions also must comply with environmental as well as spatial legislation - taking into account spatial plans for which a SEA was already carried out. Given the envisaged scope of these interventions and the mandatory compliance with environmental legal and spatial frameworks, less significant negative impacts can be expected during implementation.

The detailed assessment of the action is outlined in the table below.

Table 3: Assessment of the type of action "Strategically planned green infrastructure for the provision of environmental and socio-economic benefits" under SO 1.2

Please indicate which of the environmental objectives below are likely to be negatively affected by the measure, taking into account its life cycle.	Significant harm		Detailed justification based on evidence if "No" has been selected?
	Yes	No	
Climate change mitigation		X	The type of action supported due to it's purpose, content and mostly soft nature of activities has no foreseeable significant impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. Possible pilot actions on the field (related e.g. introducing and managing green infrastructure) will not lead to an increase in significant GHG. As such this action is considered compliant with DNSH for the relevant objective.
Climate change adaptation		X	The type of action supported due to it's purpose, content and mostly soft nature of activities has no foreseeable significant negative impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. No activities which likely lead to an increased risk related to climate change adaption are foreseen. The promotion of green infrastructure development will cause positive impacts on climate change adaptation. As such this action is considered compliant with DNSH for the relevant objective.
The sustainable use and protection for water and marine resources		X	The type of action supported due to it's purpose, content and mostly soft nature of activities has no foreseeable significant impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. No significant adverse effects to the sustainable use and protection of water and marine resources are to be expected. Possible pilot actions on the field (related e.g. introducing and managing green infrastructure) will be nature-based solutions and will

Please indicate which of the environmental objectives below are likely to be negatively affected by the measure, taking into account its life cycle.	Significant harm		Detailed justification based on evidence if "No" has been selected?
	Yes	No	
			therefore not have a significant negative impact on the relevant objective. In addition, any spatial actions have to obtain an environmental permit (if required) and all other required permits. As such this action is considered compliant with DNSH for the relevant objective.
The circular economy, including waste prevention and recycling		X	The type of action supported due to it's purpose, content and mostly soft nature of activities has no foreseeable impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. Waste creation in the context of pilot activities is expected to be minor due to the small-scale and nature-based features of those activities and therefore do not lead to significant negative harm on the environmental objective. As such this action is considered compliant with DNSH for the relevant objective.
Pollution prevention and control to air, water or land		X	The type of action supported due to it's purpose and content and mostly soft nature of activities has no foreseeable significant impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. Pollution in the context of construction activities is expected to be negligible as activities, in general, will be smaller-scale and nature-based. Existing legislation regarding air, water and land protection have to be regarded and further environmental assessment procedures (e.g. SEA for spatial plans which limit construction zones in sensitive areas) are in place. As such this group is considered compliant with DNSH for the relevant objective. As such this action is considered compliant with DNSH for the relevant objective.
The protection and restoration of biodiversity and ecosystems		X	The type of action supported due to it's purpose, content and mostly soft nature of activities has no foreseeable significant impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. Possible pilot actions on the field (related e.g. to introducing and managing green infrastructure) will be nature-based solutions and will therefore not have a significant negative impact on the relevant objective. In addition, any spatial actions have to obtain an environmental permit (if required) and all other required permits. As such this action is considered compliant with DNSH for the relevant objective.



Table 4: Assessment of the type of action "Improved protection and preservation of endangered habitats, species, and landscapes in the programme area" under SO 1.2

Please indicate which of the environmental objectives below are likely to be negatively affected by the measure, taking into account its life cycle.	Significant harm		Detailed justification based on evidence if "No" has been selected?
	Yes	No	
Climate change mitigation		X	The type of action supported due to its purpose, content and mostly soft nature of activities has no foreseeable impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. No activities which likely lead to a significant increase in GHG are foreseen. As such this action is considered compliant with DNSH for the relevant objective.
Climate change adaptation		X	The type of action supported due to its purpose, content and mostly soft nature of activities has no foreseeable impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. No activities which likely lead to an increased risk related to climate change adaptation are foreseen. Improved protection and preservation of endangered habitats, species, and landscapes will however have a positive contribution to the achievement of the relevant objective. As such this action is considered compliant with DNSH for the relevant objective.
The sustainable use and protection for water and marine resources		X	The types of actions supported due to its purpose, content and mostly soft nature of activities have no foreseeable impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. No significant adverse effects to the sustainable use and protection of water and marine resources are to be expected. Possible pilot actions on the field will be intended for the protection of nature and will therefore not have a significant negative impact on the relevant objective. In addition, any spatial actions have to obtain an environmental permit (if required) and all other required permits. As such this action is considered compliant with DNSH for the relevant objective.
The circular economy, including waste prevention and recycling		X	The type of action supported due to its purpose, content and mostly soft nature of activities has no foreseeable significant impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. Waste creation in the context of pilot activities is expected to be minor due to the small-scale and nature-based nature of those activities and therefore do not lead to significant negative harm on



Please indicate which of the environmental objectives below are likely to be negatively affected by the measure, taking into account its life cycle.	Significant harm		Detailed justification based on evidence if "No" has been selected?
	Yes	No	
			the environmental objective. As such this action is considered compliant with DNSH for the relevant objective.
Pollution prevention and control to air, water or land		X	The type of action supported due to it's purpose, content and mostly soft nature of activities has no foreseeable impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. Pollution in the context of implementation pilot activities is expected to be negligible as activities, in general, will be smaller-scale and nature protection oriented. Existing legislation regarding air, water and land protection have to be regarded and further environmental assessment procedures (e.g. SEA for spatial plans which limit construction zones in sensitive areas) are in place. As such this type of action is considered compliant with DNSH for the relevant objective.
The protection and restoration of biodiversity and ecosystems		X	The type of action supported due to it's purpose content and mostly soft nature of activities has no foreseeable impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. No adverse effects to the biodiversity and ecosystems are to be expected, since this type of activity is intended to protect and preserve endangered habitats, species, and landscapes. As such this action is considered compliant with DNSH for the relevant objective.

## 2.2. Priority 2: Resilient and sustainable region

### 2.2.1. Specific objective 2.1: Enhancing the role of culture and sustainable tourism in economic development, social inclusion and social innovation

The specific objective aims to facilitate the recovery of tourism and culture in the Programme area by greening tourism, supporting the shift from quantity towards quality, increasing diversified cultural tourism products, and supporting cultural tourism entrepreneurship and innovation. Special attention will be given to rural border areas to unlock their hidden potentials and abilities to offer demand-driven products and services while conserving their cultural uniqueness and protecting the natural environment. All the actions supported by this priority will contribute to strengthening communities, increasing

#### Types of action under the SO:

- Supporting sustainable tourism and green transition of public and private organisations through pilot and demonstration actions, collaborative learning, and awareness-raising of tourists and all stakeholders in tourism, and culture
- Enhancing resilience and recovery of tourism and culture by development and upgrade of joint cross-border tourism products and services

*Type of action 1 Supporting sustainable tourism and green transition of public and private organizations through pilot and demonstration actions, collaborative learning and awareness-raising of tourists and all stakeholders in tourism, and culture:* The indicative activities include development of joint pilot and demonstration actions to support the green transition of public and private stakeholders in tourism and culture and development of new or “greening” of existing cross-border products, services or solutions that contribute to the sustainability and accessibility of touristic products and services. Cross-border awareness and collaboration would be performed for supporting environmentally and socially responsible tourism and culture, tourists and visitors. Joint cross-border collaboration platforms and joint learning actions for supporting environmentally and socially responsible tourism, culture, and creative industries will be also supported. Cross-border training of public and private organisations for integrated sustainable destinations management by enhancing knowledge and skills supporting the transition to resilient tourism destinations will be supported. Digital skills may be involved to enhance transition for circular business models.

*Type of action 2 Enhancing resilience and recovery of tourism by development and upgrade of joint cross-border tourism products and services for enhancing resilience:*

The indicative activities include increasing diversity of cross-border tourism under newly arising COVID-19 circumstances, adjusting tourism and cultural organisations to demands of the modern visitors by preventing mass tourism, supporting cross-border demand-driven digitalisation, development of cross-border tourism regions/destinations and increasing the quality of the offer, upgrading of joint cross-border tourism products by supporting valorisation and interpretation of cultural and natural heritage, developing joint tourism products by leveraging existing infrastructure for tourism purposes in rural destinations, joint cross-border pilot actions for development, enhancing and promotion of health tourism, oenological and gastronomical offer for the development of agrotourism and farm to fork schemes, joint cross-border actions for supporting social innovations and cultural and creative industries, and creativity in tourism and culture

#### Compliance of supported actions under the SO with the principle of “do no significant harm”

The listed types of actions are intended primarily for the green transition of tourism and the adaptation and raising of the resilience of tourism and culture to COVID-19 circumstances.

Moreover, the programme will presumably support mostly “soft actions” and as such do not have direct significant negative impacts on the environmental objectives:

- Climate change mitigation
- Climate change adaptation
- The sustainable use and protection for water and marine resources
- The circular economy, including waste prevention and recycling
- Pollution prevention and control to air, water or land
- The protection and restoration of biodiversity and ecosystems

Nevertheless, all actions that increase the number of visitors in the cooperation area will be linked to some negative effects. These effects result from additional waste and wastewater, increased pressure on the natural environment, additional trips (especially by car) to the area, additional light pollution etc. Furthermore, additional infrastructure (e.g. for accessibility) is necessary to manage a larger amount of visits. These actions can be financed by the programme or linked to the implementation of the programme even though financed from other sources. This can lead to negative impacts on environmental aspects regarding human health and well-being; flora, fauna, habitats, biodiversity, protected areas and Natura 2000 areas, geodiversity and landscape diversity; soil, land use; water; air; and climate and energy. The main negative impacts could be connected to the development of outdoor tourism that could exceed the carrying capacity of a certain area (e.g., nature, social, infrastructure).

Locations and technical characteristics of potentially selected projects are not defined in the IP. However, since all interventions have to be implemented according to environmental legislation and protection regimes no significant negative impacts on the environment are expected. These negative impacts will reflect increased pressures but will not necessarily reflect in deterioration of the environment.

The implementation of the program could also mean the implementation of individual projects that cause new greenhouse gas emissions, but the level of emissions at this level is impossible to estimate (number, locations and exact descriptions of such projects are not yet defined; they will, however, have to comply with environmental legislation and were/will be -according to scope and size- subjects of SEA, EIA and environmental permitting procedures). Besides, a small number of investments in the field (pilot projects) are expected, since the program mostly encourages the implementation of soft activities. The program also does not plan major infrastructure that would need to be adopted to climate change.

Through the SEA recommendations that could decrease pressures on the environment were proposed. The recommendations were as follows:

- Increasing the sustainability of tourism through the inclusion of sustainable mobility solutions for tourism projects in the project selection criteria (contributes to a positive evaluation); Examples:
  - Promoting the use of public transport where possible;

- Arranging parking lots and organizing group transport to more visited tourist attractions;
  - Equipping parking lots with charging infrastructure for electric vehicles;
  - Promoting cycling, walking or other forms of sustainable transport.
- Increasing the sustainability of tourism through the inclusion of:
  - solutions that promote circular economy to reduce waste, wastewater and GHG emissions in the project selection criteria (contributes to a positive evaluation of the project)
- soil sealing in the project selection criteria (contributes to a negative or positive evaluation of the project); e.g. tourist products and services will require new building land (negative evaluation), tourist products and services will be provided in existing facilities or degraded areas (positive evaluation), the project includes compensation- and mitigation measures for soil sealing ( positive evaluation); e.g. tourist products and services will be provided in existing facilities or degraded areas, or the project will ensure the replacement of lost built-up land.
- Where the projects would potentially increase the number of visitors in protected areas, a requirement from the call for proposals could be to provide sustainable solutions for visitor management. The mentioned challenge should be described within the project proposal.
- In cases where the implementation of projects would require the installation of outdoor lighting (e.g. arrangement of bicycle and footpaths), in addition to the statutory requirements, the following recommendation should be taken into account: Public lighting and other outdoor lighting should be planned restrainedly and according to actual needs. Environmentally friendly lighting that does not emit a large proportion of blue and ultraviolet light should be used.
- Within the application documentation for the call for proposals, it should be defined that for the projects that increase or can potentially increase the number of visitors in protected areas, it is expected to take into consideration the carrying capacity of project-specific protected area(s) or site(s) as a part of the project proposal.
- In cases where a small-scale visitor infrastructure is planned with the project, it is recommended to give an advantage to infrastructure aimed at controlled guiding of visitors through the area.
- Enhancement of the programme contributed to the integrated heritage conservation could be provided if additional project criteria in the call for proposals would address the cultural heritage. On this basis, more projects that would include activities directly or indirectly connected to cultural heritage would apply on the call for proposals.

The detailed assessment of the action is outlined in the table below.

Table 5: Assessment of the type of action "Supporting sustainable tourism and green transition of public and private organisations through pilot and demonstration actions, collaborative learning, and awareness-raising of tourists and all stakeholders in tourism, and culture" under SO 3.1

Please indicate which of the environmental objectives below are likely to be negatively affected by the measure, taking into account its life cycle.	Significant harm		Detailed justification based on evidence if "No" has been selected?
	Yes	No	
Climate change mitigation		X	The type of action supports mainly soft activities that have no foreseeable significant negative impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. An increase in tourist numbers due to the creation of new tourism offers can be foreseen, however, impacts on climate change that are directly linked to the actions supported are minor. Created tourism-related infrastructure will not lead to an increase in significant GHG. Some aspects of supported projects (e.g. "greening" of existing cross-border products, services or being involved to enhance transition for circular business models ) will even reduce the GHG emissions as compared to the current state. As such this type of action is considered compliant with DNSH for the relevant objective.
Climate change adaptation		X	The type of action has no foreseeable significant negative impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this group across their life cycle. No infrastructure particularly vulnerable to climate change adaption is supported in general, and no other activities which likely lead to an increased risk related to climate change adaption are foreseen. Any construction efforts will follow spatial legislation and plans and are thus checked for their individual risk related to general risks increased related to climate change (e.g. flooding). As such this type of action is considered compliant with DNSH for the relevant objective.
The sustainable use and protection for water and marine resources		X	The types of actions supported due to it's purpose, content and mostly soft nature of activities have no foreseeable significant negative impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. While tangible spatial actions such as construction efforts are possible in the context of the SO implementation (pilot and demonstration actions to support the green transition of public and private stakeholders in tourism and culture and development of new or "greening" of existing cross-border products, services or solutions), they have to obtain an environmental permit (if

Please indicate which of the environmental objectives below are likely to be negatively affected by the measure, taking into account its life cycle.	Significant harm		Detailed justification based on evidence if "No" has been selected?
	Yes	No	
			required) and all other required permits. No significant adverse effects to the sustainable use and protection of water and marine resources are to be expected. As such this type of action is considered compliant with DNSH for the relevant objective.
The circular economy, including waste prevention and recycling		X	The type of action supported due to it's purpose, content and mostly soft nature of activities has no foreseeable significant negative impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. Waste creation in the context of construction activities is expected to be minor due to the small-scale nature (pilot and demonstration actions) of those activities and therefore do not lead to significant negative harm on the environmental objective. Some aspects which are at the focus of the type of actions include support to green transition of public and private stakeholders in tourism and culture and development of new or "greening" of existing cross-border products, services or solutions thus not likely to lead to a significant increase in waste. As such this type of action is considered compliant with DNSH for the relevant objective.
Pollution prevention and control to air, water or land		X	The type of action supported due to it's purpose, content and mostly soft nature of activities has no foreseeable significant negative impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. The general focus of support is laid on the green transition of public and private stakeholders in tourism and culture and the development of new or "greening" of existing cross-border products, services or solutions. Actions supported are expected to take into consideration measures to avoid pollution of air, water or land and in general, are not expected to have significantly detrimental effects. Pollution in the context of construction activities is expected to be negligible as activities, in general, will be smaller-scale, existing legislation regarding air, water and land protection have to be regarded and further environmental assessment procedures (e.g. SEA for spatial plans which limit construction zones in sensitive areas) are in place. As such this type of action is considered compliant with DNSH for the relevant objective...
The protection and restoration of biodiversity and ecosystems		X	The type of action supported due to it's purpose, content and mostly soft nature of activities has no

Please indicate which of the environmental objectives below are likely to be negatively affected by the measure, taking into account its life cycle.	Significant harm		Detailed justification based on evidence if "No" has been selected?
	Yes	No	
			foreseeable significant negative impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. Negative impacts on ecosystems and biodiversity through an increase in tourism numbers are possible in principle, as tourism close to nature, i.e. also in high nature value areas is supported. However, the core focus is laid on sustainable tourism and managing visitors and visitor flows according to sustainability criteria. Thus, it can be expected, that protection of ecosystems is considered in projects and potentially even a positive contribution can be recorded. Negative impacts on ecosystems and biodiversity in the context of construction activities are expected to be negligible as activities, in general, will be smaller-scale, existing legislation regarding nature protection (in particular regarding protected areas of high ecological value) has to be regarded and further environmental assessment procedures (e.g. SEA for spatial plans which limit construction zones in sensitive areas) are in place. As such this type of action is considered compliant with DNSH for the relevant objective.

Table 6: Assessment of the type of action "Enhancing resilience and recovery of tourism and culture by development and upgrade of joint cross-border tourism products and services" under SO 3.1

Please indicate which of the environmental objectives below are likely to be negatively affected by the measure, taking into account its life cycle.	Significant harm		Detailed justification based on evidence if "No" has been selected?
	Yes	No	
Climate change mitigation		X	The type of action supported due to it's purpose, content and mostly soft nature of activities has no foreseeable significant negative impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. An increase in tourist numbers due to the creation of new tourism offers can be foreseen, however, impacts on climate change that are directly linked to the actions supported are minor. Created tourism-related infrastructure will not lead to an increase in significant GHG. Some aspects of supported projects with infrastructural elements (adjusting tourism and cultural organisations to demands of the modern visitors by

Please indicate which of the environmental objectives below are likely to be negatively affected by the measure, taking into account its life cycle.	Significant harm		Detailed justification based on evidence if "No" has been selected?
	Yes	No	
			preventing mass tourism, cross-border pilot actions for the development of agrotourism and farm to fork schemes) will even reduce the GHG emissions as compared to the current state. As such this group is considered compliant with DNSH for the relevant objective.
Climate change adaptation		X	The type of action supported due to it's purpose, content and mostly soft nature of activities has no foreseeable significant negative impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. No infrastructure particularly vulnerable to climate change adaption is supported in general, and no other activities which likely lead to an increased risk related to climate change adaption are foreseen. Any construction efforts will follow spatial legislation and plans and are thus checked for their individual risk related to general risks increased related to climate change (e.g. flooding). As such this group is considered compliant with DNSH for the relevant objective.
The sustainable use and protection for water and marine resources		X	The types of actions supported due to it's purpose, content and mostly soft nature of activities have no foreseeable significant negative impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. Some aspects which are at the focus of the types of actions include sustainable management of tourists in general, and the focus of the actions is laid on "high quality" tourism (e.g. adjusting tourism and cultural organisations to demands of the modern visitors by preventing mass tourism, increasing the quality of the offer, supporting valorisation and interpretation of cultural and natural heritage), thus not likely to lead to a significant increase in waste. While tangible spatial actions such as construction efforts are possible in the context of the SO implementation, they have to obtain an environmental permit (if required) and all other required permits. As such this group is considered compliant with DNSH for the relevant objective.
The circular economy, including waste prevention and recycling		X	The type of action supported due to it's purpose, content and mostly soft nature of activities has no foreseeable significant negative impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle.



Please indicate which of the environmental objectives below are likely to be negatively affected by the measure, taking into account its life cycle.	Significant harm		Detailed justification based on evidence if "No" has been selected?
	Yes	No	
			Waste creation in the context of construction activities is expected to be minor due to the small-scale nature of those activities and therefore do not lead to significant negative harm on the environmental objective. Some aspects which are at the focus of the types of actions include sustainable management of tourists in general, and the focus of the actions is laid on "high quality" tourism (e.g. adjusting tourism and cultural organisations to demands of the modern visitors by preventing mass tourism, increasing the quality of the offer, supporting valorisation and interpretation of cultural and natural heritage), thus not likely to lead to the significant increase in waste. As such this type of activity is considered compliant with DNSH for the relevant objective.
Pollution prevention and control to air, water or land		X	The type of action supported due to it's purpose, content and mostly soft nature of activities nature has no foreseeable significant negative impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. The general focus of support is laid on high-quality tourism and managing tourists according to sustainability criteria (e.g. adjusting tourism and cultural organisations to demands of the modern visitors by preventing mass tourism, increasing the quality of the offer, supporting valorisation and interpretation of cultural and natural heritage). Actions supported are expected to take into consideration measures to avoid pollution of air, water or land and in general, are not expected to have significantly detrimental effects. Pollution in the context of construction activities is expected to be negligible as activities, in general, will be smaller-scale, existing legislation regarding air, water and land protection have to be regarded and further environmental assessment procedures (e.g. SEA for spatial plans which limit construction zones in sensitive areas) are in place. As such this type of activity is considered compliant with DNSH for the relevant objective.
The protection and restoration of biodiversity and ecosystems		X	The type of action supported due to it's purpose, content and mostly soft nature of activities has no foreseeable significant negative impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. Negative impacts on ecosystems and biodiversity through an increase in tourism numbers are possible in principle, as

Please indicate which of the environmental objectives below are likely to be negatively affected by the measure, taking into account its life cycle.	Significant harm		Detailed justification based on evidence if "No" has been selected?
	Yes	No	
			<p>tourism close to nature, i.e. also in high nature value areas is supported. However, the core focus is laid on sustainable tourism and managing visitors and visitor flows according to sustainability criteria (e.g. adjusting tourism and cultural organisations to demands of the modern visitors by preventing mass tourism, increasing the quality of the offer, supporting valorisation and interpretation of cultural and natural heritage). Thus, it can be expected, that protection of ecosystems is considered in projects and potentially even a positive contribution can be recorded. Negative impacts on ecosystems and biodiversity in the context of construction activities are expected to be negligible as activities, in general, will be smaller-scale, existing legislation regarding nature protection (in particular regarding protected areas of high ecological value) has to be regarded and further environmental assessment procedures (e.g. SEA for spatial plans which limit construction zones in sensitive areas) are in place. As such this action is considered compliant with DNSH for the relevant objective.</p>

## 2.3. Interreg-specific objective 1: An accessible and connected region

### 2.3.1. Specific objective 3.1: Enhance efficient public administration by promoting legal and administrative cooperation and cooperation between citizens, civil society actors and institutions, in particular, to resolve legal and other obstacles in border regions

The specific objective aims to support public administration in its role as an initiator/coordinator of processes aimed at improving the quality of services and developing innovative solutions in the area of health care, social inclusion and welfare, energy efficiency, and accessibility in the border region. A place-based and participatory approach, sustainability, digitalisation, and inclusion are the guiding principles when implementing the activities within this priority. Cross-border cooperation and resolving legal and other obstacles are crucial when taking into account the functional relations between the different actors and activities in the border area.

### Types of action under the SO:

- Improvement of the quality and diversity of the services and development of innovative solutions in the areas of health care, social inclusiveness and welfare, accessibility, and energy efficiency in the border regions by overcoming legal and administrative obstacles

Under the Type of action: *Improvement of the quality and diversity of the services and development of innovative solutions in the areas of health care, social inclusiveness and welfare, accessibility and energy efficiency in the border regions by overcoming legal and administrative obstacles* possible cooperation actions can include development and implementation of cross-border cooperation models, tools and learning networks for more efficient and accessible public administration in the areas of healthcare, social inclusion, accessibility and energy efficiency, establishment and co-ordination of joint multi-level and multisectoral knowledge exchange, governance models and development of territorial strategies, setting up new or/and upgrading existing cross-border organisational structures providing the services in the areas of support, development of innovative cross-border solutions and pilot actions in the field of energy efficiency, development of joint solutions and pilot actions for improving the quality and diversity of health, social and complementary services, development of solutions and pilot actions for improvement of accessibility and mainstreaming and up taking of developed solutions in the area of healthcare, social inclusion, accessibility and energy efficiency in the cross-border area towards civil society and public administration at different levels.

### Compliance of supported action under the SO with the principle of “do no significant harm”

Under the SO, non-investment cooperation and coordination activities are expected to be supported to foster public administration in its role as an initiator/coordinator of processes with no direct negative impacts on the environmental objectives:

- Climate change mitigation
- Climate change adaptation
- The sustainable use and protection for water and marine resources
- The circular economy, including waste prevention and recycling
- Pollution prevention and control to air, water or land
- The protection and restoration of biodiversity and ecosystems

In terms of indirect impact, these actions can cause an increase in the number of inhabitants and users of the area in the future, and this can put additional pressure on environmental components: flora, fauna, habitats, biodiversity, protected areas and Natura 2000 areas, geodiversity and landscape diversity, water quality, air, landscape, forests, and hunting. This form of impact is indirect, and at this stage, it is not possible to estimate the probability of its occurrence because it depends on many future correlation factors.

The detailed assessment of the action is outlined in the table below.

Table 7: Assessment of the type of action “Improvement of the quality and diversity of the services and development of innovative solutions in the areas of health care, social inclusiveness and welfare,

accessibility, and energy efficiency in the border regions by overcoming legal and administrative obstacles” under SO 3.1

Please indicate which of the environmental objectives below are likely to be negatively affected by the measure, taking into account its life cycle.	Significant harm		Detailed justification based on evidence if “No” has been selected?
	Yes	No	
Climate change mitigation		X	The type of action supported due to it’s soft nature has no foreseeable impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. No activities which likely lead to an increase in GHG are foreseen. As such this action is considered compliant with DNSH for the relevant objective.
Climate change adaptation		X	The type of action supported due to it’s soft nature has no foreseeable impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. No activities which likely lead to an increased risk related to climate change adaption are foreseen. As such this action is considered compliant with DNSH for the relevant objective.
The sustainable use and protection for water and marine resources		X	The types of actions supported due to it’s soft nature have no foreseeable impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. No adverse effects to the sustainable use and protection of water and marine resources are to be expected. As such this action is considered compliant with DNSH for the relevant objective.
The circular economy, including waste prevention and recycling		X	The type of action supported due to it’s soft nature has no foreseeable impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. No increase in waste creation or adverse effects to the circular economy is to be expected. As such this action is considered compliant with DNSH for the relevant objective.
Pollution prevention and control to air, water or land		X	The type of action supported due to it’s soft nature has no foreseeable impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. No adverse effects to air, water or land pollution are to be expected. As such this action is considered compliant with DNSH for the relevant objective.
The protection and restoration of biodiversity and ecosystems		X	The type of action supported due to it’s soft nature has no foreseeable impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. No adverse effects on biodiversity and

Please indicate which of the environmental objectives below are likely to be negatively affected by the measure, taking into account its life cycle.	Significant harm		Detailed justification based on evidence if "No" has been selected?
	Yes	No	
			ecosystems are to be expected. As such this action is considered compliant with DNSH for the relevant objective.

### 2.3.2. Specific objective 3.2: Build up mutual trust, in particular by encouraging people to people actions

The specific objective aims to build trust and understanding among people living in the cross-border area by supporting joint cross-border events, intergenerational cooperation, and joint learning and awareness-raising.

#### Types of action under the SO:

- People-to-people projects to improve cultural and social relations, and to get actively engaged in the community

Possible cooperation actions under *Type of actions 4.4 People-to-people projects to improve cultural and social relations, and to get actively engaged in the community* are cross-border awareness-raising actions (e.g., on solidarity, community support, and healthy living), cross-border learning actions and joint events to increase connectivity, networking and intergenerational support.

#### Compliance of supported action under the SO with the principle of "do no significant harm"

The specific objective aims to build trust and understanding among people living in the cross-border area by supporting joint cross-border events, intergenerational cooperation, and joint learning and awareness-raising.

In the environmental aspect, the impacts related to these activities can be considered negligible or such that there are no measurable negative impacts on the environmental objectives:

- Climate change mitigation
- Climate change adaptation
- The sustainable use and protection for water and marine resources
- The circular economy, including waste prevention and recycling
- Pollution prevention and control to air, water or land
- The protection and restoration of biodiversity and ecosystems

The detailed assessment of the action is outlined in the table below.

Table 8: Assessment of the type of action "People-to-people projects to improve cultural and social relations, and to get actively engaged in the community" under SO 3.2

Please indicate which of the environmental objectives below are likely to be negatively affected by the measure, taking into account its life cycle.	Significant harm		Detailed justification based on evidence if "No" has been selected?
	Yes	No	
Climate change mitigation		X	The type of action supported due to it's soft nature has no foreseeable impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. No activities which likely lead to an increase in GHG are foreseen. As such this action is considered compliant with DNSH for the relevant objective.
Climate change adaptation		X	The type of action supported due to it's soft nature has no foreseeable impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. No activities which likely lead to an increased risk related to climate change adaption are foreseen. As such this action is considered compliant with DNSH for the relevant objective.
The sustainable use and protection for water and marine resources		X	The types of actions supported due to it's soft nature have no foreseeable impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. No adverse effects to the sustainable use and protection of water and marine resources are to be expected. As such this action is considered compliant with DNSH for the relevant objective.
The circular economy, including waste prevention and recycling		X	The type of action supported due to it's soft nature has no foreseeable impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. No increase in waste creation or adverse effects to the circular economy is to be expected. As such this action is considered compliant with DNSH for the relevant objective.
Pollution prevention and control to air, water or land		X	The type of action supported due to it's soft nature has no foreseeable impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. No adverse effects to air, water or land pollution are to be expected. As such this action is considered compliant with DNSH for the relevant objective.
The protection and restoration of biodiversity and ecosystems		X	The type of action supported due to it's soft nature has no foreseeable impact on the environmental objective related to the direct and primary indirect effects of the implementation of projects of this action across their life cycle. No adverse effects on biodiversity and ecosystems are to be expected. As such this action is

*Verification of compliance with the „Do No Significant Harm principle“, Interreg Programme Slovenia-Croatia  
2021-2027, March 2022*

Please indicate which of the environmental objectives below are likely to be negatively affected by the measure, taking into account its life cycle.	Significant harm		Detailed justification based on evidence if "No" has been selected?
	Yes	No	
			considered compliant with DNSH for the relevant objective.

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