ERDF RP 21-27 Strategic Environmental Assessment

Summary for cross-border consultation

May 2022

Centro ricerche applicate per lo sviluppo sostenibile

Developed by Cras s.r.l with the contribution of:

Arch. Guglielmo Bilanzone (coordinator)

Dr. Alessandro Asprella

Arch. Federica Benelli

Arch. Pietro Cordara

Arch. Donatella de Bello

Arch. Maria Pietrobelli

Ver. 20220513/00

Contents

1 INTRODUCTION: WHAT IS THE SEA AND WHAT ARE THE CONTENTS OF THE ENVIRONMENTAL REPORT.....7

2 SUBJECT OF THE EVALUATION: MAIN CONTENTS OF THE ERDF PROGRAMME 9

3 EVALUATION OUTCOMES AND ACCOMPANYING MEASURES.....11

3.1 Coherence of the ERDF RP with the Environmental Protection Objectives and National and Regional Plans and Programmes 12

3.2 Impact Analysis..... 13

3.3 Analysis of possible interferences with the Natura2000 Network 16

3.4 Application of the "Do No Significant Harm" (to climate stability) principle (DNSH) 18

3.5 Mitigation, accompanying and monitoring measures..... 19

4 CONCLUSIONS.....22

1 INTRODUCTION: WHAT IS THE SEA AND WHAT ARE THE CONTENTS OF THE ENVIRONMENTAL REPORT

This document was drawn up as part of the Strategic Environmental Assessment procedure of the Friuli Venezia Giulia Autonomous Region's ERDF RP 21/27 in order to facilitate the cross-border consultation required by European and Italian regulations on the Strategic Environmental Assessment.

Strategic Environmental Assessment (SEA), as defined in Article 1 of Directive 2001/42/EC, is the tool to ensure a high level of environmental protection and to contribute to the integration of all environmental factors, in order to draw up and adopt plans and programmes aimed at promoting sustainable development.

Article 2 of the Directive defines "plans and programmes" as: plans and programmes, including those co-financed by the European Community, as well as amendments thereto, which are prepared and/or adopted by an authority at national, regional or local level, or prepared by an authority for approval, through a legislative procedure, by the parliament or government and which are required to be governed by legislative, regulatory or administrative provisions.

At the national level, the sector is regulated by Legislative Decree 152/06, as amended, which, in article 6, paragraph 2, sets out that a wide range of plans and programmes pertaining to different sectors must be subject to a SEA. The regional programming of EU funds, which takes place through the Regional Operational Plans, is fully within the scope, as it certainly covers the different topics mentioned in article 6 (transport, energy, tourism, etc.).

As far as the regional framework is concerned, the Autonomous Region of Friuli Venezia Giulia has issued R.L. no. 13 of 30/07/2009 and FVG Regional Council Decree no. 2627 of 29/12/2015, "General guidelines for SEA processes concerning Plans and Programmes whose approval is the responsibility of the Region, local authorities and public bodies of the Friuli Venezia Giulia Region".

In the SEA procedure, according to the standard, four fundamental actors are recognised:

- The proceeding authority, i.e. the public administration drawing up the plan or programme, which, in the present case, is represented by the RP Management Authority.
- The competent authority, i.e. the public administration responsible for adopting the reasoned opinion for the SEA of Legislative Decree 152/96) which, in the case under consideration, is the Regional Council.
- Competent environmental authorities (CEA), i.e. public administrations and public bodies that, due to their specific competences or responsibilities in the environmental field, may be affected by the impacts on the environment due to the implementation of the plans.
- The interested public and the general public, who are called upon to express their views in consultation phases open to anyone.

From a procedural standpoint, the steps are the following:

1. Development of a preliminary orientation ("scoping") phase, based on the preparation of a Preliminary Report to guide the assessment and initiate consultation.
2. Consultation with the competent environmental authorities (CEA), the territorial authorities concerned.
3. Drafting of the Environmental Report based on the requirements of the standard and the results of the consultation on the Preliminary Report.
4. Participation and consultation of the public and the competent environmental authorities (CEA) and the territorial authorities concerned;
5. Assessment of the environmental report and the results of the consultation.

6. Expression of the reasoned opinion by the competent authority and subsequent adaptation of the plan document and the environmental report to any conditions and observations contained in the reasoned opinion.
7. Decision and subsequent monitoring phase.

The procedure, when necessary, also includes consultation with the countries bordering the area covered by the Programme Plan.

This document contains a summary prepared specifically to facilitate this consultation, it being understood that all the in-depth information is available in the main SEA document, which is the Environmental Report that, as provided for by Legislative Decree 152/06, has the following contents:

(a) An explanation of the contents, the main objectives of the plan or programme and its relationship with other relevant plans or programmes.

(b) Relevant aspects of the current state of the environment and its likely evolution without the implementation of the plan or programme.

(c) Environmental, cultural and landscape characteristics of the areas that could be significantly affected.

d) Any existing environmental problems relevant to the plan or programme, in particular those relating to areas of particular environmental, cultural and landscape importance, such as Natura 2000 Network areas, as well as territories with agricultural production of particular quality and typicality.

(e) Environmental protection objectives established at the international, Community or Member State level relevant to the plan or programme and the manner in which they have been taken into account.

(f) Possible significant impacts on the environment, including aspects such as biodiversity, population, human health, flora and fauna, soil, water, air, climatic factors, material assets, cultural heritage, including architectural and archaeological heritage, landscape and the interrelationship between the above factors. All significant impacts must be considered, including secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative impacts.

(g) Measures envisaged to prevent, reduce and offset any significant adverse environmental impacts of implementing the plan or programme.

(h) A summary of the reasons for the choice of the identified alternatives and a description of how the assessment was carried out, as well as any difficulties encountered in gathering the required information.

(i) A description of the measures envisaged regarding the monitoring and control of significant environmental impacts arising from the implementation of the proposed plan or programme.

(j) Non-technical summary of the information referred to in the preceding points.

It should also be mentioned that the SEA also includes the Impact Assessment of Natura2000 Network Sites (SCI, SAC and SPA).

Based on integration with other European standards, the Environmental Report also contains all the information necessary to document compliance with the "Do No Significant Harm" (DNSH) principle specified in the "Taxonomy for Sustainable Finance", which was adopted to promote private sector investment in green and sustainable projects and to help achieve the objectives of the European Green Deal.

Please refer to the complete documentation for further details.

2 SUBJECT OF THE EVALUATION: MAIN CONTENTS OF THE ERDF PROGRAMME

The RP, the Regional Operational Plan that each Italian region draws up every seven years, is the main programming tool for the use of the resources the European Union makes available through the European Regional Development Fund (ERDF), which aims at consolidating economic and social cohesion in the European Union by correcting imbalances between regions.

The 2021-2027 ERDF Regional Programme (RP) of Friuli Venezia Giulia, for the seven-year period 2021-2027, is part of the long-term European and national planning framework, aimed at promoting a sustainable, durable and balanced development of the Union, and takes up the challenges of the digital and environmental transition, in line with the European objectives on the environment and the fight against climate change. It also takes into account the European economic and budgetary policy related to the pandemic in the last two years and the subsequent launch of the Next Generation Europe plan, with reference also to the National Recovery and Resilience Plan (NRRP).

The RP was drawn up based on a participatory process shared with economic and social partnerships, in accordance with the principles of the specific European Code of Conduct on Partnership, and its drafting took into account what has been achieved in and learned from the previous 2014-2020 programming period.

The Programme document described herein is the one approved by the Regional Council, with Decree no. 394 of 18 March 2022, to which reference is made for any further details.

The contents of the Regional Programme, in terms of investment priorities, instruments to be implemented and expected results, represent what emerged from the needs assessment survey carried out in the three-year period 2019-2021, in cooperation with the regional structures in charge of managing the regional action lines, as well as with the representatives of economic and social partnerships. The participatory process led to a progressive refinement of the Programme, in which alternative solutions were gradually reabsorbed until they became the unambiguous result of shared choices.

Within the more general framework of the Strategic Objectives defined at the EU level, the ERDF RP identifies the specific Objectives that best respond to the regional strategic priorities, structuring their implementation in Actions and Sub-Actions and defining their allocation and financing modalities.

The Strategic Policy Objectives are the following:

PO1 - a smarter Europe;

PO2 - a greener Europe;

PO4 - a more social Europe;

PO5 - a Europe closer to citizens

The following Specific Objectives (SO) were identified for each of the Strategic Objectives, selecting them from those defined in the EU regulation dedicated to the management of European funds.

For PO1:

- a1: Develop and strengthen research and innovation capacities and the introduction of advanced technologies;
- a2: Enabling citizens, businesses, research organisations and public authorities to reap the benefits of digitisation
- a3: Strengthen the sustainable growth and competitiveness of SMEs and job creation in SMEs, including through productive investment.

- a4: Develop skills for smart specialisation, industrial transition and entrepreneurship.
- a5: Strengthen digital connectivity.

For PO2:

- b1: Promote energy efficiency and reduce greenhouse gas emissions
- b2: Promote renewable energy in accordance with Directive (EU) 2018/2001, including the sustainability criteria set out therein
- b4: Promote climate change adaptation, disaster risk prevention and resilience, considering ecosystem-oriented approaches
- b6: Promote the transition to a circular and resource-efficient economy.
- b7: Strengthen the protection and preservation of nature, biodiversity and green infrastructure, including in urban areas, and reduce all forms of pollution
- b8: Promote sustainable multimodal urban mobility as part of the transition to a zero net carbon economy.

For PO4:

- d6: Strengthen the role of culture and sustainable tourism in economic development, social inclusion and social innovation

For PO5:

- e1: Promote integrated and inclusive social, economic and environmental development, culture, natural heritage, sustainable tourism and security in urban areas.
- e2: Promote locally integrated and inclusive social, economic and environmental development, culture, natural heritage, sustainable tourism and security in non-urban areas.

For each specific objective, the Friuli Venezia Giulia Region, through an intensive collaborative process with the various stakeholders, defined a series of actions and sub-actions. For the purposes of SEA, the in-depth study stops at the level of Actions, giving rise to the following table that assigns an alphanumeric code to each Action. The letter and the first numeral identify the Specific Objective to which it belongs, the third number represents the identifier used in the RP).

All impact analyses were carried out with reference to this list and the information related to it.

a.1.1	Integrated technology transfer project aimed at supporting and developing innovative start-ups with the establishment or co-participation of a venture capital fund to finance innovative start-ups
a.1.2	Funding for negotiated research, development and innovation projects
a.1.3	Non-repayable funding aimed at developing industrial research projects or experimental development of new sustainable technologies, products or services
a.1.5	Process and organisational innovation activities by means of non-repayable grants to encourage investments in design, experimentation and application of innovative solutions aimed at redesigning procurement, production, business conversion and distribution processes, as well as organisational and business models
a.2.7	Business innovation and technology investments, including those in favour of digital transformation
a.2.13	Actions for cultural operators to promote the use of ICT solutions and augmented reality
a.2.18	One-stop Services Centre project for the implementation of a single digital channel for access to PA and local authority services
a.2.19	Actions for the digitisation of Local Authorities (hardware, software and services)
a.2.22	Pilot project for mountain municipalities with small or micro rural aqueducts
a.2.36	ICT services in health and social care
a.2.37	TELEHEALTH - Provision of healthcare services through the use of innovative technologies, i.e. with the aid of ICT, as well as medical devices with remote connectivity as ancillary tools for patient care and surveillance
a.3.4	Grant funding for industrialisation of research results
a.3.7	Innovative and technological investments by enterprises, including those in favour of digital transformation [Inland areas]

a.3.9	Activation of a revolving fund for subsidised investments in favour of companies operating in the agricultural product processing sector
a.3.10	Incentives for the creation of innovative start-ups and coaching of entrepreneurs
a.3.11	Actions in support of cultural and creative enterprises [Incubation, consolidation and cross-fertilisation actions]
a.3.12	Actions to support entrepreneurship
a.3.14	Creation of a regional guarantee fund managed and utilised by Confidi
a.3.15	Actions in support of the competitiveness and structural strengthening of enterprises in the tourism sector, aimed at energy efficiency, anti-seismic upgrading, elimination of architectural barriers, construction of thermal pools and digitisation
a.4.33	Skills for industrial transition
a.5.31	Bike path connectivity in IA + Connectivity in ultra-peripheral areas in mountain areas for rescue and safety purposes (LoRA and Wi-fi FVG)
b.1.6	Actions for the transition to a circular economy and reduction of energy consumption (eco-design and reuse of waste products, adoption of energy-efficient technologies, solutions or organisational models) [Energy efficiency and demonstration projects - SME/Large Companies]
b.1.16	Recovery of works and infrastructures identified as symbolic places of the Region [Energy efficiency - Lignano]
b.1.17	Improvement of mountain lodges with regard to the need to provide a mountain tourism offer matching the demand for new services
b.1.21	Energy requalification of public buildings
b.1.29	Improvement and adaptation of municipally owned buildings to be used as multi-purpose hubs in the logic of Smart Villages
b.1.30	Energy efficiency and green modernisation of regional park authority assets intended to host initiatives linked to the enhancement of the natural, cultural and human resources of local communities
b.1.32	Promote social, economic and environmental development in urban areas
b.2.6	Transition to a circular economy and reduction of energy consumption (eco-design and reuse of waste products, adoption of energy-efficient technologies, solutions or organisational models) [Renewable energies: solar and others - SMEs]
b.4.16	Recovery of works and infrastructures identified as symbolic places of the Region [Anti-seismic adaptation - Lignano]
b.4.34	Actions for new construction and restoration of defence and protection systems against hydrogeological risk along watercourses in mountainous areas
b.4.35	Restructuring and adaptation of the urban drainage network in the City of Trieste
b.6.6	Transition to a circular economy and reduction of energy consumption (eco-design and reuse of waste products, adoption of energy-efficient technologies, solutions or organisational models) [Waste management and environmentally friendly production processes]
b.7.26	Spatial plans for environmental and landscape enhancement - Green infrastructures
b.7.28	Initiatives to enhance protected natural areas and Natura 2000 sites
b.8.23	Improvement of local public transport, including renewal of the vehicle fleet, improved accessibility and equipment of regional modal interchange centres + cross-border services
b.8.24	Investment in the extension of cycling routes of regional significance
d.6.25	Actions in favour of the accessibility of the Region's cultural and artistic heritage, also aimed at supporting local development and territorial cohesion
d.6.27	Incentives for the development of projects to enhance the role that museums, artistic-cultural collections and other cultural products can play as actors in local development
e.1.32a	Promotion of social, economic and environmental development in urban areas - Urban Authorities of Trieste, Udine, Pordenone, Gorizia (Digitisation)
e.1.32b	Promotion of social, economic and environmental development in urban areas - Urban Authorities of Trieste, Udine, Pordenone, Gorizia (Social Innovation)
e.1.32c	Promotion of social, economic and environmental development in urban areas - Urban Authorities of Trieste, Udine, Pordenone, Gorizia (Environmental Enhancement)
e.1.32d	Promotion of social, economic and environmental development in urban areas - Urban Authorities of Trieste, Udine, Pordenone, Gorizia (Cultural Enhancement)
e.2.8	Actions to support the forest-wood sector in IA
e.2.16	Actions to promote the natural heritage and ecotourism in IA
e.2.29	Smart villages in inland areas

3 EVALUATION OUTCOMES AND ACCOMPANYING MEASURES

3.1 Coherence of the ERDF RP with the Environmental Protection Objectives and National and Regional Plans and Programmes

The Environmental Report examined the coherence between the actions envisaged in the ERDF RP and international and the national environmental protection and sustainable development objectives, as well as with respect to relevant national and regional plans and programmes.

Since the guidelines for sustainable development and environmental protection are defined according to a strategic chain, in which the 17 goals of the 2030 Agenda are structured at different territorial levels - at the European level with the Green Deal, at the national and regional level with the relevant sustainable development strategies - for the coherence assessment of the RP it has been chosen to refer to the logical structure "areas-choices-goals" of the NSDS... The NSDS objectives related to sustainability vectors and the Partnership area are excluded because the strategic objectives related to these areas were not judged to significantly interfere with the specific objectives of the Regional Programme.

Generally speaking, there is an almost complete **overlap between certain specific objectives of the ERDF RP and certain strategic choices of the NSDS** and, therefore, perfect coherence with most of the relevant NSOs. In this regard, the correspondence between PO1 and the choices of Prosperity I-II, between PO2 and the choices of Planet I-II and Prosperity IV, and between PO5 and the choices of People I and Planet III are particularly noteworthy. This is a coherence at the level of underlying principles that is also indicated, to a large extent, in the matrix of the NSDS-Programming 21-27 reports drawn up by MiTE.

In the Environmental Report, the analysis was summarised in a table showing the interaction between specific RP objectives and NSDS objectives. Looking at the reports, it can be seen that the relationships of the specific objectives of PO1 with NSDS are all positive, consistency is indicated as "potential", where it depends on the content and concrete outcomes of the actions that will be eligible for funding and, in particular, on the extent to which the financed research initiatives and the technologies introduced will contribute to improving environmental sustainability and efficiency in the use of resources, especially in the production context. This aspect can be effectively enhanced by providing rewards for the most environmentally virtuous proposals.

Also for the specific objectives of PO2 a majority of coherence relations are reported, the only SOs of the Programme for which elements of potential divergence are detected are those within which measures with a substantial plant or infrastructure content could be financed, for which it is not possible to exclude a priori land occupation and interference with non-urbanised areas or at landscape level. These are, however, potential discrepancies, which it is considered possible to prevent through appropriate selection criteria and conditions to be included in the calls for tenders or specifications.

PO4, which in the FVG RP is represented by a single specific objective, dedicated to the promotion of culture and tourism, is coherent or potentially coherent - for reasons similar to those indicated above - with the strategic choices and objectives inherent above all in the Planet III and Prosperity I choices, for which no potential divergence is noted.

PO5, dedicated to integrated local development, envisages two objectives, to be achieved through multifunctional territorial tools that, at this stage, can be considered potentially consistent with almost all the choices and objectives of the NSDS. The level of coherence of the two PO5 objectives in relation to the individual NSOs of the strategy may differ, depending on the fact that one is dedicated to urban areas and the other to non-urban areas.

An almost complete commonality of purpose also emerges from the **verification of consistency with sectoral plans and programmes at the regional level**.

With respect to the **Regional Strategic Plan 2018-2023**, all the Specific Objectives under the Strategic Objective PO1, and the SOs d6, e1 and e2, which, together with b7, are also consistent with respect to the **RPP**, coincide. There is total consistency with the **Territorial Government Plan**

(TGP), the **General Regional Urban Plan** (**GRUP**), the **Regional Research and Innovation Strategy for Smart Specialisation 2014-2020 - Smart Specialisation Strategy** (**S3**) and, even more, the new **S4 Strategy**.

Coherence with planning related to **Protected Areas and Natura 2000 Sites** remains to be verified during implementation, while b4 and b7 are coherent with Hydrogeological Risk Prevention (**PGRA, PAI**) and Water Management (**PDG, PRTA**) Plans and a large part of the SOs with Plans related to Air Quality Improvement (**PRMQA**, **PAR** and **PRMQA 2021**).

With respect to the **PRRIR**, SO a3 is consistent, as b7 and a2 are consistent with the aims of the drafting **Regional Plan for Mining Activities (PRAE)**, and b1, b2, b8 with the **Regional Energy Plan (PER)**.

SO b8 is consistent with the **Regional Transport Infrastructure, Freight Mobility and Logistics Plan**, the **Regional Local Public Transport Plan** (**PRTPL**), the **Regional Electric Mobility Plan** (**PReME**), and the **Regional Cycling Mobility Plan** (**PREMOCI**).

Compared to the **Regional Waste Management Plan** (**PRGRU**), the RP's SOs are relatively irrelevant, while SOs a3, d6, e1 and e2 are consistent with the **Tourism Plan** and the most recent relevant planning documents: **Tourism and Food and Wine Relaunch Plan 2020 - 2021** and **Mountain Plan 365**.

3.2 Impact Analysis

The analysis of the impacts of the RP was conducted with the aid of a methodology based on an evaluation sheet drawn up for each of the actions listed in chapter 2, which contains identifying information on the action and an illustration of the possible impacts on the various environmental components, organised as follows:

➢ Environmental aspects

- Nature and Biodiversity
  - Biodiversity
  - Marine and coastal environment
- Water and soil
  - Inland surface and groundwater
  - Hydraulic and geological hazards
- Landscape and Cultural Heritage
- Climate and climate-altering emissions
- Pollution types
  - Air quality
  - Physical pollution
  - Waste

➢ Socio-economic aspects can be broken down into:

- Well-being and social inclusion
- Production system and employment

For each of these environmental components, taking into account what emerged from the analysis of the current conditions, the possible interaction was identified and an impact level, negative or positive, was attributed based on the following semantic scale:

0 = no/zero impact

1 = negligible impact

2 = minor impact

3 = moderately significant impact

4 = significant impact

5 = very significant impact

The assignment of relevance takes into account the size of the action (scale of resources), the physical transformational capacity associated with the action, the potential to affect sensitive contexts and other factors based on analogies with similar cases and the experience of the experts involved with a collegial approach.

The sheet also contains the results of the analysis concerning compliance with the DNSH principle, described in more detail in Chapter 3.3 below.

All data was summarised in an "evaluation matrix", which was used to perform an overall qualitative-quantitative synthesis by applying an additive model, taking into account the judgements made on individual interactions and the relative importance of environmental components and sub-components. Basically, it is a matter of applying a classic weighted sum of impacts providing a representative index of the overall impact, which can be defined as the "strategic impact level".

The weights were assigned by the experts in the working group, favouring the environmental aspects of greatest interest with respect to environmental protection policies and land characteristics.

From the results of the application, the most striking fact to emerge is **the absolute predominance of positive impacts over negative ones**.

The nature of the RP, which must intrinsically respect the logic of sustainability, has meant that risks of negative interaction could rarely be seen, which, let us remember, are in any case to be understood as entirely potential and certainly resolvable by adopting the mitigation and accompanying measures identified.

Quantitatively, the overall weighted sum of the impact levels resulted in a positive strategic impact level of 56 and a negative value of about 3, leading to a **positive balance with a value of 53**.

We should bear in mind that if only positive impacts of maximum value were to occur for all components and all actions, the balance would have a value of 230. Considering that this is an entirely theoretical value, because it is impossible for positive performance to cover all components and all actions, the value resulting from the application is certainly reassuring.

The analysis of the disaggregated figure shows that more than 42% of the positive impact balance is concentrated on the climate and emissions component.

Positive impacts on production and socio-economic issues are also important, contributing 19% and 17% respectively to the impact balance.

The nature of the RP, which is very much oriented towards pursuing the goals of reducing climate-changing emissions at the relative expense of other components affected by the RP with fewer actions and fewer resources, is quite evident.

This is the case for the "nature and biodiversity" sector, whose impact value is also conditioned by the sporadic presence of a few negative impact situations, which, however, in the overall balance, have been absorbed by the more frequent cases of positive impact.

Analysing the data by Specific Objective (SO), i.e. summing up the impact values of the actions belonging to the SO, the picture appears more varied.

The main contributor to the RP's positive performance is SO b1, which aims to "promote energy efficiency and reduce greenhouse gas emissions". This objective gives rise to 7 actions, which "fuel" the positive impact balance to the tune of about 17%.

SO a2 "enable citizens, businesses, research organisations and public authorities to reap the benefits of digitisation" and SO b4 "promote climate change adaptation, disaster risk prevention and resilience, taking into account ecosystem approaches" follow with values of 13.9 per cent and 13.5 per cent, respectively.

Aggregating the SOs further with respect to the strategic policy objectives (PO), the positive impact levels are concentrated in PO 2 and PO 1, with values of around 47% and 35% respectively, demonstrating that the Friuli Venezia Giulia RP has focused its efforts on achieving a resilient, greener and low-carbon region, and a more competitive and smart one.

Figure 1 Estimated impacts by environmental components

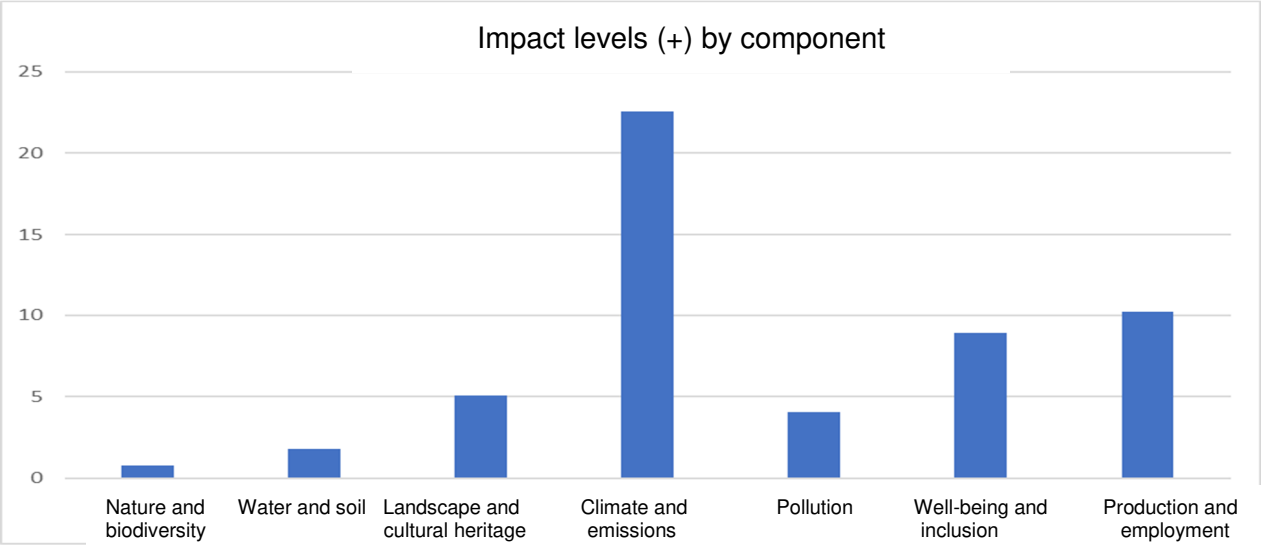


Figure 2 Estimated impacts by specific objective

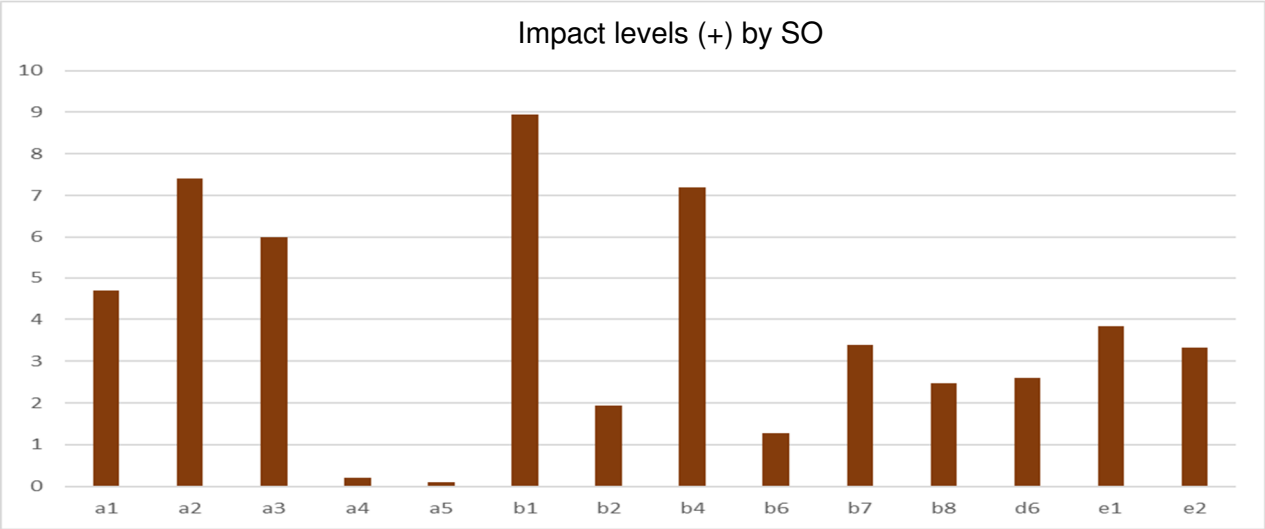
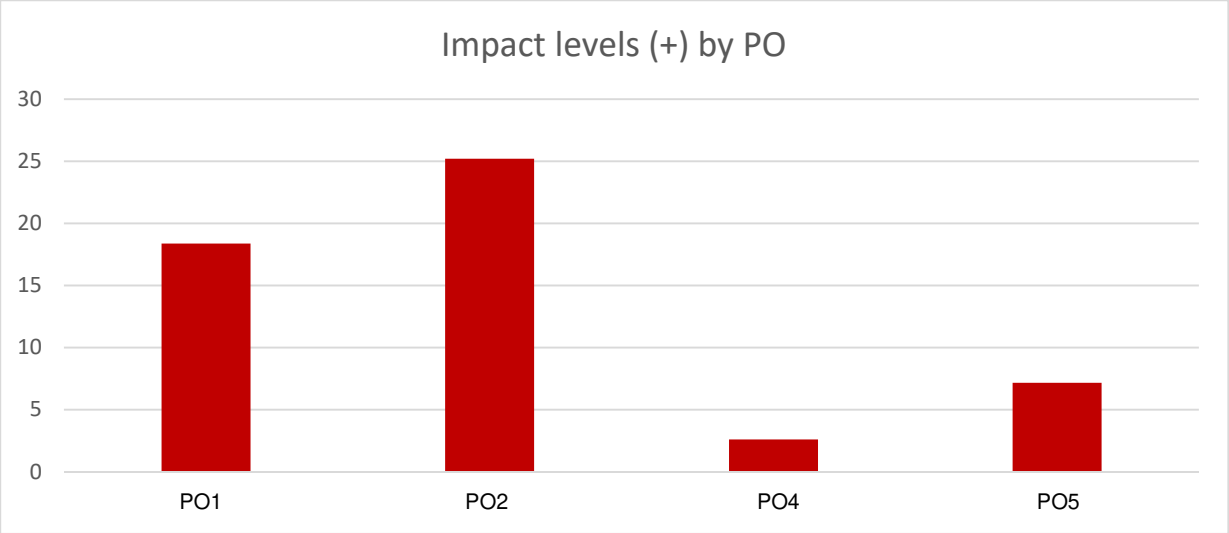


Figure 3 Estimated impacts by PO



3.3 Analysis of possible interferences with the Natura2000 Network

Natura2000 is an EU-wide environmental network established under the Habitats Directive 92/43/EEC to ensure the long-term maintenance of natural habitats and threatened or rare species of flora and fauna at the EU level.

Therefore, the implementation of actions and plans within Natura2000 areas is only allowed following a specific evaluation process: the **Impact Assessment**. This assessment was carried out within the framework of the Environmental Report, applying a methodology suited to the specificity of the case, which is a programme for the allocation of economic resources with very embryonic design indications and locational references.

The Natura network consists of areas of special environmental value: Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) defined by the Habitats Directive and 79/409/EEC Birds Directive (replaced by 2009/147/EC), transposed in Italy by Presidential Decree no. 357 of 8 September 1997.

With reference to the biogeographical region, Friuli's Natura 2000 sites are currently divided as follows:

- Alpine bio-geographical region: 3 SPA sites and 26 pSCIs-SACs.
- Continental biogeographical region: 5 SPAs and 35 pSICs/SACs.

Almost all of the SCIs in the two Friuli bio-geographical regions have been designated as Special Areas of Conservation (SAC) by specific ministerial decrees, thus completing the process required by the Habitats Directive. The Autonomous Region of Friuli Venezia Giulia has also recently identified the Arzino Stream as a Site of the Alpine biogeographical region, with Regional Council Decree 1303/2021 pursuant to RL 7/2008.

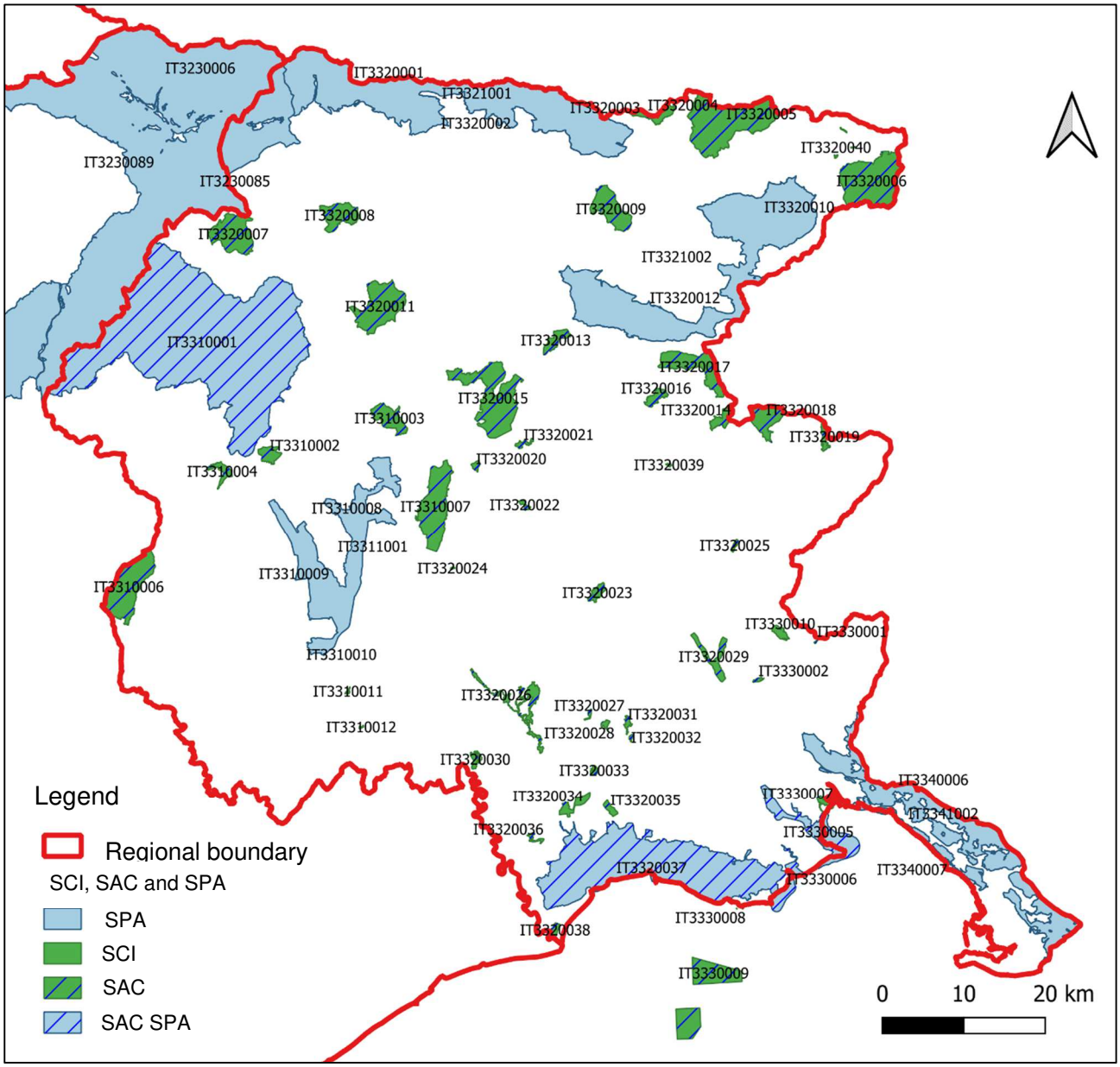
With regard to the habitats included in Annex I of Directive 92/43/EC, also defined as "natural habitats of Community interest", in FVG there are 67 Natura 2000 habitats, of which 16 are priority habitats, within the identified SACs and SPAs.

In total, therefore, there are 59 terrestrial SACs and 8 SPAs in the region, including 3 marine SCIs, with areas partially overlapping the SACs and SPAs. Based on updated ministerial data, taking into account overlaps and subdividing areas in neighbouring regions, the Natura 2000 network sites

occupy a total of 153.687 hectares on land, or 19.41% of the total area of the regional territory, and 5411 hectares at sea, or 6.50%.

Below is the reconnaissance map, drawn up from the MiTE database updated as of December 2021, which identifies the location of the Natura 2000 Sites, some of which straddle the regional border between Friuli Venezia Giulia and Veneto, showing the codes of the Sites, for their immediate identification.

Figure 4 Natura 2000 sites in the Friuli Venezia Giulia region



With regard to the **potential relations between the RP actions and the Natura 2000 Network Areas**, it must be underlined that these are, in most cases, actions and measures of a prevalently intangible character and cannot be located in a precise manner on the regional territory. It is therefore not possible, at least in the current state of definition of the available information, to identify any traces or georeferencing, so as to have, as far as possible, visual evidence of hypothetical

interactions. In the majority of cases, these are forecasts of a general nature, often to be implemented in an urban or, in any case, predominantly man-made environment.

Although the Impact Assessment applied to a wide-ranging Plan cannot be conducted according to the required standards of accuracy, which can only be obtained in the presence of very detailed project and location data, it is however possible, also following the suggestions of the Ministry for the Environment (MATTM), to use a sort of probabilistic approach, highlighting the Regional Programme's lines of action at risk of interfering with Natura2000 Network sites.

This is an approach that has already been tried on other occasions, based on reasonable reflections on the various segments of the plan, defining their potential impact according to certain significant parameters:

- The typological potential, which is based on reflections on the intrinsic characteristics of the different actions.
- The locational potential, which concerns the possibility that the action may affect natural or semi-natural areas.
- The quantitative potential, on the other hand, concerns the intensity of the measures associated with the action together with their level of territorial spread.

Combining the values assigned to these three parameters results in a final index, ranging between 0 and 10 and representing the highest or lowest **theoretical possibility of interaction (Tpi)**.

Applying these criteria, it can be seen that **almost all actions are well below attention thresholds**. Only for a.3.15, which could involve physical actions, including the construction of thermal pools, special attention was called for during implementation.

3.4 Application of the "Do No Significant Harm" (to climate stability) principle (DNSH)

The application of the "do no significant harm" (DNSH) principle in the context of cohesion policy was introduced **by the Common Provisions Regulation (Regulation (EU) 2021/1060**) in recital 10, which states that, in the context of combating climate change, funds should support activities that comply with EU climate and environmental standards and priorities and should not significantly harm environmental objectives, pursuant to article 17 of the **Taxonomy Regulation (Regulation (EU) no. 2020/852**.

As a result of specific measures, it was requested that the analysis of the DNSH principle be incorporated into the Strategic Environmental Assessment, which is why, as we have seen, the impact assessment sheet contains a specific section devoted to the subject.

Compliance with the DSNH principle is to be carried out with regard to the following environmental objectives:

1. Climate change mitigation.
2. Adaptation to climate change.
3. Sustainable use and protection of water and marine resources.
4. The transition to a circular economy, including waste prevention and increased absorption of secondary raw materials.
5. The prevention and reduction of pollution.
6. The protection and restoration of biodiversity and ecosystems.

The assessment must be made taking into account that "significant damage" is to be understood as the following situations:

1. An activity is considered harmful for climate change mitigation if it leads to significant greenhouse gas emissions.
2. An activity is considered harmful for climate change adaptation if it leads to an increase in the negative impact of the current climate and the projected future climate, on the activity itself or on people, nature or property.
3. An activity is considered to cause significant harm to the sustainable use and protection of water and marine resources if it damages the good ecological status or potential of water bodies, including surface and groundwater, or the good environmental status of marine waters.
4. An activity is considered to cause significant harm to the circular economy, including waste prevention and recycling, if it leads to significant inefficiencies in the use of materials or in the direct or indirect use of natural resources, or if it significantly increases waste generation, incineration or disposal, or if the long-term disposal of waste is likely to cause significant and long-term environmental damage.
5. An activity is considered to significantly impair pollution prevention and control if it leads to a significant increase in emissions of pollutants into the air, water or soil.
6. An activity is considered to significantly harm the protection and restoration of biodiversity and ecosystems if it is significantly detrimental to the good status and resilience of ecosystems, or detrimental to the conservation status of habitats and species, including those of Union interest.

The definition of DNSH compliance follows a fairly complex logic. To simplify, in some cases actions are considered "automatically" consistent with the DNSH principle, either because of their intrinsic nature (e.g. an action explicitly aimed at reducing climate-changing emissions) or because they fall within a certain classification. In other cases, consistency is to be sought in the specific analysis of impacts and the presence of accompanying measures to eliminate any negative impacts.

These are the situations in which, with reference to the individual environmental objective, the principle is respected:

- Where the action has no or insignificant foreseeable impact on the environmental objective.
- Where the action falls into a typology offering 100% support for climate change or the environment.
- Cases where the action "contributes substantially" to an environmental objective, pursuant to Reg. EU 2020/852 art. 10-16).
- Where the considerations of the expected environmental impacts, as set out in the assessment sheets, and compliance with the indicated accompanying measures render any interactions observed insubstantial.

Referring back to the ER for the details of the case, it is important to emphasise here that the analysis was conducted on the individual actions within the framework of the evaluation sheets and then summarised, at the level of the Specific Objectives, in a table, which shows that **the Do Not Significant Harm principle is respected** in all of them.

3.5 Mitigation, accompanying and monitoring measures

Point (g) of Annex VI of Legislative Decree 152/2006 requires to "indicate the measures envisaged to prevent, reduce and offset as fully as possible any significant adverse effects on the environment when implementing the plan or programme".

In this specific case, as we have seen, the impact analysis revealed a situation of almost total absence of negative environmental impacts, so there is no need to define specific and particular mitigation measures.

With a view to integrating the SEA and the obligation to ensure compliance with the DNSH principle for all types of actions envisaged in the RP, it is necessary to impose accompanying measures in order to specify - in the presence of actions that in the planning phase are necessarily defined in an "open" manner - the conditions to be met in the implementation phase, so that sustainability can be strengthened and the absence of damage to the 6 environmental objectives, indicated by the Taxonomy regulation (DNSH constraints), can be guaranteed.

For the identification of the additional requirements, reference was made to the "Operational Guidance for Compliance with the Principle of No Significant Harm to the Environment" published in December 2021.

These are mainly indications on selection/exclusion criteria for beneficiaries depending on the category of activity, or constraints on sustainability requirements for supplies and services eligible for funding, which in the case of public procurement, for example, will have to comply with European and national green procurement criteria, and specifications concerning the use of best available techniques/technologies.

Referring to the Environmental Report for the details of the case, in this summary report it is considered sufficient to present the reference categories of mitigation measures:

A. Predominantly intangible assets
B. Business Support Financing
C. Building actions
D. Development and equipment of green spaces
E. Building work in the absence of volumes and general building work
F. Purchase of IT/ICT equipment and related services
G. Purchase of machinery, plant, equipment and non-ICT technological devices
H. Purchase of non-technological materials, equipment
I. Purchase of vehicles
L. Creation of energy production plants from renewable sources.

Each RP action has been associated with one or more of these categories and, for each of them, one or more specific accompanying measures have been defined, to be followed during implementation, for the complete list of which please refer to the RA.

In addition to defining accompanying and mitigation measures, the Environmental Report also contains monitoring indications.

In particular, possible integrations have been defined between technical/financial monitoring of the RP, which envisages the use of output and result indicators, and the typical indicators of the environmental monitoring of Plans and Programmes defined by the national guidelines prepared by ISPRA, referred to below:

- Process indicators, to monitor the implementation of programme actions that have a positive or negative impact on the programme's specific sustainability objectives.
- Contribution indicators, for monitoring significant environmental effects, to measure the change in the context attributable to the programme's actions, including any unforeseen effects.
- Context indicators to describe the current state of the environmental context with reference to the overall sustainability objectives and to measure its evolution, both as a result of the programme and of exogenous factors.

The monitoring indications also took into consideration the management aspects, identifying the RP Management Authority as the subject responsible for monitoring, envisaging, however, extensive

cooperation with all the competent structures dealing with the subject, starting with the Regional Agency for the Protection of the Environment.

4 CONCLUSIONS

The 2021-2027 ERDF Regional Programme (RDP) of Friuli Venezia Giulia is the instrument through which to support regional development, along lines focused on sustainable, durable and balanced development, which takes up the challenges posed by the digital and ecological transition, in line with the European objectives on the environment and the fight against climate change.

The programme is organised on the basis of a set of strategic objectives selected from those defined at EU level, which envisage a smarter (PO1), greener (PO2), more social (PO4) and closer to citizens (PO5) Europe.

These strategic objectives were then organised into specific objectives (SO) and, therefore, into actions, decided by the Friuli Venezia Giulia Region, through a complex process of discussion and negotiation, oriented towards environmental sustainability, for which the results of the Strategic Environmental Assessment could only be positive.

The RP was analysed, producing an Environmental Report in which it was possible to offer a "measure" of the extent of the expected environmental benefits, as an overall balance between the environmental performance of the individual actions, by applying a specific methodology, which involved a careful analysis of the possible interactions between individual environmental (biodiversity, soil, water, etc.) and socio-economic components and individual actions. These possible interactions were described and assessed using a quantitative system, which resulted in the calculation of a **"strategic impact index" which, as mentioned above, was largely positive**.

At the level of the individual action, in some cases, possible interactions, even of a potentially negative nature, were highlighted for certain components, but these were found to be negligible and, in any case, resolvable by implementing precisely defined accompanying measures.

The environmental sector that benefits most is the climate and emissions component, where more than 42% of the positive impact balance is concentrated. From this result, it is clear that the RP has made the goal of reducing climate-changing emissions its own, to the relative detriment of other components, which are affected by a lower number of actions and fewer resources.

Reasoning by "causal factor", the main contributor to the positive performance of the RP is Specific Objective b1, which aims to "promote energy efficiency and reduce greenhouse gas emissions". This objective gives rise to 7 actions, which "fuel" the positive impact balance to the tune of about 17%.

SO a2 "enable citizens, businesses, research organisations and public authorities to reap the benefits of digitisation" and SO b4 "promote climate change adaptation, disaster risk prevention and resilience, taking into account ecosystem approaches" follow with values of 13.9 per cent and 13.5 per cent, respectively.

This basic framework also made it possible to positively conclude other assessments, which were absorbed into the SEA framework.

One of these is the verification of compliance with the DNSH principle "Do not significant harm", introduced by a number of European regulations, which aim to avoid financing actions that may be harmful to the environment, according to a specific structure involving 6 environmental objectives. This particular evaluation was also successfully concluded, with **each Specific Objective of the RP being associated with the declaration of conformity to the DNSH principle**.

Another assessment incorporated into the SEA is that of the risks of interaction with Natura2000 Network sites, which, when affected by specific actions, require an Impact Assessment under European and national regulations. In the case of wide-ranging plans and programmes, with rare and generic localised impacts, it is only possible to determine risk levels of site involvement.

In the present case, this was carried out using a specific qualitative-quantitative methodology, which made it possible to define, on the whole, a **rather low risk of the RP becoming an important**

source of interaction with the Region's **Natura2000 network**. This is mainly related to the substantial absence of heavy infrastructure measures in the RP. Indeed, a large part of the resources concern actions that are unlikely to result in major new land take or other forms of physical interaction with the territory.

Even in a situation where no significant environmental risks are perceived, a monitoring programme is still in place. One of its functions is to define any deviations from forecasts and take appropriate corrective action.

In conclusion, it is **considered that the Friuli Venezia Giulia's ERDF 2021-2027 RP fully pursues, on the whole, the environmental sustainability objectives** by which it is inspired and that, both at a global level and at the level of single specific Objective and action, **it is not a source of significant negative environmental impact**, without prejudice to the compliance with the highlighted conditions, which aim at avoiding, during the implementation phase, the possible occurrence of negative impacts and at enhancing the positive ones.

IL PRESIDENTE

IL SEGRETARIO GENERALE