



Managing Authority:

Veneto Region

Area for Economic Policies, Human Capital and Programming of European Funds
Directorate for Joint Programming
Organizational Unit Italy-Croatia Managing Authority

Interreg VI A Italy – Croatia

2021-2027

Programme

Strategic Environmental Assessment

Non-technical summary of the Environmental report



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Scope of the document

The Strategic Environmental Assessment (hereinafter SEA) aims at promoting sustainable development through evaluation to ensure that environmental issues are included in plans or programmes. This is a non-technical summary of the Environmental Report on the Interreg VI A Italy-Croatia 2021-2027 Programme, in compliance with Directive 42/2001/EC (the 'SEA Directive'). It is designed to present the SEA findings in a clear and simple format that can be seen and understood by the widest possible audience.

Presentation of the Interreg VI A Italy-Croatia 2021-2027 Programme

The Interreg VI A Italy – Croatia 2021-2027 Programme (hereinafter Programme) is a cross border cooperation programme between Italy and Croatia, co-financed by the European Regional Development Fund (hereinafter ERDF). The Programme contributes to the European cohesion policy, which pursues harmonious development across the Union by strengthening economic, social, and territorial cohesion in order to stimulate growth. The Programme extends to both sides on the Adriatic Sea, according to the 2014-2020 Past Programming Period.



The programme for the coming programming period, in line with the Common Provisions Regulation (CPR), focuses its resources on five priorities and seven Specific Objectives (SOs), and a number of actions contributing to the achievement of expected results:

- **A smarter Europe:** Policy objective I, through the SO1.1 “Developing and enhancing research and innovation capacities and the uptake of advanced technologies”, as well as SO1.4 “Developing skills for smart specialisation, industrial transition and entrepreneurship”, aim to enhance the conditions for innovation in the cooperation area by supporting cooperation between research and business players in the blue economy, the circular economy, the ITC sectors, as well as cross-border actions planned in the regional Smart Specialisation Strategies.



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- **A greener Europe:** Policy objective 2, through the SO2.4 “Climate change adaptation and disaster risk prevention” and SO2.7 “Protection of nature and biodiversity and reducing pollution”, aims to improve adaptation to climate change in the cooperation area, as well as protection of biodiversity, increasing environmental awareness and reducing pollution in critical areas.
- **A more connected Europe:** Policy objective 3, through the SO3.2 “Developing and enhancing sustainable, climate resilient, intelligent and intermodal national, regional and local mobility, including improved access to TEN- T and cross-border mobility” aims to improve national, regional, local and cross-border mobility. The sectors covered are broad, including maritime transports, tourism, logistic and ITC, energy and circular economy.
- **A more social Europe:** Policy objective 4, through the SO4.6 “Enhancing the role of culture and sustainable tourism in economic development, social inclusion and social innovation” covers sustainable tourism, as well promotion and conservation of the material and immaterial cultural heritage in the cooperation area.
- **A better cooperation governance:** Interreg Specific Objective I aims to improve legal and administrative cooperation between citizens, civil society actors and institutions, as well as strengthen institutional capacity to implement macro-regional, sea-basin and other territorial strategies.

The total forecast budget for the period 2021-2027 is 172.986.266,26 €. ERDF fund breakdown by Priority is reported in the following table:

Priority 1	Priority 2	Priority 3	Priority 4	Priority 5
14,62%	38,88%	20,76%	19,24%	6,50%

Methodology of the assessment

The assessment follows the SEA Directive methodological prescriptions. First of all, the analyses are referred to the Italy-Croatia Programme area. In the assessment procedure, the relevant environmental objectives and related indicators, identified during a preliminary scoping phase, have been used. They represent the basis for the description of the environment’s state and its development trends in the Programme’s area, as well as for the assessment of likely significant effects of the Programme on the environment.

The Programme’s potential effects on the environment were assessed through a qualitative approach. Significant issues relate to climate change and associated risks, inland and marine ecosystems, water quality and supply, soil quality and management, air quality, natural/cultural heritage and landscape, technological risks, health and sanitary risks and nuisances, energy and waste management have been addressed. Eventually, cumulative effects of the Programme on the environmental issues have been detailed, highlighting interdependencies and effect-chains.

Key environmental issues in the cooperation area

The Programme area has diverse marine, coastal and inland ecosystems. Natural risk due to climate change are increasing in the whole area with particular regard to phenomenon such as flood events and coastal erosion. Moreover, inland and maritime biodiversity loss and pollution



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represent critical issues of the CBC area. A synthesis of the state and trend of main environmental issues in the CBC area is presented in the following table.

Indicator	State	Trends	Synthetic description
Climate changes adaptation and risks			
GHG emission	☹️	➡️	The effort at international and national level for the GHG reduction have contrasted, also in the CBC area, the past rising trend of emission. The trend of GHG emission has been reduced in 2019 relative to 1990 of ~28% for Croatia and ~27% for Italy.
Temperature and variation of rainfall regimes	☹️	⬇️	Increases in average temperature, and of extreme weather events such as heat waves, and decrease of the average precipitation level can be observed in the CBC area.
Hydrogeological risks	☹️	⬇️	Mainly due to morphological reason, floods and landslides represent a criticality more in the Italian side than in the Croatian one.
Coastal erosion	☹️	⬇️	Coastal erosion is particularly strong in the Italian side of the CBC area, with the higher percentage reported for Abruzzo region, whereas Croatian coastlines are more subject to karst processes that mechanical weathering.
Inland water quality and supply			
Population connected to public water supply system	😊	➡️	Data for Croatia for 2019 shows that population connected to public water supply is equivalent to 93%. Concerning Italy, almost all Italian municipalities (99.8%) had a public water supply in operation.
Population connected to public sewage system	☹️	➡️	The wastewater treatment and collection show global convergence between the two CBC countries, although the tertiary treatment remains rare in Croatia.
Inland water quality	☹️	➡️	43% of the Italian surface water bodies had at least a good ecological status while 42% of the Croatian surface water bodies had a good or better ecological status/potential, showing a high degree of convergence.
Inland biodiversity and terrestrial ecosystem			
Nationally designated protected areas	😊	➡️	The area interested by the CBC Programme hosts numerous Natural Protected areas, mainly National Parks.
Natura 2000 network	😊	➡️	Croatia Natura 2000 network consists of 783 sites, covering 25.936 km ² . In Italy in 2020, the land surface of the protected areas of the Natura 2000 network increased slightly, reaching an extension of over 58,000 sq km.
Species and habitat conservation status	☹️	⬇️	Richness of wild species is particularly pronounced in the area. In the CBC area there is the highest percentage in Europe of threatened amphibian and reptile species. Sites in the CBC area belongs to the Mediterranean, with only 23 % of habitats in a favourable conservation status and to the Continental Biogeographic regions, with 16% of habitats in a favourable conservation status.
Biodiversity and marine ecosystem			
Marine protected areas	😊	⬆️	The area interested by the CBC Programme hosts numerous Marine Protected areas.
Natura2000 – marine sites	😊	⬆️	For marine Natura2000 sites, Italy (76 % or ca 5 200 km ²) and Croatia (5 % or ca 300 km ²) achieved major progress in their designation between 2018 and 2019.
Pollution sources	☹️	➡️	Marine areas along Adriatic coasts are facing major environmental problem such as urban effluents and solid wastes, oily effluents, coastal eutrophication and coastal urbanisation.
Bathing water quality	😊	⬆️	The quality of bathing water shows fewer problems in Croatia than along the Italian coasts, but is in both sides of good quality for a very high percentage, showing convergence in the two countries.
Catches	☹️	⬇️	Fishing represents a pressure in Adriatic Sea for marine ecosystem. The number of catches is quite elevated, even if the data shows a decreasing trend over the past years.
Soil quality and land use			



Land fragmentation			Both Italy and Croatia show a higher degree of fragmentation. In both countries the proportion of areas converted to urban land is high, even it is below the European average. In Italy about 36% of the territory is characterised by a very high and high fragmentation.
Artificial soils and surfaces			Soil and landscape quality in the cooperation area is threatened by soil sealing. Most partners have realised the importance of greenbelts and are now setting limits for urban development, which is one of the main factors in soil sealing.
Contaminated sites			Soil and landscape quality in the cooperation area is threatened by contamination, from both agricultural practices and industry, in particular in Italy. The area also favours soil decontamination, using brownfields in new development projects.
Technological risks			
Industry, trade and services			Italy was the major short sea shipping country in the EU in 2019, with a share of almost 15 % of the total EU short sea shipping tonnage, while values related to Croatia show a decrease sea of the shipping tonnage among the years.
Air quality and health			
Particulate matter emissions			Risks related to particulate matter emission are clearly affecting the whole territory. Particulate matter is mainly produced by traffic pollution. Emissions tend to be concentrated in urban areas and along major roads.
Other air pollutant emissions			Even if a decreasing trend of pollutants emissions is visible along the years for each country, hot spots still remain in the countries especially related to transport emissions in urban centers and highly populated territories.
Exposure to pollutants in urban areas			Air quality is a critical problem especially in urban areas where the levels of population and transport density are highest especially in Italy.
Landscape and cultural heritage			
Landscape			Italy and Croatia have a high level of landscape fragmentation, due in many built-up coastal areas along the Adriatic coast. Landscape qualities often come off worse in regional decision-making. Cultural and natural heritage landscape values have to face several threats from urbanisation, infrastructure development, agricultural production, as well as habitat creation and restoration projects.
Protected sites			CBC regions of both countries entail outstanding heritage sites and hotspots, also under the UNESCO convention.
Energy			
Energy consumption			In Italy Energy consumption has increased in 2019 from 1990 but its trend shows a decrease from 2010. In Croatia there is an increase in consumption in the last decades.
Renewable energy			The renewable energy production shows a remarkable increase from 2003 up to now in Italy and Croatia, at rate even higher than the European average.
Waste management			
Waste production			Constantly increasing municipal waste volume is a lasting issue in both countries, even though it is tending to stabilise.
Landfill deposit			In both countries only part of the municipal waste volume ends up being recovered while the rest is landfilled. Landfill rate of waste shows a decrease of 35% in 2019 compared to year 2012, while in Italy the decrease is equal to 28% in 2019 compared to year 2012.
Recycling			By 2019, Italy recycled about 51.4% of its municipal waste. Recycling is strongly linked to separate collection rates, which have been mainly achieved by the northern regions of the Italian side of the CBC areas. Croatia in 2019 recycled about 30.2% of its municipal waste.



Environmental protection objectives and external coherence

The selection of the environmental objectives relevant for the Programme has been based on the External Coherence Analysis performed in Chapter V of the ER. This analysis has allowed pointing out the environmental priorities for the cooperation area, in accordance to the main international, European, and national level. The environmental objectives selected have been aggregated by environmental theme. The list of objectives is illustrated in the table below.

Environmental issues	Topic	General environmental objectives
Climate change and associate risks	Mitigation	Reduce GHG emissions at least by 55% below 1990 levels by 2030
	Adaptation	Reduce risks links to heat waves
		Reduce hydrogeological risk
		Reduce fires risk
		Reduce risks linked to coastal erosion
Air quality	Air pollution	Improve air quality
Water quality and supply	Water quality	Improve or maintain underground, surface and bathing water quality
	Water use	Reduce pressures on fresh water
Inland biodiversity and terrestrial ecosystem	Biodiversity	Protect and preserve the diversity of species
	Ecosystem	Restore degraded ecosystems and their associated services
Biodiversity and marine ecosystem	Marine biodiversity	Protect and preserve the diversity of species and marine habitat
	Marine ecosystems	Improve or maintain costal water quality
		Restore degraded ecosystems and their associated ecosystems services
Soil quality and management	Soil management	Reduce the pressures on natural resources
		Remediate contaminated soils and lands
		Improve efficiency in soil and land management
Technological risks	Risks prevention	Reduce land use, fragmentation and artificialization
		Prevent technological risks from industries and shipping
Health and Sanitary risks and nuisances	Human health protection	Reduce exposure to pollutants in urban areas and its effect on health
		Reduce exposure of the population to noise levels
Natural and cultural heritage and Landscape	Landscape and cultural heritage	Preserve, conserve and valorise landscape and natural and cultural heritage
Energy	Renewable	Promote renewable energies
	Efficiency	Improve energy efficiency
Waste management	Production	Reduce waste production
	Recycling	Promote recycling and reuse

Main environmental effects and mitigation measures

Analysis of the environmental effects has three main steps. Firstly, environmental objectives in the area were matched with the proposed Specific Objectives (SOs) and eligible activities planned by the Programme. SOs with potential positive or negative effects on an environmental objective were then identified. Secondly, SEA experts estimated the effect's intensity according to a scale



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of significance. Thirdly, the information is organised to assess the cumulative and cross-border effects of each specific objective. Measures to mitigate possible negative effect or to orientate the Programme to sustainability have been proposed.

Many expected environmental effects of the Programme should be intangible and indirect with no relevant negative effects identified at this stage. Positive impacts, equally distributed across the area of cooperation, should be seen over the programming period and beyond. Positive impact can be reinforced providing synergies with other policy instruments in the area such as the Adriatic and Ionian macro-strategy EUSAIR.

Policy Objective 1 – A smarter Europe

The SO1.1 is devoted to developing and enhancing research and innovation capacities and the uptake of advanced technologies. Actions in SO 1.1 include feasibility studies, applied research, ITC services and research mobility. Action 3 (challenge 01) covering the circular economy and the blue economy has a clear environmental contribution, with expected positive effects on natural resources, through the improvement of energy efficiency, GHG emissions, waste reduction and water consumption and soil pollution's reductions. Actions 1 and 3 (challenge 01) should contribute to the maritime environmental objectives, in terms of coastal water quality and pressure on marine resources. However, most of the expected impacts should be reversible, local and non-certain. Action 2 (challenge 01) also has a potential positive contribution to environmental objectives, nevertheless the content of the intervention is unclear at this stage. Other actions, such as 4 and 5 (challenge 01) and 1 and 2 (challenges 02), have no defined environmental content, making them difficult to assess at this stage.

The SO1.4 aims to develop skills for smart specialisation, industrial transition and entrepreneurship. Actions under SO 1.4 promote experience sharing, networking between key stakeholders, training, competence, skills and dissemination activities in the cooperation area. The sectors targeted, including circular economy and blue economy, and the potential impacts are similar to SO 1.1; many actions have no clear environmental effect. It worth noting the support for collaboration with creative/cultural industries in action 1 (challenge 06), suggesting potential positive effects for cultural heritage preservation and valorisation.

Mitigation and orientation measures for priority 1: Make explicit in the Programme implementing guidance, the type of advanced technologies or innovation capacities addressed by the programme and select more eco-efficient projects, which reduces the use of primary resources, has a low carbon footprint and promotes circular economy approaches.

Policy Objective 2 – A greener Europe

The SO2.4 aims to promote climate change adaptation and disaster risk prevention, and resilience, taking into account the eco-system-based approach. The SO includes sharing experience and good practices, applied research, development of monitoring and early warning systems, training, planning and decision support tools, capacity building and awareness activities which are expected to bring direct positive effects on climate change adaptation capacity (in terms



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of flood control and coastal erosion management), as well as on the cultural and natural heritage protection objective, in maritime and terrestrial areas. Most of the actions under challenges 12 and 13 are 'soft' and knowledge based, contingent, and not local, limiting impacts. Few interventions are planned for small scale infrastructures (challenge 12, action 1 (result 2), and challenge 13, action 2 (result 2)), with potentially significant impacts at local level. At this stage the type of infrastructure is not known and the nature of the impact uncertain.

The SO2.7 aims to enhancing protection and preservation of nature, biodiversity and green infrastructure, including in urban areas, and reducing all forms of pollution. Most of the actions under challenge 16 refers to 'soft' actions, while challenge 16 action 5 (result 1) includes small scale infrastructures. Positive effects are expected mainly on marine biodiversity and maritime resources, including water quality, as well as positive indirect effects on natural and cultural heritage and landscapes. Impacts on terrestrial ecosystems are not excluded but would be limited.

Mitigation and orientation measures for priority 2: In the climate change adaptation measures, promote resilience also through actions to protect habitats, covering green infrastructure and ecological corridors, using an ecosystem-based approaches and select projects favouring sites/ areas where cultural/ natural heritage is very affected by climate change or environmental degradation, addressing more than one environmental objective (habitat conservation, climate change and cultural heritage). For biodiversity conservation, measures should also address marine litter, ecological corridors and artificialisation of coastal ecosystems.

Policy Objective 3 – A more connected Europe

The SO3.2 aims to developing and enhancing sustainable, climate resilient, intelligent and intermodal national, regional and local mobility, including improved access to TEN- T and cross-border mobility. Actions under challenge 18 and 20 include sharing experience and good practices, pilot innovative actions, applied research, developing monitoring, planning and actions plans, training and awareness activities. The improvement of multimodality, the development of a circular economy, as well as the use of alternative fuel in shipping, will imply a better use of energy, a reduction in waste production, and a better air quality. Small scale infrastructure in ports is planned but restricted to improving the environmental performance of boarding and disembarking procedures (Challenge 18 action 2). The infrastructure in ports could also lead to negative effects on energy consumption, soil artificialisation and waste production, as well as coastal ecosystems and could add additional pressure on marine resources. However, at this stage large investments in infrastructure are excluded, and actions are eligible only if contributing to sustainable Programme objectives.

Mitigation and orientation measures for priority 3: Priority should be given to projects with a low carbon footprint, by improving the environmental performance of ports and promoting innovative solutions for the circular economy approach in managing cross-border connections. Projects, which aims to reduce pollution and anthropogenic pressure on coastal areas, by promoting transport sustainability, especially for soil artificialisation, waste production and air emissions, should also be primary selected.



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Policy Objective 4 – A more social Europe

The SO 4.6 aims to enhancing the role of culture and sustainable tourism in economic development, social inclusion and social innovation. The type of actions supported is broad and include 'soft' interventions (challenges 29 and 30) and small infrastructures (challenge 31 action 2 (result 1)). Actions focus on the supply-side, promotion of integrated strategies, sharing experience and know-how, training, networking, ITC support, as well as information campaigns. In general, positive effects from sustainable tourism are expected in terms of reduction of the pressure on the natural resources – water, waste, energy and soil consumption- as well as on the natural ecosystems, indirectly, on water and air quality. Increased numbers of tourists could negatively affect the environment, specifically in vulnerable areas (urban and densely populated, protected or classified areas). At this stage, such risk is not totally excluded, though mitigated by actions which promote sustainability.

Mitigation and orientation measures for priority 4: In project selection, specify criteria for the sustainability of tourism, especially for tourism in natural areas (including the requirement in project design of specifications related to the correct management of natural resources). In general, do not promote tourism in protected areas and habitats, especially in vulnerable maritime and coastal habitats. Applying article 25 ('preventive verification of the archaeological interest') of the Code of Public Contracts (National Law 50/2016 and amendments), as best practice to guarantee the conservation of sites and assets of archaeological interest, should also be considered.

Impacts and transnational effects on the environment and Natura 2000 sites

The Programme has mainly 'soft' actions that do not interact directly with habitat or species. However, indirect interference on habitats cannot be excluded a priori. In fact, an increment of tourism in natural areas protected under Natura 2000 network could represent a disturbance for species. Moreover, interference on habitats from the efficiency and quality of maritime transports could also be detected. Thus, mitigation measures are needed to avoid negative impacts on protected habitats or reduce the use of resources.

Thus, the introduction of the following criteria could help to avoid disturbance to protected habitat and species:

- SO2.4 and 2.7: In case of small-scale infrastructure and investment, also related to SOs in favour of the environment, the interventions must comply with the management plans of the individual sites potentially affected (according to the regulation in force);
- SO3.2: Promotion of transport connections for ports and maritime transport services must avoid Natura 2000 sites or should be accompanied by an appropriate and preventive assessment at project level;
- SO4.6: introducing specific criteria for the sustainability of tourism. This will require to not promote tourism in protected habitats, with peculiar attention to coastal habitat or habitat with a high endemism rate. In general, any physical interventions (including



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renewable energy facilities) and provision of small-scale infrastructure in the Natura 2000 sites must be avoided, when not in line with the provisions in the site management plans.

Under these conditions, the Programme will not bring additional damage to habitats and species of Community interest for which conservation objectives have been set and Natura 2000 sites created.



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Environmental issues	Environmental objectives	SO1.1	SO1.4	SO2.4	SO2.7	SO3.2	SO4.6
Climate change and associated risks	Reduce GHG emissions	n.s.	n.s.	n.e	n.e	n.s	n.e
	Reduce hydrogeological risk	n.e	n.e	+	n.s	n.e	n.e
	Reduce risks linked to heat waves	n.e	n.e	+	n.s		
	Reduce risks linked to coastal erosion	n.e	n.e	+	n.s	n.e	n.e
	Reduce fire risk	n.e	n.e	?	?	n.e	n.e
Air quality	Improve air quality	n.s.	n.s.	n.e	n.e	n.s.	n.e
Water quality and supply	Improve or maintain underground, surface and bathing water quality	n.e	n.e	n.e	?	n.e	n.e
	Reduce pressures on fresh water	n.s.	n.s.	n.e	n.e	n.e	?
Biodiversity and ecosystem	Restore degraded ecosystems and their associated services	n.e	n.e	n.e	+	n.e	n.e
	Protect and preserve the diversity of species	n.e	n.e	n.s	+	n.e	n.e
Biodiversity and marine Ecosystem	Improve or maintain coastal water quality	n.s.	n.s.	n.s	+	?	?
	Protect and preserve the diversity of species and marine habitat	n.e	n.e	n.s	+	?	?
	Restore degraded ecosystems and their associated ecosystems services	n.e	n.e	n.s	+	?	?
	Reduce pressures on natural resources	n.s.	n.s.	n.s	+	?	?
Soil quality and use	Remediate contaminated soils and lands	n.e.	n.e.	n.e	n.e	n.e	n.e
	Reduce soil consumption	?	?	n.e	n.s.	n.e	n.e
	Improve efficiency in soil and land management	n.e	n.e	?	n.s.	?	n.e



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Environmental issues	Environmental objectives	SO1.1	SO1.4	SO2.4	SO2.7	SO3.2	SO4.6
Technological risks	Prevent technological risks from industries and shipping	n.s.	n.s.	n.e	n.e	n.s	n.e
Health and Sanitary risks and nuisances	Reduce exposure to pollutants in urban areas and the effect on health	n.s.	n.s.	n.e	?	n.s	n.e
Natural and cultural heritage - Landscape	Reduce exposure of people to noise	n.e	n.e	n.e	n.e	n.s	n.e
Energy	Preserve landscape and cultural heritage	n.e	n.e	n.s.	n.s.	n.e	?
	Promote renewable energy	n.e	n.e	n.e	n.e	n.e	n.e
	Improve energy efficiency	n.s.	n.s.	n.e	n.e	n.s.	?
Waste management	Reduce waste production	n.s.	n.s.	n.e	n.e	n.s.	?
	Promote recycling and reuse	n.s.	n.s.	n.e	n.e	n.s.	?

Positive effects	Scale to measure the intensity of the effects	Negative effects
+	Significant effect	-
n.s.	Effect but no significant	n.s.
?	Unknown effect	?
n.e	No interaction with the environmental component/objective	n.e



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Monitoring measures

A monitoring system is integral to the SEA procedure. The proposed monitoring system takes into account the environmental context as well as output and performance indicators. These are all able to monitor unexpected environmental effects from the Programme intervention during its implementation phase. Most of these indicators will be based on information already available in the Programme monitoring system; while a few will be quantified based on information collected from beneficiaries.

All the information collected at different levels, from the monitoring system and other relevant databases, will be included and analysed in an environmental report, periodically drafted and made available to the Joint Secretariat and Managing Authority for decision making. This report should be discussed in monitoring committees, especially during the Programme review, to prompt decisions regarding re-programming or adjustment of the Strategy to obtain more sustainable development of the area under the cooperation objective.

Information of potential alternatives and justification of the Programme choices

The risk of significant negative effects means that alternatives must be considered within the Programme to give decision makers the opportunity to select options which eliminate or reduce environmental impacts and which improve the global environmental footprint of the Programme. During the SEA procedure, different alternative scenarios were considered, based on the allocation of resources. The current strategy proposed (scenario "C") must be considered as a good alternative compared to other Programme options discussed during the preparation phase, because it represents a compromise between the needs of the CBC area and the environmental performance of the Programme and allows a more balanced financial allocation among the priorities.

Conclusion

The environmental assessment revealed that the Programme has overall positive effects on environmental issues. The proposed Strategy clearly contributes to improving environmental conditions in the CBC area. So, the current strategy must be considered as a good alternative from an environmental point of view, compared to other options discussed during the preparation phase.

During the assessment of the environmental effects of the Programme, two main difficulties have been encountered in compiling the required information:

Difficulties encountered	How the difficulty has been faced
Data at Nuts 3 level from European statistics institutions (European Environmental Agency and Eurostat) were often lacking. Moreover, the analysis was limited in many cases by the difference in quality, time period covered and by a non uniform availability (for some environmental issues) of data.	Data have been added based on data availability and relevance with cross-border Programme objectives.



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Regional Strategies, Plans or Programmes proposed for the analysis.	Information with a cross-border format was considered first. Plans, Programmes and Strategies included in the analysis are those relevant at transboundary level and concerning issues related to the Programme.
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SEA procedure includes a consultation phase for environmental issues in which stakeholders and the generic public will be involved. Suggestions collected during consultations will be taken into account in the final Programme version.



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APPENDIX I – OPINIONS AND SUGGESTIONS RECEIVED DURING THE CONSULTATION PHASE AND ANSWERS

Region	Administration	Contribution/observation	Answer to the observation
Apulia	Agenzia Regionale strategica per lo sviluppo ecosostenibile del territorio	Si suggerisce di introdurre i seguenti temi ambientali: agenti fisici (rumori e vibrazioni), radiazioni ionizzanti e non, campi magnetici ed elettromagnetici, mobilità. Per la tematica acqua, si suggerisce di suddividere in: acque superficiali, acque sotterranee, acque destinate al consumo umano, rete idrica e fognaria	Environmental themes have been addressed based on data availability and relevance with cross-border programme objectives. Data on noise pollution and water has been added in chapter III, air quality and health and inland water quality and supply of the ER
		Inserire tra gli obiettivi ambientali anche il dissesto idrogeologico e il consumo di suolo	Hydrogeological risk and soil consumption have been added. See chapter VI of the ER
		Da avviare, già nella fase di scoping, uno screening di VINCA con identificazione dei Siti di Importanza Comunicati interessati dal programma	The section on Natura2000 sites is already included in the report (see sub-chapter VII.3 of the ER)
		Da verificare la coerenza con la pianificazione regione e provinciale nelle aree interessate dal programma	Plan, Programme and Strategies included in the analysis are those relevant at transboundary level and concerning issues related to the IP
	Sezione risorse idriche	Si suggerisce di integrare documenti chiave sullo stato dell'ambiente inerenti alla sua area di competenza	Plan, Programme and Strategies included in the analysis are those relevant at transboundary level and concerning issues related to the IP. Nevertheless, a list of Plans and Programme suggested in the scoping phase is reported in appendix 3 of the ER, for further analysis at project level
	ARPA	Da approfondire la tematica relativa all'inquinamento costiero, aggiungendo anche le informazioni derivanti dal monitoraggio dei rifiuti marini e delle microplastiche	Environmental themes have been addressed based on data availability and relevance with cross-border programme objectives. Data on marine litter have been added in chapter III, biodiversity and marine ecosystems, of the ER
		Per la tematica suoli, si suggerisce di aggiungere gli obiettivi ambientali di riduzione del consumo di suolo e frammentazione territorio naturale e agricolo	Soil consumption and fragmentation of the natural and agricultural territory have been added in chapter III, soil quality and land use, of the ER
		Si suggerisce il link di ARPA Puglia che rimanda a documenti utili per la descrizione dello stato dell'ambiente	Environmental themes have been addressed based on data availability and relevance with cross-border programme objectives
		Da approfondire la sinergia tra il programma e il piano nazionale di ripresa e resilienza	The recovery and resilience plan is considered in the coherence analysis (see sub-chapter V.2 of the ER, Italy principal strategies on environmental issues)
	Abruzzo	Dipartimento territorio – ambiente Servizio Gestione e qualità acque	Si segnala di fare riferimento al Piano di Tutela delle Acque regionale e ai dati sul monitoraggio delle acque superficiali e sotterranee



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		In riferimento alla tematica acqua si segnalano ulteriori indicatori	Environmental themes have been addressed based on data availability and relevance with cross-border programme objectives. Data on water have been added in chapter III, inland water quality and supply, of the ER
	Ministero della Cultura	Si segnalano ulteriori piani sulla tutela del patrimonio culturale e del paesaggio e si chiede di verificare la presenza di aree tutelate ai sensi del Codice dei Beni Culturali e del Paesaggio	Addition plans and strategies on cultural heritage have been added in the coherence analysis (see sub-chapter V.2 of the ER, Italy principal strategies on environmental issues). The reference to regional plans on landscape and cultural heritage has been added in appendix 3
		Si suggerisce di approfondire la tematica della compatibilità dello sviluppo economico sostenibile con la tutela del paesaggio e del patrimonio culturale, con riferimento all'utilizzo di energia da fonti rinnovabili e ad interventi di efficientamento energetico. Si suggerisce un approfondimento sull'impatto delle reti tecnologiche per la dotazione della connettività a banda larga	The theme related to landscape is covered in the context analysis (see chapter III, Landscape and cultural heritage of the ER)
	Autorità di Bacino Distrettuale dell'Appennino Meridionale	Si suggerisce di integrare la lista documenti chiave sullo stato dell'ambiente	The documents have been integrated in the analysis, based on their cross-border relevance. Regional data sources have been added in appendix 2 of the ER
		Dare rilevanza autonoma al tema dell'Economia circolare, che dovrebbe essere riferita non solo alla gestione dei rifiuti, ma anche alla corretta gestione delle risorse ambientali	The circular economy and correct management of natural resources have been addressed in the entire ER
Emilia Romagna	Parco Delta del Po	Tab. I: 'Biodiversità ed ecosistemi naturali', includere le aree regionali protette. Obiettivo specifico OSp vii: azioni per il recupero della plastica in mare e nelle coste, corridoi ecologici e riduzione della frammentazione degli ecosistemi costieri dovuta alla rete viaria, attività di conservazione a livello transfrontaliero (zone umide costiere)	Data on protected areas are reported in chapter III, Inland biodiversity and terrestrial ecosystem. The regional references are reported for each region in appendix 2 of the ER. The suggestion has been considered in SO 2.7, challenge 16 - Result 3
	Servizio Valutazione Impatto e Promozione Sostenibilità Ambientale – Posizione Organizzativa VAS Piani e Programmi	Suggerire azioni mirate alla conservazione di ecosistemi naturali marino-costieri e dei servizi eco-sistemici e la messa in atto di misure di mitigazione, promozione di progetti di 'gestione integrata delle zone costiere', monitoraggi sul trasporto solido dei corsi d'acqua, sviluppo di nuove tecnologie per il ripristino del flusso naturale dei sedimenti	The suggestion has been considered in SO2.7, challenge 16 – Result 1
		Aggiornare l'elenco di piani regionali potenzialmente utili	Plan, Programme and Strategies included in the analysis are those relevant at transboundary level and concerning issues related with the IP. Nevertheless, a list of Plans, and Programme suggested in the scoping phase is reported in appendix 3 of the ER, for further analysis at project level
		Aggiornare l'elenco di fonti di dati ambientali a livello europeo, nazionale e regionale per l'analisi di contesto	The relevant data sources for the programme area have been added in the report. It worth nothing that the context analysis will be drafted using common indicators and homogeneous data for all the CBC area. The data sources suggested at regional level have been added in appendix 2 of the ER
		Per il tema del Patrimonio naturale e culturale, includere anche la 'valorizzazione'	In the cultural heritage, valorisation has been added (see table in chapter VI of the ER)



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		Inserire nuovi temi ambientali con i relativi indicatori e indicare precise criticità del territorio e rischi associati ai cambiamenti climatici	Environmental themes have been added based on data availability and relevance with cross-border programme objectives. The analysis of climate change risk is available in chapter III, climate change and associate risks, of the ER
		Includere nel Rapporto Ambientale la valutazione delle 'ragionevoli alternative'	Alternative scenarios have been taken into account in the ER, related to budget allocation by priority (see sub-chapter X.1 of the ER)
		Includere nel Rapporto Ambientale l'analisi di incidenza	This is already included in the report (see sub-chapter VII.3 of the ER)
		Nel sistema di monitoraggio utilizzare indicatori in grado di valutare l'efficienza delle azioni rispetto all'effetto ambientale valutato	A specific chapter is already dedicated to the evaluation of the efficiency of the actions compared to the environmental effects (see sub-chapter VII.2 of the ER)
Friuli Venezia Giulia	Azienda sanitaria universitaria Giuliana Isontina	Includere alcuni documenti chiave sullo stato dell'ambiente per il Friuli	The information has been reported in the context analysis (see chapter III, soil quality and land use, of the ER)
		Nel problema ambientale relativo alla qualità dell'aria, valutare anche i principali parametri di valutazione (National Law 155/10)	According to national legislation, the evaluation parameters have been considered (see chapter III, air quality and health, of the ER)
		Integrare l'obiettivo ambientale riguardante l'impatto da trasporto marittimo derivante dal turismo	Maritime transport related to tourism has been added and addressed in chapter III, technological risks, of the ER
		In termini di priorità ambientali, includere nel nuovo programma: organizzazione di workshop e seminari tecnici sui temi dell'ambiente della trasparenza e della partecipazione nei processi di valutazione ambientale	The suggestion has been considered in SO 2.7, challenge 16 - Result 2
Friuli Venezia Giulia	ARPA - FVG	Nel Rapporto Ambientale dettagliare le azioni correlate ai singoli obiettivi specifici e i criteri e/o la metodologia utilizzata per la selezione dei progetti finanziabili	The actions have been correlated with the SOs (see sub-chapter I.2, Programme strategy, of the ER). Concerning the criteria and the methodology, references have been added in chapter VIII, Mitigation and orientation measures. Additional evaluations will be done, if it is the case, at a later stage
		Effettuare un'analisi dei punti di forza e di debolezza del Programma e delle opportunità e delle minacce che lo possono condizionare	This analysis is not relevant for the scope of the ER
		Presentare l'esito della verifica di coerenza sia interna che esterna tramite appositi paragrafi descrittivi riassuntivi	This is already included in the report (see chapter IV and V of the ER)
		Integrare l'elenco di fonti di dati ambientali a livello regionale per l'analisi di contesto con i database suggeriti	The data sources for the programme area are noted in the report. The context analysis will be drafted using common indicators and homogeneous data for all the CBC area. The data sources suggested at regional level have been added in appendix 2 of the ER
		Includere nell'analisi delle alternative gli orizzonti temporali previsti per il programma e gli effetti ambientali, individuando le alternative più coerenti con i criteri di sostenibilità e gli obiettivi del programma	The evaluation of alternatives is addressed in sub-chapter X.1 of the ER. The analysis of the temporal horizon will be addressed, if it is the case, in a later stage
		L'analisi e valutazione degli effetti, disaggregata per singolo aspetto ambientale e per singola azione, deve essere riaggregata organicamente in base al contesto ambientale	The evaluation of effects, with the reference to each SO and associate action, is addressed in sub-chapter VII.2 of the ER
		Monitorare le misure di mitigazione tramite opportuni indicatori descritti nel piano di	The mitigation measures are addressed in chapter VIII of the ER. The evaluation



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		monitoraggio di VAS, al momento della definizione puntuale delle azioni o dei bandi	related to the definition of the action and of the offers will be done, if it is the case, in a later stage
		Nel sistema di monitoraggio, chiarire la diversa tipologia di indicatori utilizzati e porre particolare attenzione a Indicatori di Processo che siano significativi in base alle Azioni di Programma	Monitoring is addressed in chapter IX of the ER. The evaluation related to the actions of the Programme will be done, if it is the case, in a later stage
		Implementare il Monitoraggio di VAS anche in fasi successive al fine di includere nel monitoraggio tutte le ricadute ambientali derivanti dalle azioni, di cui i bandi dovranno prevederne la misura	The ER proposed a specific organisation for monitoring programme implementation (see chapter IX of the ER)
	Direzione Centrale Risorse Agroalimentari, Forestali e Ittiche	Si suggerisce di integrare l'elenco di Piani e Strategie regionali e l'elenco di fonti di dati ambientali	Plan, Programme and Strategies included in the analysis are those relevant at transboundary level and concerning issues related to the IP. Nevertheless, a list of Plans, and Programme suggested in the scoping phase will be added as annex to the ER, for further analysis at project level. The relevant data sources for the programme area have been mentioned in the report. The data sources suggested at regional level have been added in appendix 2 of the ER
Marche	Unione Montana dei Sibillini	Interventi finalizzati ad identificare e affrontare le sfide che nascono dalle 'complesse relazioni tra cambiamento ambientale globale e lo sviluppo sostenibile'	The suggestion is considered in SO 2.4, challenge 12 - Result 3
	PF Tutela delle Acque	Aggiornare l'elenco di piani regionali potenzialmente utili	Plan, Programme and Strategies included in the analysis are those relevant at transboundary level and concerning issues related to the IP. Nevertheless, a list of Plans, and Programme suggested in the scoping phase have been added in the appendix 3 of the ER, for further analysis at project level
		Pag. 56 del rapporto di Scoping, per la voce 'Rischi di alluvioni' si suggerisce l'inserimento di link e modifiche alla frase	The suggestion has been added in appendix 2 of the ER in the table related to regional data sources
	AATO 2	Nella tematica 'Acqua' si suggerisce di integrare l'indicatore 'popolazione collegata al sistema depurativo pubblico' In relazione alle 'Fonti di informazioni dati', si segnalano ulteriori dati relativi all'ultimo anno disponibile (2020)	Environmental themes have been addressed based on data availability and relevance with cross-border programme objectives. Data on water have been addressed in chapter III, inland water quality and supply. The suggestion related to the source has been added in appendix 2 of the ER in the table related to regional data sources
	ARPAM	Si suggerisce di integrare le fonti di informazioni relative agli indicatori associati alle tematiche: cambiamenti climatici, acqua ed ecosistemi marini, biodiversità ed ecosistemi naturali, suolo, salute umana e rifiuti	Environmental themes have been addressed based on data availability and relevance with cross-border programme objectives. Each theme has been addressed in the contest analysis. The data sources suggested at regional level have been added in appendix 2 of the ER
Si segnala che tra le tematiche ambientali strategiche potrebbe essere inserita anche quella riguardante 'Sviluppo sostenibile e ambiente', indicando possibili obiettivi principali		The suggestion has been considered in SO 4.6, challenge 29 - Result 1	
Si suggerisce di inserire tra gli obiettivi ambientali generali anche la riduzione del consumo suolo		The theme related to land use has been added. Soil consumption and fragmentation of natural and agricultural territory have been added in chapter III, soil quality and land use. The general	



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			environmental objective on land use has also been added (see table of chapter VI of the ER)
		Nel Rapporto Ambientale, gli Indicatori Ambientali correlati agli obiettivi ambientali dovranno essere coerenti con la produzione di dati ed informazioni a livello istituzionale/pubblico	The analysis of indicators is coherent with data sources available at public/institutional level (see chapter III of the ER)
		Dovrà essere considerata anche la coerenza esterna del Programma	The analysis of external coherence is already included in the ER (see chapter V of the ER)
		Relativamente al monitoraggio, si suggerisce di definire la metodologia e l'oggetto del monitoraggio e gli Indicatori ambientali complessivi di contesto e di contributo	This is already included in the ER (see chapter IX of the ER)
		Si suggerisce di definire la metodologia per stimare gli effetti significativi positivi e/o negativi e/o nessun effetto, il quadro complessivo degli effetti ambientali, la valutazione degli effetti e il perseguimento degli obiettivi di sostenibilità	This is already included in the ER (see sub- chapter VII.1 Methodology for assessment of the ER)
Servizio Tutela Gestione ed Assetto del Territorio Posizione di Funzione Valutazioni ed Autorizzazioni Ambientali, Qualità dell'Aria e Protezione Naturalistica		Tab. 1 - Si suggerisce di sostituire l'indicatore 'temperatura' inerente i cambiamenti climatici, con indicatori più idonei ad inquadrare il contesto dei rischi climatici	Environmental themes have been added based on data availability and relevance with cross-border programme objectives. The analysis of climate change risk is available on chapter III, climate change and associate risks, of the ER
		Si suggerisce di definire l'indicatore 'emissioni di polveri sottili' nel rapporto ambientale in relazione alle tipologie prevalenti di azioni/progetti	The comment is not clear. The evaluation of the typology of actions/projects will be done, if it is the case, in a later stage
		Per il tema biodiversità ed ecosistemi naturali, si suggerisce di considerare la variazione di naturalità	Duly noted. See chapter III, inland biodiversity and terrestrial ecosystem, of the ER
		Per quanto riguarda l'indicatore 'inquinamento costiero', i dati disponibili per la Regione Marche fanno riferimento alla qualità delle acque marino costiere	The comment has been added in the appendix 2 of the ER, on the regional data sources
		Per una descrizione uniforme delle principali caratteristiche di paesaggio, si suggerisce di far riferimento alle classi di uso del suolo	The theme related to the analysis of landscape types has been addressed in chapter III, landscape and cultural heritage, of the ER
		Per quanto riguarda il quadro di riferimento strategico, sarebbe opportuno già in questa fase una prima identificazione degli strumenti programmatici e strategici da cui derivano gli obiettivi di riferimento	The analysis has been carried out based on the level of detail reached by the Programme. A further identification of the programmatic and strategic instruments could be considered in a later stage
		Per quanto riguarda gli obiettivi della politica di conservazione e gestione della biodiversità, si ritiene importante menzionare la Strategia dell'UE sulla biodiversità per il 2030 (Com(2020) 380	The EU Biodiversity strategy for 2030 has been considered for the analysis and the reference has been added in sub- chapter V.1 of the ER, Biodiversity, Landscape and Cultural Heritage Policy Framework
		Tab. 2: Considerare l'aspetto legato alla temperatura massima giornaliera come riguardante la mitigazione e non l'adattamento ai cambiamenti climatici. Per l'indicatore 'Gestione del suolo' si suggerisce di citare esplicitamente nell'obiettivo ambientale la riduzione del consumo di suolo	The environmental objective related to the heating degree days has been removed. The environmental objective on soil consumption has been added in chapter VI of the ER
		Il capitolo 5.1 fa riferimento alla valutazione di incidenza e non alla valutazione appropriata	According to the directive, sub- chapter VII.3 of the ER refers to appropriate analysis
		Nella valutazione dei probabili effetti ambientali significativi, si suggerisce, in fase di valutazione, di identificare in maniera più	This is already included in the ER (see sub-chapter VII.2 of the ER)



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		chiara le tipologie di intervento in relazione agli obiettivi specifici	
		Dal momento che la valutazione degli effetti viene approfondita nella successiva fase, si suggerisce di utilizzare questa prima analisi come solo riscontro della presenza di interazioni	This is already included in the ER (see sub-chapter VII.2 of the ER)
		Per quel che riguarda l'analisi di alternative, si suggerisce di approfondirla in funzione di una diversa allocazione delle risorse	Alternative has been analysed based on budgetary scenarios (sub-chapter X.I of the ER)
Molise	Autorità di Bacino Distrettuale dell'Appennino Meridionale	Si suggerisce di integrare la lista documenti chiave sullo stato dell'ambiente	The documents have been integrated in the analysis, based on their cross-border relevance. Regional data sources have been added in appendix 2 of the ER
		Dare rilevanza autonoma al tema dell'Economia circolare, che dovrebbe essere riferita non solo alla gestione dei rifiuti, ma anche alla corretta gestione delle risorse ambientali	The circular economy and the correct management of natural resources have been addressed in the entire ER
	Agenzia Regionale per lo Sviluppo Agricolo, Rurale e della Pesca	Tra le tipologie di indicatori, si suggerisce di considerare anche la tematica rischio incendi	The theme related to fire risk has been added in chapter III, climate change and associated risks, of the ER
	Regione Molise	Si suggerisce di integrare l'elenco che individua le fonti, non esaustive, dei dati richiesti per l'estensione dei documenti ambientali	The data sources at regional level have been added in appendix 2 of the ER
Veneto	Environmental Authority (Regional Commission SEA)	Da sottolineare il ruolo della valutazione durante la fase di elaborazione del programma, fornendo indicazioni circa le alternative possibili	The analysis of alternatives has been reported in sub- chapter X. I of the ER
		Da approfondire gli obiettivi dell'agenda 2030 per lo Sviluppo Sostenibile, da integrare con la strategia regionale	The objectives have been analysed based on cross-border relevance and to the 2030 agency for the Sustainable Development. The reference to regional strategy has been added in appendix 3 of the ER
		Integrare l'elenco di piani e programmi da analizzare nell'analisi di coerenza esterna	The analysis of coherence has been carried out based on cross-border relevance. The Plans and Programmes at regional level has been added in appendix 3 of the ER
		Si evidenzia la necessità che vengano sviluppate azioni per contrastare fenomeni legati ai cambiamenti climatici	The suggestion has been considered in SO 2.4.
		Devono essere approfondite nel Rapporto Ambientale ulteriori tematiche e settori rilevanti e per le componenti ambientali che presentano criticità, le cause e le misure previste per mitigare gli effetti negativi	The analysis is available in chapter III, VII and VIII of the ER
		Devono essere valutate le prescrizioni/raccomandazioni e i contributi delle Autorità Ambientali	The recommendations for each Environmental Authority are reported in this table (appendix 4 of the ER)
		Devono essere individuate azioni concrete per il raggiungimento degli obiettivi	This is already included in the entire ER
		Devono essere individuate le ragionevoli alternative	See sub-chapter X. I of the ER
		Deve essere portata avanti una valutazione di incidenza	See sub-chapter VII.3 of the ER



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	The ER should contain information as for Annex VI, Second section, National Law 152/2006	This is already included in the entire ER
	Da considerare specifici elementi per il piano di monitoraggio	The monitoring elements have been reported in chapter IX of the ER
Ministero della Transizione Ecologica	L'elenco riportato nell'Appendice I dovrà essere integrato con i riferimenti delle Autorità di bacino distrettuale competenti	Appendix I refers only to Environmental Authorities, not to authorities with environmental competences
	Integrare l'elenco di piani e programmi da analizzare nell'analisi di coerenza esterna	The plans and programmes, with transboundary relevance, have been added in the ER. Regional plans and programmes have been added in appendix 3 of the ER
	In merito alle questioni ambientali e agli indicatori di contesto si suggerisce di integrarli utilizzando gli indicatori della Direttiva Quadro Acque 2000/60/CE. Aggiungere riferimenti relativi al rischio idrogeologico nella tabella 2 'Aspetti ambientali e obiettivi ambientali generali'. Per la metodologia per la valutazione dei probabili effetti ambientali significativi (par. 5.3), indicare la matrice delle componenti ambientali interessate	Environmental themes have been addressed based on data availability and relevance with cross-border programme objectives. Hydrogeological risk has been added (see section VI of the ER). For the evaluation of the environmental effects see chapter VII of the ER
	Si suggerisce di integrare nel capitolo 4 'obiettivi di sviluppo sostenibili e ambientali' a pag. 13, l'indicazione della Direttiva Europea sulla Pianificazione dello Spazio Marittimo	The reference to the Directive has been added in chapter V of the ER
	Nella tabella 1, capitolo 3 si suggerisce di modificare le nomenclature dei temi ambientali e i relativi indicatori	The suggestions on environmental themes have been integrated. See chapter VI of the ER
	Nella tabella 2 Aspetti ambientali e obiettivi ambientali generali si consiglia di apportare modifiche nella voce dedicata all'ambiente marino	The suggestions on environmental objectives have been integrated. See chapter VI of the ER
	Si consiglia di integrare le fonti di informazioni e dati con le fonti suggerite	Data source has been added based on cross-border relevance. The complete list of data sources at European, national and regional levels is available in appendix 2 of the ER
	Si consiglia di integrare l'elenco di strategie, piani e programmi rilevanti per l'area di cooperazione	The plans and programmes indicated, with transboundary relevance, will be added in the ER. The complete list of data sources at European, national and regional levels is available in appendix 3 of the ER
	Si rappresenta che, laddove gli interventi previsti per il raggiungimento degli obiettivi del Piano ricadano anche all'interno dei Siti di interesse Nazionale, gli stessi dovranno essere sottoposti alla valutazione di competenza della Direzione di competenza del Ministero	Duly noted. This should be done at a later stage in the implementation phase regarding project selection.
	In sede di pianificazione e successiva progettazione sia data particolare rilevanza alla valutazione di soluzioni alternative che non interessino, a livello progettuale, direttamente o indirettamente siti Natura 2000 o altre tipologie di aree protette e tutelate	Duly noted. This has been stressed in sub-chapter VII.3 of the ER
Ministero della Cultura	Si suggerisce di coordinare gli obiettivi programmatici con i contenuti del nuovo Piano Territoriale Regionale di Coordinamento (P.T.R.C.) del Veneto	This document has been considered only based on cross-border relevance. The complete list of data sources at regional level is available in appendix 3 of the ER
	Per quanto riguarda l'analisi delle alternative, si suggerisce un'analisi di dettaglio che tenga in debito conto gli aspetti legati alla conservazione dei segni storici del paesaggio e	The analysis of alternative has been done considering three different scenarios discussed during the task forces and based on the expected budget allocation.



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		alle possibili interferenze, evidenziando le possibili conseguenze attese nel caso di mantenimento dello status quo (scenario O)	
		Si suggerisce di integrare i riferimenti ad importanti strumenti giuridici internazionali	The plans and programmes indicated, with transboundary relevance, have been added in the ER. The completed list of data sources is available in appendix 3 of the ER
		Si suggerisce di integrare le informazioni inerenti le Autorità/Enti che dovranno essere coinvolti nel programma in base alle rispettive competenze istituzionali e amministrative	In the chapter related to monitoring a brief description of competences and roles in programme implementation has been provided
		Si suggerisce di analizzare le relazioni paesaggistiche e culturali fra i beni tutelati e il contesto di riferimento, in modo da poter evidenziare le possibili conseguenze che l'attuazione del Programma possa generare nel palinsesto attuale e le risposdenze con gli obiettivi di tutela paesaggistica territorialmente attesi	The theme related to the analysis of landscape types has been addressed in chapter III, landscape and cultural heritage, of the ER
		Si suggerisce di valutare in chiave paesaggistico-percettiva il potenziale impatto, sia in termini di consumo di suolo che di trasformazione dei luoghi, conseguente all'implemento delle tecnologie per le energie rinnovabili e allo sviluppo dei servizi di mobilità transfrontaliera	The theme related to the analysis of landscape types has been addressed in chapter III, landscape and cultural heritage, of the ER
		Si suggerisce di integrare le considerazioni inerenti le misure previste per impedire, ridurre o compensare nel modo più completo possibile gli eventuali impatti negativi sui beni culturali e sul paesaggio (con particolare riferimento agli obiettivi strategici OSt3 e OSt4)	Duly noted. See chapter VIII, related to mitigation measures
		Si suggerisce di approfondire adeguatamente il tema dedicato al sistema di monitoraggio	See chapter IX of the ER
	Consorzio di Bonifica Adige Euganeo	Si richiede di integrare il campo relativo ai cambiamenti climatici con indicatori aggiuntivi	Environmental themes have been added based on data availability and relevance with cross-border programme objectives. The analysis of climate change risk is available in chapter III, climate change and associate risks, of the ER
	ARPAV	Si suggerisce di approfondire alcuni ulteriori documenti strategici e pianificatori	The plans and programmes indicated, with transboundary relevance, have been added in the ER. The complete data sources have been reported in Appendix 3 of the ER
		Si suggerisce di integrare nel Rapporto Preliminare le tipologie di misure attuative su cui il Programma si basa per raggiungere gli obiettivi specifici, e gli esiti del periodo di programmazione precedente. Per le tematiche ambientali proposte, si suggerisce di effettuare una prima valutazione sulla pertinenza delle medesime in relazione agli obiettivi di Programma, individuando indicatori di contributo misurabili	Past programming achievements have been illustrated in the ER. Environmental themes have been addressed based on the relevance with cross-border programme objectives. In addition, specific indicators have been identified in the chapter IX related to monitoring
	Consiglio di Bacino Laguna di Venezia	Si suggerisce di sviluppare i futuri elaborati tenendo conto di ulteriori documenti a livello europeo	The plans and programmes indicated, with transboundary relevance, have been added in the ER. The complete data sources have been reported in Appendix 3 of the ER
	Comune di Treviso	Per il Tema Cambiamento climatico, considerare anche l'attenuazione degli impatti degli eventi meteorici avversi e l'erosione costiera. Per il tema Qualità del suolo e	Environmental themes have been added based on data availability and relevance with cross-border programme objectives. The analysis of climate change risk is



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	paesaggio si suggerisce tra gli obiettivi la riduzione del consumo di suolo e la rinaturalizzazione di aree antropizzate. Per il Tema Salute, rischio sanitario e problemi ambientali l'obiettivo dovrebbe comprendere anche la riduzione dell'esposizione agli inquinanti nelle aree rurali o comunque scarsamente urbanizzate	available on chapter III of the ER, climate change and associate risks. Soil consumption and fragmentation of the natural and agricultural territory have been added in chapter III of the ER, soil quality and land use. The theme related to human health and exposure to pollutants has been added in chapter III of the ER, air quality and health
	Si suggerisce di integrare nel Rapporto Ambientale le connessioni dei territori oggetto del Programma con aree interne adiacenti agli stessi, legate ad essi da aspetti culturali, ambientali e sociali	The analysis is limited to the area covered by the Programme
Soprintendenza Archeologia, belle arti e paesaggio per il Comune di Venezia e Laguna	Si ritiene debba essere tenuta in considerazione la peculiarità dell'ambiente lagunare particolarmente fragile. Si ritiene utile consultare il PALAV (Piano d'Area della Laguna e dell'area Veneziana) e, per gli aspetti archeologici, la proposta di Piano Paesaggistico d'Ambito recepita dalla Giunta Regionale con delibera n. 699 del 14/05/2015. Si ritiene utile fare riferimento, a livello di proposta metodologica, alla Recommendation on HUL (Historic Urban Landscape-Paesaggio Storico Urbano), che l'UNESCO ha emanato alla fine del 2011	A focus has been done on the Laguna in the chapter III related to the context analysis.
	Si ritiene non esaustiva l'illustrazione dei contenuti degli obiettivi generali e specifici del Programma e del rapporto con altri pertinenti piani o programmi, in particolare con i piani paesaggistici d'ambito attualmente vigenti e con i Piani di gestione dei siti Natura 2000 e Piani di gestione UNESCO	Duly noted, data sources have been analysed based on cross-border relevance. Additional data sources have been added in Appendix 3 of the ER
	Si ritiene non esaustivo il metodo di analisi dei contesti territoriali per la valutazione delle strategie di intervento coerentemente con gli strumenti di pianificazione paesaggistica. Si suggerisce di raccordare il Piano con lo stato attuale della pianificazione paesaggistica della Regione (Piano Territoriale Regionale di Coordinamento del Veneto)	Duly noted, data sources have been analysed based on cross-border relevance. Additional data sources have been added in Appendix 3 of the ER
	Si ritiene non esaustiva la considerazione dei possibili impatti significativi sull'ambiente, compresi, tra gli altri, quelli relativi ai beni materiali, al patrimonio culturale, architettonico, archeologico, il paesaggio e l'interazione tra questi e gli altri fattori ambientali (aree tutelate per legge ex art. 142 e ai beni paesaggistici ex art. 136 del National Law. n.42/2004), rispetto ad un utilizzo di energia da fonti rinnovabili	Duly noted. See sub-chapter VII.2 of the ER
	Si ritiene non esaustiva la considerazione delle misure previste per mitigare gli eventuali impatti negativi significativi sull'ambiente, e quindi anche sui beni culturali e sul paesaggio, conseguenti all'attuazione del Programma, con particolare riguardo al miglioramento del ruolo del turismo culturale e sostenibile nello sviluppo economico	The analysis on mitigation measures is developed in chapter VIII of the ER



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		<p>Si ritiene utile un approfondimento delle caratteristiche culturali e paesaggistiche delle aree che potrebbero essere significativamente interessate dall'attuazione degli obiettivi del Piano (beni culturali tutelati ai sensi della parte II e della Parte III del National Law 42/2004). È auspicabile la consultazione della mappatura dei beni culturali e paesaggistici terrestri e sommersi, prodotta dal MIC (https://catalogo.beniculturali.it/)</p>	<p>Environmental themes have been added based on data availability and relevance with cross-border programme objectives. The data source related to mapping cultural sites has been added in appendix 2 of the ER</p>
		<p>Si ritiene non esaustiva la valutazione dell'impatto né le eventuali azioni di mitigazione per quanto riguarda i beni archeologici. Si raccomanda una tempestiva applicazione delle previsioni dell'art. 25 del Codice dei Contratti Pubblici (National Law. 50/2016 e s.m.), come best practice per garantire la conservazione dello stato dei siti e dei beni di interesse archeologico</p>	<p>Duly noted, the analysis of the effects and mitigation measures is reported in chapter VII and VIII of the ER</p>
Croatia	Ministry of Economy and Sustainable Development	<p>The ER should assess, impacts of programme on the NATURA 2000 network, mitigation measures and the conclusion that the programme will not have adversely effects on conservation objectives and the integrity of the NATURA 2000 network</p>	<p>See sub-chapter VII.3 of the ER</p>
		<p>The ER should assess, the impacts, mitigation measures and the conclusion on the acceptability of the programme, on biodiversity, on protected areas, on geodiversity and landscape</p>	<p>See chapter VII and VIII of the ER</p>
		<p>Suggest new data sources in the document</p>	<p>Data sources have been added in appendix 2 of the ER</p>
		<p>Modify the Croatian regions (counties) covered by the programme</p>	<p>The County of Istria is included in the entire ER</p>
		<p>Identify the challenges of protecting the marine environment in terms of the need to introduce an ecosystem approach to human activity management and sustainable management of marine resources</p>	<p>This is already included in the entire ER</p>



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