Ex-ante Evaluation of the

Cooperation Programme INTERREG VB North-West Europe 2014 - 2020

Strategic Environmental Assessment

Consultation Report

for

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Cooperation Programme INTERREG VB North-West Europe 2014 - 2020

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INTRODUCTION

Based on the draft operational (dated 4 March 2014), the environmental report was prepared for the **Cooperation Programme INTERREG VB North-West Europe 2014 - 2020**.

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, one hundred and twenty (120) authorities, institutions and private persons responded to the consultation and have submitted comments and suggestions regarding the strategic environmental assessment.

Most of the responses submitted provide yes or no-answers to the following questions:

Do you think the environmental report is clear?	Yes: 113 / No: 7	(n = 120)
Do you think the environmental report is complete?	Yes: 110 / No: 10	(n = 120)
Do you have any objections to the environmental report?	Yes: 13 / No: 96	(n = 109)

Received comments and suggestions qualifying submitted yes- or no-answers are listed below; remarks concerning their consideration are added:

No.	Member States / Authorities	Comments	Remarks
Belgium			
1	OVAM Flanders Waste Agency; Regional Government	It is unclear if e.g. under low carbon technologies it is still possible to (co)invest in old technologies, e.g. gas or coal. Which would be investing in the past, not the future.	According to Europe 2020 and European climate protection policy, low carbon technologies refer to the promotion of renewable energy sources and energy efficiency.
2	Provincie Vlaams-Brabant; Regional Government	Recommendation 1 goes too far. Projects under priority 1 should not necessarily all respond to the environmental challenges in the NWE area. However, the formulation that projects "do not conflict with the principles of sustainable development" should be complemented. Projects that contribute to the transition towards a green economy, could receive a bonus in the evalua-	In our opinion, proposed recommendation 1 is useful to anchor the consideration of environmental aspects in project applications. However, it is the task of the programme developers to consider this recommendation or to follow other proposals to promote environmental protection in project proposals (e.g. via bonus).

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		tion procedure. Recommendation 7 should only apply to the assessment and selection of RELEVANT project applications.	Recommendation 7 will be adjusted accordantly (see p. VI and p. 69).
France			
3	Communauté d'agglomération Orléans val de Loire; local administration	Il met l'accent sur des concepts tels "renouvelable" et "circulaire". Il devrait également inclure les concepts tels que la production forte intensité énergétique ou "intense ressources" *It focuses on concepts such as "renewable" and "circular". It should also include concepts such as energy-intensive production or "resource intensive".*	Energy- and resource-intensive production can also benefit from promotion of new technologies, services, products and processes to improve energy and resource efficiency. (see Priorities 2 und 3)
4	CCI CHER; local administration	Contestation n'est pas vraiment le cas. A mon sens, il n'apparait suffisamment clairement si les critères d'évaluation par priorité sont indépendants, c'est a dire que chaque projet sera évalué strictement par rapport au critères de la priorité candidatée. *Questioning is not really the case. In my view, it does not appear sufficiently clear whether the evaluation criteria per priority are independent that is to say that each project will be evaluated strictly in relation to the criteria of the targeted priority.*	The issue mentioned tackles an important aspect for the future applicants. It should be further clarified in the application guidelines.
5	Conseil Régional Nord-Pas de Calais; regional administration	Il peut être difficile de fixer en amont des objectifs précis ou encore des objectifs chiffrés comme les effets à prévoir sur l'environnement. Lorsque l'on démarre un projet, il s'agit avant tout de la transcription d'une vision prospective dont les effets sont souhaités mais qui peuvent différés à l'issue du projet. Il conviendrait de distinguer les effets réels attendus et les effets réels atteints en fin de projet. Questions :SO3 : >>Certaines technologies permettent de réduire les GES mais ne sont toutefois pas elle-même à	The issue mentioned tackles an important aspect for the future applicants. It should be further clarified in the application guidelines.

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		faible émission en carbone. P2 - P3 P2 : à quel titre l'accompagnement du changement dans les usages pourra être éligible ? SO2, au titre de stratégies de réduction du carbone ? ou S03 au regard de l'adoption de technologies ? Est-ce que le financement d'équipements sera limité par type de projet ? cf. utilisation de la biomasse *It can be difficult to set specific objectives upstream or quantified objectives such as expected effects on the environment. When a project is started, it is primarily the transcription of a prospective vision whose effects are desired but which may be delayed at the completion of the project. It should be distinguished between real expected effects and actually achieved effects at the end of the project. Questions: SO3: >> Some technologies reduce GHGs but are, however, not themselves of low-carbon emission. P2 - P3 P2: to which extent the accompanying change in practice may be eligible? SO2, under carbon reduction strategies? Or S03 in terms of technology adoption?* *Is a financing of equipment limited by the type of project? cf. use of biomass*	
6	SMEDAR; local administration	particulièrement sur la pollution, pourquoi axer uniquement sur les GES ... *particularly on pollution, why focus only on GHG ...* Ce rapport amène clairement à imposer l'innovation en axe prioritaire, il y a déjà le programme HORIZON 2020, LIFE, COSME. Pourquoi ne pas proposer des axes complémentaires? *This report clearly suggests imposing*	We agree that the reduction of GHG is not a specific measure to reduce air pollution in general. However the reduction of GHG can as a side-effect help to reduce air pollution, for example in case of traffic reduction. GHG reduction is the topic the programme focuses on. It was the decision of the Member States to define the priority axes as they are presented in the Cooperation Programme.

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		innovation as a priority axis, there are already the programmes HORIZON 2020, LIFE, COSME. Why not propose complementary axes?	
7	CRESS chambre régionale de l'économie sociale et solidaire	Dans le chapitre relatif au niveau stratégique (page IV) et dans le chapitre "recommandations (page VI) , nous souhaiterions que soit mis en exergue l'innovation sociale et les démarches participatives et qu'au delà d'une économie verte, soit décliné l'enjeu d'un objet supplémentaire : l'inclusion afin de converger vers l'objectif de cohésion sociale. *In the chapter on the strategic level (page IV) and in the chapter "recommendations (page VI), we would like that social innovation and participatory approaches and a view beyond a green economy are highlighted, meaning that the challenge of an additional object is refused: inclusion in order to converge towards the goal of social cohesion.*	The assessment of the topics social innovations and participation considering the goal of social cohesion) is not an issue of the strategic environmental assessment. It is part of the general ex-ante evaluation of the program.
Germany			
8	Emschergenossenschaft; public water board	Diese Art der Analyse bewegt sich notwendigerweise auf einem sehr abstrakten Niveau und kann vielen nationalen oder regionalen Bedürfnissen nicht gerecht werden. Es erfordert vom Leser eine hohe Kompetenz in der Kenntnis der vorangegangenen Programmentwicklung und Bereitschaft, sich mit der Materie förderobjektspezifisch auseinanderzusetzen. Die Aussage "Vor dem Hintergrund der Größe des Programmraums, haben der (finanziellen) Umfang des Programms und die vorgeschlagenen Aktivitätsarten, kurzfristig keine umfassenden, wesentlichen direkten Auswirkungen auf die Umwelt" ist demotivierend, wenn man sich konkrete Erfolge vergangener Interreg-Programme vergegenwärtigt (mit sehr wohl konkreten	Thank you for the comment. The mentioned statement in the environmental report refers to effects on the entire programme area. By individual projects, direct effects on particular sub-areas can be generated definitely. These potential effects have to be assessed at project level (→ tiering).

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		Auswirkungen, z.B. bei der Schaffung von Hochwasserschutzräumen am Rhein etc.). Auch die Betrachtung von Umweltaspekten in der "dienenden Funktion" wird hier eher unterstützt. *Necessarily this kind of analysis is linked to a very abstract level and cannot refer to many particular national and regional needs. An extensive knowledge of the preceding program development is required by the reader and the willingness to deal with the topic in a particular manner of supported projects. The statement "the (financial) extent of the Programme and the proposed Types of Actions do not allow, considering the spatial coverage of the programme, widespread significant direct effects on the environment in the short run" is demotivating in the light of the concrete successes of previous Interreg programs (with concrete effects in fact, e.g. the establishment of flood prevention areas along the river Rhine, etc.).* *Also the consideration of environmental issues as "serving functions" is rather underestimated in this context.*	
		Aus Nordrhein-Westfalen kenne ich die strategische Umweltprüfung für die EFRE-Programme in sehr viel ausführlicherer Form, die auch konkretere inhaltliche Orientierung ermöglichen. *As for North Rhine-Westphalia I know the strategic environmental assessment for the ERDF programs in a much more extended form allowing more concrete orientation regarding the contents.*	We agree with this statement; regional programs are more detailed and focused and therefore can be assessed more concrete.
		Die Empfehlung "Für Umwelt- und Naturschutz zuständige wichtige nationale oder regionale Behörden sollten in die Beurteilung und	The recommendation aims on the assessment of project proposals according their potential effects on the environment. It seems neces-

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		Auswahl von Projektanträgen einbezogen werden" halte ich für gefährlich: Ich kenne aus Diskussionen mit anderen Bundesländern die dortige Einstellung einiger Ministerien, dass nur "von oben" gewünschte Inhalte überhaupt in Interreg-Anträge dürfen. Damit wird NGOs die Möglichkeit genommen, sich in politisch unbequemen Projekten zu engagieren! *I consider the recommendation "Relevant national or regional authorities responsible for environmental and nature protection should be involved in the assessment and selection of project applications" as risky: I know by discussions with other German federal states the attitude of several ministries that only contents may be considered in Interreg applications desired from above. By this, NGOs is taken the opportunity to engage in politically uncomfortable projects!*	sary to include "environmental competence" in the assessment procedure. However, the risk of political influences in the selection of projects to the detriment of NGOs exists but should be as possible suspended by mechanisms provided in the application guidelines.
Luxembourg			
9	Conseil Régional de Lorraine; regional administration	Certaines formulations sont vagues et n'ont pas de sens. Même en relisant plusieurs fois, on a l'impression d'être noyé dans un verbiage infini: une lecture repétitive et laborieuse. Un lecteur doté de facultés mentales 'normales' ne doit pas avoir à relire x fois un paragraphe avant d'en voir/ cerner le sens. D'autant qu'il s'agit d'une partie de l'évaluation ex-ante. Document que 'tout à chacun' peut consulter. Théoriquement. exemple :"l'évaluation des effets cumulatifs et synergiques ne peut être réalisée que de manière abstraite" (page V) ?! *Some formulations are vague and meaningless. Even rereading several times, it seems to be embedded in an infinite verbiage: repetitive and laborious reading.*	Thank you for your comment. Due to the fact that no details of supported projects are known yet (spatial conditions, range of interventions, volume, etc.), environmental effects can be assessed by describing their principle potential. In case of cumulative and synergetic effects, statements on potential effects are even more based on general considerations of interrelations only without referring to concrete conditions of the interventions.

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		A reader with "normal" mental faculties should not have to reread a paragraph x times before seeing / understanding the meaning. All the more so since it is a part of the ex-ante evaluation. A document that ' everyone' can see. Theoretically. example: "the assessment of cumulative and synergetic effects can be achieved only in an abstract manner" (page V)?	
10	Ministry for Sustainable development and Infrastructure; Environmental department	The environmental report shows a clear structure, a consistent argumentation and transparent explanations of facts and proposals. The environmental report contains all points, which are required according to Luxembourg legislation. The conclusions of the environmental report are explained in a comprehensible way. The recommendations from the Strategic Environmental Report should be considered and be included when finalizing the Cooperation Programme document, with a special Focus of the recommendations 1, 3, and 5 of page 68 of the report. It is regrettable that the programme does not address the issue of Biodiversity and of the NATURA 2000 network. There are many challenges in those fields, as is illustrated also in the environmental report, and transnational cooperation can give important impulses.	It was the decision of the Member States to not concentrate on the issues biodiversity and NATURA 2000 network.
11	Water administration, Luxembourg	Special attention on the potential negative effects of measures taken for renewable energy, namely the production of hydroelectricity. Modifications of the structure of waterbodies can have negative effects on the ecosystem especially with regards to the free circulation of fish and other aquatic organisms thus conflicting with the EU Water Framework Directive 2000/60/EC). It is welcome, that this point has	Thank you for your comment.

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		been taken on board in the environmental report. The objective of good status of all European surface and groundwater-bodies in river basins by 2015 is taken into account. Nonetheless, if for reasons well explained, this is not possible, for exceptional cases, the objective is to have a good status by the end of 2027.	The statement in the environmental report (table 2, p. 12f) presents the formulated respective objective of the EU, provided in the EU Water Framework Directive - integrated river basin management for Europe (Directive 2000/60/EC) as well in the Roadmap to resource efficient Europe (COM(2011) 571). The possible extension of the period, as stated in the 'Common Implementation Strategy for the Water Framework Directive (2000/60/EC) (= Guidance Document No. 20 - Guidance Document on Exemptions to the Environmental Objectives)', has to be seen separately.
12	Ministry for Culture, "Service des Sites et monuments", Centre National de la Recherche Archéologique	For the environmental issue "Material Assets, Cultural Heritage including Architectural and Archeological Heritage" it is proposed to add as reference for the objectives and targets the Convention of Granada from 3rd October 1985, Art. 1 and 3 (Convention for the Protection of the Architectural Heritage). With regard to possible impacts it should be mentioned, that for Investment Priority 2 "Low Carbon" possible conflicts with regard to cultural heritage can occur, for example due to external insulation measures, which are taken for housing, in order to increases energy efficiency. The protection and preservation of archaeological heritage is a relevant environmental issue. The expected results of the programme are an improved implementation of regional development policies and programmes, in order to support regional actors in protecting cultural heritage and preventing its loss and degradation. As details of the individual funded projects are not known, only general comments can	Concerning the issue "Material Assets, Cultural Heritage including Architectural and Archeological Heritage" the "European Convention on the Protection of the Archaeological Heritage (Revised) Valetta, 16.I.1992" was considered. Thank you for the hint. The environ-mental report will be amended accordantly. (see chapter 5.3.2 Page 50 and 51, chapter 5.4 page 63) We agree with this comment. Possible effects on the cultural heritage should be assessed on project level (tiering). Recommendation 7 of the environmental report states: "7.Relevant national or regional authorities responsible for environmental and nature protection should be involved in the assessment and selection of relevant

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		be made on negative effects. All projects including new constructions may potentially have direct negative effects on archaeological heritage as they may require the excavation and removal of archaeological sites. This concerns power plants (wind, hydro, biomass, large solar plants on green fields and distribution networks) as well as all other new constructions, for example those related to the improvement of SMEs, new transportation facilities such as ports or other infrastructure-related constructions. The actual impact on the archaeological heritage however can only be assessed for each individual project. Archaeological sites are a part of the European cultural heritage, which represents the common history of all European member states. The study and understanding of ancient societies show that modern European countries share the same past which binds them together across recent national borders. The preservation of archaeological sites is the principle basis to the understanding of the shared European past and a sustainable management of this cultural resource is therefore crucial. European countries are faced to the same issues: the economic development of the regions and the growth of population cause increasing land consumption particularly in old cultural landscapes. This threatens the existence of archaeological sites, potentially menaced by all development measures including ground penetration, such as construction activities and infrastructure projects. Therefore, a balance between the regional development and the conservation and protection of cultural heritage is necessary. An early inclusion of the national or regional actors (in Luxembourg the *Centre national de recherche archéologique*) in the planning proc-	project applications”, which includes also cultural heritage.

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		ess of all construction projects is important for the regional development. Archaeological sites can be conserved and protected by finding a heritage compatible solution or can otherwise be excavated and removed without inferring with the project's deadlines. The implementation of archaeologists in the planning process at a very early planning state is thus a win-win situation both for cultural heritage and economic development. These objectives have led to the establishment of administrative procedures ensuring the early implementation of regional authorities in the planning process such as the *archéologie préventive* in France and the *Bodendenkmalpflege* in Germany. These are outcomes of the transformation of the *European convention on the protection of the Archaeological Heritage* (signed in La Valetta in 1992) into national law. It stipulates in its article 5, that archaeologists should participate in "*planning policies designed to ensure well-balanced strategies for the protection, conservation and enhancement of sites of archaeological interest*". Plus, the conservation and protection of cultural heritage have been integrated in many parts of the legislation of European countries such as the European Council directive on the *Environmental Impact Assessment*. Nevertheless, the national transposition of these European agreements concerning the implementation of archaeological heritage in planning policies is different in the EU member states. As the issues and the scientific techniques are comparable (e.g. inventory of known sites, measures of protection, detection of unknown archaeological sites) an exchange of experiences is important for public bodies dealing with the management of cultural heritage. They can get to know the lessons learnt by partner authorities	

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		during exchange visits as foreseen by the INTERREG programme and then be stimulated to implement these experiences into their own practices. This will lead to a significant improvement of the performance of all European actors in archaeology. As the EU does not have a decision making power in the cultural heritage policy, it is important to bring national and regional European actors together and to improve their scientific and administrative exchange. This enables these actors to refine their competency in advising their regional decision makers in the field of the conservation and protection of cultural heritage on a European level. This can be considered as a contribution in order to achieve the overall aim of the cohesion policy to reduce existing disparities between EU member states.	
The Netherlands			
13	MOB	niet gelezen, dus geen mening. Maar 'geen mening' vakje ontbreekt. Not read, so no opinion. But 'no opinion' box is missing.	---
United Kingdom			
14	ICBAN - Irish Central Border Area Network Ltd	In Section C the questions are on the Environmental report. ICBAN does not feel we are suitably qualified to give informed responses to the specific questions.	---
15	Brighton & Hove City Council; local government	I only looked at the non-technical summary but was wondering what the evidence was that (page V) 'shifting of the funds in favour of priorities 2 and 3 would generate limited additional positive effects concerning climate and resource protection. At the same time this change of funding would reduce the enhancement of innovation performance capabilities'.	The respective statement in chapter 5.1 (p. 40) explains this issue more clearly.
16	University of Sheffield	The authors of the Environmental	Thank you for the comment.

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	(Department of Civil and Structural Engineering)	Report appear to have addressed the issues raised in the draft programme, but there are wider issues. The impact of Objective 1 seems to be debatable. This depends on the steps taken to address the issues raised in this consultation.	
17	Greater London Authority; regional government	We found that the report rightly highlighted the scope and urgency of the air quality challenge in NWE but failed to indicate the necessary measures to address it. Relying on generic actions to address GHG emissions will have very limited effect on air quality: without specific measures to curb pollutants' emissions, in particular in transport, it will have little impact. In this sense we found that the generic actions proposed are inconsistent with the specificity and urgency of the challenge.	We agree that the reduction of GHG is not a specific measure to reduce air pollution in general. However the reduction of GHG can as a side-effect help to reduce air pollution, for example in case of traffic reduction. GHG reduction is the topic the programme focuses on.
18	Disability Action	The Horizontal Principles (Article 7 (3)) etc. Regulation equal opportunities and non-discrimination are not adequately recognised in the TO's.	This is an issue of the programme development.
19	Atkins	I think that VB should do more to encourage working across professions. For example, it is becoming clear that there is an important relationship between our environment and health. This particularly affects vulnerable people; the very young, the very old and the disabled. Therefore, in the case of mobility, we need to understand more about how these groups may remain mobile. This should involve engineers, transport planners, health practitioners and psychologists. In the past, we have tended to work in 'silos' and not communicate enough with other professions. VB needs to promote more cross-professional dia-	We agree with this statement.

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		logue.	
20	Liverpool John Moores University	The Environmental Report is indubitably a comprehensive review, involving much care and attention to detail. However, to the busy layman it reads like a detailed response to a specific brief - more for internal EU use than for external reference. It would have been very useful to overlay specifically the key points from the Environmental Report onto the Strategic Objectives, as a summary reference document for potential applicants.	Thank you for the comment, this could be an issue for the formulation of the application guidelines.