
Interreg Programme Alpine Space 2021-2027

Information on the decision according to article 9 of directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment

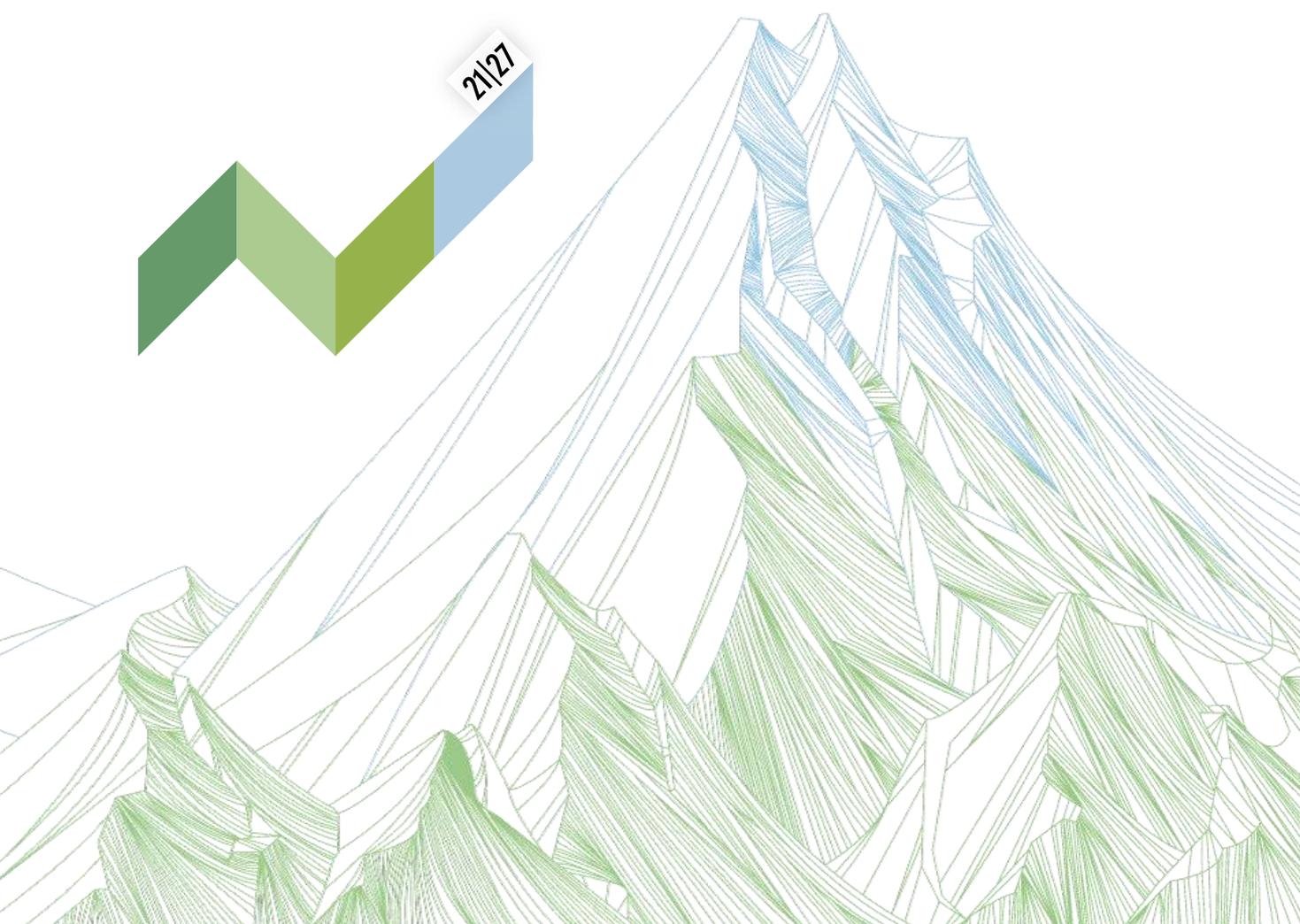




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Introductory remarks

According to article 9 of directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment the authorities referred to in article 6 (3) of the same regulation, the public and any member state consulted under article 7 shall be informed when a plan or programme being subject to the directive is adopted. The following items shall be made available to those so informed:

- the programme adopted,
- a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report prepared pursuant to article 5, the opinions expressed pursuant to article 6 and the results of consultations entered into pursuant to article 7 have been taken into account in accordance with article 8 and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with, and
- the measures decided concerning monitoring in accordance with article 10.

The present document provides for information on the above-mentioned issues as well as on the process applied in the context of the strategic environmental assessment (SEA) of the Interreg Alpine Space programme 2021-2027. This document has been made available to the representatives and environmental authorities of the partner states and any other interested organisations via the programme's website.

1. The adopted programme

The Interreg programme "Alpine Space" 2021-2027 was adopted by the task force set up for the programming process (composed of representatives of the partner states, the European Commission, the Alpine Convention, Managing Authority and the Joint Secretariat) in July 2021, submitted to the EC for approval and made available for the public on the programme's website www.alpine-space.eu in August 2021. Following the observations of the EC on the draft programme it was slightly revised and adopted by the programme's programme committee in January 2022 and submitted to the EC for formal approval on February 17th 2022.

2. The SEA-process

The steps as set out in the graph below have been taken in the context of the SEA (articles quoted are the ones of the SEA-directive):

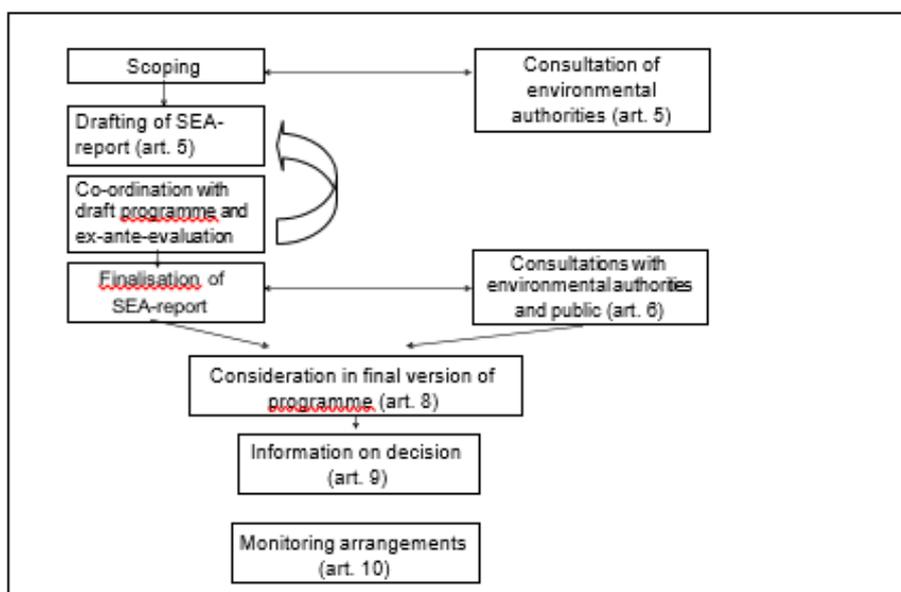


Figure 1: SEA process according to the EU Directive and applied as iterative process to the development of the Alpine Space Programme

For the assessment a scheme elaborated and applied already during the SEA of the previous Alpine Space Programme 2014-2020 was applied in order to enhance comparability with previous programming periods. Table 1 shows the assessment scheme.

Assessment Scheme	
positive impacts	<ul style="list-style-type: none"> Significant positive impacts on the environmental issue likely expected
no significant impacts	<ul style="list-style-type: none"> No relevancy concerning the respective environmental issue
high negative impacts	<ul style="list-style-type: none"> Highly negative impacts on the environmental issue, no mitigation measures available
medium negative impacts	<ul style="list-style-type: none"> Highly negative impacts on the environmental issue(s) are expected, but effective mitigation measures are available Medium significant impacts on the environmental issue, no mitigation measures available
slight negative impacts	<ul style="list-style-type: none"> Medium significant impacts on the environmental issue are expected, but effective mitigation measures are available Low impact on the environmental issue

Table 1: Assessment schema for the SEA



3. Non-technical summary of the SEA-report

Overall, Alpine environmental issues are - despite past achievements in the Alpine Space territory - continuously affected by pollution, land use change, climate change impacts and related spread of neobiota. Climate change itself but also response to it as well as mitigation efforts can imply also negative consequences and conflicts of objectives. **Resource scarcity** is very likely to increase in the Alpine Space territory due to a combination of drivers of land use change. Particularly, soil (land) and water capacities are affected, so are air quality and human health in some parts of the Alpine territory still due to harmful emissions.

In this context, the environmental report as central outcome of the SEA highlights four significant goals to improve the condition of the environmental issues in the Alpine territory further:

- improve the ecological condition and connectivity,
- decrease pollution and deterioration of environmental issues,
- enhance multi-functional land-use to reduce conflicts and enhance co-benefits (e.g. for climate regulation, hazard protection, mitigation and nature conservation targets),
- reduce resource consumption.

The Interreg Alpine Space Programme 2021-2027 is tackling several of these challenges and goals actively and is supposed to contribute directly and indirectly to improvements of the environmental condition in the programming territory. The SEA was iteratively integrated in the programme development process. Amongst others, the scoping results, major environmental goals and challenges (including also perspectives on the zero variant without the implementation of the programme) for each environmental issue and possible interrelationships affecting the Alpine Space territory overall were discussed with the programming task force, representatives of MA, JS and the experts entrusted with the elaboration of the programme document. During the programme drafting process also the monitoring results for the previous Alpine Space Programme 2014-2020 were taken into consideration by the task force as well as possible implications for the upcoming programming period related to similar priorities and specific objectives. Altogether, the programme planning process has strongly reflected environmental aspects therefore.

To sum up, the SEA did not identify any significant negative environmental impacts of the programme, considering the monitoring results of similar specific objectives (and over-arching priorities) of the past Alpine Space Programme (2014-20), viewing the actions planned and including the feedback of the iterative process with the programme drafting experts and programming task force.

Assessment results of the four priorities are summarized and displayed in the following table. Detailed

information on the assessment results for each environmental objective with specific explanation in context of the actions planned under this specific objective are provided in section 5 of the environmental report.

Priorities	Specific Objectives	Soil	Water	Climate/Air	Fauna, Vegetation, Biodiversity	Landscape	Human health, Population	Material assets and cultural heritage
Priority 1 "Climate resilient and green Alpine region"	S.O. iv. Promoting climate change adaptation, risk prevention and disaster resilience	Significant positive impacts likely	No significant impacts to positive impacts	No significant impacts to positive impacts	No significant impacts to positive impacts	No significant impacts to positive impacts	Significant positive impacts	Significant positive impacts
	S.O. vii. Enhancing biodiversity, green infrastructure in the urban environment, and reducing pollution	Significant positive impacts likely	Significant positive impacts likely	Significant positive impacts likely	Significant positive impacts likely	Significant positive impacts likely	Significant positive impacts likely	Significant positive impacts likely
Priority 2 "Carbon neutral & resource sensitive Alpine region"	S.O. i Promoting energy efficiency measures	No significant impacts to positive impacts	No significant impacts to positive impacts	Significant positive impacts likely	No significant impacts to positive impacts	No significant impacts to positive impacts	Significant positive impacts likely	No significant impacts likely
	S.O. vi. Promoting the transition to a circular economy	No significant positive impacts likely	No significant to significant positive impacts likely	Significant positive impacts likely	No significant impacts to positive impacts	No significant impacts to positive impacts	Significant positive impacts likely	No significant impacts likely
Priority 3 "Innovation and digitalisation oriented green Alpine region"	S.O. i Enhancing research and innovation capacities and the uptake of advanced technologies	No significant impacts likely	No significant impacts likely	No significant to positive impact	No significant impacts likely	No significant impacts likely	Significant positive impacts likely	No significant impacts likely
	S.O. ii. Reaping the benefits of digitalisation for citizens, companies and governments	No significant impacts likely	No significant impacts likely	No significant to positive impacts likely	No significant impacts likely	No significant impacts likely	Significant positive impacts likely	No significant impacts likely
Priority 4 "A better Interreg Governance"	enhance institutional capacity of public authorities and stakeholders to implement macro-regional strategies and sea-basin strategies	No significant impacts likely	No significant impacts likely	No significant to positive impacts	No significant impacts likely	No significant impacts likely	No significant impacts to positive impacts	No significant impacts likely

Table 2: Assessment tables summarizing the impact assessment for the different Specific Objectives (SO)

No mitigation or compensation measures are required in case the specific objective iv focuses on nature-based solutions and retention capacities. Thereby, if synergies with S.O. vii are well used, it can even create positive co-benefits for other adaptation or mitigation targets or even flora/fauna/biodiversity conservation objectives. Actions also address higher alpine areas. These territories and their flora/fauna/habitats will be impacted strongly by climate change. Project selection, implementation and monitoring therefore needs to pay special attention not to deteriorate or negatively impact habitat conditions. Also, for S.O. i of priority 2 negative environmental impacts are unlikely viewing the planned activities. Consequently, no specific mitigation measures (or selection criteria) are recommended.

In the first draft of the environmental report the SEA encouraged applying the **sustainability statement** included in priority three for the entire programme. In the final version, the programme announces a clear commitment to amplify positive environmental impacts including strong efforts to mitigate climate change and also its impacts on the alpine territory. Early consideration of negative impacts and avoidance of any harm on the environmental issues is explicitly addressed as the following statement of the programmes' final draft announces: *“To foster the “green and CO2-neutral approach” of the Alpine Space programme 2021-2027 even more, the programme invites all partners to consciously consider expected and unexpected impacts of their projects or actions on the environment, climate and sustainability, to seek mitigation of possible adverse effects, to strengthen any positive effects and, whenever possible, to incorporate mechanisms or practices that will unleash such positive effects (e.g. “green projects” considering environmental aspects right from the beginning).”*

Throughout the whole project lifetimes synergies with other projects can be established to maximize co-benefits. For the programme 2021-2027, the SEA estimates synergies between several priorities and specific objectives, as also partly indicated within the programme itself. The following figure summarizes synergistic effects among priority one to three with regard to enhancement of positive environmental impacts. Positive interrelationships between several environmental issues are likely and can be further exploited through positive cumulative impacts with other specific objectives and even additional funding schemes and planning initiatives complementary to the Alpine Space Programme's activities. Concrete positive interrelationships are feasible in case nature-based solutions contribute not only to prevention of soil erosion, stabilization of slopes/ hilly/ mountainous territories and retention capacity but also to benefits for flora/fauna/biodiversity (such as e.g. the sustainable management of protection forests). Additionally, positive interrelationships are likely with “climate/air” in this context as carbon sinks can be preserved or (re-)established. Positive synergies can occur with targets promoted under S.O. vii and under the specific objectives of Priority 2 as also mentioned in the final programme document. The SEA perceives priority four as neutral in this context and therefore it is not included in this figure. Apart from the synergies within the Alpine Space Programme 2021-2027, other funding and research programmes at

European and national level offer opportunities to join efforts and maximize positive outcomes in their foci.

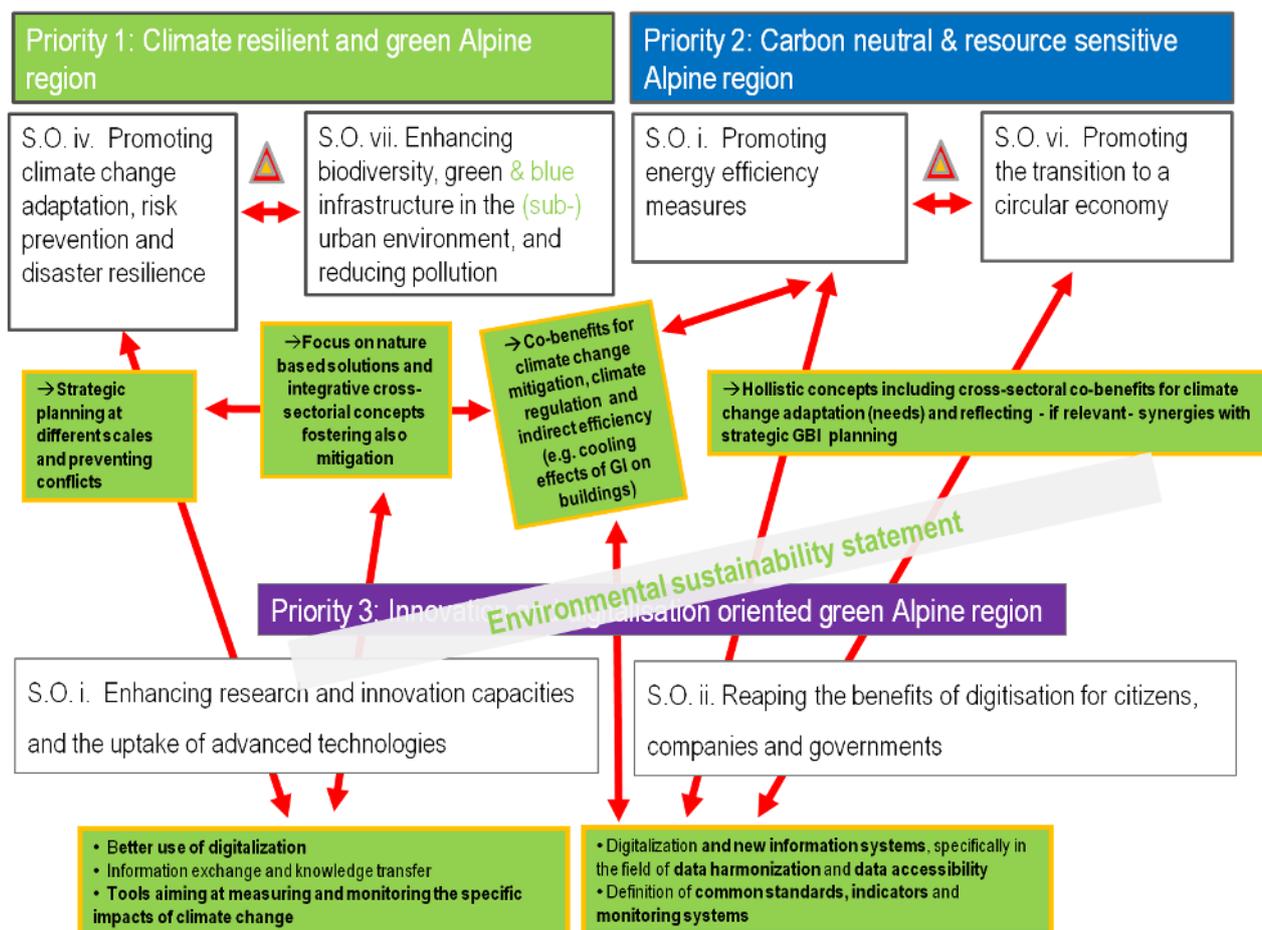


Figure 2: Overview of synergistic interrelationships between the specific objectives to enhance even more the positive environmental impacts of the Interreg Alpine Space Programme

As the SEA monitoring of the Interreg Alpine Space programme 2014-2020 showed, the integrative consideration of environmental impacts and positive synergies is highly dependent on the integration of environmental expertise into the projects implementation right from the beginning. Information on environmental challenges and environmental goals (see also section three and four of the environmental report) can contribute already in the calls and application procedure to a more detailed reflection on multi-dimensional sustainability.

The following suggestions, deriving from the monitoring report of the SEA accompanying the Alpine Space Programme 2014-2020, serve as outline to achieve stronger awareness on environmental aspects throughout the entire projects' lifetimes and increase positive synergies between specific objectives and their projects:

Communicate environmental challenges and core environmental objectives of the Alpine Space territory accordingly: Due to the urging necessity to reflect environmental sustainability as an inherent concept of all priorities, a brief communication of environmental goals of the Alpine Space Programme could be considered.

Consider environmental aspects right from the beginning: Applicants could rank the expected contributions of the project to the environmental sustainability if they received information on the environmental challenges and core objectives. This forecasting self-evaluation on positive contributions to environmental sustainability could be either generally relevant for all priorities or - to be more effective - cover those aspects which are most important in the thematic context of the priority (Specific Objective).

Foster the integration of adequate environmental expertise and institutional capacities: In order to maximise co-benefits either for diverse environmental issues or for several dimensions of sustainability (Sustainable Development Goals) the SEA-experts recommend the involvement of environmental expertise (relevant to the specific project themes) either by project partners or observers.

Encourage the identification of synergies - even beyond one Specific Objective: A beneficial approach could be "twinning or clustering of projects" in order to enhance knowledge-transfer and exchange between projects of the same programme period under the same Specific Objective (which partly already happened in the last programming period subject to this monitoring). For this purpose, shared workshops with projects with a focus on Green Economy, Nature Conservation or related topics or invitation of experts from their consortiums to project activities could enhance the integration of novel eco-innovative topics. Benefits could also be achieved when "matching" projects of two or more specific objectives which consider a thematic field from multiple perspectives (e.g. forestry, protection forests, ecological connectivity, sustainable consumption, and sustainable public procurement).

Encourage communicating the environmental achievements: Illustration of environmental achievements is important to raise awareness for the positive impacts achieved under the Alpine Space Programme and to enhance the consideration of these topics beyond the individual project. Projects should check the consistency of the information on environmental aspects and provide sound information how to achieve these targets instead of using "tag words" and leaving those who apply the tools without concrete hints. Accompanying contributions by environmental expert(s) could check and enhance this consistency and discover "hidden chances" of some outcome documents.

Make the interim reports more informative about environmental achievements: In order to achieve an added-value for the mandatory environmental monitoring according to the SEA Directive, the self-evaluation on environmental topics could be continued in the mid-term and final project reports to keep the environmental targets and achievements in mind and allow projects to adapt their implementation outcomes if necessary and/or seek additional environmental expertise if necessary. To this aim sections could be integrated to review the work packages (or overall project's) impact on the environment (either quantitatively or projects describe shortly their environmental achievements, impact on the environment and/or how they minimize/avoid negative environmental impacts).

Although not significant negative impacts are to be expected from the Alpine Space Programme 2021-2027, provided the project selection will reflect environmental impacts accordingly, monitoring of any unforeseen environmental impacts is recommended (see section F). Additionally, the SEA monitoring can survey synergistic effects to create significant positive environmental impacts and interrelationships between several environmental issues.

4. Information on consultations with public and environmental authorities

In summer 2019 the SEA-experts provided the environmental authorities nominated by the member states participating in the programme with the scoping documents and invited them to comment on these and the scoping process.

During the **scoping** environmental authorities of the countries involved in the Alpine Space Programme were invited to provide feedback on:

- the **methodological approach**,
- **relevant data sources**,
- **relevant national and international legislations** and
- **core environmental objectives**.

For the **consultation of the public** guiding questions were formulated in order to stipulate feedback according to the main tasks of the Strategic Environmental Assessment.

Based on this feedback the SEA-experts finalised the determination of scope and level of detail of information to be included in the SEA-report. The draft cooperation programme and draft SEA-report were published on the programme's website. The environmental authorities in the member states were



invited via e-mail to comment on the draft documents. Furthermore, the broad public was given the opportunity to raise observations on draft SEA-report and programme. This consultation process ran from July to September 2020.

The remarks and statements that were made on the SEA-report were classified by the SEA-experts into the four categories mentioned above.

5. Summary on how environmental considerations, SEA-report, results of consultations were taken into account

The elaboration of the environmental report evolved out of a continuous discussion process in constant interaction between the SEA experts and the expert-team drafting the cooperation programme. Changes in the programme were therefore influenced by the feedback of the SEA-experts and vice versa. Additionally, SEA-monitoring results with regard to the previous programme 2014-2020 were taken into account if relevant. As a consequence of this joint elaboration process, the SEA-team could consider direct feedback and explanation on the content and meaning of the thematic objectives and related indicative actions in their assessment. On the other hand recommendations made by the interim SEA-reports could be immediately reflected and integrated into the drafting of the cooperation programme. Chapter 8 of the environmental report explains how the alternatives of the programme have been influenced by the SEA.

Remarks applicable for the different categories of the SEA mentioned in section d4 of the present document were considered and integrated into the SEA-report where possible and/or additional explanation was given as requested by the statements.

→ Responses are displayed in the following **collection of powerpoint slides set up by the SEA-experts for discussions in the programming task force meetings** as well as the way the SEA team took these suggestions into consideration.

→ A detailed list with a suggested procedure to integrate each statement related to the SEA was submitted to the programming task force by the SEA-experts.

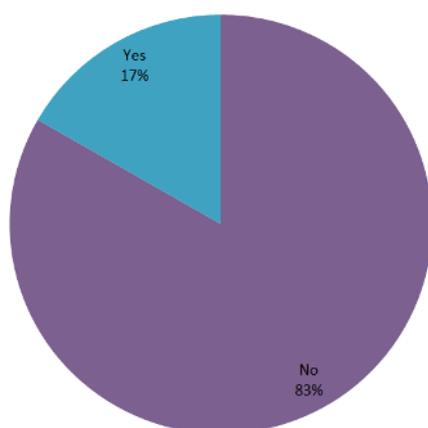


Q1 – SEA report

50. Would you suggest additional data sources and/or thematic aspects to be considered based on the state of the Alpine Space's environment and the likely future development without the programme?



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Additional sources of information



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Only a few additional sources were suggested

- **These data sources will be considered for the environmental report**
- **Partly**, the sources were **already contained**. We added information on the specific location in the environmental report in these cases.
- we will **not consider regional/ federal state level documents** (e.g. the *Biodiversitätsprogramm Bayern*), however, in order to avoid an overload of references and information, as the program particularly refers to **transnational challenges and strategic environmental goals** (as explained in the introduction of the environmental report on page five)

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Orientation in the report



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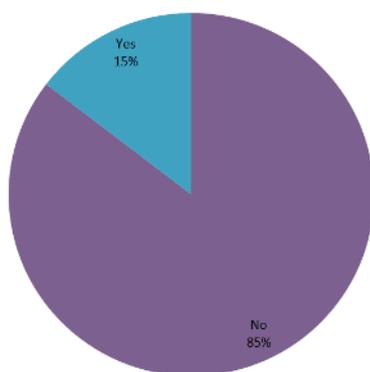
Some statements contained **recommendations on thematic issues to be included in the environmental report**: e.g.: „*Soil is, apart of air and water, the central component of terrestrial ecosystems. Soil provides the widest range of ecosystem services (=soil ecosystem services). Speaking about environment, soil must not be overlooked.*”

- Almost all of the thematic aspects acknowledged in these statements **were already contained in the environmental report** → we **added detailed feedback with reference to the respective sub-sections in the report** (see table with detailed response on the consideration of the statements).
- **We assume that partly those who were commenting did not study the environmental report itself but maybe only the “non technical-summary”**.

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Q2 – Significant environmental impacts

52. Are there significant environmental impacts (positive or negative) not yet mentioned in the environmental report with relevance to the priorities and specific objectives subject to this SEA?



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Specific comments I



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Climate change adaptation and conflicting interests:

“Climate change adaptation measures could have adverse effects on soil, biodiversity and landscape if not designed in a sustainable way (e.g. built flood protection measures, increasing summer tourism etc.) - i.e. sustainability has to be a “must criterion”. “

→ The **emphasis on nature-based solutions** as well as the focus on sustainability was **outlined in the environmental report section five regarding priority one and its potential to counteract possible negative effects of climate change adaptation measures** keeping both specific objectives and their activities in mind. We also addressed the need for a sustainable adaptation in the field of tourism and recreation (*see also link to next statement below*). **If needed, the value of NBS can be illustrated even more in detail.**

“Increasing tourism and leisure activities (hiking, mountain-biking, skitours, geocaching on-and off-trail) need to be properly regulated to avoid negative impacts on mountain farming and the whole environment”

→ Addressed in **the assesment of the environmental impacts** for the **Specific Objective vi**

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Specific comments II



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Climate change mitigation – side effects/trade-off:

“Massive shifts to digitization could increase total energy consumption / GHG emissions, i.e. adverse effects on climate/air (problem: often geographically disconnected).”

- The impact of digitization on global GHGs can not be neglected and effects should be minimized by **sufficient and efficient use of digital devices (sustainability statement)**.
Overall, positive impacts on climate/air as well as human health/population expected when looking at the effect of digitization for remote areas.

“Effects on existing structural (hydromorphologic) deficits of Alpine waterbodies”

- Mentioned in the state of the art and trend (zero variant) sub-sections for water (pages 40-46), we will reconsider whether to go more in detail about the hydromorphological deficits. In the current version, no Specific Objective is likely to harm the Alpine water bodies when keeping the monitoring results in mind.

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Methodological feedback I



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Differentiating significant positive environmental impacts at multiple scales:

“While the differentiation for negative impacts is very sophisticated (part. considering that the measure description is quite vague), only one option is available for positive ones.”

- The **scale** was in accordance with the previous SEA of the Alpine Space Programme and the Task Force/MA/JS agreed on this suggestion. Of course, also positive differentiations exist for other environmental reports and this would also be **an option for a future SEA** for the Alpine Space. **In particular, as we see a stronger trend to focus on the positive impacts by the entire program.**
- However, so far we also saw **some methodological deficiencies in the differentiation of positive impacts on multiple-scales** (weighing of certain environmental targets etc.) in other SEAs. Therefore, we kept our system this time as it was in the past.
- We would acknowledge this suggestion in the methodological section, thought.

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Methodological feedback II



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Integration of environmental goals in the assessment:

"[...] Sometimes it seems like a scientific paper but does not clearly show the link between overall (and even too detailed) Policy Goals, planned ASP measures and their Impact based on clear indicators."

- We will include an assessment of the actions against the background of the environmental goals for the final environmental report.
- A good and feasible way to highlight positive impacts but also point out which environmental targets are not (explicitly) covered with the final program draft.

Methodological approach was questioned:

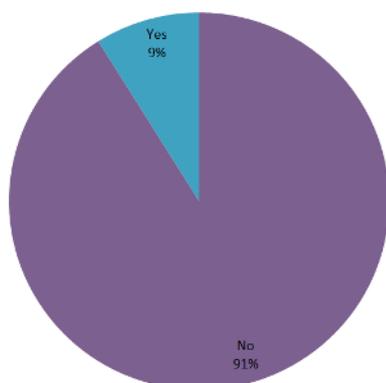
"Please clearly state what kind of structured foresight approach was chosen, if any - otherwise please state expert judgement as such"

- Likelihood approach was explained in sub-section 2, partly based also on the environmental monitoring

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Q3 – Alternative formulations

54. Would you like to contribute alternative formulations or alternative wording/small-scale changes in thematic aspects regarding the actions of the programme with particular relevance for the environmental assessment?



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Connection to the programme



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No explicit alternative formulations were suggested

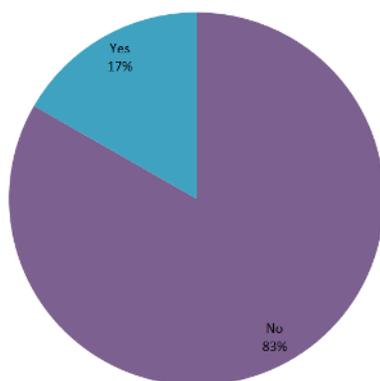
One statement acknowledged the benefits of directly mentioning the programme activities also in the environmental report for better understanding:

“A short description of the Programmes measures would improve readability”

- We could reconsider citing the actions of each Specific objective at the beginning of the assessment of the relevant significant environmental impacts, when the actions are finally determined
- At the moment they are only cited if relevant for the assessment of certain significant environmental impacts in the explanatory text to each Specific Objective

Q4 – Cumulative effects Synergies other funding

56. Do you see any cumulative effects (both positive and negative) with other funding programmes and/or major strategies for the programme territory relevant for environmental issues worth mentioning in the SEA report?



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Links to other funding programmes



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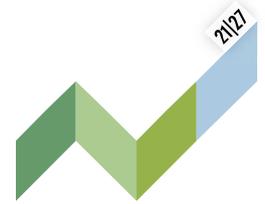
Links to some other European funding programmes and schemes were mentioned at a general level:

„E.g. Horizon Europe, LIFE (likely positive) e.g. European funding schemes supporting agriculture and infrastructure (likely negative) - e.g. European Agricultural Guarantee Fund (EAGF) support schemes, Agricultural Fund for Rural Development (EAFRD) EBRD funds/loans, EIB funds/loans,.... if applicable to the Alpine region“

We appreciate the suggestions and comments

- For the final environmental report, it is planned not only to **demonstrate the interrelationships between the environmental policy goals** and the planned priorities, specific objectives and their actions (see feedback to statements regarding Q2).
- Additionally, if applicable, we could highlight **positive synergies with complementary funding programmes, if this is appreciated by the Task Force and MA/JS**

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Ideas for greening the Management of the ASP



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Suggestions for CO₂-calculation and offsetting of the programme's activities

"Interesting to have a CO₂ calculator for the activities of the projects funded (at least the main activities-travels and events) and to pay for the CO₂ (at project level or at program level). People are travelling a lot."

→ We will include this in the final **suggestions as recommendation for project management and procedural environmental issues** to be decided and established by the MA/JS

Impacts on environmental issues I



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- *“A number of measures are recommended to avoid or minimize possible negative impacts, including measures to **reduce noise in general** and in particular to **preserve quiet areas in mountain regions (Directive 2002/49/EU)**, and **regarding digitalization to avoid inducing further polarization and marginalization of the peripheral Alpine areas. As for energy efficiency, it is recommended to promote energy production systems with low impact on natural landscapes of value for tourism.**”*
- Most of these aspects are treated already in the impact assessment we will add further aspects at suitable passages

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Impacts on environmental issues II



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- *“For **Specific Objective VII**, [...], it is suggested to consider the theme of **ecosystem services produced in the Alpine Space**, evaluating their **functionality also in terms of support for more urbanized areas.**”*
- We agree a lot of the aspects mentioned e.g. climate regulation function (of GI) matches with the concept of ecosystem services, which was already mentioned in the detailed assessment of this SO
- *“As regards PO2-SO1 "Promoting energy efficiency measures", special attention is suggested to the protection of landscape, fauna vegetation and biodiversity, soil and water. **It is strongly recommended that the protocols and declarations recognized in the Alpine Convention are considered in the actual design of the calls.**”*
- We will mention the protocols also in the description of likely impacts if applicable

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Formulation of environmental criteria




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- *“Regarding landscape, it is suggested to define actions and criteria for the selection of the projects. As for healthcare and population, it is suggested to insert criteria where needed to reward projects with no impact on health for harmful emissions or noise pollution.”*
- In the past mitigation measures in terms of selection criteria were only formulated for S.O.s and actions likely to lead to significant negative environmental impacts
- This will be continued
- Keeping also the monitoring results in mind, we would also appreciate to formulate criteria to emphasize positive environmental impacts

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Connection to the programme




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“It is suggested that the Environmental Report emphasizes the added value of cooperation and describe in more detail POs, SOs, and actions.”

- At the moment all POs and SOs are described in the impact assessment, actions are only cited if relevant for the assessment of certain significant environmental impacts in the explanatory text to each Specific Objective
- The added value is outlined in several parts of the ER, particularly when synergies between the POs, SOs and actions are addressed

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6. Measures decided concerning monitoring

Focus of the monitoring

SEA monitoring can on the one hand serve to, if necessary, take remedial action to improve the programs' environmental impacts if unexpected environmental effects should occur and on the other hand identify hidden chances and define space for improvement regarding the environmental sustainability. As the current Strategic Environmental Impact does not expect any significant negative impacts judging from the information available for the public consultation, we would not recommend a specific focus on one or more specific objectives but encourage carrying out a compact monitoring nevertheless to exclude unforeseen negative impacts and particularly to strengthen the multiple positive impacts including also surveying the positive interrelationships between the environmental issues. For this purpose the SEA-experts suggest the indicators applied throughout the SEA to be used. According to the results of the environmental assessment of the thematic objectives, indicators should be chosen which refer to those environmental issues with potential final risks, even if likely significant environmental impacts could be excluded judging from today's knowledge. As the programme overall strives to achieve positive environmental impacts, the monitoring could concentrate on assessing the improvements. The results of the monitoring process should be documented in a separate monitoring report in order to ensure sufficient documentation, which can provide support for further monitoring processes as well as the formulation of future programmes in this area. The monitoring process could be carried out either by the Joint Secretariat or by external experts as in 2019/2020.