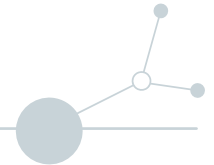




STRATEGIC ENVIRONMENTAL ASSESSMENT

ENVIRONMENTAL STATEMENT



March 2022



PREAMBLE

The Environmental statement has been prepared within the framework of the Strategic Environmental Assessment (SEA) of the transnational cooperation programme Interreg CENTRAL EUROPE 2021-2027 co-financed by the European Regional Development Fund.

The SEA was conducted by the independent expert consortium Integra Consulting (CZ) and ZaVita (SI).

The statement is issued following the adoption of the Interreg CENTRAL EUROPE (CE) Programme on 23 March 2022 in accordance with the Article 9 of the SEA Directive. It includes the conclusions of the Environmental report and responses to comments obtained during consultation process.

The Environmental statement should be read together with the adopted Interreg CE Programme and the Environmental Report which are published on the [programme website](#).



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INTRODUCTION

A Strategic Environmental Assessment (hereinafter SEA) for the future Interreg CENTRAL EUROPE 2021-2027 Programme (Interreg CE) was conducted in accordance with the EU Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (hereinafter SEA Directive) and the UNECE Protocol on Strategic Environmental Assessment to the Convention on Environmental Impact Assessment in a Transboundary Context (hereinafter SEA Protocol).

The environmental statement has been prepared following the adoption of the Interreg CE 2021-2027 Programme based on the requirements of the Article 9 of the SEA Directive. The statement includes a summary of:

- how **environmental considerations** have been integrated into the Interreg CE Programme,
- how **recommendations of the environmental report** have been taken into account and
- how the **feedback of the environmental authorities and the public gathered within the consultation process** on the scoping report and on the environmental report have been incorporated into the SEA process and the Interreg CE.

Furthermore, this environmental statement refers to the “reasons for choosing the programme as adopted, in the light of the other **reasonable alternatives** dealt with” and provides **measures for monitoring** potential environmental effects resulting from the Interreg CE 2021-2027 Programme. As laid down in Article 9 of the SEA Directive 2001/42/EC this document is made available to inform the environmental authorities and the public. This statement should be read together with the INTERREG CE Programme and the Environmental Report.

INTERREG CENTRAL EUROPE PROGRAMME

The Interreg CENTRAL EUROPE (CE) Programme is one of the transnational cooperation programmes established under the European Territorial Cooperation goal in the framework of the EU Cohesion Policy. The programme supports regional cooperation among nine central European countries: Austria, Croatia, the Czech Republic, Hungary, Poland, Slovakia and Slovenia, as well as parts of Germany and Italy.

The Interreg CENTRAL EUROPE 2021-2027 Programme includes four priorities and 9 specific objectives (SOs):

Priority 1: Cooperating for a smarter central Europe

SO 1.1: Strengthening innovation capacities in central Europe

SO 1.2: Developing skills for smart specialisation, industrial transition and entrepreneurship in central Europe

Priority 2: Cooperating for a greener central Europe

SO 2.1: Supporting the energy transition to a climate-neutral central Europe

SO 2.2: Increasing the resilience to climate change risks in central Europe

SO 2.3: Taking circular economy forward in central Europe

SO 2.4: Safeguarding the environment in central Europe

SO 2.5: Greening urban mobility in central Europe

Priority 3: Cooperating for a better connected Europe

SO 3.1: Improving transport connections of rural and peripheral regions in central Europe

Priority 4: Improving governance for cooperation in central Europe

SO 4.1: Strengthening governance for integrated territorial development in central Europe

SEA PROCESS

The Interreg CE Managing Authority and its Joint Secretariat (hereafter MA/JS) has commissioned the SEA to independent external experts selected through a tendering process – a consortium of Integra Consulting Ltd. (Czechia) and Zavita Ltd. (Slovenia). The SEA was integrated into the IP elaboration and in terms of the SEA procedure involved standard steps outlined in Figure 1.

Figure 1 Steps of the SEA process and timeline

Steps of the SEA process	Schedule
Kick off meeting	31 Jan 2020
Integrating the SEA process to the programming process timeline	Feb-Apr 2020
Scoping document and consultations with environmental authorities	June-July 2020
Informal feedback on the programming document	July-Aug 2020
Draft Environmental Report	Sep-Oct 2020
Consultations of env. authorities and the public	Nov 2020 - March 2021

The SEA was performed in an interactive way between the contractor and the MA/JS through regular virtual meetings and exchanges on the progress of the SEA. In practical terms, the SEA process has involved the following technical tasks that provided inputs into the formulation of the Interreg Central Europe Programme for 2021-2027 (hereafter IP):

The SEA team has started by elaborating an environmental reference framework for the IP using a very early draft IP (during February-March 2020). The framework was closely discussed with the IP programming team and was included in the SEA scoping report that was sent to the relevant EU Member states for consultations in accordance with Article 5 (4) of the SEA Directive.

The scoping consultations with the relevant EU Member states covered by the programme area were conducted during June-August 2020. They provided inputs into the finalisation of the environmental reference framework as well as for the further elaboration of the draft IP.

Additionally, the SEA team elaborated two sets of working inputs for the the IP. First, the SEA team prepared an internal Aide Memoire (June 2020) that summarized the key findings coming out of the environmental baseline analyses for the potential use within the IP elaboration. Second, the programming team and the SEA team had a working session in late August 2020 to discuss initially the working draft of the IP. All relevant comments were fully integrated into the IP working draft.

The resulting IP proposal which was used for the elaboration of the SEA Report has been, thanks to these multiple interactions, fully optimized with regard to the SEA process inputs. The SEA report presented the impacts of the IP proposal on the expected future evolution of the environmental baseline trends (zero-alternative) and highlighted

only few outstanding issues of concern to be considered before and during the formal IP adoption and implementation.

The SEA team has presented the progress in the SEA process to the 8th Interreg CE Working Group meeting on 24 Sept 2020 before the consultations on the Environmental Report.

Consultations on the IP proposal and its accompanying Environmental Report (version October 2020) were conducted in accordance with the SEA Directive Article 6. They involved environmental authorities and the public in all 9 Member States of the CE Programme area and lasted from Nov 2020 to March 2021.

During this period, the SEA Team and the Interreg CE programming team have jointly considered comments obtained from these consultations and prepared a detailed response sheet provided in Annex 1 to this statement. The SEA Team and the Interreg CE programming team have also considered jointly the conclusions of the Environmental Report. The recommendations from the SEA process were presented at the 10th Interreg CE Working Group meeting on 28 January 2021.

The proposed IP, its accompanying Environmental Report and the draft Environmental Statement for the proposed programme were submitted to the Interreg CE Working Group for final review before adoption of the Interreg CE 2021-2027 Programme.

THE ASSESSMENT METHODOLOGY

The actual assessment used the guiding questions determined at the end of the scoping process and involved matrices with the textual explanations of the potentially significant impacts of the interventions proposed in the programming document. The analysis was conducted on an issue-by-issue basis, which facilitated consideration of potential cumulative or synergistic impacts of the entire Interreg CE 2021-2027 Programme on each environmental issue/concern.

The assessment has taken into consideration the fact that the programme primarily focuses on transnational cooperation, strategic and operational planning, , capacity building and skills improvement, best practice transfer and knowledge exchange. It involves “limited investment” interventions - any supported actions with an “investment character” will be supported for the purpose of the piloting of innovative solutions. This often meant that only localized direct impacts can be reasonably expected in case of specific projects and their pilot actions. Within this context, the assessment worked with plausible scenarios of best-case and worst-case implications that can realistically result from implementation of the proposed interventions in different settings.

CONCLUSIONS OF ENVIRONMENTAL REPORT REGARDING EFFECTS OF THE INTERREG CENTRAL EUROPE 2021-2027 PROGRAMME ON ENVIRONMENT AND HUMAN HEALTH

As evident from the overview provided below, the Interreg CE 2021-2027 Programme is clearly oriented towards sustainable development and searches for green solutions by design. The programme’s environmental effects are largely positive – both in national as well as transboundary settings. Since all projects and their potential pilot actions with an “investment character” need to be implemented in line with national level legislation and standards, no potentially significant adverse impact is foreseen even for the realistic worst/case scenario of the programme implementation. The programme creates only few minor risks of potentially adverse impacts which can be managed by the existing well-established procedures in the member states covered by this programme.

SO 1.1: Strengthening innovation capacities in central Europe

SO 1.1	Air	CC	Water	Soil	Bio	Health	Mater.	Cult	Land
Benefits	/	+1	+1	+1	+1	/	+2	+2	/
Risks	/	/	/	/	-1	/	/	/	/
TB	/	/	/	/	/	/	/	/	/

SO 1.2: Developing skills for smart specialisation, industrial transition and entrepreneurship in central Europe

SO 1.2	Air	CC	Water	Soil	Bio	Health	Mater.	Cult	Land
Benefits	/	+1	/	/	/	+1	+1	/	/
Risks	/	/	/	/	/	/	/	/	/
TB	/	/	/	/	/	/	/	/	/

SO 2.1: Supporting the energy transition to a climate neutral central Europe

SO 2.1	Air	CC	Water	Soil	Bio	Health	Mater.	Cult	Land
Benefits	+2	+2	/	/	/	+1	+1	/	/
Risks	/	/	-1	/	-1	-1	/	/	-1
TB	T+	T+	/	/	T	/	/	/	/

SO 2.2: Increasing the resilience to climate change risks in central Europe

SO 2.2	Air	CC	Water	Soil	Bio	Health	Mater.	Cult	Land
Benefits	+1	+2	+2	+2	+2	+2	+2	+2	+T
Risks	/	/	-1	/	/	/	/	/	/
TB	/	T+	T+	/	T+	T+	/	/	/

SO 2.3: Taking circular economy forward in central Europe

SO 2.3	Air	CC	Water	Soil	Bio	Health	Mater.	Cult	Land
Benefits	+1	+1	+2	+1	+1	+1	+2	/	/
Risks	/	/	/	/	/	/	/	/	/
TB	/	/	/	/	/	/	/	/	/

SO 2.4: Safeguarding the environment in central Europe

SO 2.4	Air	CC	Water	Soil	Bio	Health	Mater.	Cult	Land
Benefits	+2	+2	+2	+2	+2	+2	/	/	+2
Risks	/	/	/	/	/	/	/	/	/
TB	/	T+	T+	/	T+	T+	/	/	/

SO 2.5: Greening urban mobility in central Europe

SO 2.5	Air	CC	Water	Soil	Bio	Health	Mater.	Cult	Land
Benefits	+2	+2	/	/	/	+2	/	+1	/
Risks	/	/	/	/	/	/	-1	/	/
TB	/	/	/	/	/	/	/	/	/

SO 3.1: Improving transport connections of rural and peripheral regions in central Europe

SO 3.1	Air	CC	Water	Soil	Bio	Health	Mater.	Cult	Land
Benefits	+1	+1	/	/	/	+1	/	/	/
Risks	-1	-1	/	/	-1	-1	/	/	-1
TB	T	/	/	/	T	/	/	/	T

SO 4.1: Strengthening governance for integrated territorial development in central Europe

SO 4.1	Air	CC	Water	Soil	Bio	Health	Mater.	Cult	Land
Benefits	+1	+1	+1	+1	+1	+1	+1	+1	+1
Risks	/	/	/	/	/	/	/	/	/
TB	/	/	/	/	/	/	/	/	/

Key:

+2	+1	/	-1	-2
Significant positive impact	Moderate positive impact	Limited or no impact	Moderate adverse impact	Significant adverse impact

T Transboundary impact (T+ moderate positive impact, T- moderate adverse impact)

Air air quality

CC climatic factors and climate change

Water water quality

Soil soil quality

Bio biodiversity

Health public health

Mater. material assets

Cult cultural heritage

Land landscape

The Environmental Report has also found out that transboundary (TB) effects of the Interreg CE 2021-2027 Programme are largely positive. The programme creates only few minor risks of potentially adverse transboundary impacts in the case of transboundary policy/strategic frameworks and infrastructure interventions in border areas that would be independently followed up by investments outside of the Interreg CE programme framework. Such risks can be managed by the existing well-established provisions for the transboundary consultations within the respective EIAs or SEAs that would accompany any such intervention.

CONSIDERATION OF COMMENTS OBTAINED THROUGH CONSULTATIONS HELD IN ACCORDANCE WITH ARTICLE 6 OF THE SEA DIRECTIVE

Consultations on the IP proposal and its accompanying Environmental Report (version October 2020) were conducted on national and transnational levels. At transnational level the required consultation documents have been published on the CE Programme’s website by the MA/JS. At national level, the Member States participating in the Interreg CE 2021-2027 Programme conducted the consultation process based on the national specific

requirements. The consultations lasted from Nov 2020 to March 2021 and a total of 34 organisations from different countries submitted comments.

The comments received through these consultations largely confirmed the conclusions of the Environmental Report (See Annex 1 for in-depth overview). They could be divided into the following categories:

- Proposed minor clarifications of the Environmental Report (e.g. environmental situation, impact assessment and proposed monitoring system). These comments were fully integrated in the final version of Environmental Report that became part of the final package of documents that accompanied the CE IP.
- Requests to integrate all mitigation and enhancement measures into the IP implementation arrangements. These comments were integrated to the possible extent into the final IP.
- Requests that that all future supported projects comply with the relevant EU and national environmental legislation and therein foreseen procedures (e.g. applicable in-country requirements for SEA, EIA, Natura 2000 Appropriate Assessments, etc.) during their implementation. These comments are taken up by integrating the responsibility for such legal compliance in the subsidy contracts of funded projects and as eligibility criteria which will be laid down in the programme manual.
- Requests to specify arrangements for monitoring arrangements of the IP implementation that will allow to identify any unforeseen adverse effects and allow to undertake appropriate remedial action at early stage. These comments will be considered during the elaboration of the implementation settings which will be laid down in a separate document, notably the programme manual.
- Proposals for inclusions of additional examples of actions or thematic fields into Specific Objectives of the IP. Most of these comments were fully integrated into the final IP document.

Annex 1 to this document provides an overview showing the received comments as well as responses by the SEA team and the programming team indicating how they were considered in the final IP. In summary, it can be noted that all comments which were considered relevant have been duly taken into account.

INCORPORATION OF RECOMMENDATIONS OF THE ENVIRONMENTAL REPORT

Chapter 6 of Environmental Report proposed mitigation and enhancement measures aimed to ensure that the Interreg CE 2021-2027 Programme will not affect the environment in a negative way and maximize its beneficial impacts on environment. All these recommendations were taken up and integrated in the programme in the following manner

Proposed mitigation and enhancement measure recommended in the Environmental Report	Follow-up by the Interreg CE MA/JS
GENERIC CROSS-CUTTING RECOMMENDATION FOR THE ENTIRE INTERREG CENTRAL EUROPE PROPOSAL	
<p>Mitigation measure no. 1</p> <p>The IP should encourage all applicants to use ‘environmental sustainability by design’ approach. This approach implies that environmental or broader sustainability considerations are no longer treated as “afterthoughts” and instead become the core part of decision-making processes ranging from e.g. the business management tools (such as analytics and product development) public sector planning and programming (adapted from Palerm & Slootweg, 2020).</p>	<p>Accepted</p> <p>The “environmental sustainability by design” approach has been integrated as a horizontal principle for delivery in the IP, including also a specification of related implications.</p> <p>Further details will be included in future programme implementation documents addressing both the</p>

<p>To promote such thinking in the actual project applications, the CE programme is advised to:</p> <p>a) encourage the prospective applicants to identify and consider any potentially significant environmental and health issues of concern during their project design; consider available options for implementing projects that do not adversely affect the quality of the environment and ideally contribute to regeneration of the environment and ecosystem functions and services; and prepare arrangements for environmentally sound project implementation;</p> <p>and</p> <p>b) explain all of the above considerations in the project application (e.g. in the dedicated section of the project application templates).</p> <p>The project selection process should recognize and appreciate good practices in environmental sustainability-by-design.</p>	<p>application, selection and implementation stage such as in the programme manual and relevant templates.</p>
<p>PROPOSED MITIGATION AND ENHANCEMENT MEASURES FOR SO 1.1: STRENGTHENING INNOVATION CAPACITIES IN CENTRAL EUROPE</p>	
<p>Mitigation measure no. 2 With regard to the potential support to bio-economy any supported innovation that involve genetic modifications (e.g. synthetic biology) should be supported only if they prove compliance with the related acquis communautaire for genetic engineering, including the relevant provisions of the EU Biodiversity Strategy 2030.</p>	<p>Accepted Specific reference to these requirements have been included in the IP under the SO1.1.</p>
<p>Enhancement measure no. 1 We recommend to consider adding a new indicative example of action on innovations that facilitate decentralisation and demand-responsive production systems (as they generate lower environmental footprint due to their reduced transport demands and lower dependencies on external products and material supplies).</p>	<p>Accepted A related example of action was included in the IP in SO1.1.</p>
<p>Enhancement measure no. 2 The IP could guide the potential applicants to transfer and up-scale already proven green solutions, thus capitalizing on ready-to-go solutions and maximizing its impact delivery potential. It could also encourage any mutually beneficial linkages between the proposed actions and the future investment mobilisation for next generation technologies under the InvestEU and the new Strategic Investment Facility (through e.g. preparation of cross-border projects or regional know-how exchanges to discuss good practices in the use of these instruments).</p>	<p>Accepted A related reference was included in the IP in SO1.1.</p>
<p>Enhancement measure no. 3 The IP could include “creative industries” and “cultural heritage institutions” in the main target groups which could enhance its beneficial impact on the service sector and the leisure economy.</p>	<p>Accepted A related reference was included in the IP in SO1.1.</p>
<p>Enhancement measure no. 4 Consider adding a new indicative example of action on skills for the productive use of cultural heritage, assets and arts in the service sector and leisure economy.</p>	<p>Accepted Reference to enabling cross-sectoral cooperation to help businesses (including cultural and creative industries) for product and service development has been included in the IP in SO1.1.</p>
<p>PROPOSED MITIGATION AND ENHANCEMENT MEASURES FOR SO 2.1: SUPPORTING THE ENERGY TRANSITION TO A CLIMATE NEUTRAL CENTRAL EUROPE</p>	
<p>Mitigation measure no. 3</p>	<p>Accepted</p>

<p>The project selection process should ensure that proposals for the production of renewable energy consider their potential impacts on biodiversity and Natura 2000 species and habitats, hydro-morphology, water-use, landscape, noise, vibrations and electromagnetic impacts.</p>	<p>Reference to the consideration of potential environmental impacts of actions regarding renewable energy production has been explicitly included in the IP under SO 2.1. This will be considered during the project application and selection process.</p>
<p>Enhancement measure no. 5 We recommend to consider adding new indicative examples of actions on:</p> <ul style="list-style-type: none"> • carbon capture, utilisation and storage; • business networks raising corporate climate change mitigation and adaptation targets or embedding climate change mitigation and adaptation (along with other relevant environmental factors) into existing business management tools (e.g. analytics) and core corporate decision-making (e.g. product development, etc.); • second generation of biofuels (produced from non-food crops, such as cellulosic biofuels and waste biomass) and third generation of biofuels (algal biomass), as well as sustainable management of management of end-of-life solar panels; • energy efficiency solutions in challenging environments such as cultural heritage buildings. 	<p>Accepted Related examples of actions have been included in the IP under SO 2.1.</p>
<p>PROPOSED MITIGATION AND ENHANCEMENT MEASURES FOR SO 2.2: INCREASING THE RESILIENCE TO CLIMATE CHANGE IN CENTRAL EUROPE</p>	
<p>Mitigation measure no. 4 The project selection process should ensure that proposals for climate change risk (e.g. floods) adaptation measures consider their potential hydro-morphological impacts.</p>	<p>Accepted Reference to the consideration and avoidance of potential hydro-morphological impacts of adaptation measures has been explicitly included in the IP under SO 2.2. This will be considered during the project application and selection process.</p>
<p>Enhancement measure no. 6 The IP should encourage all applicants to promote, as much as possible, sustainable ecosystem-based solutions and approaches to climate change adaptation and treating infrastructure upgrades as the last resort possibilities.</p>	<p>Accepted Reference to ecosystem-based solutions has been included in the IP under SO 2.2.</p>
<p>PROPOSED MITIGATION AND ENHANCEMENT MEASURES FOR SO 2.3: TAKING CIRCULAR ECONOMY FORWARD IN CENTRAL EUROPE</p>	
<p>Enhancement measure no. 7 We suggest to consider adding new indicative example of action related to:</p> <ul style="list-style-type: none"> • recovery of organic waste, including nutrients from municipal wastewater; • regenerative circular economy approaches based on manufacturing of products that can be disassembled and be either broken down by nature or returned to production process; and • creation of (single or synchronized) marketplaces for recyclates in the region. 	<p>Accepted Related examples of actions have been included in the IP under SO 2.3.</p>
<p>PROPOSED MITIGATION AND ENHANCEMENT MEASURES FOR SO 2.4: SAFEGUARDING THE ENVIRONMENT IN CENTRAL EUROPE</p>	
<p>Enhancement measure no. 8</p>	<p>Accepted</p>

<p>We suggest to consider adding ‘transboundary water management on a river basin scale’ and ‘protection, preservation and improved management of landscapes’ amongst priority topics to be addressed within this SO. We also suggest to consider adding new indicative examples of actions related to:</p> <ul style="list-style-type: none"> • reuse of degraded brownfields and regeneration of degraded peri-urban areas for resilience building purposes; • ‘transboundary water management on a river basin scale; and • protection, preservation and improved management of landscapes. 	<p>Related e examples of actions have been included in the IP under SO 2.4.</p>
<p>PROPOSED MITIGATION AND ENHANCEMENT MEASURES FOR SO 3.1: IMPROVING MOBILITY AND ACCESSIBILITY OF RURAL AND PERIPHERAL REGIONS IN CENTRAL EUROPE</p>	
<p>Mitigation measure no. 5 Should the IP fund the preparation of transport infrastructure plans and programmes that would fall under the scope of the SEA Directive or SEA Protocol, it needs to ensure that the relevant activities consider the required strategic environmental assessments.</p>	<p>Accepted The compliance of project activities supported with the applicable legislative and regulatory requirements in the specific country(ies) concerned (including those related to the SEA) will be ensured by integrating this issue in the subsidy contract and is an eligibility criteria which will be laid out in the programme manual.</p>
<p>Mitigation measure no. 6 The IP should encourage all applicants to use ‘environmental sustainability by design’ approach, that considers, particularly in the SO 3.1, whether and how the proposed transport actions:</p> <ul style="list-style-type: none"> • reduce the need for transport; • reduce or optimize the transport flows; • promote switching to least emission-intensive transport systems; • reduce or optimize fragmentation of habitats; and • reduce the impacts of the transport systems on air and noise pollution; public health; biodiversity and Natura 2000 species and habitats, landscape fragmentation, hydro-morphological impacts, land take and cultural and archaeological heritage. 	<p>Accepted The “environmental sustainability by design” approach has been integrated as a horizontal principle for delivery in the IP. In addition, the thematic considerations as pointed out in this mitigation measure 6 have been explicitly included in the IP under the SO3.1.</p>
<p>Mitigation measure no. 7 Should the IP fund the preparation of transport infrastructure projects in border regions that would fall under the scope of the Espoo Convention and the Article 7 of the EIA Directive, it needs to ensure that the activities consider the relevant requirements for transboundary consultations.</p>	<p>Accepted The compliance of project activities supported with the applicable legislative and regulatory requirements in the specific country(ies) concerned (including those related to the Espoo Convention and the EIA directive) will be ensured by integrating this issue in the subsidy contract and is an eligibility criteria which will be laid out in the programme manual.</p>
<p>PROPOSED MITIGATION AND ENHANCEMENT MEASURES FOR SO 2.5: GREENING URBAN MOBILITY IN CENTRAL EUROPE</p>	
<p>Mitigation measure no. 8 As mentioned in the case of SO 3.1, the IP should encourage all applicants to use ‘environmental sustainability by design’ approach, that is particularly relevant to also</p>	<p>Accepted The “environmental sustainability by design” approach has been</p>

<p>for the SO 2.5. This approach should consider whether and how the proposed transport actions:</p> <ul style="list-style-type: none"> • reduce the need for transport; • reduce or optimize the transport flows; • promote switching to least emission-intensive transport systems; and • reduce the impacts of the transport systems on air and noise pollution; public health; and cultural heritage. 	<p>integrated as a horizontal principle for delivery in the IP. In addition, the thematic considerations as pointed out in this mitigation measure 8 have been explicitly in the IP under the SO2.5.</p>
<p>Enhancement measure no. 9 We recommend to consider the following wording changes in the proposed thematic fields:</p> <ul style="list-style-type: none"> • Sustainable multimodal connections between urban and peri-urban areas; • Urban traffic congestions management; and • Monitoring and management of greenhouse gases and other air pollutants from urban transport. 	<p>Mostly accepted Wording of thematic fields under SO 2.5 has been partially adapted and considered within the examples of actions.</p>
<p>Enhancement measure no. 10 We also suggest to consider adding a new indicative example of action on the future management or use of end-of-life batteries in electromobility systems.</p>	<p>Accepted A related example of action has been included in the IP under SO 2.5.</p>
<p>PROPOSED MITIGATION AND ENHANCEMENT MEASURES FOR SO 4.1: STRENGTHENING GOVERNANCE FOR INTEGRATED TERRITORIAL DEVELOPMENT IN CENTRAL EUROPE</p>	
<p>Enhancement measure no. 11 We suggest to consider adding a new indicative example of action aiming to integrate new biodiversity governance frameworks (with e.g. more effective stakeholder dialogues) developed based on the 2030 EU Biodiversity Strategy into new territorial governance models promoted by the IP.</p>	<p>Accepted A related example of action has been included in the IP under SO 4.1.</p>

As consequence, the implementation of the Interreg CE 2021-2027 Programme should have positive effects on the environment and possible negative effects are being avoided.

REASONS FOR CHOOSING THE PROGRAMME AS ADOPTED, IN THE LIGHT OF THE OTHER REASONABLE ALTERNATIVES DEALT WITH

The IP as adopted will not have negative effects on the environment but rather will affect most of the environmental issues in a positive way. Chapter 4 of Environmental Report describes the relevant aspects of the current state of the environment and its likely evolution without implementation of proposed IP. This baseline constitutes the zero alternative that was used as a basis to compare the possible effects resulting from the implementation of the IP. In conclusion, it can be noted that the programme with its positive environmental effects will bring a clear added value to the environment compared to the zero alternative.

MONITORING MEASURES

The IP does not include specific provisions for the future programme monitoring and evaluation. It sets the overall frame of the Interreg CE 2021-2027 Programme. In accordance with the draft ERDF regulation, the IP includes a set of output and result indicators for each programme SO in order to monitor the programme's performance. Following the guidance provided by the European Commission only a limited number of indicators have been included, i.e.

common output and result indicators as specified in the Annex 1 of the draft ERDF regulation have been selected, which are however not directly reflecting environmental considerations.

The detailed implementation provisions, covering also the monitoring procedures, will be defined outside of the IP within the programme implementation documents. These documents are not available at the time of the IP preparation and will be drafted in parallel to the programme adoption. The monitoring of possible environmental effects will be reflected during the project cycle as follows:

Application and contracting

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

Implementation

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

Closure

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

No further monitoring system is proposed in order to avoid potential duplicities in the monitoring as stipulated by the Article 10 of the SEA Directive. The above arrangements will allow the MA/JS to identify at an early stage unforeseen adverse effects and will ensure appropriate remedial actions.

ANNEX 1: RESPONSES TO COMMENTS OBTAINED FROM THE CONSULTATIONS WITH THE RELEVANT MEMBER STATES, ENVIRONMENTAL AUTHORITIES AND THE PUBLIC

Comments from countries	Response by the SEA team	Follow-up by the Interreg CE MA/JS
Austria		
Oberösterreich		
No comments	Noted	Noted
Croatia		
No major comments	Noted	Noted
Czechia		
Ministry of Environment		
The Czech Environmental Inspectorate welcomes the proposed support for many measures, especially in the area of adaptation to climate change and prevention of related risks. In the area of support for biodiversity, however, it points out that it is necessary to point out some specifics of the Central European region, which are directly related to the issue of conservation or support of its biodiversity. It is typical for a large part of this region (and this applies almost exclusively to the Czech Republic) that a significant part of biodiversity is tied to a more or less cultural or at least cultivated landscape. Many species and habitat types are even dependent on the human activity for their existence. Therefore, in addition to the "protection of wildlife" and the "restoration of damaged ecosystems", the concept should focus on the aspect of human coexistence and support of biodiversity of the cultural landscape, especially on the identification and support of activities whose by-product may consist in the support of biodiversity. Especially in connection with the natural renaturation of exploited habitats, which (compared to the targeted "restoration of damaged ecosystems" in the usual form of realisation) it appears to be significantly more effective if the scale is based on the support of the biodiversity of species and habitats.	Agreed. The SEA team suggest to reflect the comment in the IP proposal.	Accepted. The SO 2.4 was expanded to include the following thematic field: Sustainable land management and landscape planning that optimize human activities within the cultural landscapes with biodiversity protection and enhancement measures. The indicative actions within the SO 2.4 were also expanded with the additional example of action: Fostering the implementation of policies and strategies for the protection of cultural landscapes and integrating biodiversity protection interests into landscape management. The restoration of degraded ecosystems was included into the thematic fields of the SO 2.4. and examples of actions were expanded to include : Testing in pilot actions innovative technical solutions for the restoration of degraded eco-systems (e.g. rivers, high-diversity landscapes, forests) and upscaling these approaches at a wider territorial level .
The Administration of Krkonoše National Park believes that, with the inclusion of measures to exclude or minimize the impact of the concept on individual components of the environment, which are proposed in Chapter 5.2 Potentially significant impacts of the Interreg CENTRAL EUROPE 2021-2027 proposal on the environment and human health and summarized in Chapter 6 General cross-cutting	Agreed. The SEA team suggest to incorporate the comment into the IP implementation and monitoring arrangements.	Accepted. The compliance of project activities supported with the applicable legislative and regulatory requirements in the specific country(ies) concerned will be ensured by integrating this issue in the subsidy contract and is an

<p>recommendations for the whole proposal of the Interreg CENTRAL EUROPE of the assessment, the presented concept will not generate significant effects on the environment and therefore it requires for these measures to be incorporated into its final form. It points out, however, that the specific impacts of individual supported projects should be assessed at the stage of the support application, i.e. before it is granted.</p>		<p>eligibility criteria which will be laid out in the programme manual.</p>
<p>The Deputy Mayor of the Capital City of Prague also demands that all "measures to mitigate and strengthen" proposed in the evaluation be applied both in the text of the concept itself and in its implementation.</p>	<p>Agreed. The SEA team suggest to incorporate the comment into the IP implementation arrangements.</p>	<p>Accepted. The Interreg CE has integrated the mitigation and enhancement measures as stated in the environmental report of the SEA to the possible extent.</p>
<p>The regional authorities of the South Moravian and Zlín regions agree that in the case of some projects implemented on the basis of priorities and objectives set by the evaluated concept, a significant impact on the subject of protection and integrity of Natura 2000 sites can be expected and they point out that their assessment will have to be made individually for their effects on localities.</p>	<p>Noted. This is already covered by Environmental Report section 6.4 with Mitigation measure no. 3 requiring that the project selection process should ensure that proposals for the production of renewable energy consider their potential impacts on biodiversity and Natura 2000 species and habitats, hydro-morphology, water-use, landscape, noise, vibrations and electromagnetic impacts and the cultural lanscape protection.</p>	<p>Noted</p>
<p>Among others the Regional Authority of the Liberec Region requires in the area of support for the use and production of electricity from renewable sources to take into account the efficiency and overall environmental benefits of a specific solution in order to ensure that the chosen solution represents a variant with the lowest possible negative impact and its energy efficiency significantly outweighed the potential negative impacts on the natural components of the environment and the ecosystem services provided by them.</p>	<p>Noted. This is already covered by Environmental Report section with Mitigation measure no. 3 requiring that the project selection process should ensure that proposals for the production of renewable energy consider their potential impacts on biodiversity and Natura 2000 species and habitats, hydro-morphology, water-use, landscape, noise, vibrations and electromagnetic impacts and the cultural lanscape protection.</p> <p>It is also already covered by Environmental Report section 6.1 with Mitigation measure no. 1 which calls on the CE programme to promote</p>	<p>Noted</p>

	environmental sustainability-by-design in the project applications.	
The Ministry of Culture (hereinafter referred to as the “MC”) requires the consideration and treatment of the interests of state monument care administration and the compliance with the interest in the protection of cultural and historical values, as well as the submitted concept to take into account and place increased emphasis on respecting cultural values in protected localities and cultural landscapes, on the sustainability of historical compositional solutions, on the specifics of management and historical contexts, which are the subject of protection according to the Act on State Monument Care. The Ministry of Culture further emphasizes that the set goals of the concept must be addressed with regard to both cultural values and the values of the cultural and historical landscape of the Czech Republic. The specific measures resulting from the concept must be designed in such a way that all protected areas located in the Czech Republic are not adversely affected.	Agreed. The SEA team suggest to incorporate the comment into the IP implementation and monitoring arrangements.	Accepted The compliance of project activities supported with the applicable legislative and regulatory requirements in the specific country(ies) concerned (including those related to protection of cultural landscapes) will be ensured by integrating this issue in the subsidy contract and is an eligibility criteria which will be laid out in the programme manual. .
In terms of waste, the Ministry of the Environment recommends supplementing the text of the draft concept with information on the New Action Plan for the Circular Economy, which focuses on further deepening of the circularity in many areas identified as key to the further shift of the circular economy in the European Union. It also proposes to complement the measures proposed for funding with thematic areas such as "reducing the landfill of all types of waste and maintaining its value in the economic cycle" and "research and innovation in waste management and resource efficiency".	Agreed. The SEA team suggest to incorporate the comment into the IP implementation and monitoring arrangements.	Accepted. SO2.3 includes reference to the EU Circular Economy Action Plan (2020). In addition, the examples of actions for SO 2.3 were expanded with an additional action: Fostering approaches for limiting landfilling of all types of waste and retaining their value (as future resources) in the economic cycle..
Given the general nature of the proposed concept, the Ministry of the Environment recalls that the implementation of the proposed objectives and measures in the concept, especially before the start of the implementation of plans based on supported measures, it is still necessary to strictly follow the Directive of the European Parliament and the Council 2001/42/EC on the assessment of the effects of certain programs and plans on the environment (SEA Directive) and the Directive of the Council 2011/92/EU on the assessment of the effects of certain public and private projects on the environment, as amended (EIA Directive).	Agreed. The SEA team suggest to incorporate the comment into the IP implementation and monitoring arrangements.	Accepted The compliance of project activities supported with the applicable legislative and regulatory requirements in the specific country(ies) concerned (including those related to applicable EIA and SEA obligations) will be ensured by integrating this issue in the subsidy contract and is an eligibility criteria which will be laid out in the programme manual. .
Ministry of Environment – Waste Department		

<p>Chap. 1.2 Summary of the main common calls; Circular economy area on page 11: We recommend adding the following wording at the end of the first paragraph of the text: "In March 2020, the European Commission presented a New Action Plan for the Circular Economy, which builds on previous European Commission activities on the circular economy in 2015, 2018 and 2019. The New Action Plan aims to further deepen the circularity in a number of areas that have been identified as key to forward the EU's circular economy."</p>	<p>Agreed. The SEA team suggest to incorporate the comment into the IP.</p>	<p>Accepted Reference to the new EU Circular Economy Action Plan (2020) is already included in the introduction to SO 2.3.</p>
<p>Priority Area 2 - Supporting the transition to a circular economy; SO 2.3: Moving the circular economy forward in Central Europe; on page 46 Transnational cooperation measures. We recommend adding thematic areas to the funded measures:</p> <ul style="list-style-type: none"> - reducing the landfill of all types of waste and maintaining their value in the economic cycle. - research and innovation in waste management and resource efficiency 	<p>Agreed. The SEA team suggest to incorporate the comment into the IP.</p>	<p>Accepted. The examples of actions for SO 2.3 were expanded with an additional action: Fostering approaches for limiting landfilling of all types of waste and retaining their value (as future resources) in the economic cycle.</p>
<p>Czech Environmental Inspectorate</p>		
<p>In terms of its competence, the CEI does not make any fundamental comments on the draft concept in question.</p>	<p>Noted</p>	<p>Noted</p>
<p>A significant influence in the field of water protection in case of this draft concept can be ruled out provided the Czech and European legislative standards are observed.</p>	<p>Noted</p>	<p>Noted</p>
<p>It is typical for a large part of the CE region that a significant part of biodiversity is tied to a more or less cultural or at least cultivated landscape. Many species and habitat types are even dependent on (extensive forms of) human activity for their existence. Therefore, in addition to the "protection of wildlife" and the "restoration of damaged ecosystems", the concept should focus on the aspect of human coexistence and support of biodiversity of the cultural landscape, especially on the identification and support of activities whose by-product may consists in the support of biodiversity. Especially in connection with the natural renaturation of exploited habitats, which (compared to the targeted "restoration of damaged ecosystems" in the usual form of realisation) it appears to be significantly more effective if the scale is based on the support of the biodiversity of species and habitats.</p>	<p>Agreed. The SEA team suggest to incorporate the comment into the IP.</p>	<p>Accepted The restoration of degraded ecosystems was included into the thematic fields of the SO 2.4. and examples of actions were expanded to include: Testing in pilot actions innovative technical solutions for the restoration of degraded eco-systems (e.g. rivers, high-diversity landscapes, forests) and upscaling these approaches at a wider territorial level.</p>
<p>We welcome the funding of transnational cooperation measures in the thematic areas, in particular in the "climate change resilience and adaptation measures", "climate resilient landscapes and urban planning", "weather</p>	<p>Noted</p>	<p>Noted</p>

<p>extremes and related hazards (rainfall, floods, landslides, heat, drought, scarcity water, fires, etc.)", "risk prevention and management" and "socio-economic and health impacts caused by the climate change". We also agree to share knowledge on the development of climate-resistant solutions in the agricultural and forestry sectors in order to increase their resilience to, for example, drought, pest infestations, etc. We are equally positive in the field of the "environmental protection in Central Europe - the territorial need for Central Europe", in the financing of the above-mentioned transnational cooperation measures</p>		
<p>Ministry of Culture</p>		
<p>The above concept "Interreg CENTRAL EUROPE 2021 - 2027" can have a significant impact on the environment. We demand that the interests of the state heritage conservation be taken into account and treated, and that the compliance with the interest in the protection of cultural and historical values be set.</p> <p>The proposed concept of the program in protected sites and cultural landscapes need to take into account and place increased emphasis on the respect for cultural values, sustainability of historical compositional solutions, specifics of management and historical contexts that are subject to protection under the Act on the state heritage conservation.</p> <p>The specific measures resulting from the concept shall be designed in such a way that all protected areas located in the Czech Republic are not adversely affected.</p> <p>The Ministry of Culture has no other fundamental comments in terms of the protection of cultural values in the area addressed</p>	<p>Agreed.</p> <p>The SEA team suggest to incorporate the comment into the IP implementation and monitoring arrangements.</p>	<p>Accepted</p> <p>The compliance of project activities supported with the applicable legislative and regulatory requirements in the specific country(ies) concerned (including those related to protection of cultural landscapes) will be ensured by integrating this issue in the subsidy contract and is an eligibility criteria which will be laid out in the programme manual.</p>
<p>The City of Prague</p>		
<p>The evaluation of the environmental impact of the Interreg CENTRAL EUROPE 2021-2027 program draft basically solves all relevant aspects and problems of environmental protection, nature, landscape and biodiversity that are important for the Czech Republic, and therefore we have mostly only partial comments. The assessed concept strives for the sustainable development and search for "green" solutions. As all projects and their potential pilot actions of an investment nature will be made in accordance with legal standards at the national level, we do not anticipate any potentially significant adverse effects of the concept as such.</p>	<p>Noted</p>	<p>Noted</p>
<p>We strongly recommend that all proposed mitigation and strengthening measures</p>	<p>Agreed.</p>	<p>Accepted</p>

<p>(Chapter 6 of the evaluation, p. 102 - 106) be applied both in the supplemented and improved text of the program itself (strengthening measures) and in its implementation (mitigation measures).</p>	<p>The SEA team suggest to incorporate the comment into the IP implementation and monitoring arrangements.</p>	<p>The Interreg CE Programme has integrated the mitigation and enhancement measures as specified in the environmental report of the SEA to the possible extent.</p>
<p>We recommend considering the priority support for integrated landscape solutions in which all key components of the environment will be coordinated, and adding this principle to the general cross-cutting recommendations, as is the case for the mitigation measure 1 in Chapter 6.1.1.</p>	<p>Noted but not incorporated. Mitigation measure no. 1 in Environmental Report section 6.1 addresses all relevant environmental protection measures.</p>	<p>Noted. The programme will strive to promote sustainable development (including integrated landscape solutions) as a horizontal principle..</p>
<p>Regarding the issue of waste, waste and circulation management, we remind you that in the Czech Republic we have valid and discussed conceptual and strategic documents, such as Waste Management Plan, but also Secondary Raw Materials Policy, Waste Prevention Program, etc., which to some extent coincide with areas of the specific objective 2.3. Moving the circular economy forward in Central Europe The Czech Republic should mainly support the transnational cooperation in this area in terms of exchanging knowledge and experience from circulation systems, waste utilization, recycling, ecological and environmental education, etc. In no case the specific objective 2.3 should support the cross-border shipment of waste for treatment or recovery.</p>	<p>Agreed. The SEA team suggest to incorporate the comment into the IP.</p>	<p>Noted. The SO 2.3 supports actions for sustainable circular economy approaches which are in line with the EU Green Deal and the EU Circular Economy Action Plan. In addition, the compliance of project activities supported with the applicable legislative and regulatory requirements in the specific country(ies) concerned (including those related to waste management) will be ensured by integrating this issue in the subsidy contract and is an eligibility criteria which will be laid out in the programme manual.</p>
<p>The present program states for mitigation measures 6 and 8 that IP should encourage all applicants to take the "environmental sustainability approach from the draft" approach, in particular for the specific objective 3.1 We consider the creation of conditions and the support for reducing the negative effects of transport on the environment to be an urgent task. In this context, we point out that some of the negative effects of transport originate in inappropriate urbanization of the area. An example is found the recent and current construction in the immediate vicinity of the City of Prague, although adequate public transport cannot be provided in the this area, and this causes an undesirable increase in car traffic mostly leading to the capital. We therefore recommend considering the possibility of including the requirement for a priority orientation of the development of new construction in sites where the offer of the necessary environmentally friendly public transport systems is available (or will really be).</p>	<p>Not agreed. The comment is too detached from the IP as it is not expected to develop new construction in sites.</p>	<p>Noted</p>
<p>Regional Authority of the South Moravian Region</p>		

<p>The nature protection authority states that it is not aware of any other nature and landscape protection interests that could be affected by this intention and the application of which is the responsibility of the local regional authority. However, it must be emphasized that for specific projects implemented on the basis of priorities and objectives set by the evaluated concept, it is necessary to perform their individual assessment in terms of their impact on Natura 2000 sites.</p>	<p>Agreed. The SEA team suggest to incorporate the comment into the IP implementation and monitoring arrangements.</p>	<p>Accepted The compliance of project activities supported with the applicable legislative and regulatory requirements in the specific country(ies) concerned (including those related to Natura 2000 sites) will be ensured by integrating this issue in the subsidy contract and is an eligibility criteria which will be laid out in the programme manual.</p>
<p>Regional Authority of the Zlín Region</p>		
<p>The concept may not have, alone or in conjunction with other concepts or plans have a significant effect on the subject matter of protection or the integrity of an European area of conservation or a bird area.</p>	<p>Noted</p>	<p>Noted</p>
<p>Regional Authority of the Liberec Region</p>		
<p>Requests that the general specification of the supported measures under SO 2.1: Support to the energy transition to a climate-neutral Central Europe are supplemented by the following requirement</p> <p>The supported measures will be based on an evaluation of the overall ecological benefit of the solution, which will include, in case of necessary interventions in landscape and natural habitats, an assessment of ecosystem services provided by the affected environmental components and the extent of their reduction due to project implementation, as well as possible weakening of the landscape's ecological stability. The chosen solution will always represent a variant with the lowest possible negative impact on the landscape and natural habitats, and its energy efficiency will significantly prevail any negative impacts on the natural components of the environment and the ecosystem services provided by them.</p>	<p>Noted. This is already covered by Environmental Report section 6.4 with Mtigation measure no. 3 requiring that the project selection process should ensure that proposals for the production of renewable energy consider their potential impacts on biodiversity and Natura 2000 species and habitats, hydro-morphology, water-use, landscape, noise, vibrations and electromagnetic impacts and the cultural lanscape protection.</p>	<p>Accepted. The mitigation measure 3 applicable to the SO2.1 will be considered during the application and selection process.</p>
<p>Suggests to add the following measure for SO 2.2: Development and implementation of integrated strategies and action plans in the field of climate, which improve the resilience and adaptability of Central European regions.</p>	<p>Agreed. The SEA team suggest to incorporate the comment into the IP.</p>	<p>Accepted The comment has beenintegrated into the IP under SO 2.2 as example of action: Developing integrated strategies and solutions to improve central European capacities for preparing and adapting to climate change and its negative impacts on society, economy and the environment (e.g. by addressing different aspects of resilient eco-systems)</p>
<p>Suggests to add the following measure for SO 4.1:</p>	<p>Partly agreed. Activities with the same focus are already included into the</p>	<p>Partly accepted. Activities with the same focus are already included in the IP under SO</p>

"Education of local and regional political representatives, state and local government officials, watercourse administration, farmers, teachers of secondary vocational schools and designers in the field of adaptation to climate change, climate protection and protection and strengthening the ecological stability of the landscape."	IP under SO 2.2 and SO 2.4 and analysed in the Environmental Report. The SEA Team does not see the need to address similar activities also in SO 4.1.i	2.2 and SO 2.4. There is no need to repeat them under SO 4.1.
In particular, within the framework of the specific objectives SO 2.1 – 2.4, SO 3.2, the region generally recommends including of measures for a direct financial support for the implementation of appropriate solutions (e.g. resulting from relevant strategic documents) into real practice and a support for ensuring their long-term functionality.	Agreed. The SEA team suggest to incorporate the comment into the IP implementation and monitoring arrangements.	Accepted. Sustainability and transferability of solutions is one of the key requirements for all SOs which will have to be demonstrated both in the application stage and during reporting.
Regional Authority of the Central Bohemia Region		
A significant impact of the submitted concept can be excluded, being alone or in connection with other concepts or intentions for the protection or integrity of European areas of conservation or bird areas determined by relevant government regulations that fall within the competence of the Regional Authority.	Noted	Noted
Administration of the Krkonoše National Park		
The KRNAP Administration considers that, when the proposed mitigation measures are included, the submitted concept will not generate significant effects on the environment and requires them to be incorporated into its final form. The specific impacts of individual supported projects should be assessed at the stage of the application for support, i.e. before it is granted	Noted	Noted Environmental sustainability will be considered during the application and selection process.
Hradiště Military Training Area Office		
The document will NOT have, alone or in combination with other concepts or intentions, any significant effect on the favourable condition of objects of protection or integrity of the European area of conservation Hradiště and the Doupovské hory Bird Area.	Noted	Noted
Germany		
Bavaria		
Non-technical summary, page 7, in point SO 3.1 it is stated: „Should the programme support the preparation of transport infrastructure plans and programmes that would fall under the scope of the SEA Directive or SEA Protocol, it needs to ensure that the relevant activities include the required strategic environmental assessments.” - If what is meant by this is that one should ensure that SEA should be	Agreed Since the project selection will ensure that all applicable national legal requirements in the relevant countries are met during the implementation of the Interreg CE interventions, there is no need to restate the need for SEA.	Accepted The compliance of project activities supported with the applicable legislative and regulatory requirements in the specific country(ies) concerned (including those related to the SEA) will be ensured by integrating this issue in the subsidy contract and is an eligibility criteria which will be laid out in the programme manual.

<p>carried out for infrastructure investments where necessary, the reference seems superfluous, as this is regulated by law anyway. There is no need for a recommendation to follow the law.</p> <ul style="list-style-type: none"> - If what is meant is that the implementation of an SEA must be included in the funding as a mandatory requirement, that seems too strict. Perhaps there are other sources of funding that could be used and could thus relieve the CE budget. <p>Therefore the paragraph should be deleted</p>	<p>The Environmental Report and its Non-technical summary was updated to to remove the reference to SEA obligations.</p>	<p>We agree that there is a no need to stipulate that the SEA needs to be conducted with the support by the Interreg CE programme.</p>
<p>The abbreviations in the table on p. 5f. may not be immediately clear to the reader: TB, CC, Mater.</p>	<p>Agreed The Non-technical summary of the Environmental Report was updated to reflect this minor editorial change.</p>	<p>Noted</p>
<p>Berlin</p>		
<p>The programme approach between SO 1.1. and SO 4.1. is rather broad and very complex; according to which model are the SEA topics (preferably protected natural resources) defined? The following topics are unclear:</p> <ul style="list-style-type: none"> - Does the SEA theme "Biological diversity and NATURA 2000 areas" fully reflect the flora/fauna as protected assets, or does the consideration mainly focus on Natura 2000 areas? In this case, the consideration would be to narrow. - Do the SEA themes "material assets" and "cultural heritage" fully reflect all cultural and material asset, which need to be protected? - Why does the SEA theme "resilience" not also cover the resilience of ecosystems? 	<p>Noted Yes, the SEA appropriately addresses the flora/fauna both as protected assets and Natura 2000 species.</p> <p>Yes, the SEA in our understanding fully covers all cultural and material asset, which need to be protected</p> <p>SEA theme "resilience" covers systems and concerns addressed as part of the Agenda 2030 (which forms aspirational objectives for the assessment). Ecosystem resilience is implicitly considered under another SEA topic: Biodiversity, Natura 2000 and Ecosystem services.</p>	<p>Noted.</p>
<p>Would it not make more sense to present positive and/or negative relationships of the SEA themes to the specific objectives (SO) rather than to simply assess the relationships in strong-significant-weak. The assessment remains partly unclear in this case.</p> <ul style="list-style-type: none"> - For example, the implementation of SO 3.1 (transport projects) is accompanied by soil sealing, i.e. intervention. It is not clear why there is a strong relationship to the objective of "protection and conservation of biological diversity and natural 	<p>Noted</p> <p>Figure 59 in Chapter 4 presents key areas where the IP may have positive or adverse impacts of key EU environmental including health policy objectives and concerns. It was meant to show only the strengths of interaction which can be exither positive or adverse, and are examined in</p>	<p>Noted</p>

ecosystems", but a weak relationship to preventing soil loss.	subsequent parts of the Environmental Report – specifically in its Chapter 5.	
Brandenburg		
The term "landscape" lacks a clear distinction between cultural landscapes and natural landscapes, especially where reference is made to agriculture.	Noted but not accepted. The term landscape is used in a broad meaning, covering both natural and cultural landscapes.	Noted
Hungary		
Ministry of Agriculture		
From soil protection point of view, objectives of the Environmental Report related to the Interreg/Central Europe 2021-2027 Programme (hereinafter referred to as CEP) are too general but agree with the outcome of the Environmental Report that, unfortunately, the European Union does not have coherent and comprehensive regulation on the soil protection currently.	Noted	Noted
Sustainable land use goals set out by 2030 to achieve significant efforts to combat soil desertification and to improve flood-affected soils is fully supported, however, the 10-year period might be too short for significant results.	Noted	Noted.
To ensure the sustainability of arable land, Hungary recommends the CEP better focusing on areas of prevention the final use of arable land for other purposes; moreover, it highlights the importance of reducing erosion damage as well as increasing the organic matter content of the soil; furthermore, it also suggests implementation of effective measures to reduce compaction, and points out here the importance of introducing incentives and subsidies in order to achieve the goals.	Agreed. The SEA team suggest to incorporate the comment into the IP.	Accepted. Under the SO 2.4 an additional example of action has been included: Promoting innovative solutions, considering also applicable regulatory arrangements and incentives, to advert soil degradation (including soil compaction) and enhance the soil properties, e.g. increasing the organic matter content of the soil.
Taking into account the fact that mercury contamination is less frequent in Hungary, we suggest a wide scope monitoring of the soil pollution by extending it to all heavy metals and hazardous organic pollutants.	Not Agreed. The SEA team finds that this suggestion does not fall within the scope of IP.	Noted. The CE Programme cannot support such interventions - they would fall within the scope of the core activities of national authorities tasked with monitoring of the soil pollution.
With regard to land use, Hungary agrees with the trends identified by the CEP, and supports the expected consequences. However, due to its very general wording, and that it could lead to misunderstandings, we do not agree with the sentence on page 13. as follows: "However, due to recent progress/achievements of afforestation, it could be a realistic goal to restore at least 15 percent of degraded ecosystems and to integrate biodiversity better into agriculture and forestry by 2020."	Noted. The final text of the IP and the Environmental Report do not contradict the concern made.	Noted.

<p>It is clearly seen in the Great Plain area that habitat degradation rather corresponds with inappropriate agricultural technology (especially with drained areas and poor water management) than with afforestation. One of the main consequences is the groundwater decrease by as much as 4-6 metres at some places, affecting adversely the native tree stands such as stepp oak forest on sand (<i>Festuco rupicolae-Quercetum roboris</i>). To our recent knowledge, erosion and deflation can be reduced the most effectively by protective afforestation, thus planting various tree stands in these sites is considered not the result of habitat degradation but, on the contrary, a habitat protection.</p> <p>Therefore, please revise the indicated sentence above accordingly in a way to omit indication of afforestation as a negative reason.</p>		
Ministry of Interior		
<p>We recommend including integrated municipal rainwater management and natural water retention solutions in the priority PO2 , as possible thematic areas for supported projects.</p>	<p>Agreed. The SEA team suggest to incorporate the comment into the IP.</p>	<p>Accepted. This topic is already covered by the Interreg CE Programme under the SO 2.2. The IP has also included additional reference to rainwater management and water retention. The list of examples of actions should be understood as a non-exhaustive list.</p>
<p>One of the results of the LIFE-MICCAC project led by the Ministry of the Interior is an Adaptation Guide, which will present natural water retention solutions and the process and steps of their creation, on the other hand, it will include possible adaptation action for municipalities at local level. The Guide will be published shortly and it can be attached as a good practice to the relevant priorities of the Interreg CE programme, if necessary.</p>	<p>Noted</p>	<p>Noted</p>
Italy		
Ministry for Environment, Land and Sea Protection		
<p>Consistency of intervention objectives in the frame of the mentioned Directive is currently described only for Eutrophication but it should address also impacts on health, well being and ecosystems with regards to “Achieve the national exposure reduction target for SO2 and NOx.” With reference atmospheric pollution, among the conditions for Programme actions it is necessary to consider the fulfillment of standards indicated by the WHO, in general and/or for Europe (stricter than current EU law provisions but scientifically based): WHO Europe - Air quality Guidelines global update 2005 (PM O3 NO2 SO2)</p>	<p>Agreed. The SEA team suggest to incorporate the comment into the IP.</p>	<p>Accepted Reference to WHO standards was included in the specification of the following example of action under the SO 2.5: Fostering and implementing integrated urban mobility concepts including e.g. zero-emission transport including cycling and monitoring strategies that contribute to improved air quality management for reducing exposure of the population to transport-related emissions (air and noise</p>

		pollution) based on the applicable WHO guidelines and EU Directives.
The programme foresees for coordination between "different smaller functional areas", but should also provide for vertical coordination between the European, national, regional and local levels, promoting such governance to ensure that all initiatives are effective; plans and programmes are coherent in all levels and all involved actors are aware of all strategies.	Not Agreed. The SEA team finds that this suggestion does not fall within the scope of IP.	Noted. The aim of a better policy coherence, following a cross-sectoral approach and fostering the horizontal and vertical cooperation of relevant actors, is explicitly addressed under the SO4.1: Strengthening governance for integrated territorial development in central Europe..
With reference to economic capacity, the statement "Given the large environmental, social, economic and territorial impacts climate change can have, adaptation and mitigation measures need to be supported and expanded, including the consideration that action on risk management can also require large investments", a further study of the topic should be carried out by specifying and expanding the concept of large investments.	Not Agreed. The SEA team finds that this suggestion do not fall within the scope of IP.	Noted. Climate change adaptation investments are context-specific. The scale of proposed project interventions needs to be determined on case-by-case basis, such study goes however beyond the scope of the IP.
The Interreg Programme, is lacking when proposing only actions aiming to reduce the acoustic impact of electricity production and road transport infrastructures, instead of giving consideration to the noise produced by railways, airports and industrial plants, which are contemplated in the objectives of Directive 2002/49/EC.	Agreed. The SEA team suggest to incorporate the comment into the IP.	Accepted It has been explicitly highlighted in the IP under SO 2.1, SO 2.5 and SO 3.1 that the design of actions should in particular consider environmental impacts such as noise from renewable energy production, urban mobility and transport regarding. In addition, the reduction of environmental pollutions, including noise, and of their health impacts included one of the thematic fields under SO2.4 and in the examples of action under SO 2.5.
The policies adopted should contain more effective actions to improve sufficiently air quality. Additional measures and recommendations should be applied and defined and, once defined, should be evaluated and verified in terms of their effectiveness in reducing citizens' exposure to air pollution. The role of public opinion should be further highlight by providing clearer information by providing better information to citizens.	Agreed. The SEA team suggest to incorporate the comment into the IP.	Accepted The reduction of air pollution is specifically highlighted in the thematic fields of SO 2.4 and examples of action under SO 2.5.
The "Alpine Convention 1991" must be considered as binding (at least for those countries of the Alpine arc that have signed it), in particular regarding actions taken under S.O. 3.1 "Improving transport connections of rural and peripheral regions in central Europe" and the relative Transport Protocol 2000, of which should be acquired the limiting criteria for transalpine and infra-alpine road infrastructure projects.	Agreed. The SEA team suggest to incorporate the comment into the IP implementation and monitoring arrangements.	Accepted The compliance of project activities supported with the applicable legislative and regulatory requirements in the specific country(ies) concerned (including those related to the Alpine convention) will be ensured by integrating this issue in the subsidy contract and is an eligibility criteria

		which will be laid out in the programme manual.
<p>With regard to the Specific Objective 2.1 <i>“Supporting the energy transition to a climate-neutral central Europe”</i> and in particular the initiatives, that can be highlight in the Programme in terms of energy production from renewable sources and energy efficiency that may arise in terms of energy infrastructure, it will be appropriate to pay particular attention, to the protection, from an early stage especially in the Alpine territories, to water resource in general and in specific to river, lake systems and wetlands in their multiple components and values, ecosystem, nature, geomorphological and land, the latter also for their cultural identity, resource for a sustainable tourism-recreation fruition (also valuable in mountain and marginal areas).</p> <p>With this regard, in every Programme actions, should consider to implement what was recently established in the recent XVI Conference of the Alpine Convention held on 10 December 2020, with the sign of many Ministers of the various Member States and by the delegates of the European Union, in the <i>“Declaration of the XVI Alpine Conference on integrated and sustainable water management in the Alps”</i> and, more specifically, indicated just as an example, the recent Guidelines of the Italian Ministry of the Environment <i>“DD STA 29”</i> and <i>“D.D. STA 30”</i>, respectively <i>“Guidelines for the ex-ante environmental assessments of water derivations, in relation to the objectives of environmental quality”</i> and <i>“Guidelines for updating the methods for determining the minimum vital flow in order to guarantee maintenance in courses water from the ecological runoff to support the achievement of environmental quality objectives”</i>.</p>	<p>Agreed.</p> <p>The SEA team suggest to incorporate the comment into the IP implementation and monitoring arrangements.</p>	<p>Accepted</p> <p>The compliance of project activities supported with the applicable legislative and regulatory requirements in the specific country(ies) concerned will be ensured by integrating this issue in the subsidy contract and is an eligibility criteria which will be laid out in the programme manual.</p> <p>In addition, specific reference to the Alpine Convention has been included in the IP under SO 2.1.</p>
<p>It is not clear the statement regarding the effects generated by the Programme are mainly positive and possible negative and limited impacts are considered only if they are activated by: <i>“...in the case of transboundary policy/strategic frameworks and infrastructure interventions in border areas that would be independently followed up by investments outside of the Interreg CE programme framework”</i>.</p> <p>Furthermore, it is not clear whether the evaluation has considered only the so-called <i>“limited investment”</i> interventions or whether were also considered the effects of any other</p>	<p>Noted.</p> <p>Environmental impact of each project application will be always considered on case-by-case basis – both on a general level (Mitigation measure no. 1) that calls for environmental sustainability by design principle as well as with regard to the specific concerns raised in mitigation and enhancement measures for each SO.</p>	<p>Accepted</p> <p>The “environmental sustainability by design” approach has been emphasized as horizontal principle for delivery of actions and respective mitigation measures have been integrated under the relevant SOs..</p>

<p>“investment character” of a pilot and experimental actions and, in case of negative response, when they will be evaluated if activated later.</p>		
<p>The Environmental report takes into account the long-term effects on health of populations exposed to noise, especially road traffic noise, effects such as annoyance, sleep disturbance, negative effects on the cardiovascular and metabolic system as well as cognitive impairment in children. The study, in a shareable way, does not consider pathologies and effects related to noise on the auditory system with repercussions on auditory functions and abilities, limited just to work activities, and linked with noise connected to higher sound levels than those attributable to the sources of anthropogenic noise.</p> <p>The Environmental report of Interreg Central Europe Programme is well in line with the European Commission strategies and with the EU Environmental Noise Directive (2002/49/EC), which Italy has implemented and, since 2007, has contributed in terms of noise maps and action plans for the reduction of population exposed to noise.</p> <p>Data contained in the Environmental report refer to studies and results derived from the application of Directive 2002/49 / EC, they are therefore shareable and correct.</p>	<p>Noted</p>	<p>Noted</p>
<p>The section “Adaptation to climate change, including natural risks and manage of natural disaster”, does not take clearly into account the long-terms effects, in particular the indirect ones. The impact reduction of natural risks might have significant consequences deriving from governance actions that refer to different dimensions, such as economic and social. In this framework, concepts of resilience and adaptation should move from a passive resilience (“response and recovery”) to an active one (“transformative resilience”) in which adaptation and systemic change represent the starting point of a concept of resilience as part of sustainability.</p>	<p>Not Agreed The concept of resilience used in the SEA comprises an active transformative resilience</p>	<p>Noted</p>
<p>The content analysis as well as the structure of possible future scenarios are coherent and exhaustive with the environmental issue affected by the Programme. On these scenarios, however, no alternative have been made to compare the objectives of the draft Programme, more than the “zero-alternative”, and often, in particular this kind of Programmes, can also focus on the comparison of a different distribution of financial resources</p>	<p>Noted</p>	<p>Noted</p>

<p>available within the intervention strategy identified.</p> <p>As regards the "zero-alternative" conceived as a comparison of the various scenarios in absence of the Programme and which highlights, enhancing it in fact, the contribution to the sustainability of the programme proposal, it is appropriate to emphasize the added value of "cooperation" in achieving the identified objectives of environmental sustainability.</p>		
<p>Likewise, we agree with the structure of Chapter 6 of the Environmental Report where recommendations for the implementation phase of the Programme both on a planning and intervention scale, although it should be noted that in some cases the addresses are generic, attributable more to indications of sustainable objectives/approaches than indications for their achievement like: criteria for the selection of interventions or methods of implementation and could therefore be ineffective in guiding intervention strategies.</p> <p>By way of examples, indicated for the specific objective:</p> <p>3.1 reduce the need for transport; reduce fragmentation of habitats or reduce the impacts of the transport systems on air;</p> <p>3.2 making sustainable mobility greener</p>	Noted	Noted
<p>These recommendations might be valuable for environmental sustainability objectives, unlike what suggested for the specific objectives indicated below, for which recommendations and implementation guidelines are provided for the selection phase of interventions:</p> <p>2.1: Supporting the energy/climate transition 2.2 : Resilience to climate change</p> <p>In particular for the specific objective 2.1 Supporting the energy transition to a climate-neutral central Europe:</p> <p>According to the SEA-Environmental Report <i>"The project selection process should ensure that proposals for the production of renewable energy consider their potential impacts"</i>. As the programme aims to be coherent with relevant climate change policy objectives, such as the climate neutrality target of net-zero greenhouse gas emissions by 2050, project selection is also based on quantifying their contribution to such objective, for example on the reduction of greenhouse gases and on the assessment of their carbon footprint.</p>	Agreed. The SEA team suggest to incorporate the comment into the IP implementation and monitoring arrangements.	Partly accepted Environmental sustainability will be considered during the application and selection process. Concerning the reduction of greenhouse gas emissions and carbon footprint, such quantification during selection is not feasible due to the soft character of actions and/or pilot scale of interventions supported by the programme. It might however be considered during the programme impact evaluation.
<p>According to the SEA-Environmental Report, <i>"The project selection process should recognize</i></p>	Not Agreed.	Noted

<p><i>and appreciate good practices in environmental sustainability by-design". The project selection should be based on the evaluation of the projects' potential impacts, evaluated along their life cycle by utilizing methodologies such as LCA (Life Cycle Assessment) and by following common methodological rules such as PEFCR (Product Environmental Footprint Category Rules) o PCR (Product Category Rules) when available.</i></p> <p>In this context, the Interreg Europe project LCA4Regions propose a valuable approach, which should contribute to a more effective implementation of environmental policy tools through the application of "diet life cycle med" by expanding the use of life cycle methods as a holistic approach in designing and implementing public policies relating to environmental protection and resource efficiency.</p> <p>This measure should be included in chapter 6.1 – Proposed mitigation and enhancement measures, because an approach based on a comprehensive assessment of the impacts of a product or process along the life cycle, can prevent the burden from shifting from one part of the product life cycle to another (for example from production to consumption). Similarly, the shifting of burdens can be seen in terms of spatial and temporal resolution, such as the transfer of problems from within the EU to the outside or from current to future generations (https://ec.europa.eu/info/sites/info/files/file_import/better-regulation-toolbox-64_en_0.pdf).</p>	<p>LCA (Life Cycle Assessment) methodologies tend to be applied mainly to products and are too complex for plans and programmes.</p>	<p>Environmental sustainability will be considered during the application and selection process, but it will not be feasible to request a detailed LCA from applicants since this will be too complex.</p>
<p>Finally, the Programme should select projects that encourage a "prevention approach" for all environmental policy issues by giving priority to those strategies aimed at preventing and reducing the environmental impact, such as those followed to "reduce the need for transport" and "waste prevention", according to a logic adapted from the waste hierarchy pyramid.</p>	<p>Agreed. The SEA team suggest to incorporate the comment into the IP implementation and monitoring arrangements.</p>	<p>Accepted. The "environmental sustainability by design" approach has been integrated as horizontal principle for delivery of actions.</p>
<p>As mentioned above, the chapter "Proposed Monitoring Arrangements" of the Environmental Report, the experts SEA team states that they have not found any potentially adverse impact and do not provide particular recommendation for monitoring, if one the one hand seeking to derail the SEA Regulation Provision - which specifies among the contents of the Environmental Report the measures envisaged for the implementation of the Programmes' environmental monitoring such as: methodology, actors, resources, reporting-</p>	<p>Agreed. The measures concerning monitoring have been included the final SEA report and key principles will be included into the Environmental Statement that accompanies the proposed IP.</p>	<p>Accepted Specific monitoring provisions will be laid down in a separate programme document (programme manual) later on.</p>

<p>on the other hand, is therefore to point out that the environmental monitoring, monitors the achievement of the environmental sustainability objectives settled out, verifies the consistency of the potential estimate of the positive and negative effects highlighted and “measure” the variations in the characteristics and status of the environmental components affected by the Programme, also with respect to the benefits derived from the implementation of the Programme strategy.</p> <p>It is therefore necessary to develop, on the basis of the results of the evaluation process the measures relating to monitoring, also on the basis of the results of the Environmental Monitoring of the INTERRG 2014-20 Programme, the latter mentioned, but no in-depth information was found in the documents placed for consultation.</p>		
<p>Regarding the Environmental Impact Assessment of Natura 2000 sites, which cover a large part of the Programme area, relating to the type of actions that can be implementing, although the strategic orientation’s level does not allow for a specific site assessment, it may be postponed to the subsequent stages of implementation, it is necessary to indicate how this aspect is dealt with, also providing any indications by level of macro typologies of areas and macro typologies of intervention.</p>	<p>Noted. Such arrangement is already included in the proposed Mitigation and Enhancement measures in Environmental Report.</p>	<p>Noted The compliance of project activities supported with the applicable legislative and regulatory requirements in the specific country(ies) concerned (including those regarding Environmental Impact Assessment of Natura 2000 sites) will be ensured by integrating this issue in the subsidy contract and is an eligibility criteria which will be laid out in the programme manual.</p>
<p>Institute for Environmental Protection and Research</p>		
<p>Referring to the text “The Interreg CE programme proposal for 2021- 2027 builds upon the approach followed by the Interreg CE programme for 2014-2020. The Interreg CE 2021-2027 Programme will be implemented in line with the relevant regulatory framework. The programme thereby builds on the experience and expertise gained in the frame of the ongoing Interreg CE2014-2020 Programme.” from pag. 19 of the Environmental Assessment Report . Information on how monitoring data and environmental results of the 14-20 Programme were considered is missing. A short description should be available in the Environmental Report as this document should be self-explicit and include all elements necessary to the evaluation.</p>	<p>Accepted The key principles concerning monitoring have been included the final Environmental Report and in the Environmental Statement that accompanies the proposed IP.</p>	<p>Accepted The IP builds on past experiences of the Interreg CE2014-2020 Programme, e.g. by integrating the results of the operational evaluation (as further specified in IP chapter 1.2, lessons learned) and engaging in a large partner involvement process (as further specified in IP chapter 4). Specific monitoring provisions will be laid down in a separate programme document (programme manual) later on.</p>
<p>The consistency analysis of objectives of the IP and other relevant Plans and Programmes insisting on the same area.</p>	<p>Not Agreed.</p>	<p>Noted</p>

	The CE programme area is too extensive that such task is not feasible.	
SO 3.1 with regard to the environmental issue “Air” (pag. 84) “The SO 3.1 includes thematic fields and indicative example of actions that aim to improve the mobility in and accessibility of rural and peripheral regions, especially in view of their linkages to main EU transport corridors and nodes. All such interventions represent both opportunities as well as risks for air quality protection” it is suggested “to ensure that proposals for new infrastructure development include assessment of potential transboundary impacts if and when required under the EIA Directive and Espoo Convention”. Even if crossborder impacts might occur, box for transboundary (TB) is marked in green which means benefit.	Agreed. The transboundary impact in the assessment table for Air was marked T (not T+) which means potentially adverse impacts. The coloring was however wrong and it was corrected to reflect this fact. Yet, the concluding presentation of the synergistic & cumulative impacts of the entire Interreg Central Europe 2021-2027 proposal in section 5.2.10 correctly indicates potentially adverse impacts	Noted
If for the environmental issue “Air” risks are not excluded, for issues as “Waters” and “Soil” it is said that “due to the “non- investment” character of the IP no such direct impacts are expected during the lifetime of this IP“ and only general mitigation measures and recommendations are proposed. To ensure consistency between provisions among all environmental issues , also for “Waters” and “Soil” possible impacts should be identified. In this phase it is considered more reasonable to pinpoint possible effects that could be further investigated or dismissed during Programme implementation phase.	Agreed Incorporated into SEA report.	Noted
With regards to SO2.2 there might be an error as the column TB is marked in green (water pag.87).	Not agreed. We expect that the actions proposed under SO 2.2. may have predominantly positive transboundary impacts on water bodies.	Noted
Paragraph 5.2.10 “Synergistic & cumulative impacts of the entire Interreg Central Europe 2021-2027 proposal” does not provide an analysis of the cumulative and synergistic impact but rather a summary of the impacts identified in previous paragraphs. In fact cumulative impacts, that might become relevant, are the combined results of activities (and of the combined effects of those activities), not just a simple summation.	Not Agreed At the level of generality at which the CE programe operates, it is impossible to assess cumulative and synergistic impacts of its (expected very gerographically dispersed) interventions within the programme area.	Noted
At pag. 106 it is reported “The IP does not yet include specific proposals for the future programme monitoring and evaluation. Detailed arrangements for monitoring will not be part of the IP but laid down in a separate document later on. Considering the fact that the IP does not have any potentially significant	Accepted The key principles concerning monitoring have been included the final Environemtnal Report and in the Environmental Statement	Noted IP monitoring provisions will be laid down in a separate programme document(programme manual) later on.

<p>adverse impacts on the environment, the SEA team does not have any specific recommendations for the monitoring arrangements under the SEA Directive Annex 1, item i.” Even though SOs are not defined yet, in the Environmental Report some possible effects of the IP are already identified, then a description of monitoring settings should have been provided in the document submitted in this phase as foreseen by the SEA process</p>	<p>that accompanies the proposed IP.</p>	
<p>Poland</p>		
<p>In Chapter 5.2.5.,strategic objective 2.1, states that „ <i>some supported actions under it could cause a significant risk to biodiversity and Natura 2000.Primarily, those are actions related to renewable energy production with the potential risks i.e. on birds, bats, and migration of large carnivores (wind farms), butterflies and pollinating insects (solar farms) or water ecosystems (hydropower plants)</i>”. This objective is assigned with -1, which means that the impact is relatively negative. It should be explained, why this objective is not assigned with -2 value (significantly negative impact), since the description clearly states that this impact may be significant. In context of this information, the other provisions of the environmental report should be also verified and harmonised, for example these in Chapter 5.2.2 “<i>no potentially significant adverse impact is foreseen even for the realistic worst/case scenario of the programme implementation</i>”. If the significant negative impact on Natura 2000 with regard to implementation of the provisions of draft document is likely, the report should be supplemented as required by the EU legislation in this scope.</p>	<p>Agreed. Since the significance of the impact greatly depends on the scale of the projects as well as on their location, it cannot be assessed at strategic level (as it is elaborated in Environmental Report Chapter is 5.2.10), the text is revised into: “<i>some supported actions under it could cause a certain risk to biodiversity and Natura 2000.</i>”</p>	<p>Noted.</p>
<p>With regard to transboundary effects, Chapter 5.2.2 states that the “<i>transboundary effects of the programme are largely positive</i>” however there the negative effects are still likely, for example for strategic objective 3.1 (Chapter 5.2.5). It should be explained whether such negative transboundary impacts will occur only within the area;</p>	<p>Not Agreed. Environmental Report Section 5.2.10. presents the synergistic & cumulative impacts of the entire Interreg Central Europe 2021-2027 proposal, including its potential transboundary impacts. Also, Environmental Report section 6.7.1 and section 6.8.3 propose arrangements for an early and effective anticipation and management of any potential transboundary impacts.</p>	<p>Noted.</p>
<p>The environmental report points out at the potential cumulative impacts, e.g. for specific objective 2.1 (Chapter 5.2.3 and Chapter 5.2.6), however no detailed description is</p>	<p>Not Agreed Environmental Report Section 5.2.10. presents the synergistic & cumulative</p>	<p>Noted</p>

provided. The description should be then more thorough, if possible, subject to adequacy to the draft <i>Interreg CE</i> programme.	impacts of the entire Interreg Central Europe 2021-2027 proposal.	
The environmental report provides no monitoring methodology and frequency of monitoring. Pursuant to Article 10(1) of the SEA Directive, monitoring is obligatory in the case of occurrence of significant environmental impact (this option should be explained with a view to comment 1). Pursuant to the Polish legislation (Article 55(5) of the EIA Act), the authority preparing a draft document is obliged to monitor the effects of implementation of the provisions of the adopted document regardless of the type of identified impacts. The need for monitoring was also highlighted in the opinion to the scoping report (letter of Director of Department for Environmental Impact Assessment of the General Directorate for Environmental Protection of 17 July 2020	Agreed The key principles concerning monitoring have been included the final Environmental Report and in the Environmental Statement that accompanies the proposed IP.	Accepted Specific monitoring provisions will be laid down in a separate programme document (programme manual) later on.
Technical remark – there is no key to tables CS 1.1 – CS 4.1 in the non-technical summary, which prevents its proper interpretation. Since the summary may act as an independent study, the key should be added.	Agreed. The Non-technical summary of the Environmental Report was updated to reflect this minor editorial change.	Noted
In context of information provided in the introduction to the non-technical summary, in accordance to which the <i>Interreg CE</i> programme “ <i>may be subject to further consultations and changes</i> ”, we point out that in the case of supplementing the draft document with the new provisions that might affect natural environment, consideration of repeating of certain elements of strategic environmental assessment or repeated performance thereof in effect of such changes upon adoption of the document will be necessary.”	Noted	Noted.
Slovakia		
Ministry of Environment – Environmental Projects Section		
No comments.	Noted	Noted
Ministry of Environment – Geology and Natural Resource Section		
No comments.	Noted	Noted
Ministry of Environment – Water Section		
No comments.	Noted	Noted
Ministry of Environment – Air Protection Section		
No comments.	Noted	Noted
Ministry of Economy		
No comments.	Noted	Noted
Nitranský region		

Requires that the Slovak legislation related to environmental protection and Natura 2000 sites in Slovakia is respected.	Agreed. The SEA team suggest to incorporate the comment into the IP implementation and monitoring arrangements.	Accepted The compliance of project activities supported with the applicable legislative and regulatory requirements in the specific country(ies) concerned will be ensured by integrating this issue in the subsidy contract and is an eligibility criteria which will be laid out in the programme manual.
Banskobystrický region		
No comments.	Noted	Noted
Association of Home Self-Governments (Združenie domových samospráv)		
Requests visualization of climate change in Slovakia in a bar code: scientists analyzed data for the years 1908 to 2018 and processed the results into this graph; each strip represents one year and its color and intensity indicate the character of that year.	Not agreed The Interreg CE programme covers much wider area than Slovakia. The comment seems to be written for another programming process.	Not agreed.
Request to evaluate the location of the project in terms of thermal map processed by satellite imaging (infrared imaging freely available from LANDSAT-8 satellite) and compare with water bodies, drought maps, as well as precipitation and air temperature maps based on their evaluation to design appropriate adaptation and mitigation measures according to the strategic document of the Slovak Republic "Strategies of adaptation of the Slovak Republic to the adverse consequences of climate change" approved by the Resolution of the Government of the Slovak Republic no. 148/2014 to the following stages of the project documentation of the project	Not agreed The locations of the projects that will be supported by the Interreg CE programme is not yet known. The comment seems to be written for another programming process.	Not agreed
Request the consistent application of the strategic document of the Slovak Republic "Strategies for the adaptation of the Slovak Republic to the adverse consequences of climate change" approved by the Resolution of the Government of the Slovak Republic no. 148/2014, and present the characteristics of the most important measures, which is the petitioner in accordance with §3 paragraph 5 of the Act No. 543/2002 Coll. obliged to incorporate it into the project documentation of the project.	Not agreed The Interreg CE programme covers much wider area than Slovakia. The comment seems to be written for another programming process.	Not agreed
Water management, ensuring a sound water regime as well as tackling climate change is a comprehensive and systematic activity; pursuant to §3 par. 4 to 5 of Act No. 543/2002 Coll. legal entities are obliged to incorporate environmental measures into the project	Agreed. The SEA team suggest to incorporate the comment into the IP implementation and monitoring arrangements.	Accepted The "environmental sustainability by design" approach has been emphasized as horizontal principle for delivery of actions and respective

documentation. The way in which the issue is resolved is up to the decision of the proposer, but it must meet certain qualitative and technical parameters		mitigation measures have been integrated under the relevant SOs. The compliance of project activities supported with the applicable legislative and regulatory requirements in the specific country(ies) concerned will be ensured by integrating this issue in the subsidy contract and is an eligibility criteria which will be laid out in the programme manual.
Request that the Waste Management Programme of the Slovak Republic be consistently applied and incorporated into the binding part of the strategic document in question.	Agreed. The SEA team suggests to incorporate the comment into the IP implementation and monitoring arrangements.	Accepted The compliance of project activities supported with the applicable legislative and regulatory requirements in the specific country(ies) concerned will be ensured by integrating this issue in the subsidy contract and is an eligibility criteria which will be laid out in the programme manual.
Demand that the public spaces and the architectural design of public spaces in the form of facades, exteriors and common interior elements also include immovable artwork inseparable from the building itself (sculpture, sculpture, relief, fountain, etc.).	Not relevant The Interreg CE programme does not include projects on public spaces and the architectural design of public spaces. The comment seems to be written for another programming process.	Not relevant
We request to state in the binding part of the zoning plan the observance of the methodology Minimum standards of equipment of municipalities, Bratislava 2010	Agreed. The SEA team suggest to incorporate the comment into the IP implementation and monitoring arrangements.	Accepted The compliance of project activities supported with the applicable legislative and regulatory requirements in the specific country(ies) concerned will be ensured by integrating this issue in the subsidy contract and is an eligibility criteria which will be laid out in the programme manual.
We request that the binding part of the zoning plan state compliance with the methodology of the European Commission HANDBOOK FOR SUPPORT OF THE SELECTION, DESIGN AND IMPLEMENTATION OF RETENTION MEASURES FOR NATURAL WATERS IN EUROPE	Partially agreed Although the comment seems to be written for another programming process, it suggests a useful resource material which could be considered in the IP implementation.	Noted.
We request that the criteria for project evaluation be a detailed elaboration in the text and graphic part of the transport connection, as well as the overall organization of transport	Not relevant The Interreg CE programme covers much wider area than Slovakia. The comment	Not relevant

in the area related to the proposed activity in accordance with the relevant STN standards and SSC Technical Conditions.	seems to be written for another programming process.	
We request that parking spaces be solved in the form of underground garages under buildings and the surface of the area is treated as a local park. We recommend the maximum use of the roofs of parking houses as grassed playgrounds or outdoor training grounds.	Not relevant Interreg CE will not fund parking spaces	Not relevant
We request to respect the Technical-qualitative conditions of MDVRR SR, part 9 - Covers of sidewalks and other paving areas, Technical conditions for the design of drainage equipment on roads as well as other mentioned technical regulations in full.	Not relevant Interreg CE will not fund parking spaces	Not relevant
If necessary of parking on surface as well as on flat roofs and other reinforced horizontal area, we require the use of drainage paving, which will ensure a minimum of 80% share of the seepage area demonstrably retention of at least 8 l of water / m2 for the first 15 minutes. rain and reduce thermal stress in the territory,	Not relevant Interreg CE will not fund parking spaces	Not relevant
We request to prepare the Document on the care of woody plants and the Document of the local territorial system of ecological stability according to 69 par. and their incorporation as part of the binding part of the strategic document in question	Not relevant The comment goes into excessive detail for the nature of the IP. The comment seems to be written for another programming process.	Not relevant
We request strict compliance with the Act on the Protection of Agricultural Land No. 220/2004 Coll. We ask to verify the creditworthiness of the occupied agricultural land and to provide a justification for the need for such an occupation	Agreed. The SEA team suggest to incorporate the comment into the IP implementation and monitoring arrangements.	Accepted The compliance of project activities supported with the applicable legislative and regulatory requirements in the specific country(ies) concerned will be ensured by integrating this issue in the subsidy contract and is an eligibility criteria which will be laid out in the programme manual.
Restoration of forests, so that the document should address the mandatory creation of new areas of forests - parks - in all areas that "lie fallow" in the short term - a maximum of five years. We mean uncultivated pastures and arable land, undeveloped areas in industrial areas, undeveloped open areas in settlements, unused areas around water bodies and rivers.	Partially Agreed The comment goes into excessive detail for the nature of the IP. However, similar actions are already included in proposed expamples of actions on regeneration and renaturalisation of ecosystems (not only forests).	Noted. Restoration of degraded eco-systems including forests is already addressed in the IP under SO 2.4.
Implement windbreaks on agricultural land in the form of returning tree vegetation and	Partially agreed The comment goes into excessive detail for the	Noted

<p>reducing - dividing - large areas of agricultural land.</p>	<p>nature of the IP, yet it offers a potentially useful suggestion to discuss with the successful applicants of relevant projects.</p>	
<p>In the general description of the project, "participatory management" is assumed, while it is not entirely clear what the submitter means by him. We can only conclude that this means e.g. "Participation of public administration partners; from the economic and social field; and bodies representing civil society, including environmental partners, non-governmental organizations and bodies responsible for promoting equality and non-discrimination. " Such arrangements are however limited and some government officials are testing the sensitivity of civil society as well as European ones and Slovak institutions for attacks on civil society.</p>	<p>Noted</p>	<p>Noted</p>
<p>The ZDS therefore requests that the decision on the strategic document "Partnership Agreement of the Slovak Republic for the years 2021 - 2027" include binding measures that I. ensure a guided society-wide debate on civil society, the importance and activities of environmental associations and the results of their activities, with the ZDS being one of the legitimate representatives of this social debate II. set up mechanisms for active and close participation in management as well as control and awareness with the implementation of the Partnership Agreement of the Slovak Republic, while the ZDS is interested in being one of such associations that will participate in such processes</p>	<p>Not agreed. The comment addresses another programming process ("Partnership Agreement of the Slovak Republic for the years 2021 - 2027")</p>	<p>Not accepted</p>
<p>In view of the above, we request that the comments from this opinion be taken into account and in accordance with §7 par. 5 of Act no. 24/2006 Coll. decided to assess the strategy paper "Interreg Central Europe Program 2021-2027" under this law; in this case, we ask that you accept our comments in the terms of the final opinion. In the event that the competent authority, despite our request, issues a decision from the investigation procedure on further non-assessment of the environmental impacts of this strategy paper under the EIA Act, we request the inclusion of individual points of our statement in the binding part of the strategy document.</p>	<p>Noted The Interreg CE proposal has duly undergone assessment in accordance with the "SEA" Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment and its transposition in the EU member States covered by the Interreg CE programme. In accordance with the Article 9 of this Directive, the environmental report prepared pursuant to Article 5, the opinions expressed</p>	

	pursuant to Article 6 and the results of any transboundary consultations pursuant to Article 7 (including comments of ZDS) were taken into account during the preparation of the final Interreg CE programme and before its submission to adoption by the European Commission.	
Ministry of Labour, Social Affairs and Family		
The Ministry of Labour and Social Affairs of the Slovak Republic expressed its position on all SOs and explained exiting efforts to support selected topics on the national level. However, only one specific comment or suggestion for improvement was stated – to “highlight social entrepreneurship and social innovation”.	Noted All mentioned topics are already covered by the Interreg CE programme.	Noted. The topic of social entrepreneurship is already covered in the Interreg CE Programme under the SO 1.2 and the related examples of action.
SK Ministry of Culture		
In the environmental report we recommend: - To add “moderate positive impact” of culture on the environment also in the specific objective 1.2; 2.1 and 2.4 (table on page 100 of the environmental report, part 5.2.10 Synergies and cumulative impacts of draft programme Interreg CE 2021-2027); - To add “important impact” for the area culture – support of participative management – also in specific objective 1.1 and 2.2. At this time there is only overlap with specific objective 4.1 (table on page 16 – connection of objectives of EU environmental policy with draft specific objectives of the programme) Culture and cultural heritage, including creative industry are key values for regional competitiveness and social cohesion. They affect the quality of life of inhabitants and are important for development of municipalities and regions. In the context of urban innovation activities, taking into account the EU activities, the state administration bodies are requested to test innovative solutions which can have positive on growth and employment opportunities and social cohesion. Identification and use of models of innovative participative management for cultural heritage, e.g. through seeking synergies between urban policies and digital non-technical sciences, can bring sustainable advantages for municipalities and regions. Due to these facts we propose to assess these connections.	Noted but not accepted. The Interreg CE programme does not address cultural heritage issues as a specific topic within specific objectives 1.2; 2.1 and 2.4. However, innovative participative management for cultural heritage is addressed in the Interreg CE programme by SO 4.1. Thus, we consider the topic appropriately covered by the Interreg CE programme and assessed by the SEA report. Table on page 16 only illustrates multiple (mainly positive) linkages between the Interreg CE programme and stated EU environmental policy objectives. It does not state the importance of impacts.	Noted. The Interreg CE programme does not explicitly focus on actions regarding cultural heritage as such. It is to be noted that cultural and creative industries are among the sectors to be addressed within SO 1.1 and SO 1.2, while actions under SO 2.1 linked to energy efficiency could possible cover also cultural heritage buildings. Actions under SO 4.1 focussing on governance processes, could among others address also cultural issues.
Simultaneously, we propose to amend the draft SEA (chapter 6 Draft mitigation and	Noted but not accepted.	Noted.

enhancing measures) with recommendation to support activities focused on protection of archaeological sites and cultural locations. Specific area 2.4 of programme is mainly focused on the support of activities in the area of nature site protection. Archaeological sites and nature museums are not represented in this programme though they have strong importance from the point of view of development of tourism.	The Interreg CE programme does not address cultural heritage issues as a specific topic within specific objective 2.4 and only mentions sustainable tourism in the context of valorisation of natural heritage. Protection of archaeological sites is not considered as a main focus the Interreg CE Programme. However, stated topics could be potentially addressed in the Interreg CE programme through specific objectives 1.1 (if linked to cultural and creative industries), 2.2 (if linked to resilience to climate change risks), and 4.1 (if linked to improved governance and management). Thus, we consider topic appropriately covered by the Interreg CE programme and assessed by the SEA report.	The protection of archaeological sites is rather a niche topic and is not considered as a main focus for transnational cooperation within the Interreg CE Programme. Sustainable tourism is addressed in general terms under SO 2.4.
Ministry of Foreign and EU Affairs		
No comments.	Noted	Noted
SK Ministry of Finance		
No comments.	Noted	Noted
Ministry of Education, Science, Research And Sport		
No comments.	Noted	Noted
Ministry of Interior		
No comments.	Noted	Noted
Prešov Self-governing Region		
No comments.	Noted	Noted
Slovenia		Done
Slovenia has no comments	Noted	Noted
Comments from other stakeholders		Response
Europarc		
General comments		
There is a clear need in the region to improve management effectiveness across all Protected Areas (in terms of capacity, communication, planning, monitoring, stakeholder engagement, funding), to increase surface being protected and support connectivity (among sites and across borders).	Noted. This topic is already covered by the Interreg CE programme through the SO 2.2., 2.4 and partly SO4.1.	Noted. The list of examples of actions supported should be understood as a non-exhaustive – i.e. the interventions proposed are not limited to the mentioned exemplary activities.
The program should contribute to promote the development of sustainable food chains, encourage initiatives to bring back agricultural areas under high-diversity landscape features (with buffer strip, rotational or non-rotational	Agreed. This topic is already partly covered by the Interreg CE programme through the SO 2.4. The SEA team advises to	Accepted. A reference to sustainable environmental management practices e.g. for agriculture was included in SO2.4 in the examples of

<p>fallow land, hedge, non-productive trees, terrace wall and ponds), and promote initiatives to support and value the role of farming for sustainable landscape management.</p>	<p>add a reference to sustainable agriculture in the examples of actions.</p>	<p>actions. The list of examples of actions supported should nevertheless be understood as non-exhaustive – i.e. the interventions proposed are not limited to the mentioned exemplary activities.</p>
<p>Promote, across the region, initiatives that can strengthen coherence and complementarity among rural development and biodiversity conservation priorities, favor and reward sustainable farming practices, support integrated rural landscape management and partnership building processes among the farming sector and the nature conservation sector, with specific reference to Protected Areas.</p>	<p>Agreed This topic is already covered by the Interreg CE programme through the SO 2.4. The SEA team nevertheless advises to include an explicit reference to cultural landscapes under the 2.4.</p>	<p>Accepted. Reference to cultural landscapes has been added in the IP under SO2.4. The list of examples of actions supported should be understood as non-exhaustive - – i.e. the interventions proposed are not limited to the mentioned exemplary activities.</p>
<p>The CE program should promote measures for the development of broad-based platforms at European, national and regional level that bring together health, environmental and other sectors to discuss, develop and champion nature-based solutions in policy and practice.</p>	<p>Noted This topic is already covered by the Interreg CE programme through the SO 2.4.</p>	<p>Noted. The list of examples of actions supported should be understood as non-exhaustive - – i.e. the interventions proposed are not limited to the mentioned exemplary activities.</p>
<p>The CE program should also support initiatives aiming to maximise the potential of Europe’s Protected Areas as key assets for improving public health and well-being through nature access, outdoor sports and recreation, contributing to reduce health inequalities across the region.</p>	<p>Agreed. The SEA team suggests to integrate the comment within the action on ecosystem services under SO2.4.</p>	<p>Accepted. The comment has been integrated within the example of action on ecosystem services under SO 2.4.</p>
<p>The CE program should also ensure that adequate support is given to leverage and capitalize on existing good practices, building on previous project results from Interreg and other EU funded programs.</p>	<p>Noted. Capitalization on good practices is already embedded in the Interreg CE programme.</p>	<p>Noted. Capitalization on good practices is already embedded in the Interreg CE Programme.</p>
<p>Further recommendations concerning specific objectives:</p>		
<p>Priority 2 - A greener central Europe through cooperation SO 2.2 Increasing the resilience to climate change in central Europe.</p> <ul style="list-style-type: none"> • Support measures for habitat restoration – giving priority to climate sensitive and carbon rich ecosystems. • Promote connectivity among Protected Areas, ensure ecological continuity cross borders. • Support initiatives for long-term, large-scale, holistic land use planning that integrate nature protection and recovery, as well as climate change adaptation and mitigation. • Promote initiatives for the integration of climate adaptation planning within wider landscape management plans and strategies, valuing the role of Protected Areas. 	<p>Noted This topic is already covered by the Interreg CE programme through the SO 2.2.</p>	<p>Noted. The list of examples of actions supported should be understood as non-exhaustive – i.e. the interventions proposed are not limited to the mentioned exemplary activities.</p>

<ul style="list-style-type: none"> • Encourage systematic analyses -considering vulnerability assessments, biodiversity irreplaceability, climate change vulnerability, connectivity, and ecosystems’ processes and services. • Promote the development of dedicated trainings initiatives. 		
<p>SO 2.4 – Safeguarding the environment in central Europe</p> <ul style="list-style-type: none"> • Explicitly refer to the role of Protected Areas (including coastal, marine and periurban areas) together with Natura 2000 sites, as priority areas - target and beneficiaries. Those are key players in landscape management, for the implementation of the EU Biodiversity Strategy and for the implementation of Green Infrastructures. • Support measures to promote sustainable agriculture for biodiversity, including the development of innovative landscape governance models and initiatives for partnership building among Protected Areas, farmers and consumers. • Promote initiatives encouraging – and rewarding - farmers and fishermen to integrate nature conservation measures in their practices and inspiring the development of sustainable food chains and high-quality productions. • Highlight the values and benefits of biodiversity for health and support initiatives that can promote connection between the health sector and nature conservation sector. Recognise here and value the role of Protected Areas (Periurban parks in particular). • Include measures to support coexistence between people and wildlife. Mainly referring to the coexistence with large carnivores: capacity building, awareness raising, communication, conflict management, conflict preventive measures. • Promote and support initiatives to establish wide platforms involving local authorities, municipalities and landscape managing authorities to take action for nature and biodiversity on the spirit of the Covenant of Mayors for Climate. 	<p>Agreed. This topic is already covered by the Interreg CE programme through the SO 2.4. The SEA team nevertheless advises to specifically include a reference to health in SO 2.4.</p>	<p>Accepted. Specific reference to health has been included under SO 2.4. The list of examples of actions supported should be understood as non-exhaustive – i.e. the interventions proposed are not limited to the mentioned exemplary activities.</p>
<p>Priority 4 – A better governance for cooperation in central Europe SO 4.1 Strengthening governance for integrated territorial development in central Europe</p> <ul style="list-style-type: none"> • Measures and processes are needed to support the involvement of Youth in the governance of landscapes – in particular in rural/mountain areas. Young people are the 	<p>Noted Youth is already recognized by the Interreg CE programme as one of the target groups for SO 4.1. Additionally, SO 4.1 is clearly aiming towards the <i>“increased participation of citizens in decision-making</i></p>	<p>Noted.</p>



<p>future of rural places in Central Europe, and yet they are increasingly moving to more urban places with the risk of losing the future stewards of our natural heritage, our cultural landscapes and the biodiversity they are home to.</p>	<p><i>and to strengthen civic engagement”.</i></p>	
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