

Dr. Dräger & Thielmann



**2014-2020 Interregional Cooperation Programme
under the European Territorial Cooperation Objective
(INTERREG EUROPE)**

**Strategic Environmental Assessment
Consultation Report**

for

GEIE GECOTTI

INTERREG IVC

„Les Arcuriales“, Entrée D, 5e étage

45d, rue de Tournai

59000 LILLE - FRANCE

**2014-2020 Interregional Cooperation Programme
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**Strategic Environmental Assessment
Consultation Report**

Prepared by:

Dr. Dräger & Thielmann PartG
Marburger Straße 7
D-60487 Frankfurt am Main
Tel: 069 – 70792026
Mail: stefan.draeger@iesy.net

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INTRODUCTION

Based on the draft operational (dated 20 December 2013), the environmental report was prepared for the **2014-2020 Interregional Cooperation Programme under the European Territorial Cooperation Objective**.

Jointly, the draft programme and the environmental report were subject of the consultation of authorities responsible for environmental protection and of the public consultation, as required in Article 6 of the Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment.

The consultation was conducted in each Member State individually according to the respective national legal requirements.

RESULTS OF THE CONSULTATION

In total, thirty-nine (39) authorities, institutions and private persons responded to the consultation and have submitted comments and suggestions regarding the strategic environmental assessment.

The contributions provided cover a wide range of issues. Quite a considerable number of comments underline statements done in the environmental report. Some highlight particular sectors to which more detailed information should have been given like forests or soil; others refer to aspects which might have been elaborated more clearly in the environmental report.

In the table below all received comments and suggestions and their consideration are listed:

No.	Member States / Authorities	Comments	Remarks
Belgium			
1	TECHNOPOLIS GROUP	While we agree that doing SEA of such non-technical / non -infrastructure programmes is not that straightforward, one would expect to see more precise picture (possibly with qualitative indicators) on the environmental impact. But we guess it all depends on the methodological choice.	---
2	Future of Rural Energy in Europe (FREE) initiative	FREE believes that energy situation in rural areas should be more prominently addressed in the Strategic Environmental Assessment.	The environmental report refers to the INTERREG EUROPE Programme, which does not focus on particular type of areas.
Bulgaria			
3	Executive Forest Agency/Ministry of Agriculture and Food	Missing cross-reference with the EU forest territories covering over 40% of the MS land areas and ongoing process of adoption of the new EU Forest Strategy (COM(2013) 659 final))	Thank you for the hint. The environmental report will be amended accordingly. (see table 1 and table 2 of revised environmental report)

No.	Member States / Authorities	Comments	Remarks
4	Ministry of Environment and Water	<p>Table 3 (page 48 to SEA Report) contains symbols (related to the progress towards meeting environmental targets or objectives), which meaning is not explained. That makes the table not informative.</p> <p>2. To component WATER:</p> <ul style="list-style-type: none"> - To the draft Programme Priority Axis 4: Environment and Resource Efficiency, Investment Priority 6(c): Conserving, protecting, promoting and developing natural and cultural heritage we recommend an addition to the Expected Results: "protection of ecosystems of the surface water" as an element of the investment priority; - To the draft Programme Priority Axis 4: Environment and Resource Efficiency, Investment Priority 6(g): Supporting industrial transition towards a resource-efficient economy, promoting green growth, eco-innovation and environmental performance management in the public and private sectors we recommend including the topics of the economy of water, its circulating use at the manufacturing, introduction of incentives for similar best practices; - Table 1 to SEA Report: <i>Relevant environmental issues, EU environmental objectives and targets, and related indicators – Water</i> – we consider that the findings relates the purposes of The EU Water Framework Directive - (Directive 2000/60/EC) should be re-specified as that its aim is achieving and maintain "good status" by 2015, but according to the reported status of the Europe water at the River Basin Management Plans this aim will not be achieved for some of them, which demands transitional periods till 2021 and 2027 for achieving the aim of the Directive. - Table 2 to SEA Report: <i>Present state of environmental issues in the EU according to defined indicators - Water</i> - 	<p>Table 3 and table 4 of the environmental report are connected; the legend can be found at the end of table 4. Due to copying reasons these tables could not be further treated.</p> <p>This is a matter for the development of the Cooperation Programme.</p> <p>This is a matter for the development of the Cooperation Programme.</p> <p>The year 2015 is set in the indicator; an explanation concerning possible extension and transitional periods will be added to the environmental report in table 1.</p> <p>The indicator of the EEA concerning drinking water will be added to the environmental report in table 1</p>

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		<p>we recommend presenting information on status of the surface and groundwater related to the priority substances and priority hazardous substances and other pollutants, apart from biogenic elements nitrogen and phosphorus. We consider necessary presenting information of the quality status of the drinking water;</p> <p>- To point 4.2 to SEA Report: <i>Existing environmental problems and trends of the environmental development</i> - we recommend clearly distinguishing that achieving good ecological and chemical condition relates to surface water, but good chemical and qualitative condition relates to groundwater.</p> <p>3. To point 6 as RECOMMENDATIONS we propose to be added:</p> <p>- Giving priority to projects, which implementation will result in improvement of the condition of the environments, but also of the human health;</p> <p>- Plans, programmes, projects and investment proposals resulting from the Cooperation Programme INTERREG EUROPE 2014-2020, should be approved only after implementation of the related Environmental Impact Assessment procedures (according to EIA Directive 2011/92/EU)/ecological assessment (according to SEA Directive 2001/42/EU)/ Appropriate Assessment (according to Article 6, Paragraphs 6 (3) to Directive 92/43/EEC) and in conformity with the recommendations, conditions, requirements and measures by the implemented Assessments.</p>	<p>and 2, although it is assessed in 2004 only.</p> <p>We see the point. However the text cites EU environmental objectives "To achieve good ecological and chemical status of water bodies" and "To achieve good quantitative status of water bodies" as stated in table 3 (p. 37) and table 4 (p. 38). See also EEA (2010): The European Environment State and Outlook, Synthesis, p.18</p> <p>We share this perspective. Recommendation 2 (chapter 6, p. 58) and monitoring proposal 1 (chapter 8, p. 60) cover this issue.</p> <p>We share this perspective. In chapter 5.4 of the environmental report it is stated that "certain effects have to be assessed at another level or in the frame of another programme (e.g. regional programmes). This 'tiering' of the assessment is implicit because no direct effects will be realised by the Programme. The closer the programming comes to the end of the impact chain the more crucial and detailed the assessment of the likely significant environmental effects must be." (p. 58) The further assessment (tiering) includes the application of relevant European and/or relevant national assessment procedures.</p>
		<p>Based on the analyses and assessments at SEA report we do not have additional recommendations to the measures</p>	<p>Thank you for this comment.</p>

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		formulated at point 8 on monitoring and control of the impacts on the environment by projects funded by this Programme.	
Czech Republic			
5	Ministry of the Environment, Waste Department	Within the scope of Priority Axis 4 "Environment and effective use of resources", the table "Sustainable consumption and production (resource efficiency)" on page 24 states that landfilling should be virtually eliminated by 2020. With regard to the information indicated in the submitted material, the Waste Department notes that landfilling continues to prevail in the Czech Republic as the most common method of municipal waste management (in 2012 landfilling accounted for 53.64% of waste disposal). The Czech Republic plans to prohibit the landfilling of untreated mixed municipal waste by 2025. Negotiations on the landfill ban, i.e. the exact deadline and specific definition of the waste covered by the end of landfilling, are currently being addressed by a working group convened by the Ministry of the Environment.	In this table the environmental objectives of the EU are listed. In this case it is about a quotation from the "Roadmap to a Resource Efficient Europe (COM(2011) 571)" concerning the vision how waste should be managed in 2020.
6	Czech Environmental Inspectorate	Regarding the declared expected result of the specific objective 3.1, attention needs to be paid to the fact that the production of energy from certain renewable resources can have negative impacts on other areas of the environment. In recent years, more and more conflicts have become apparent between the climate protection objectives and the objectives related to the conservation of natural resources and biodiversity. Support for the production of energy from renewable sources must take into account these conflicts and strike an acceptable balance between these conflicting interests. Although the effects of the programme are very indirect, it would appear that these potential impacts need to be assessed in the initial stage of the impact chain.	We agree with this comment. The conflicts between production of energy from renewable sources and conservation of natural resources and biodiversity is seen and the potential negative impacts of the production of energy from certain renewable resources are mentioned several times (for example see chapters 5.2.2.3, 5.3 or 6 - Recommendation 6). The assessment in the initial phase of the impact chain can be done in a principle manner only because important details of interventions are not known.
7	Orlické Mountains	The draft concept is so general that, in	Thank you for this comment.

No.	Member States / Authorities	Comments	Remarks
	Protected Landscape Area Authority and Hradec Králové Regional Centre	itself, it cannot have a significant negative impact on the environment in the Czech Republic. A large number of meetings are expected that will focus on individual measures, such as site visits, events, seminars, etc., resulting in a large number of official trips that could jeopardise the EU's target to reduce greenhouse gas emissions. Output indicators, such as the number of meetings, events, etc., should be reformulated in order to promote other ways of exchanging information and observations with fewer demands on travel (see the SEA recommendations on page 58).	
8	Orlické Mountains Protected Landscape Area Authority and Hradec Králové Regional Centre	<p>Regarding the support of projects under Priority Axis 3 (Low-carbon economy), we draw attention to the highly probable negative environmental impact due to the fact that an increasing in the share of renewable energy in the total energy mix, created by supporting and facilitating the production and distribution of renewable energy sources, will have a negative impact on other areas of the environment. For example:</p> <p>Wind farms can have a negative impact on the lives of birds, bats and other mammals, and will have a negative impact on the appearance of the Czech landscape.</p> <p>The cultivation of crops from which biomass is extracted could contribute to the further expansion of single-crop farming, with negative impacts on the environment, i.e. on the landscape, water, and biodiversity, not only in this country, but also in Europe and other regions of the world, due to possible imports of biomass. Biodiversity is reduced in particular by the conversion of meadows and pastures into land for the production of biomass.</p> <p>The construction of hydropower plants could have a negative impact on water-courses and aquatic habitats, and could also have a negative impact on the fish population if technical measures to eliminate these negative impacts are</p>	<p>Thank you, we agree with this comment.</p> <p>The conflicts between production of energy from renewable sources and conservation of natural resources and biodiversity is seen and the potential negative impacts of the production of energy from certain renewable re-sources are mentioned several times (for example see chapters 5.2.2.3, 5.3 or 6 (Recommendation 6)). The assessment in the initial phase of the impact chain can be done in a principle manner only because important details of interventions are not known.</p> <p>Referring "solar power plants in the open countryside" the report will be complemented. (see chapters 5.2.2.3 of revised environmental report)</p>

No.	Member States / Authorities	Comments	Remarks
		<p>not taken.</p> <p>The building of solar power plants in the open countryside could also have a negative impact on the landscape of the Czech Republic, so it is recommended that they be placed in brownfield sites or on the roofs of existing buildings.</p>	
9	Orlické Mountains Protected Landscape Area Authority and Hradec Králové Regional Centre	<p>In relation to other strategic concepts of the Czech Republic for the next programming period (2014–2020), the following requirements exist within the scope of the evaluation of the draft concept:</p> <p>Assess the degree of influence of Priority Axis 3 (Low-carbon economy) on the restoration and conservation of natural, historical, cultural and aesthetic values in the landscape (the appearance of the landscape, significant landscape features, natural parks), and on natural communities with potential negative effects on biodiversity.</p> <p>In tenders for projects aimed at promoting energy production from renewable sources, there should be greater consideration for the potential impacts on biodiversity, the landscape and water; in this regard, establish criteria for the selection of the projects to be supported.</p> <p>Take into account the negative impacts of the draft concept regarding the promotion of specific renewable energy sources, e.g. wind power plants, hydroelectric power stations and power plants using biomass, as described above. Where projects involve, among other things, the growing of crops for biomass or other large-scale projects related to land use, lay down conditions for the elimination of accelerated runoff from the land, reducing the required small water cycle and strengthening the incidence rate of droughts in certain regions, and in this regard establish criteria for the selection of the projects to be supported.</p> <p>The draft concept of the OP INTERREG</p>	Thank you, we agree with this comment.

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		<p>will not have a direct negative impact on the protection of nature and the landscape in the Orlické Mountains Protected Landscape Area.</p> <p>Broumov Protected Landscape Area Authority – the implementation of projects to promote specific renewable energy, e.g. wind power plants, hydroelectric power stations and power plants using biomass, even if primarily based on the principle of sustainable development, could actually have adverse local and regional impacts on ecosystems or individual species of plants and animals, whether direct or indirect, as highlighted in the SEA assessment. Such impacts could be generally predictable by the type of plan on the one hand, but on the other hand they may not become apparent until a specific situation arises at the point of implementation. These potential risks should not be underestimated – individual projects will have to be examined closely. In border areas, of which the Broumov Protected Landscape Area is one, certain projects implemented in the territory of a neighbouring country could also have a significant impact.</p>	
Cyprus			
10	FEDERATION OF ENVIRONMENTAL ORGANIZATIONS OF CYPRUS (NGOS)	<p>The suggestions and recommendations written in the Environmental Report need to be taken under consideration. There are significant proposals which need to be adopted in the programme especially regarding the allocation of money in thematic priorities, the preferable renewable energy sources for the biodiversity protection and the transportation required for the audits by EU and the several partners in project level in order to reduce the air pollution.</p>	Thank you for this comment.
11	Department of Environment	<p>Although the Environmental Report assesses and focuses on environmental issues (PA3- low-carbon economy and PA4-environment and resource efficiency), the following issues are not well</p>	<p>a) Due to the general character of the programme no reasonable alternative is seen; this suggestion was confirmed by the scoping.</p> <p>b) The programme itself focuses on</p>

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		<p>analysed:</p> <p>(a) except the zero alternative, no alternative is defined and assessed.</p> <p>(b) only indirect effects were assessed, this is mainly due to the soft measures provided under the Programme.</p> <p>(c) the environmental impacts of the linkages between the Priority Axes (PA1-innovation and PA2-SMEs) with the environmental ones (PA3 and PA4).</p> <p>(d) the minimization of the number of meetings, visits and events, that aim to reduce the emissions of greenhouse gases from travelling, is not quantified, at the extent possible.</p>	<p>ex-change and sharing of experiences and policy learning. Pilot actions could be supported by the programme. According to INTER-REG EUROPE, the pilot actions will cover the testing of tools, practices, methodologies and similar “soft” measures only (see environmental re-port, chapter 5.2.1). Significant direct effects (except those caused by meetings, visits, events) are not to be expected.</p> <p>c) The importance of linkages between the Priority Axes 1 and 2 with Priority Axes 3 and 4 is described in chapter 5.2.1 and 5.3. Detailed environmental impacts cannot be identified because of the general character of the programme. However, the potential to increase positive effects (and mitigate negative effects) by linking the priority axes should be highlighted as done in the report.</p> <p>d) ---</p>
Finland			
12	Regional Council of Central Finland	It is good, that in the environmental report the novel technologies and the utilization of them, e.g. video negotiations, has been taken into consideration. These technologies enable the e.g. project management to operate without travelling. However, if the focus is on learning from each other’s, the face-to-face meetings cannot be ignored.	Face-to-face meetings are also seen as important, but it is also necessary to consider environmental effects of travelling.
France			
13	Euromontana	There is recognition of the importance of the sustainable development horizontal theme and the recommendation to use this as a weight in particular actions is welcomed. However, the assertion that the environmental impacts of the programme will be, “highly indirect” may not be the case in remote, peripheral areas, where actions under specific objectives could have significant environmental impacts.	The programme itself focuses on exchange and sharing of experiences and policy learning. Pilot actions could be supported by the programme. According to INTER-REG EUROPE, the pilot actions will cover the testing of tools, practices, methodologies and similar “soft” measures only (see environmental report, chapter 5.2.1).

No.	Member States / Authorities	Comments	Remarks
14	POLITICAL SCIENCE INSTITUTE GRENOBLE	EACH COUNTRY HAS ITS OWN WAY TO DEAL WITH ENVIRONMENTAL POLICY. WE CAN CONSIDER THAT THE FRENCH SYSTEM IS MOST OF THE TIME REALLY DIFFERENT THAN THE EUROPEAN MODEL. DEALING WITH A STRATGIC ASSESSEMENT WITH UNCLEAR NATIONAL AND REGIONAL POLICIES IS JUST IMPOSSIBLE.	---
15	CHAMBRE DE COMMERCE & D'INDUSTRIE MARSEILLE PROVENCE	1/ Enterprises are a vector of the ecological transformation of the EU, 2/ Most polluting enterprises have little environmental expertise, 3/ Mentioned enterprises require support in environmental expertise, 4/ VMEs & SMEs should, where relevant, adopt a shared approach in their environmental performances, both in terms of competence and tools.	We share this view; therefore we recommend the consideration of the EU instrument "Eco-Management and Audit Scheme (EMAS)". (see environmental report, chapter6, Recommendation 5).
16	Ville de Reims	The purpose of the Report is unclear, and seems far from the challenges local and regional authorities are facing when they participate in one Interreg project. I fear it will add another official document, whose impact on the efficiency of the project, and more generally on the environment, is not certain...	---
Germany			
17	IdE Institut dezentrale Energietechnologien GmbH	Advantages of renewable energies and a shift towards them is not made clear and even partly doubted	Advantages of renewable energies for climate protection are highlighted in all chapters with relevant specific objectives. However, potential conflicts between climate protection objectives and objectives for protection of natural resources and biodiversity have to be mentioned. The environmental report has to consider all possible negative impacts on the environment.
18	Technologiepark Hei- delberg GmbH	The description of the separate environmental report is not easily understandable.	---
Greece			
19	Managing Authority of Rural Development	Taking into account the environmental performance (regionally) and our comments/ remarks / corrections (before)	Thank you for this comment.

No.	Member States / Authorities	Comments	Remarks
	Plan	concerning the INTERREG EUROPE programme draft report, we fully agree.	
20	The Athens Chamber of Small-Medium Industries	Not very coherent!	---
Hungary			
21	National Institute of Environmental Health (NIEH)	<p>The Environmental Report -analysing Europe's existent environmental problems and challenges- calls for attention in regard of soil in the chapter "Situation of Environment and Existent Environmental Problems" (Env. Rep./ page 6). It states that soil erosion is originated from inappropriate cultivation.</p> <p>In my opinion the environmental risk of anthropogenic impacts on soils is much more complex in Europe. Soil is a multifunctional system. It can be exposed to direct and indirect physical, chemical and biological degradation and it is waste recipient environment as well. It has direct connection with surface and ground watersheds. These environments' pollution could directly impact soils and vice-versa.</p> <p>I consider more complex approach of the environmental pollutant risks related to Europe's soils, and I also consider expanding the present description.</p> <p>I agree with the Environmental Report's conclusion - from a health care view point - that states the need of detailed monitoring including environmental elements before each goal launched in the frames of INTERREG EUROPE Programme. I agree with the Environmental Report's conclusion because its goals could have direct and long-term impacts to the environmental elements. Nevertheless such developments in the programme without any previous impact studies and well-planned decisions could mean serious human and environmental health care risk.</p>	<p>We share the view, that soil is an important, complex and multifunctional system; the environmental report will be amended accordingly. (See chapter 4.2, subchapter "soil" of the revised environmental report)</p>
22	Móricz Ádám területi elemző-tervező referens/regional plan-	It was proofed by several domestic examples that vast investments related to space reservation in Hungary are	We agree with this view; see environmental report chapter 4.2, "Landscape" and Soil".

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	<p>ner-analyst</p> <p>Nemzetgazdasági Minisztérium / Ministry for National Economy</p> <p>Területfejlesztési Tervezési Főosztály / Department of Territorial Development Planning</p>	<p>realized by reserving agricultural lands. It decreases the area of Hungary's agricultural lands that are important natural resources of the country. Meanwhile there are large-scale lands out of use and under-utilized (brown field) areas.</p> <p>We might highlight the need of focusing on brown field investments instead of green field investments in the case of economy development processes and to strengthen positive effects related to agricultural lands.</p> <p>The environmental assessment primarily mentions the forests in the presentation of elements of existing EU strategies and relevant documents but the large scope of the environmental assessment does not allow forest and forestry-related specified problems to appear in the document. Especially, it is true in the case of forest protection that brings the accomplishment of the environmental assessment in focus.</p> <p>The paragraph referring to the fragmentation of ecosystems on page 38 is basically acceptable. We do not find that any further clarification of the text would be necessary because it is part of the SEBI report. We only highlight that temporary clear-cut areas are normal and inherent phenomenon of forestry and in many cases there are positive effects in the composition and properties of forests as they improve biodiversity by giving room for such rare species whose habitats depend rather on sunlight than shade.</p> <p>The statement on page 45 about deforestation as one of the most principle source of greenhouse effect is correct indeed in a global viewpoint. It is regrettable that this chapter does not contain an outlook over Europe, where increasing forest-cover and consequently significantly increasing carbon storage takes place. It would be required to build it into the environmental assessment.</p>	<p>We agree with this view. Due to the highly abstract character of the programme recommendations concerning land can be made on a more concrete level of planning (tiering).</p> <p>Aspects of forests will be amended in the environmental report. (see table 1 and table 2 of the revised environmental report)</p> <p>---</p> <p>The term "deforestation" in chapter 4.2 (sub-chapter "Global Climate") means the global perspective. Aspects of forests will be amended in the environmental report. (see table 1 and table 2 of the revised environmental report).</p> <p>Negative impacts of Climate Change on ecosystems are mentioned in the report. Ecosystems include also forests (see environmental report chapter 4.2, sub-chapter "Global Climate").</p>

No.	Member States / Authorities	Comments	Remarks
		According to our present knowledge, climate change is predicted to be disadvantageous to the stability and health of forest ecosystems in Europe's southern and central regions. It would be necessary to mention it in the predictions.	
Italy			
23	City of Terni	Programmes as Interreg remain vague especially at local scale.	---
Latvia			
24	Ilga Gruševa Ministry of Environmental Protection and Regional Development of the Republic of Latvia	<p>1. Section 8 "Proposed monitoring measures" (page 61) - Environmental State Bureau recommends to indicate whether/the Programme provides support for the development of the regional development documents, which also includes exchange of experience, without intention to provide specific financial support to the activities referred in the Annexes of European Parliament and Council Directive 2011/92/EU (13th December 2011) on the assessment of the effects of certain public and private projects on the environment. Thus Strategic Environmental Assessment and the monitoring should be carried in the appropriate level of detail to another level of planning documents or regional programmes.</p> <p>2. As there is a large share of small and medium enterprises in Latvia, while improving the competitiveness of small and medium enterprises, the compliance of their activity with requirements of environmental protection should not be forgotten, balancing them with sustainable development and economical aspects, highlighting and analysing the impact of the companies on the special nature areas of conservation. Within frameworks of the Programme's priority axes PA1 "strengthening research, technological development and innovation" and priority axes PA2 "enhancing the competitiveness of SME's" orientation of supported activities to the environmental protection and sustainable development should be strictly deter-</p>	<p>1. We agree that the assessment of direct environmental effects as well as monitoring should be carried out on the appropriate level.</p> <p>2. We share this view. Recommendations 1 and 2 (chapter 6 of environmental report) explicitly ask for the consideration of principles of sustainable development in Priority Axes 1 and 2. In recommendation 5 explicitly for therefore we recommend the consideration of the EU instrument "Eco-Management and Audit Scheme (EMAS)" is stated.</p>

No.	Member States / Authorities	Comments	Remarks
		mined.	
Malta			
25	Kevin Gatt Managing Consultant Management Efficiency Unit Chairperson SEA Focal Point	<p>The Designated Authority notes that the Interreg Europe Programme is a high strategic level document. Due to its scope and nature, the resulting environmental impacts are likely to be indirect and depend mainly on the focus, purpose and nature of the proposals coming forward at a later stage and how these proposals are taken forward in subsequent plan-level and project-level decisions. However, despite its high strategic level, the Designated Authority considers that the Environmental Report has made important conclusions and recommendations. In particular, it shares the same opinion on the following issues:</p> <p>1) The programme needs to improve integration between all specific objectives to ensure that proposals which are promoted, directly or indirectly, as a result of the Interreg Programme, do not have adverse impacts on the environmental Investment Priorities of the same programme, such as Priority 6(c) regarding the conservation and protection of natural and cultural heritage, and other EU environmental objectives.</p> <p>2) Although Specific Objective 3.1 (Low-carbon economy) is expected to have positive indirect impacts on the environment, e.g. less generation of GHG emissions and reduction of air pollution, caution is required due to the likely negative impacts that particular renewable energy sources could have on environmental resources (e.g. biodiversity, landscape and water). Examples include potential impacts of windfarms on the landscape and wildlife (e.g. birds) and impacts of PV farms on land use and the landscape.</p> <p>3) Further to the above, environmental resources and objectives need to be mainstreamed (i) across all priority areas, and (ii) at all stages of the Inter-</p>	Thank you for this comment.

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		<p>reg Programme, including the process for selecting eligible proposals, implementation of pilot projects and integration of the learning outcomes of Interreg projects into lower-tier plans and projects. The Environmental Report notes that "Whether the effects and contributions will be finally realised depends on decisions and influences outside INTERREG EUROPE. The Programme provides mechanisms and information which, as described above, create opportunities to realise positive effects and contributions. Some counts for the question if certain effects have to be assessed at another level or in the frame of another programme (e.g. regional programmes). This 'tiering' of the assessment is implicit because no direct effects will be realised by the Programme. The closer the programming comes to the end of the impact chain the more crucial and detailed the assessment of the likely significant environmental effects must be."</p> <p>Therefore, the Designated Authority notes the conclusions in the Environmental Report for the Interreg Europe Programme 2014 - 2020 and considers that the SEA recommendations should be taken into account in the following stages of the programme and its implementation.</p>	
Netherlands			
26	Landschapsbeheer Nederland	Description of relevant stakeholders, regional actors is useful. E.g. the role of local landowners related to authorities is missed as well as the importance of civilians and public. Not in a mandatory way, but they are of vital importance for sustainably growth.	----
27	MOVARES	The focus on carbon emissions is logical, but based on the reduction of a symptom instead of facing the primary problem. The primary problem is the use of energy (electric, oil, etc) The program should not focus of the reduction of emissions but on the reduction of the	Energy efficiency is an integrated part of the programme (see Investment Priority 4(e), Specific Objective 3.1)

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		use of energy in general. Fix the problem at the front of the chain, not at the back.	
28	Delft University of Technology	Environmental Assessment on the level of a programme like this does not mean a lot while nearly all environmental impacts are related to the projects and activities supported by the programme.	Thank you for this comment.
Poland			
29	Anonymous*	<i>translated from Polish using Google:</i> We would like to turn your attention that disclosure of the contents of the report only in English as well as identify opportunities to submit comments in English is significantly restricts the opportunity for consultation for potentially interested persons, and thus violates the provisions of the Aarhus Convention and the SEA Directive. In any of the above. Document does not have entered the English language requirement to participate in the public consultation :). I recall that the (google-translator) Convention requires you to enable zainteresowanu the public to participate in the preparation of a document within a reasonable time - in Poland min. 21 days. I also recall that English is the working language of the EU, and not official.	According to the information provided by the Ministry of Infrastructure and Development of Poland, there was the possibility of commenting the programme draft and the SEA report in Polish between 31 January and 7 March 2014. Polish versions of documents and the questionnaire were published on the ministerial website.—
30	General Directorate for Environmental Protection	Positive opinion regarding the SEA.	Thank you for this comment.
Slovak Republic			
31	Ministry of Environment of the Slovak Republic, Climate Department	In all documents the term “mitigation relevant adaptation measures” does not make sense to us. There are separate mitigation and separate adaptation measures. Therefore, we propose examining whether the given text is correct, or it should be revised as follows: “mitigation or relevant adaptation measures”.	We agree with this view on the term “mitigation relevant adaptation measures”. However, it is prescribed in the ERDF regulation (Investment Priority 4(e), Art. 5) and the consideration of this investment priority in the programme was agreed by INTERREG EUROPE Member States.
Spain			
32	Girona City Council	With regards to Priority Axis 4 / Investment Priority 6 (c) /Specific Objective 4.1./ Expected results (pg.11 -or pg. 22	Thank you for this comment.

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No.	Member States / Authorities	Comments	Remarks
		of the pdf archive-), last paragraph: This comment is just to stress on the great importance of improving capacities and implementing lessons learnt.	
33	EREN	The negative affection derived by renewable energies that is mention in point 5.2.2.3 could go against the growth and job for a low carbon economy itself	The environmental report has to consider all possible negative impacts on the environment.
Sweden			
34	WINNET SWEDEN – EUROPE	Add Gender equality which is needed, how to include GE in environment issues	Gender is not a topic of the environmental report.
Switzerland			
35	REGIO BASILIENSIS	Gobal aspects are missing	As described in chapter 1.3 (p. 3) of the environmental report, the main focus of the assessment was the European Union; the global character of the environmental issue “Global Climate” and of “Resource Efficiency” was stated.
United Kingdom			
36	University of Ulster Centre for Sustainable Technologies	A very useful document giving an overview of progress to date concerning meeting environmental targets.	Thank you for this comment.
Various Member States			
37	WWF Germany WWF Germany but acting for WWF in Europe	SEA should provide more and better proposals how the horizontal principles could be addressed across all thematic objectives	Thank you for this comment. Recommendations 1 and 2 explicitly deal with this concern. More detailed criteria should be stipulated in the project application manuals of the INTERREG EUROPE as stated in chapter 8 - Proposed monitoring measures, point 1.
38	BIO-EN-AREA Network various EU MS	The negative affection derived by biomass that is mention in point 5.2.2.3 could go against the growth and jobs for a low carbon economy itself.	The environmental report has to consider all possible positive and negative impacts on the environment.
39	RENREN Network	The negative affection derived by renewable energies that is mention in point 5.2.2.3 could go against the growth and Job for a Low carbon economy itself.	The environmental report has to consider all possible positive and negative impacts on the environment.