



European  
Commission



# Mainstreaming the environment in cohesion policy in 2014-2020

Report of the European Network of Environmental  
Authorities – Managing Authorities (ENEA-MA)  
working group

September 2016

*This is not an official document from the European Commission or Member States. It reflects the views of the members of the 'Working Group on mainstreaming the environment into the implementation of 2014-2020 Cohesion Policy' established within the 'European Network of Environmental Authorities-Managing Authorities' (ENEA-MA). Its content reflects the practical experience of ENEA-MA members - environmental and managing authorities, as well as other organisations - regarding Cohesion Policy programmes and projects.*

*This document was developed as a result of the work carried out within the 'Working Group on mainstreaming the environment into the implementation of 2014-2020 Cohesion Policy'. The main contributors include: Gottfried Lamers (Federal Ministry for Agriculture, Forestry, Environment and Water Management, Austria), Anastasia Grozdanova and Emel Mehmedova (Operational Programme, Environment, Bulgaria), Tiina Pedak (Ministry of the Environment, Estonia), Juhana Rautiainen (Ministry of the Environment, Finland), Evangelia Tsartsou and Chryssoula Kourteli (Ministry of Environment and Energy, Greece), Nicolaos Mamalougas and Charalampos Syropoulos (Ministry of Economy, Development and Tourism, Greece), Gyöngyvér Gyene (Prime Minister's Office, Hungary), Krisztina Teréz Szabó (Ministry of Agriculture, Hungary), Angela Sorce (Network of Environmental Authorities, Italy), Peter Jány (Ministry of Environment, Slovakia), Elena Barrios Barcia and Yago Garcia (Spanish Network of Environmental Authorities, Spain), Markus Trilling (Bankwatch), Elen Baltzar Mossop and Ruslan Zheckov (the Regional Environmental Center for Central and Eastern Europe), Directorate General for Regional and Urban Policy (Sander Happaerts and Camelia Mihaela Kovács) and Directorate General for Environment (Yvette Izabel and Agata Payne). Special thanks are also extended to the respondents of the 'EU Survey on Environmental Integration', in particular, Chriss O'Connell (the Welsh Funding Office, UK). Further contributions were also provided by other ENEA-MA members within the consultations.*

## Contents

|  |           |
|--|-----------|
| <b>1. Introduction</b>   | <b>5</b>  |
| 1.1 Nature and purpose of this document  | 5         |
| 1.2 Overview of the document   | 5         |
| <b>2. What is ‘environmental integration’?</b>   | <b>7</b>  |
| 2.1 Defining environmental integration   | 7         |
| 2.2 Environmental integration as a way to achieve sustainable development  | 7         |
| 2.3 Legal basis for environmental integration in cohesion policy   | 8         |
| <b>3. Lessons learnt from the 2007-2013 period</b>   | <b>9</b>  |
| 3.1 Evaluations of the 2007-2013 programming period  | 9         |
| 3.2 Regulatory framework   | 10        |
| 3.2.1 Sustainable development  | 10        |
| 3.2.2 <i>Ex ante</i> conditionalities  | 13        |
| <b>4. How much funding for the environment? Quantitative assessment of 2014-2020 allocations and environmental integration</b> | <b>14</b> |
| 4.1 Environmental integration by thematic objective  | 14        |
| 4.2 Environmental integration by type of investment  | 17        |
| 4.2.1 Direct environmental categories  | 17        |
| 4.2.2 Indirect environmental categories  | 22        |
| 4.3. Environmental integration in the ETC programmes   | 25        |
| 4.4 Conclusions  | 25        |
| <b>5. Environmental integration at programme level</b>   | <b>27</b> |
| 5.1 Sustainable development as a cross-cutting principle – approaches and mechanisms   | 27        |
| 5.2 Addressing specific issues listed in Article 8   | 28        |
| 5.2.1 Resource efficiency  | 28        |
| 5.2.2 Biodiversity   | 29        |
| 5.2.3 Climate change mitigation  | 29        |
| 5.2.4 Climate change adaptation  | 30        |
| 5.2.5 Disaster resilience  | 30        |
| 5.2.6 Risk prevention  | 30        |
| 5.3 OPs’ section 11.1 on sustainable development   | 30        |
| 5.4 Strategic environmental assessment   | 32        |
| 5.5 Role of partners in integrating sustainable development requirements   | 34        |
| 5.5.1 The European code of conduct on partnership (ECCP)   | 34        |
| 5.5.2 The role of environmental authorities in environmental integration   | 35        |
| 5.5.3 Involving non-governmental organisations   | 37        |
| 5.6 Environmental networks to support environmental integration  | 38        |
| 5.6.1 Pan-European networks  | 38        |
| 5.6.2 National networks  | 39        |

|  |           |
|--|-----------|
| <b>6. Environmental integration at the implementation stage .....</b>  | <b>40</b> |
| 6.1 From programmes to projects .....  | 40        |
| 6.2 Major projects.....  | 41        |
| 6.3 Non-major projects .....   | 43        |
| 6.3.1 The project cycle .....  | 43        |
| 6.3.2 The preparation phase .....  | 44        |
| 6.3.3 Project ranking and selection .....  | 47        |
| 6.3.4 Project implementation .....   | 51        |
| 6.4 Helping project applicants .....   | 53        |
| 6.4.1 Types of assistance.....   | 53        |
| 6.4.2 Mechanisms for sharing experience .....  | 54        |
| 6.4.3 Timing of assistance .....   | 55        |
| 6.4.4 Who provides assistance .....  | 55        |
| 6.4.5 Specific assistance for SMEs.....  | 57        |
| <b>7. Monitoring and evaluation of environmental integration .....</b>   | <b>58</b> |
| 7.1 Monitoring and evaluation in 2014-2020 cohesion policy – emphasis on results .....   | 58        |
| 7.2 Indicators .....   | 58        |
| 7.2.1 Indicators for measuring contributions to cross-cutting sustainable development.....   | 59        |
| 7.2.2 Going beyond indicators to measure contributions to cross-cutting sustainable development.....   | 60        |
| 7.3 The role of the monitoring committee .....   | 61        |
| 7.4 Actions to address non-compliance with cross-cutting environmental requirements .....  | 62        |
| 7.5 Communicating compliance with cross-cutting environmental requirements .....   | 63        |
| <b>8. Conclusion .....</b>   | <b>64</b> |
| <b>Annexes .....</b>   | <b>65</b> |
| Annex 1: Survey on environmental integration in cohesion policy.....   | 65        |
| Annex 2: Key references to environmental integration in the 2014-2020 regulations.....   | 81        |
| Annex 3: The Spanish Environmental Authorities Network .....   | 83        |
| Annex 4: Overview: national networks’ actions to support environmental integration into 2014-2020 cohesion policy..  | 84        |
| Annex 5: Economic incentives in calls for proposals to promote the adoption of voluntary commitments for sustainability and the low-carbon economy in SMEs (Ceuta, ES) ..... | 85        |
| Annex 6: Cross-cutting environmental integration in the ERDF regional economic incentives programme (ES) .....   | 86        |
| Annex 7: Cross-cutting integration of environmental sustainability in 2007-2013 – list of available environmental measures (HU) .....  | 89        |
| Annex 8: Links to environmental project appraisal/selection criteria .....   | 91        |
| Annex 9: Cross-cutting selection criteria and guidance for cross-cutting criteria in the EAFRD programme (AT).....   | 92        |
| Annex 10: Terms of reference for the environmental sustainability manager – Welsh European Funding Office (UK) .....   | 93        |

## 1. Introduction

### 1.1 Nature and purpose of this document

[The Treaty on the Functioning of the European Union \(TFEU\)](#) and the cohesion policy regulations require EU cohesion policy to be in line with the principle of sustainable development. In this document, we review how this is done in the light of experience in the preparation, implementation and evaluation of the 2007-2013 programming period.

The review is based mainly on the cohesion policy regulations, official Commission statistics and the results of a survey carried out in the framework of [the European Network of Environmental Authorities - Managing Authorities \(ENEA-MA\)](#) working group (see Box 1 and [Annex 1](#)). It was supported by additional contributions from ENEA-MA members. The ENEA-MA survey was mainly addressed to cohesion policy managing authorities across the EU and there were 45 respondents (including about 10 % of the managing authorities).

#### **Box 1: Survey on environmental integration in cohesion policy (ENEA-MA survey)**

The ENEA-MA survey was carried out between the end of June and mid-September 2015. It was mainly addressed to the cohesion policy managing authorities. In total, 45 completed questionnaires were received, from 21 Member States, including 35 from managing authorities.

The survey sought to review Member States' experience of integrating environmental or sustainable development requirements in a cross-cutting way under the cohesion policy. It looked in particular at mechanisms to achieve environmental integration as stipulated by Article 8 of the Common Provisions Regulation (CPR). The intention was not to ask questions on typical environmental investments such as wastewater treatment plants or solid waste facilities, but rather to capture how managing authorities ensure that environmental aspects are integrated into operational programmes and projects that have primarily economic and/or social objectives, e.g. integrating resource efficiency measures into assistance to SMEs or supporting green infrastructure within transport or urban development schemes.

**Further information:** [results of the ENEA-MA survey](#) (presentation) at the ENEA-MA website.

Given the coverage of the survey, caution should be exercised in the interpretation of the results. The survey does not pretend to be scientific. Nevertheless, the survey results do indicate some trends and can be used for the purpose of experience-sharing, in line with the ENEA-MA network's overall purpose of learning from each other to strengthen the environmental dimension of cohesion policy.

### 1.2 Overview of the document

Figure 1 shows the structure of this document. In general, this reflects the programming process, supplemented with some introductory information regarding the definition of concepts, references to previous experience and financial allocations.

**Figure 1: Overview of the document (status and opportunities for environmental integration)**



## 2. What is ‘environmental integration’?

This section introduces and explains the concept of environmental integration and then discusses how it relates to sustainable development, including its legal basis.

### 2.1 Defining environmental integration

Environmental integration can be approached in different ways in the context of cohesion policy. Typically, two approaches are followed:

- ‘vertical environmental integration’ – a programme may involve projects that are of direct benefit to the environment (e.g. water, waste or nature conservation);
- ‘horizontal environmental integration’ – this complements the first approach and involves integrating environmental aspects (e.g. resource-efficiency requirements) in a cross-cutting manner in non-environmental measures in a programme.

The term ‘horizontal environmental integration’ is used interchangeably with other terms such as ‘environmental integration’, ‘environmental mainstreaming’, ‘environment as a cross-cutting theme’, ‘environmental integration as a horizontal principle’, etc.

For the purpose of this report, we refer to environmental integration as ‘the incorporation of environmental requirements into all stages of the preparation and implementation of cohesion policy, in accordance with Article 8 of the Common Provisions Regulation (CPR)<sup>1</sup> and with a view to promoting sustainable development’. The link between environmental integration and sustainable development is explained below.

#### So what does ‘horizontal environmental integration’ mean to the survey respondents?

The understanding of over half of the respondents (23) related to or was identical to the wording of Article 8 CPR; in some cases, it was closer to that of Article 11 TFEU. For some (2), the meaning of the term was limited to avoiding, mitigating or bringing an end to negative environmental impact.

A few respondents’ definitions incorporated additional elements, including eco-friendly solutions, green public procurement, project selection criteria or resource efficiency for SMEs.

The majority of respondents shared the view that the ‘lack of understanding of environmental integration requirements as a horizontal objective’ is one of the biggest barriers to environmental integration in their OPs.

### 2.2 Environmental integration as a way to achieve sustainable development

Environmental integration is considered an effective strategy for achieving sustainable development. Although sustainable development concerns the interplay of economic, social and environmental goals, in policy terms it often translates into strong environmental provisions<sup>2</sup>. This view of environmental integration as a strategy for achieving sustainable development is reflected in the [TFEU](#), which states (Article 11) that ‘environmental protection requirements must be integrated into the definition and implementation of the Union’s policies and activities, in particular with a view to promoting sustainable development’.

<sup>1</sup> Regulation (EU) No 1303/2013 of the European Parliament and of the Council of 17 December 2013 laying down common provisions on the European Regional Development Fund, the European Social Fund, the Cohesion Fund, the European Agricultural Fund for Rural Development and the European Maritime and Fisheries Fund and laying down general provisions on the European Regional Development Fund, the European Social Fund, the Cohesion Fund and the European Maritime and Fisheries Fund and repealing Council Regulation (EC) No 1083/2006 (OJ L 347, 20.12.2013, p. 320).

<sup>2</sup> Happaerts, S. and H. Bruyninckx. 2014, ‘Sustainable development: the institutionalisation of a contested policy concept’, in Betsill M.M., Hochstetler K., Stevis D. (eds.), *Palgrave advances in international environmental politics*: 300-327. Basingstoke: Palgrave Macmillan.

## 2.3 Legal basis for environmental integration in cohesion policy

In line with Article 11 TFEU, the cohesion policy regulations for the 2014-2020 programming period include a requirement to integrate environmental concerns in the preparation and implementation of the policy. Article 8 CPR (on the principles of Union support for the European Structural and Investment Funds (ESIFs) – sustainable development) stipulates that '[t]he Member States and the Commission shall ensure that environmental protection requirements, resource efficiency, climate change mitigation and adaptation, biodiversity, disaster resilience, and risk prevention and management are promoted in the preparation and implementation of partnership agreements and programmes'. This means that these environmental issues should be taken into account in all aspects of cohesion policy, including within programmes and investments that do not directly concern the environment.

[Annex 2](#) sets out key environment-oriented references from the 2014-2020 cohesion policy regulations. These refer to both horizontal and vertical environmental integration; in this report, we focus mainly on the former.



### 3. Lessons learnt from the 2007-2013 period

This report is largely based on lessons learnt in cross-cutting environmental integration by Member State authorities in 2007-2013; in this section, we look mainly at the EU level. We do not attempt an exhaustive review, but seek to start a discussion by drawing attention to a few issues linked to the 2007-2013 *ex post* evaluations and the 2014-2020 cohesion policy regulations, as regards the sustainable development principle and *ex ante* conditionalities (preconditions for funding that could lead to the suspension of funds).

#### 3.1 Evaluations of the 2007-2013 programming period

Cohesion policy funding in 2007-2013 has been subject to a wide range of evaluations at EU level<sup>3</sup>. These include a recent series of *ex post* European Regional Development Fund (ERDF) and Cohesion Fund (CF) evaluation reports on various topics, including SMEs, innovation, ICT, energy efficiency, transport and environment-related infrastructure (in particular, drinking water, wastewater treatment and solid waste management).

These reports and other evaluations provide some insights into how the environment has been integrated vertically (i.e. through typical environmental projects). They also give limited and scattered information on environmental integration across non-environmental measures. However, they do not really form a sufficient basis for sound recommendations for strengthening the cross-cutting dimension of environmental integration.

As regards the other cross-cutting theme (equality between men and women and non-discrimination), a 2009 study<sup>4</sup> looked into the translation of Article 16 of the 2007-2013 General Regulation<sup>5</sup>.

There are some good examples of reports at Member State level that examine the implementation of the cross-cutting sustainable development principle (see Box 2).

#### **Box 2: Welsh European Funding Office (WEFO) cross-cutting themes evaluation: equality and sustainability (UK)**

The study evaluated the integration of the cross-cutting themes (CCTs) – equal opportunities and gender mainstreaming, and environmental sustainability – in the 2007-2013 programme, making the following broad recommendations for the new programme:

- support – develop a more systematic approach to development, support and delivery of CCTs in the context of the wider Structural Funds system;
- management – clarify project support roles within WEFO and commit to developing a culture of communication and cooperation between WEFO and projects; communicate a corporate vision for CCTs to help ‘make Wales a better place’, and contribute to delivery of Welsh policy; and
- monitoring – revise monitoring and evaluation to capture CCTs more effectively.

**Source:** [WEFO cross-cutting themes evaluation: equality and sustainability](#), research report (2015)

<sup>3</sup> The 2007-2013 cohesion policy evaluations regarding are available on the InfoRegio website:

[http://ec.europa.eu/regional\\_policy/en/policy/evaluations/ec/2007-2013/](http://ec.europa.eu/regional_policy/en/policy/evaluations/ec/2007-2013/)

<sup>4</sup> [http://ec.europa.eu/regional\\_policy/sources/docgener/evaluation/pdf/eval2007/art16\\_finalrep\\_en.pdf](http://ec.europa.eu/regional_policy/sources/docgener/evaluation/pdf/eval2007/art16_finalrep_en.pdf)

<sup>5</sup> Council Regulation (EC) No 1083/2006 of 11 July 2006 laying down general provisions on the European Regional Development Fund, the European Social Fund and the Cohesion Fund and repealing Regulation (EC) No 1260/1999 (OJ L 210, 31.7.2006, p. 25).

## 3.2 Regulatory framework

### 3.2.1 Sustainable development

Under Article 17 (sustainable development) of the General Regulation for cohesion policy in 2007-2013, '[t]he objectives of the Funds shall be pursued in the framework of sustainable development and the Community promotion of the goal of protecting and improving the environment as set out in Article 6 of the Treaty'.

The principle is further developed (see Figure 2) in general provisions on objectives, partnership, the contents of the national strategic reference frameworks and evaluation, and a requirement for a strategic environmental assessment (SEA) for operational programmes (OPs), if applicable. It is also stressed in the 2007-2013 Community strategic guidelines (CSGs) on economic, social and territorial cohesion<sup>6</sup>.

The CPR for 2014-2020 goes beyond such relatively general provisions. It operationalises the sustainable development principle and ensures feedback through the evaluation of partnership agreements (see Figure 3).

The CPR starts with a broader formulation (Article 8) and lists specific elements that should be taken into account (e.g. resource efficiency, climate change and biodiversity). It also integrates sustainable development as a cross-cutting principle in the provisions on the partnership agreement and OPs. As regards the latter, it requires not only an SEA (if applicable), but also *ex ante* evaluation to assess 'the adequacy of planned measures to promote sustainable development'. However, the biggest new development in terms of addressing the sustainable development principle concerns monitoring and evaluation. In part, this is linked to an overall focus on results in 2014-2020, which also affects how the cross-cutting principles, in particular sustainable development, are monitored. Whereas the 2007-2013 General Regulation required merely that evaluations take account of sustainable development, the CPR introduced clear obligations for OP implementation reports and partnership agreement progress reports to set out information on, and assess, action taken to promote it. Monitoring committees have been also given a clear responsibility to examine 'actions to promote sustainable development'. Clear and binding monitoring and evaluation provisions will close the loop of 2014-2020 programming and produce feedback for the next programming period.

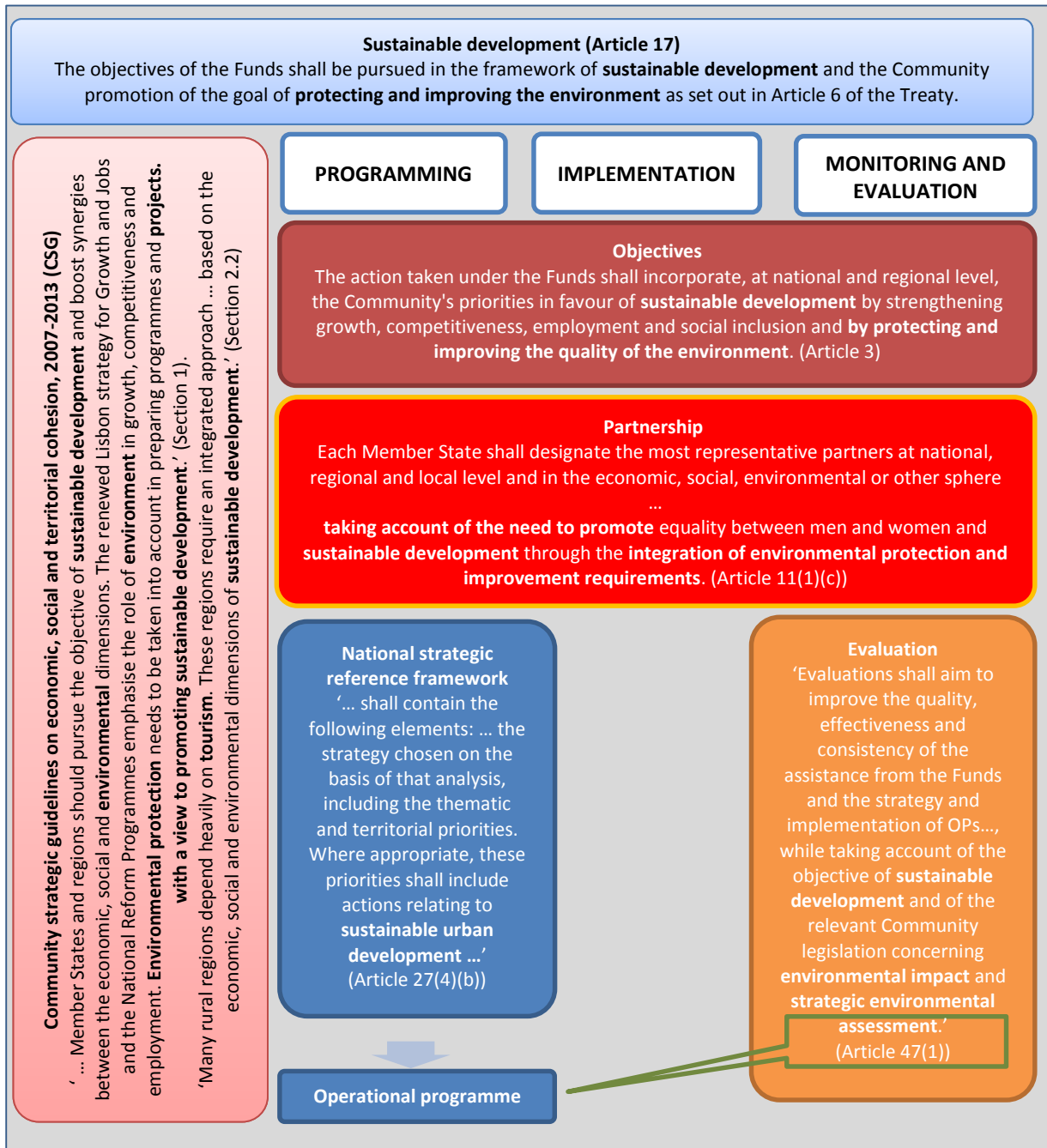
Finally, the common strategic framework (CSF)<sup>7</sup> for 2014-2020 (the equivalent of the CSGs for 2007-2013) includes several specific actions to support sustainable development, bringing it closer to authorities and stakeholders in the Member States.

---

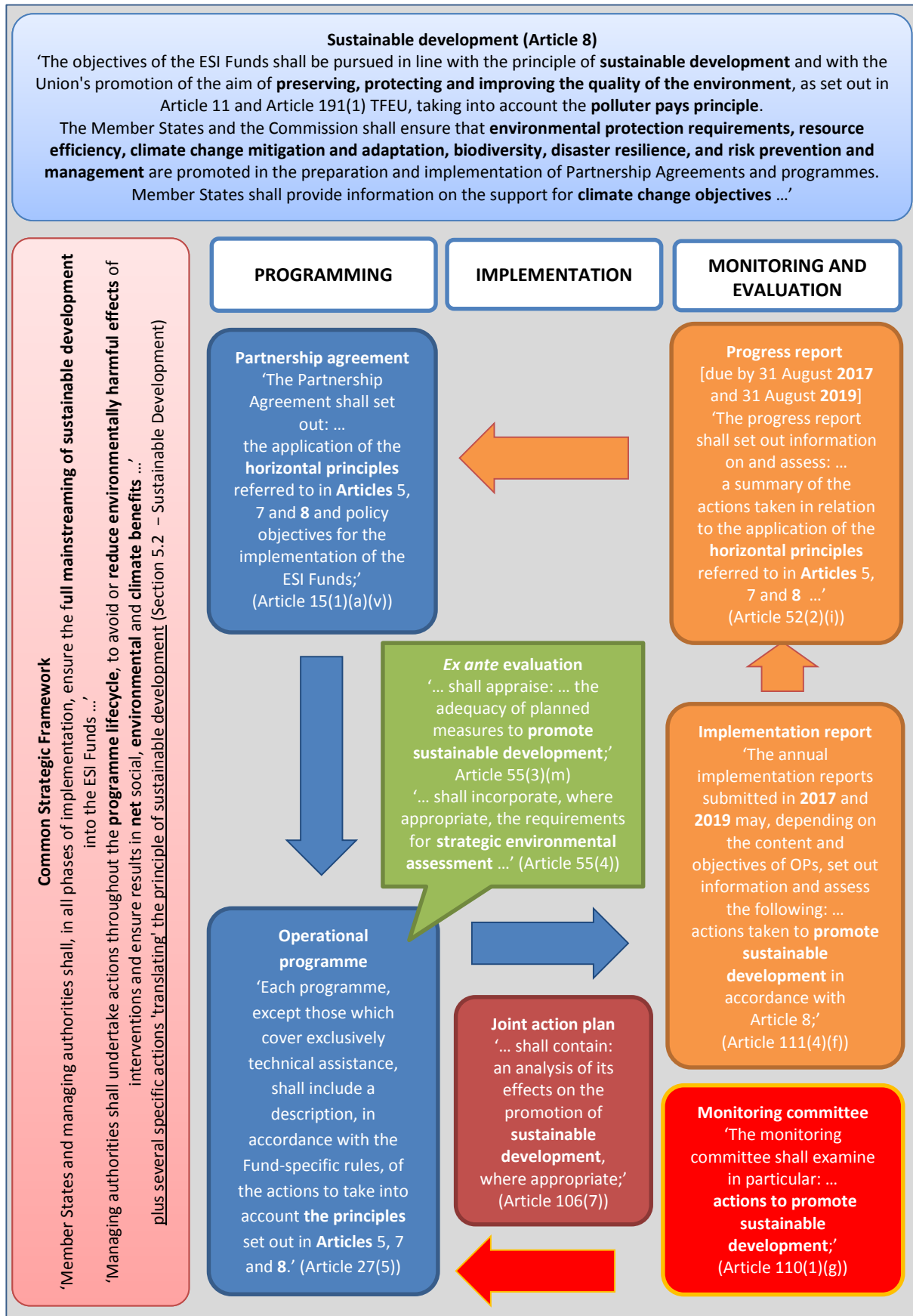
<sup>6</sup> [http://ec.europa.eu/regional\\_policy/sources/docoffic/2007/osc/l\\_29120061021en00110032.pdf](http://ec.europa.eu/regional_policy/sources/docoffic/2007/osc/l_29120061021en00110032.pdf)

<sup>7</sup> See Annex I CPR.

**Figure 2: Sustainable development principle in the 2007-2013 programming period (based on key requirements of the General Regulation)**



**Figure 3: The sustainable development principle in the 2014-2020 programming period (based on key requirements of the CPR)**



### 3.2.2 *Ex ante* conditionalities

*Ex ante* conditionalities (EACs) are a new element in cohesion policy for 2014-2020. They are intended to ensure that the prerequisites are in place for the effective and efficient use of the ESIFs and are based, to a large extent, on lessons learnt from the previous programming period.

There are two types of EAC: thematic EACs (relating to a sector or policy) and general EACs (can apply to all sectors and policies). Several EACs have a bearing of some sort on sustainable development. For example, the two environmental thematic EACs for the waste and water sectors require, *inter alia*, that sectoral (i.e. waste and river basin management) plans are in place to promote economically and environmentally sustainable investments.

These are definitely important considerations for the environment. However, to what extent have other economic sectors supported under the cohesion policy been affected by the existence of EACs promoting sustainable development? The transport EAC (requiring the preparation of a transport plan that complies with SEA requirements) seems to be the best example in this respect. The need to carry out an SEA for such plans should be taken as an opportunity to strengthen the environmental dimension of sustainable development. Given that many options are still open at the planning stage, a good SEA should, for example, recommend choosing more sustainable transport modes or early consideration of alternative routes for transport corridors to avoid or reduce impacts on Natura 2000 sites, etc.

The general EAC on legislation on environmental impact assessment (EIA/SEA) is another important mechanism for promoting sustainable infrastructure projects. The EIA<sup>8</sup> and SEA<sup>9</sup> Directives impose a high level of environmental protection and require that environmental assessments are carried out for a large number of infrastructure plans and projects.

Although Member States have to comply with the EIA Directive, there were non-compliance issues with a number of projects in 2007-2013, often left over from the period before the Member State joined the EU (e.g. old, non-compliant EIAs) and linked to incorrect transposition or ineffective application of the Directive. Therefore, the EAC's call for 'arrangements for the effective application of Union environmental legislation related to EIA and SEA' is an important source of extra pressure to ensure that projects are compliant and to avoid or reduce their environmental impacts.

---

<sup>8</sup> Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment (OJ L 26, 28.1.2012, p. 1), as amended by Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014 (OJ L 124, 25.4.2014, p. 1).

<sup>9</sup> 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 (OJ L 197, 21.7.2001, p. 30).

## 4. How much funding for the environment? Quantitative assessment of 2014-2020 allocations and environmental integration

This section looks at the financial allocations for the 2014-2020 funding period, in general and from a thematic point of view, and compares them, where possible, with investments in 2007-2013. It serves as a quantitative complement to the more analytical aspects of this report. The financial data is publicly available on the Commission's Open Data Platform<sup>10</sup>.

### 4.1 Environmental integration by thematic objective

Cohesion policy aims to strengthen economic, social and territorial cohesion in the EU by reducing imbalances between regions. It supports regional and local development to contribute to all the **thematic objectives (TOs)** laid down in the CPR:

1. research and development, and innovation;
2. information and communication technologies;
3. competitiveness of SMEs;
4. shift towards a low-carbon economy;
5. climate change adaptation, risk prevention;
6. protecting the environment and promoting resource efficiency;
7. promoting sustainable transport;
8. employment and labour mobility;
9. social inclusion and poverty;
10. education and training; and
11. institutional capacity and efficiency of public administration.

The ERDF and the CF invest in TO-6, which involves the following investment priorities:

- investing in the waste sector to meet the requirements of the Union's environmental acquis and to address needs, identified by the Member States, for investment that goes beyond those requirements;
- investing in the water sector to meet the requirements of the Union's environmental acquis and to address needs, identified by the Member States, for investment that goes beyond those requirements;
- conserving, protecting, promoting and developing natural and cultural heritage (ERDF only);
- protecting and restoring biodiversity and soil and promoting ecosystem services, including through Natura 2000, and green infrastructure;
- action to improve the urban environment, revitalise cities, regenerate and decontaminate brownfield sites (including conversion areas), reduce air pollution and promote noise-reduction measures;
- promoting innovative technologies to improve environmental protection and resource efficiency in the waste and water sectors and with regard to soil, or to reduce air pollution (ERDF only); and

---

<sup>10</sup> See <https://cohesiondata.ec.europa.eu/> and [http://ec.europa.eu/regional\\_policy/en/policy/evaluations/data-for-research/](http://ec.europa.eu/regional_policy/en/policy/evaluations/data-for-research/). At the time of writing, the Open Data Platform contains the latest known figures (for November 2015); these will be updated regularly. The figures used for the specific types of investment in this report are an update from January 2016.

- supporting industrial transition towards a resource-efficient economy, promoting green growth, eco-innovation and environmental performance management in the public and private sectors (ERDF only).

To ensure that EU investments are concentrated on the key jobs and growth priorities under the EU’s 2020 strategy, minimum allocations are set for a number of priority areas:

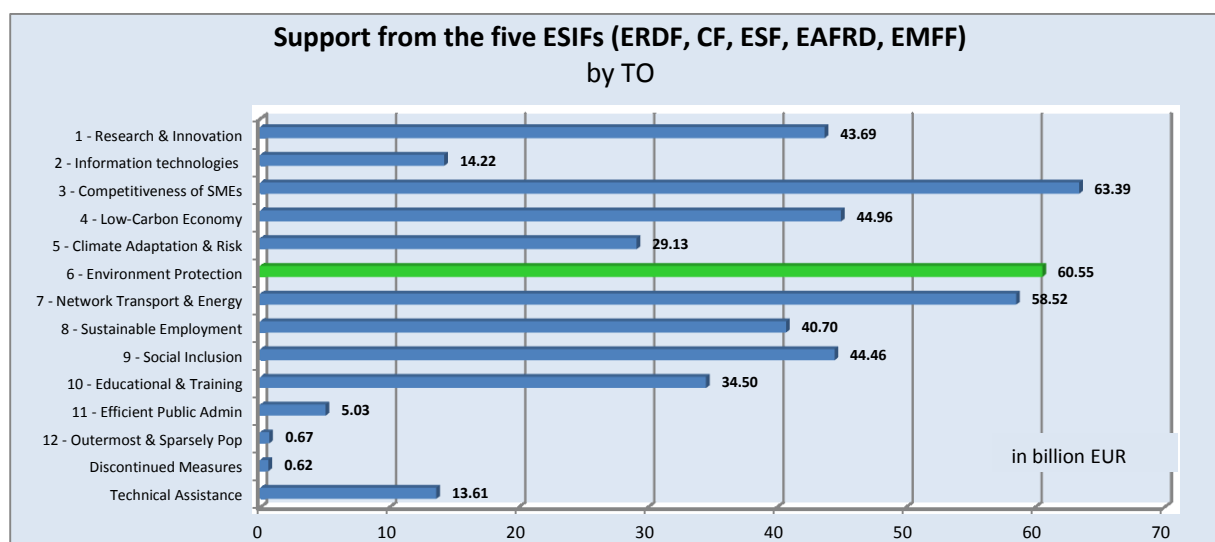
- in *more developed regions*, at least 80 % of ERDF resources at national level should be allocated to TO-1 (innovation), TO-2 (ICT), TO-3 (SME support) and TO-4 (low-carbon economy); and at least 20 % of ERDF resources at national level should be allocated to TO-4;
- in *transition regions*, at least 60 % of ERDF resources at national level should be allocated to TO-1, TO-2, TO-3 and TO-4; and at least 15 % of ERDF resources at national level should be allocated to TO-4;
- in *less developed regions*, at least 50 % of ERDF resources should be devoted to TO-1, TO-2, TO-3 and TO-4; and at least 12 % of ERDF resources at national level should be allocated to TO-4.

TO-6 is not covered by the requirements for thematic concentration, so the relevant direct environmental investments will be funded from the remaining proportions of ERDF funding (i.e. 20 % in the more developed regions, 40 % in the transition regions and 50 % in the less developed regions). There is no thematic concentration for the CF resources.

A minimum 30 % of the European Agricultural Fund for Rural Development (EAFRD) resources is earmarked for climate change and the environment<sup>11</sup>.

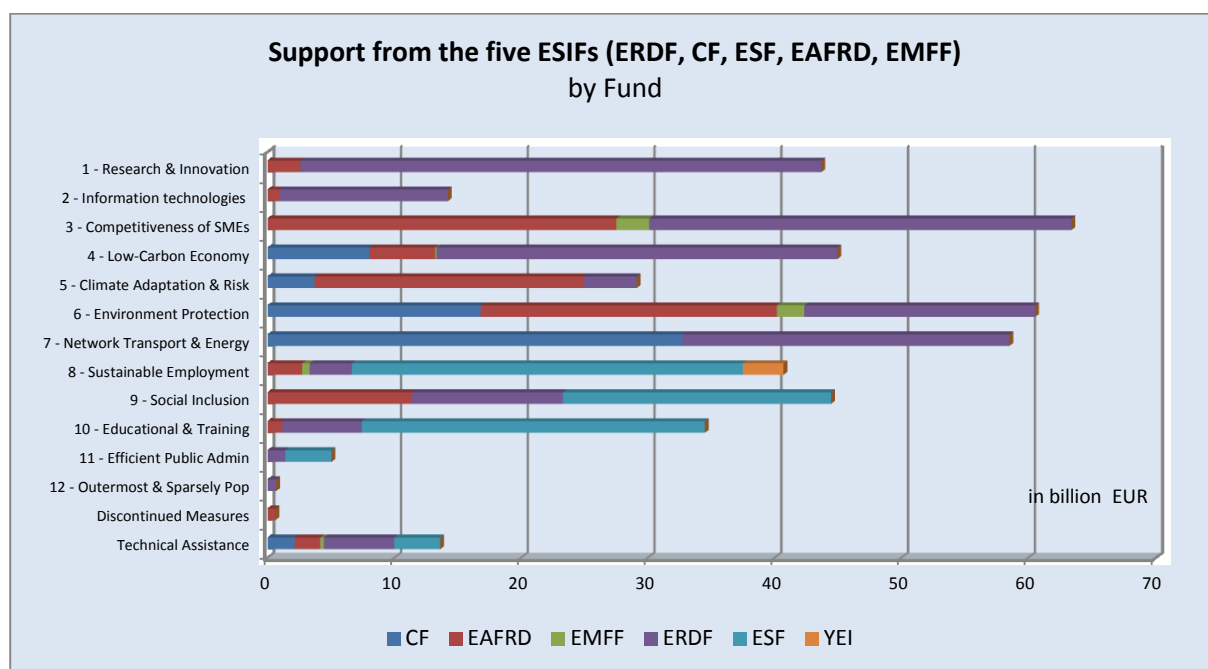
According to the latest available data, about EUR 60.6 billion (13.3 %) will be allocated to **TO-6** across the ESIFs in 2014-2020. This represents the second highest share, after support for SMEs (TO-3) with EUR 63.4 billion (13.9 %) and before transport and energy infrastructure (TO-7) with EUR 58.5 billion (13.4 %) (see Figure 4). **Looking at the five ESIFs overall, this is a positive result for TO-6** and is partly thanks to the EAFRD earmarking, which should represent EUR 28.6 billion.

**Figure 4: Support from the five ESIFs, by TO**



<sup>11</sup> See [EAFRD Regulation](#), recital 22 and Article 59(6).

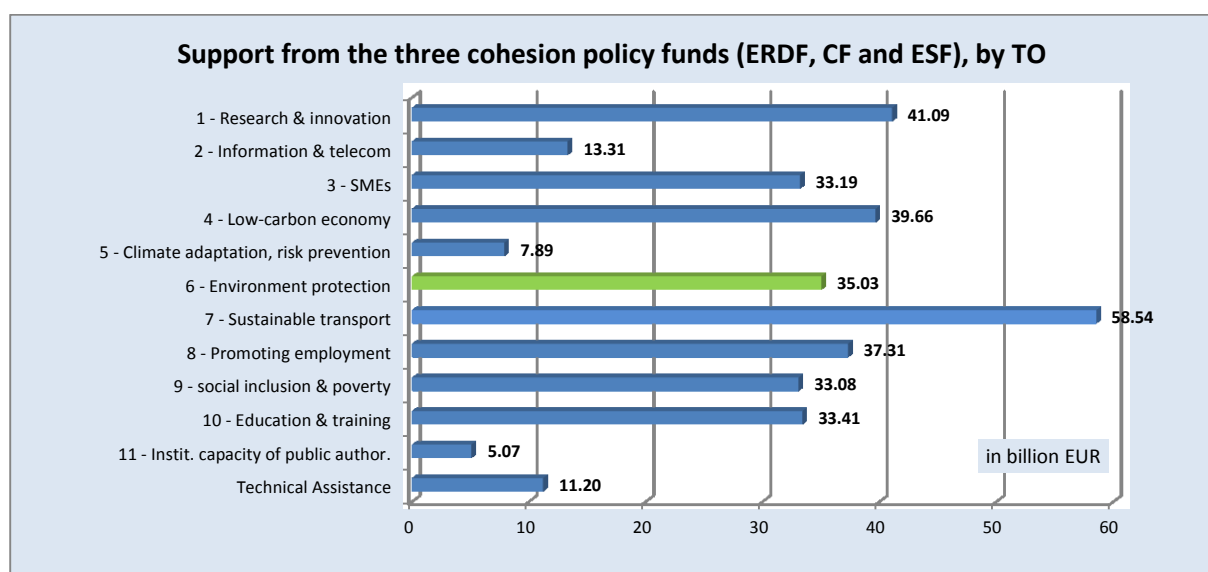
Figure 5: Support from the five ESIFs for the 11 TOs, by Fund



The picture is different if we look only at the **cohesion policy funds** (see Figure 6): ERDF, CF and the European Social Fund (ESF), bearing in mind that the ESF does not invest in TO-6. EUR 35.0 billion (only 10 % of the total) is allocated to TO-6, which is not subject to any thematic concentration requirement. As regards cohesion policy funding priorities, the **biggest allocations** are for transport and some energy infrastructures (TO-7) (EUR 58.5 billion, or 17 % of the total cohesion policy funds), followed by research (TO-1) (EUR 41.1 billion, 12 %) and low-carbon economy (TO-4) (EUR 39.7 billion, 11 %).

Investments under TO-4 (contributing to resource efficiency) and TO-5 (covering ecosystem-based approaches and ecosystem services) have an environmental dimension. Together, TOs 4, 5 and 6 will account for EUR 82.5 billion of environment-related funding.

Figure 6: Support from the three cohesion policy funds, by TO





## 4.2 Environmental integration by type of investment

A more refined way of looking at environmental investments is to consider allocations by category of investment (according to the category nomenclature in the Implementing Regulation<sup>12</sup>, as used to classify intended investments under each OP).

The two main advantages of looking at categories are that:

- it facilitates (in some cases) comparison with allocations in previous programming periods; and
- they show what types of investment are planned across all OPs, independently of the TO structure, and so provide a picture of environmental integration across the entire programming.

We should stress, however, that the allocations to categories of expenditure in the OPs are only indicative and express spending intentions. Information on actual spending will become available at the implementation stage.

### 4.2.1 Direct environmental categories

The direct environmental categories are as follows<sup>13</sup>:

017: Household waste management: minimisation, sorting, recycling measures  
018: Household waste management: thermal treatment, incineration  
019: Commercial, industrial or hazardous waste management  
020: Provision of water for human consumption (extraction, treatment, storage and distribution)  
021: Water management and drinking water conservation (including river basin management, water supply, metering, charging reduction, leak reduction etc.  
022: Waste water treatment  
023: Environmental measures aimed at reducing and / or avoiding GHG emissions  
069: Support to environmentally-friendly production processes and resource efficiency in SMEs  
083: Air quality measures  
084: Integrated prevention and pollution control (IPPC)  
085: Protection and enhancement biodiversity, nature protection and green infrastructure  
086: Protection, restoration and sustainable use of Natura 2000 sites  
087: Adaptation to climate change measures; prevention and management of climate related risks, e.g. erosion, fires, flooding, storms and drought, including awareness raising, civil protection and disaster management systems and infrastructure  
088: Risk prevention and management of non-climate related natural risks (earthquakes) and risks linked to human activities  
089: Rehabilitation of industrial sites and contaminated land

Table 1 shows allocations for the direct environmental categories and environmental investment per Member State as proportions of all such investment in the EU and of the Member State's total cohesion policy allocations.

<sup>12</sup> Commission Implementing Regulation (EU) No 215/2014 of 7 March 2014 laying down rules for implementing Regulation (EU) No 1303/2013 of the European Parliament and of the Council laying down common provisions on the European Regional Development Fund, the European Social Fund, the Cohesion Fund, the European Agricultural Fund for Rural Development and the European Maritime and Fisheries Fund and laying down general provisions on the European Regional Development Fund, the European Social Fund, the Cohesion Fund and the European Maritime and Fisheries Fund with regard to methodologies for climate change support, the determination of milestones and targets in the performance framework and the nomenclature of categories of intervention for the European Structural and Investment Funds (OJ L 69, 8.3.2014, p. 65).

<sup>13</sup> The categories are listed in Annex I to the Implementing Regulation.

**Table 1: Financial allocations for environmental categories<sup>14</sup>**

| Member States     | Allocation for environmental categories (EUR) | % of EU total allocation for environmental categories | Total cohesion policy allocation (EUR) | % of cohesion policy allocation used for environmental investments |
|-------------------|---|---|--|--|
| HR*               | 2 092 736 363                                 | 5.4 %   | 8 463 255 776                          | 24.7 %   |
| MT*               | 156 532 371                                   | 0.4 %   | 692 989 554                            | 22.6 %   |
| BG*               | 1 609 492 487                                 | 4.2 %   | 7 320 791 277                          | 22.0 %   |
| CY*               | 142 000 000                                   | 0.4 %   | 702 201 708                            | 20.2 %   |
| RO*               | 4 258 207 379                                 | 11.0 %  | 22 441 107 909                         | 19.0 %   |
| ETC <sup>15</sup> | 1 737 564 581                                 | 4.5 %   | 9 293 160 279                          | 18.7 %   |
| GR*               | 2 695 335 383                                 | 7.0 %   | 15 275 247 163                         | 17.6 %   |
| SK*               | 2 328 147 970                                 | 6.0 %   | 13 768 317 148                         | 16.9 %   |
| SI*               | 499 282 626                                   | 1.3 %   | 3 011 899 768                          | 16.6 %   |
| HU*               | 3 004 399 893                                 | 7.8 %   | 21 544 112 983                         | 13.9 %   |
| LV*               | 546 461 680                                   | 1.4 %   | 4 418 233 214                          | 12.4 %   |
| LT*               | 816 143 508                                   | 2.1 %   | 6 709 396 130                          | 12.2 %   |
| <b>EU-28</b>      | <b>38 746 378 894</b>                         | <b>100.0 %</b>  | <b>348 316 848 214</b>                 | <b>11.1 %</b>  |
| ES                | 3 006 476 879                                 | 7.8 %   | 27 141 912 630                         | 11.1 %   |
| CZ*               | 2 238 251 849                                 | 5.8 %   | 21 643 218 575                         | 10.3 %   |
| EE*               | 310 551 596                                   | 0.8 %   | 3 534 560 285                          | 8.8 %  |
| PT*               | 1 837 467 736                                 | 4.7 %   | 21 342 542 314                         | 8.6 %  |
| IT                | 2 700 978 826                                 | 7.0 %   | 31 586 254 104                         | 8.6 %  |
| PL*               | 6 083 605 105                                 | 15.7 %  | 76 866 461 337                         | 7.9 %  |
| FR                | 1 072 697 865                                 | 2.8 %   | 14 763 176 455                         | 7.3 %  |
| DE                | 1 189 671 673                                 | 3.1 %   | 18 269 459 134                         | 6.5 %  |
| FI                | 57 226 186                                    | 0.1 %   | 1 304 456 595                          | 4.4 %  |
| BE                | 67 890 825                                    | 0.2 %   | 2 020 742 087                          | 3.4 %  |
| AT                | 32 076 771                                    | 0.1 %   | 978 349 432                            | 3.3 %  |
| UK                | 232 896 949                                   | 0.6 %   | 10 974 276 104                         | 2.1 %  |
| IE                | 18 000 000                                    | 0.0 %   | 1 019 788 509                          | 1.8 %  |
| SE                | 12 282 394                                    | 0.0 %   | 1 763 510 980                          | 0.7 %  |
| DK                |   | 0.0 %   | 413 231 682                            | 0.0 %  |
| LU                |   | 0.0 %   | 39 558 626                             | 0.0 %  |
| NL                |   | 0.0 %   | 1 014 636 456                          | 0.0 %  |

\* Member States supported by the Cohesion Fund

In Table 1, the Member States are ranked according to the proportion of their total cohesion policy allocation used for environmental investments; this ranges from 24.7 % in Croatia to 0 % in Denmark, Luxembourg and the Netherlands. With a few exceptions, Member States that are CF beneficiaries allocate significantly more to environmental investments than those that can use ERDF resources only. This is explained by the fact that the CF can be used for only a limited number of TOs and that it does not have thematic concentration requirements (see above). Of the CF countries, Poland allocates the least in relative terms (7.9 %), but the most in absolute terms. Non-CF countries with less-developed regions (Spain, Italy and France — the UK being the exception) rank above those without such regions.

<sup>14</sup> As of January 2016.

<sup>15</sup> European Territorial Cooperation (ETC) programmes.

It is striking that the European Territorial Cooperation (ETC) programmes invest a much greater proportion (18.7 %) in the environmental categories than most Member States. The programmes are responsible for about 4.5 % of total environmental investments, although they account for only 2.7 % of cohesion policy funds. As explained below, this is especially marked for nature investments, adaptation to climate change and risk prevention. In addition, it should be remembered that ETC programmes are not subject to thematic concentration requirements.

In order to provide more specific explanations for environmental allocations, the following paragraphs look at the main sectors of direct and indirect environmental investments. Where relevant and possible, a comparison with the previous funding period is included.

#### 4.2.1.1 Water management

Of all environmental sectors, the water sector will again receive the most investment in the 2014-2020 period (EUR 14.7 billion). This is in line with the fact that many Member States are still facing significant needs for investment in water infrastructure in order to comply with the Water Framework Directive, Urban Wastewater Treatment Directive and the Drinking Water Directive.

**Table 2: Financial allocations for the water sector (EUR)**

| 020  | 021  | 022                  | Total                 |
|--|--|----------------------|-----------------------|
| Provision of water for human consumption (extraction, treatment) | Water management and drinking water conservation | Wastewater treatment |                       |
| 1 760 931 413  | 2 972 340 800                                    | 10 015 417 370       | <b>14 748 689 582</b> |

Nevertheless, the investments are significantly lower than in 2007-2013, when planned investments in the sector amounted to EUR 21.9 billion<sup>16</sup>. The main reason is that the Commission wanted to focus available resources on the less-developed and transition regions and, in accordance with the water legislation, on agglomerations above 2 000 population equivalent. Only in the case of a few well-justified exceptions will water infrastructure still be funded in more-developed regions. Allocations to the water sector are also lower than in the previous period in a number of CF countries (e.g. CZ, EE, HU, LV, PT and SI). It is likely that some needs have already been met in these Member States, partly thanks to previous cohesion policy investments. As an illustration, Estonia largely met its investment needs in water infrastructure in 2007-2013 and is therefore focusing on other areas in 2014-2020. In general, the European Court of Auditors has stressed that cohesion policy played a decisive role in ensuring compliance with EU water legislation<sup>17</sup>.

The extent to which the decrease of investments in water management is related to the introduction of EACs is unclear. Some Member States may have allocated fewer resources to water management because they were afraid that they would fail to comply with the EAC (linked to the adoption of river basin management plans and a water pricing policy). Although this could reduce overall environmental investment, it would arguably serve the objective of avoiding investments without having a proper strategy in place. However, the fact that allocations in other fields subject to equally demanding EACs have remained constant (e.g. waste management) or even increased significantly (e.g. energy efficiency) undermines the plausibility of this hypothesis.

<sup>16</sup> Financial data from the 2007-2013 investment period is publicly available at: [http://ec.europa.eu/regional\\_policy/en/policy/evaluations/data-for-research/](http://ec.europa.eu/regional_policy/en/policy/evaluations/data-for-research/)

<sup>17</sup> European Court of Auditors, Special Report 2/2015, *EU funding of urban wastewater treatment plants in the Danube river basin: further efforts needed in helping Member States to achieve EU wastewater policy objectives* (Luxembourg, 2015).

#### 4.2.1.2 Waste management

The waste sector is another typical target for environmental investments under the cohesion policy. At EUR 5.5 billion, allocations for 2014-2020 remain at the same level as in the previous period, which indicates that there are still significant needs for basic waste management infrastructure in several Member States. The highest allocations are in Poland, Croatia, Slovakia and Hungary.

**Table 3: Financial allocations for the waste sector (EUR)**

| 017  | 018  | 019  | Total                |
|--|--|--|----------------------|
| Household waste management: minimisation, sorting, recycling | Household waste management: MBT, thermal treatment, incineration, landfill | Commercial, industrial or hazardous waste management |                      |
| 2 122 706 826  | 2 775 231 106  | 621 806 779  | <b>5 519 744 712</b> |

For the first time, the categorisation data allows us to distinguish between the first three and last two stages of the waste hierarchy. It seems that more funding goes to recovery (including incineration) and disposal than to prevention, reuse and recycling. However, it should be pointed out that recovery is much more capital-intensive than recycling. More importantly, the Commission stressed in the OP negotiations that new investments in the waste sector should be in line with waste management plans designed to meet national recycling targets. This means that funding for landfill will be provided only in exceptional and well-justified cases (e.g. mainly for non-recoverable hazardous waste or closures of illegal landfills) and that funding for incineration should take due account of the need to avoid overcapacity and not to jeopardise recycling targets.

#### 4.2.1.3 Biodiversity and nature

Two investment categories involve nature and biodiversity investments, including support for green infrastructure or 'nature-based solutions'. Member States have allocated a total of EUR 3.7 billion to these categories.

**Table 4: Financial allocations for biodiversity and nature (EUR)**

| 085  | 086  | Total                |
|--|--|----------------------|
| Protection and enhancement of biodiversity, nature protection and green infrastructure | Protection, restoration and sustainable use of Natura 2000 sites |                      |
| 2 690 733 258  | 982 024 060  | <b>3 672 757 318</b> |

Two phenomena stand out here:

- many Member States have selected these categories (i.e. 22, which is more than for water or waste), but the overall amounts per Member State are relatively low (EUR 141 million on average, excluding the ETC programmes); and
- this is the field of environmental investment where allocations have increased most (from only EUR 2.5 billion in 2007-2013).

These observations suggest that Member States acknowledged the merit of including green infrastructure measures across various investment priorities, as the Commission stressed during the

negotiations<sup>18</sup>. The fact that category 085 was selected in multiple TOs (4, 5, 6, 7, 9 and ‘multi-TO priority axes’) supports this assumption.

Looking at the breakdown by Member State, it appears that the most important contribution to nature protection will come from the ETC programmes, rather than Member States’ mainstream programmes. The former will provide EUR 575 million of the EUR 3.7 billion of support for nature protection, which is three times more than in 2007-2013. This level of support is no doubt linked to the fact that environmental issues know no borders, so it is appropriate to protect the environment at transnational level, e.g. by developing green infrastructure corridors or tackling air pollution or water quality issues.

#### 4.2.1.4 Climate change adaptation and risk prevention

Member States have allocated EUR 7.4 billion to the categories of intervention relating to climate change adaptation and risk prevention; this roughly corresponds to the allocations to TO-5.

**Table 5: Financial allocations for climate change adaptation and risk prevention (EUR)**

| 087  | 088   | Total                |
|--|---|----------------------|
| Adaptation to climate change measures and prevention and management of climate-related risks | Risk prevention and management of non-climate related risks |                      |
| 6 383 996 594  | 1 056 874 447   | <b>7 440 871 041</b> |

Through these investments, cohesion policy can address various types of weather-related, geophysical and industrial risks, which may or may not be linked to climate change. This includes measures to reduce Europe’s vulnerability to the effects of climate change in the broad sense. While some investments will be used to address multiple (climate- and non-climate-related) risks, Member States have allocated significantly more to category 087 than to category 088. We assume that this is at least partly due to the fact that the former accounts for 100 % in the calculation of support for climate change objectives, while the latter does not, according to the values of the coefficient for the calculation of support to climate change objectives set in the Commission Implementing Regulation (EU) No 215/2014<sup>19</sup>.

Many Member States (21) have selected these categories and they also benefit substantially from the ETC programmes. Allocations to the equivalent categories in 2007-2013 were similar, at EUR 7.6 billion.

<sup>18</sup> See also the green infrastructure guidance for the programming phase: [http://ec.europa.eu/regional\\_policy/en/information/publications/guides/2013/guide-to-multi-benefit-cohesion-policy-investments-in-nature-and-green-infrastructure](http://ec.europa.eu/regional_policy/en/information/publications/guides/2013/guide-to-multi-benefit-cohesion-policy-investments-in-nature-and-green-infrastructure)

<sup>19</sup> The Commission Implementing Regulation (EU) No 215/2014 of 7 March 2014 laying down rules for implementing Regulation (EU) No 1303/2013 of the European Parliament and of the Council laying down common provisions on the European Regional Development Fund, the European Social Fund, the Cohesion Fund, the European Agricultural Fund for Rural Development and the European Maritime and Fisheries Fund and laying down general provisions on the European Regional Development Fund, the European Social Fund, the Cohesion Fund and the European Maritime and Fisheries Fund with regard to methodologies for climate change support, the determination of milestones and targets in the performance framework and the nomenclature of categories of intervention for the European Structural and Investment Funds (OJ L 69, 8.3.2014, p. 65).

#### 4.2.1.5 Other environmental fields

Other categories of direct environmental investment are summarised below.

**Table 6: Financial allocations for other environmental fields (EUR)**

| 023  | 069                                     | 083                  | 084  | 089  | Total                |
|--|---|----------------------|--|--|----------------------|
| Environmental measures to reduce/avoid GHG emissions | Support for resource efficiency in SMEs | Air quality measures | Integrated prevention and pollution control (IPPC) | Rehabilitation of industrial sites and contaminated land |                      |
| 453 754 171  | 2 345 072 648                           | 1 579 216 989        | 153 824 222  | 2 832 448 211  | <b>7 364 316 241</b> |

Small allocations include investments in IPPC and environmental measures for climate mitigation, which are selected in TO-6 and TO-4. Somewhat more significant are the air quality measures, which are predominantly programmed in four Member States where certain cities are facing severe air pollution problems (CZ, PL, RO and SK), and are at a level similar to that in 2007-2013. EUR 2.3 billion will be invested in resource-efficiency measures for SMEs (as compared with EUR 1.9 billion in 2007-2013), a category is mostly included in TO-4 and TO-3. Finally, EUR 2.8 billion goes to the rehabilitation of industrial sites and contaminated land (as compared with EUR 2.4 billion in 2007-2013). These investments are to a large extent aimed at urban regeneration and included in the priority axes dedicated to sustainable urban development (Article 7 of the ERDF Regulation<sup>20</sup>).

#### 4.2.2 Indirect environmental categories

Indirect environmental investments reflect the cross-cutting nature of environmental mainstreaming, i.e. the integration of environmental aspects across non-environmental TOs and priorities, such as energy, transport and tourism. Below is a list of the indirect environmental categories discussed in the following three sections:

##### Energy

- 009: Renewable energy: wind
- 010: Renewable energy: solar
- 011: Renewable energy: biomass
- 012: Other renewable energy (including hydroelectric, geothermal,
- 013: Energy efficiency renovation of public infrastructure demons
- 014: Energy efficiency renovation of existing housing stock, demo
- 015: Intelligent Energy Distribution Systems at medium and low voltage levels
- 016: High efficiency co-generation and district heating
- 065: Research and innovation processes, technology transfer and c
- 068: Energy efficiency and demonstration projects in SMEs and sup
- 070: Promotion of energy efficiency in large enterprises
- 071: Development and promotion of enterprises specialised in low-carbon

##### Transport

- 024: Railways (TEN-T Core)
- 025: Railways (TEN-T comprehensive)
- 026: Other Railways
- 027: Mobile rail assets
- 035: Multimodal transport (TEN-T)
- 036: Multimodal transport
- 039: Seaports (TEN-T)
- 040: Other seaports
- 041: Inland waterways and ports (TEN-T)

<sup>20</sup> Regulation (EU) No 1301/2013 of the European Parliament and of the Council of 17 December 2013 on the European Regional Development Fund and on specific provisions concerning the Investment for growth and jobs goal and repealing Regulation (EC) No 1080/2006 (OJ L 347, 20.12.2013, p. 289).

042: Inland waterways and ports (regional and local)  
 043: Clean urban transport infrastructure and promotion  
 044: Intelligent transport systems (including the introduction of demand management, tolling systems, IT monitoring, control and information systems)

**Tourism**

090: Cycle tracks and footpaths  
 091: Development and promotion of the tourism potential of natural areas

**4.2.2.1 Environmental integration in energy investments**

The shift to a low-carbon economy is a key priority for the 2014-2020 cohesion policy, as is reflected in the thematic concentration requirements for TO-4. Member States have gone beyond these requirements and investments in this objective have more than doubled as compared with the previous period. As shown in the table below, about EUR 29.2 billion is now going into energy investments, as against EUR 11.7 billion in 2007-2013.

**Table 7: Financial allocations for environmental integration in energy (EUR)**

|                           |  |                       |
|---------------------------|--|-----------------------|
| 005                       | Electricity (generation, storage and transmission)                       | 1 276 962 624         |
| 006                       | Electricity (TEN-E)  | 105 000 000           |
| 007                       | Natural gas  | 461 958 894           |
| 008                       | Natural gas (TEN-E)  | 468 250 000           |
| 009                       | Renewable energy: wind   | 432 632 677           |
| 010                       | Renewable energy: solar  | 1 195 085 591         |
| 011                       | Renewable energy: biomass  | 1 862 011 979         |
| 012                       | Other renewable energy (including hydroelectric, geothermal,             | 1 375 354 703         |
| 013                       | Energy efficiency renovation of public infrastructure demons             | 7 909 592 043         |
| 014                       | Energy efficiency renovation of existing housing stock, demo             | 5 420 251 013         |
| 015                       | Intelligent Energy Distribution Systems at medium and low voltage levels | 1 083 956 663         |
| 016                       | High efficiency co-generation and district heating                       | 1 651 810 830         |
| 065                       | Research and innovation processes, technology transfer and c             | 2 113 691 903         |
| 068                       | Energy efficiency and demonstration projects in SMEs and sup             | 2 744 470 825         |
| 070                       | Promotion of energy efficiency in large enterprises                      | 636 588 075           |
| 071                       | Development and promotion of enterprises specialised in low-carbon       | 336 456 110           |
| <b>Total</b>              |  | <b>29 074 073 930</b> |
| <b>Sustainable energy</b> |  | <b>26 761 902 412</b> |
|                           |  | <b>92.0 %</b>         |

The energy investments focus mainly on energy efficiency, renewable energy and smart distribution systems. This is linked to the Commission’s commitment to earmarking 20 % of the EU budget for climate-related spending. A methodology was developed to track this spending using the intervention categories. As a result, EUR 113 billion (about 25 % of all ESIF funding) will be spent on climate change. For the ERDF and the CF, the proportions are 19 % and 28 % respectively.

**4.2.2.2 Environmental integration in transport investments**

Transport remains an important priority for cohesion policy investments, although its significance is decreasing in both absolute and relative terms. While it was the biggest category in 2007-2013, with EUR 82 billion, it is now in third place, with about EUR 69 billion.

**Table 8: Financial allocations for environmental integration in transport (EUR)**

|              |  |                       |
|--------------|--|-----------------------|
| <b>024</b>   | Railways (TEN-T Core)  | 7 880 941 401         |
| <b>025</b>   | Railways (TEN-T comprehensive)   | 4 597 184 206         |
| <b>026</b>   | Other railways   | 4 161 792 262         |
| <b>027</b>   | Mobile rail assets   | 2 022 722 921         |
| <b>028</b>   | TEN-T motorways and roads - Core network (new build)   | 9 107 880 593         |
| <b>029</b>   | TEN-T motorways and roads - Comprehensive network (new build)  | 6 657 791 224         |
| <b>030</b>   | Secondary road links to TEN-T road network and nodes (new build)   | 2 512 215 319         |
| <b>031</b>   | Other national and regional roads (new build)  | 2 016 509 619         |
| <b>032</b>   | Local access roads (new build)   | 187 861 820           |
| <b>033</b>   | TEN-T Reconstructed or improved road   | 2 067 381 623         |
| <b>034</b>   | Other reconstructed or improved road (motorway, national, re   | 7 400 519 282         |
| <b>035</b>   | Multimodal transport (TEN-T)   | 1 235 685 522         |
| <b>036</b>   | Multimodal transport   | 978 607 147           |
| <b>037</b>   | Airports (TEN-T)   | 394 081 706           |
| <b>038</b>   | Other airports <sup>10</sup>   | 44 836 191            |
| <b>039</b>   | Seaports (TEN-T)   | 1 474 106 498         |
| <b>040</b>   | Other seaports   | 551 100 269           |
| <b>041</b>   | Inland waterways and ports (TEN-T)   | 354 408 876           |
| <b>042</b>   | Inland waterways and ports (regional and local)  | 465 294 193           |
| <b>043</b>   | Clean urban transport infrastructure and promotion   | 12 352 399 835        |
| <b>044</b>   | Intelligent transport systems (including the introduction of demand management, tolling systems, IT monitoring, control and information systems) | 2 054 352 367         |
| <b>Total</b> |  | <b>68,517,672,876</b> |
|              | <b>Sustainable transport (categories used for climate tracking)</b>  | <b>38 128 595 497</b> |
|              | (Without applying the 40 % coefficient)  | <b>55.6 %</b>         |

However, the biggest shift is in the modal split. Overall, less support will go to basic modal infrastructure such as roads (down from EUR 42 billion to EUR 30 billion) and airports (from EUR 1.5 billion to EUR 0.4 billion). Allocations to rail investments have dropped by 20 % in absolute terms, but when one adds the likely Connecting Europe Facility's contribution to rail (to which a part of the CF was transferred), rail investments will increase in both absolute and relative terms as compared with 2007-2013.

Much more is invested in integrated, multi-modal and intelligent transport systems. Allocations to these categories now total EUR 16.6 billion, as compared with EUR 11 billion in 2007-2013. Member States have included much of this investment under TO-4 (rather than TO-7), using the opportunity to include low-carbon transport investments in investment priority 4(e) or 4(v). In such cases, the focus is on urban areas.

#### **4.2.2.3 Environmental integration in the tourism sector**

The investments in [Table 1](#) do not include support for natural and cultural heritage. The Commission classified these categories under 'environment' and one of the ERDF investment priorities in TO-6 focuses on the conservation, protection, development and promotion of natural and cultural heritage.

A total of EUR 7.2 billion has been allocated to these categories, across TOs 3, 6, 8, 9 and 11, including more than EUR 1 billion under ETC programmes. Some of the investments include specific support for tourism. There may be concerns that such investments will not contribute to the overall objective of environmental protection and resource efficiency. This will have to be monitored at the level of project selection and in the course of programme implementation.



**Table 9: Financial allocations for environmental integration in the tourism sector (EUR)**

|              |   |                      |
|--------------|---|----------------------|
| <b>090</b>   | Cycle tracks and footpaths  | 1 532 955 998        |
| <b>091</b>   | Development and promotion of the tourism potential of natural areas | 1 039 061 718        |
| <b>092</b>   | Protection, development and promotion of public tourism assets      | 1 026 961 262        |
| <b>093</b>   | Development and promotion of public tourism services                | 342 854 709          |
| <b>094</b>   | Protection, development and promotion of public cultural heritage   | 4 362 083 037        |
| <b>095</b>   | Development and promotion of public cultural heritage services      | 440 568 332          |
| <b>Total</b> |   | <b>8 744 485 056</b> |

**Sustainable tourism**

**2 572 017 715**

### 4.3. Environmental integration in the ETC programmes

As indicated above, the ETC programmes provide substantial support for environmental protection (19 % of the ETC funds are allocated to environmental investments). Many prioritise the **protection of common natural assets** such as seas, rivers and natural areas, and risk management. Raising awareness of environment-related issues is another important objective of ETC activities (e.g. conferences, workshops, education campaigns). It is interesting to note that one programme has proposed the development of a common environmental infrastructure (for urban wastewater treatment on the island of Saint Martin).

**Table 10: Financial allocations for environmental integration in the ETC programmes (EUR)**

|            |   |               |
|------------|---|---------------|
| <b>017</b> | Household waste management: minimisation, sorting, recycling          | 21 466 198    |
| <b>018</b> | Household waste management: thermal treatment, incineration           | 10 258 850    |
| <b>019</b> | Commercial, industrial or hazardous waste management                  | 49 104 970    |
| <b>020</b> | Provision of water for human consumption (extraction, treatment)      | 1 272 214     |
| <b>021</b> | Water management and drinking water conservation (including           | 131 380 588   |
| <b>022</b> | Waste water treatment   | 52 885 670    |
| <b>023</b> | Environmental measures aimed at reducing and / or avoiding g          | 88 332 367    |
| <b>069</b> | Support to environmentally-friendly production processes and          | 131 223 240   |
| <b>083</b> | Air quality measures  | 14 063 419    |
| <b>084</b> | Integrated prevention and pollution control (IPPC)                    | 31 990 090    |
| <b>085</b> | Protection and enhancement biodiversity, nature protection a          | 414 252 332   |
| <b>086</b> | Protection, restoration and sustainable use of Natura 2000 s          | 160 898 884   |
| <b>087</b> | Adaptation to climate change measures and prevention of climate risks | 428 380 189   |
| <b>088</b> | Risk prevention and management of non-climate related natural risks   | 182 129 498   |
| <b>089</b> | Rehabilitation of industrial sites and contaminated land              | 19 926 070    |
|            |   | 9 293 160 279 |
| 18.7 %     | <b>1 737 564 581</b>  |               |

### 4.4 Conclusions

**Support for environmental protection has decreased slightly** compared with the previous programming period: in areas covered by TO-6, investments amounted to around EUR 46 billion in 2007-2013. There has been a reorientation of the policy focus, with specific earmarking for certain categories, in particular the low-carbon economy (TO-4): allocations to TO-4 now total about EUR 40 billion, up from only EUR 16.6 billion. However, support for a low-carbon economy also promotes environmental objectives such as resource efficiency and less air pollution. The decrease in environmental investments is almost entirely due to reductions of EUR 7 billion in the water sector. This may be due to the fact that such investments are eligible only in the less-developed

regions in 2014-2020, and to needs having been addressed by significant investments in the past. This issue requires further investigation.

Overall, it can be noted that specific areas (in particular, nature and biodiversity protection) are receiving more funding and that a large proportion of ETC spending is on the environment.

Finally, the strong CPR provision on environmental integration (Article 8) has probably encouraged managing authorities to pay more attention to the concrete integration of environmental concerns in their investment choices. In general, the picture that emerges is one of a growing trend of environmental integration under the cohesion policy that is not limited to the traditional environmental sectors, but expanding to more and more sectors, with real efforts to embed environmental considerations in other policy areas.

## 5. Environmental integration at programme level

The environmental integration requirements for 2014-2020 called for greater efforts at all stages in OPs, which did not happen systematically in all Member States in the previous period. The managing authorities face the challenge of how to implement these provisions on the ground; how to translate them into effective investment priorities, procedures and good practice tools ensuring that environmental objectives are integrated throughout the various programme and project phases.

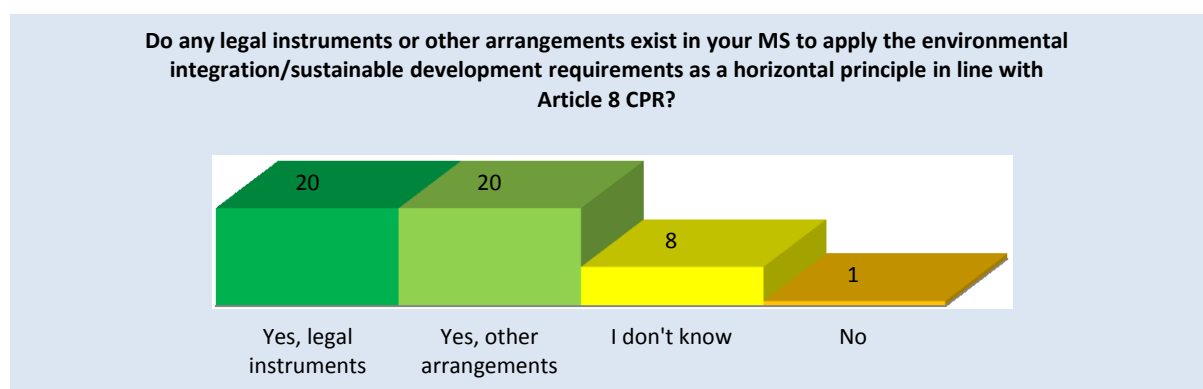
In 2007-2013, the sustainable development principle was implemented in the course of programmes and projects largely through compliance with legislative requirements, in particular as regards the nature and environmental impact assessments.

This section looks at how sustainable development is integrated as a cross-cutting principle in 2014-2020 and the specific issues that the principle refers to. It also screens other 'hooks' for environmental integration at programme level, including SEAs and the role of partners and environmental networks.

### 5.1 Sustainable development as a cross-cutting principle – approaches and mechanisms

The CPR does not prescribe exactly how Article 8 should be implemented at programme level. As reflected in the responses to our questionnaire, Member States have tried to achieve environmental integration using a variety of procedural tools, including a set of assessment procedures, proofing tools, and monitoring and reporting systems (e.g. SEA, EIA and performance reserve funds), and by providing clear guidance.

**Figure 7: Existence of legal instruments or other arrangements to apply environmental integration/sustainable development requirements as a cross-cutting principle (Article 8 CPR)**



In all, 20 respondents (see Figure 7) confirmed that they have legal instruments in place to apply the environmental integration/sustainable development requirements as a cross-cutting principle. The majority of answers referred either to impact assessment requirements (8), general environmental legislation or sectoral environmental requirements (9).

Three respondents (Hungary, Denmark and Finland) referred to specific legal instruments established to support environmental integration in cohesion policy. For instance, a legislative act in Hungary sets out how to integrate cross-cutting (sustainable development) requirements into OPs and support schemes in the 2014-2020 programming period<sup>21</sup>. This includes references to the establishment of an inter-institutional working group, the national sustainable development strategy, the national environment programme and environmental legislation. Finland's law on

<sup>21</sup> Government Decree No 272/2014.

structural fund management is an example of regulatory good practice, with provisions on sustainable development, renewal, welfare and social cohesion<sup>22</sup>.

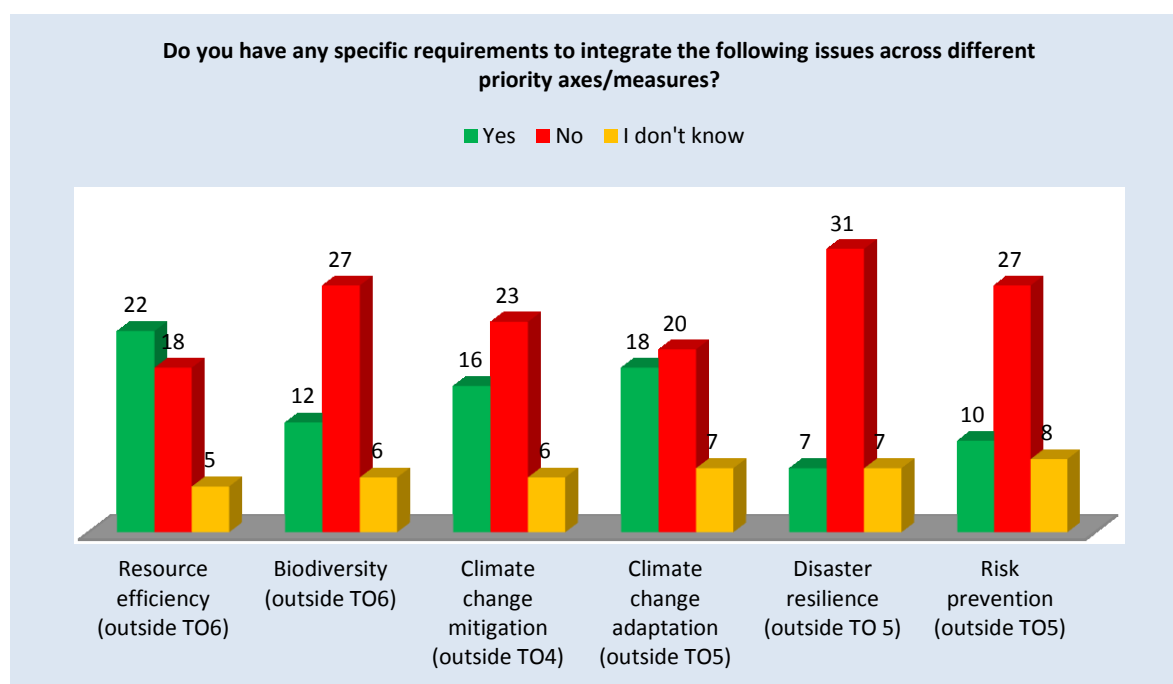
Again, 20 respondents confirmed that they have non-legislative arrangements to support environmental integration. Five referred to national sustainable development strategies and others to guidelines, monitoring requirements or specific questions in application forms.

The survey results show that many programmes still interpret sustainable development in environmental terms and that relevant aspects of EU-funded programmes are delegated to environmental authorities rather than being addressed in an integrated manner.

## 5.2 Addressing specific issues listed in Article 8

Article 8 CPR refers to the overall promotion of sustainable development, but also to specific topics: resource efficiency, biodiversity, climate change mitigation, climate change adaptation, disaster resilience, and risk prevention and management. Each of these relates to specific investment priorities within specific TOs, but we looked at whether they are also integrated in a cross-cutting way in other TOs, in line with the spirit of Article 8. On the basis of the replies (see Figure 8), it seems that OPs struggle to do this.

**Figure 8: Do you have any specific requirements to integrate the following issues across different priority axes/measures?**



### 5.2.1 Resource efficiency

The results presented in Figure 8 indicate that resource efficiency is the easiest topic to integrate in a cross-cutting way (generating more 'yes' than 'no' answers), because many economic development measures, e.g. support for SMEs under TOs 3 and 4, aim at efficiency gains in terms of material and energy inputs. Nevertheless, this does not necessarily include considerations of increased production capacities and rebound effects.

<sup>22</sup> <https://www.finlex.fi/fi/laki/ajantasa/2014/20140007>

Interestingly, one respondent noted that ‘rather than requirements, there are opportunities to encompass resource efficiency into elements of business support and innovation support as standard. Stakeholders developing operations are considering how best to do this’.

**Box 3: Supporting resource efficiency under TOs 1 and 3 (ERDF/CF operational programme for the implementation of EU cohesion policy 2014-2020, SI)**

Specific measures and a special result indicator under TO-3 target improved resource productivity. These promote energy efficiency, renewable energy sources, resource efficiency (e.g. industrial symbiosis), waste prevention and more effective waste management. The overall goal is to support a shift to a circular economy.

In addition, under TO-1 (in the context of eco-innovation), support will be given to the development of new materials based on renewable and natural resources, and of environment-friendly products, processes, services and business models (e.g. in terms of reducing dependence on primary raw materials, the design of processes and products for reuse and recycling, and waste management). This will address every stage of the lifecycle, the concept of cradle-to-cradle design and efforts to increase material and energy efficiency.

### 5.2.2 Biodiversity

Although the quantitative section of this report demonstrated that green infrastructure measures are widely integrated across various TOs, a large majority of respondents seem unaware of the integration of biodiversity outside TO-6. Some did give examples of biodiversity integration in project selection criteria (see [Section 6](#)).

As an example of good practice in integrating biodiversity considerations, one respondent mentioned that ‘[t]he aspect of biodiversity is included under the relevant investment priorities under the guiding principles. These aspects are also included in the selection criteria’.

### 5.2.3 Climate change mitigation

Only 16 respondents stated that specific requirements exist to include climate change mitigation outside TO-4. Nevertheless, the integration of climate change mitigation aspects is already covered by the requirement to dedicate 20 % of expenditure per Member State to climate-related spending.

The UK respondent referred to the building research establishment environmental assessment methodology (BREEAM) to integrate low-carbon requirements for buildings (see Box 4). In Finland, guidance was developed for low-carbon project appraisal in ERDF<sup>23</sup>.

**Box 4: Sustainability standard for buildings (UK)**

BREEAM is a sustainability assessment method for master planning projects, infrastructure and buildings. It addresses a number of lifecycle stages, such as new construction, refurbishment and in-use. Globally, there are more than 531 800 BREEAM-certified developments and almost 2 209 800 buildings have been registered for assessment since it was first launched in 1990. BREEAM inspires developers and creators to excel, innovate and make effective use of resources. The focus on sustainable value and efficiency makes BREEAM-certified developments attractive property investments and generates sustainable environments that enhance the well-being of the people who live and work in them.

**Further information:**

The [BREEAM website](#) has a [Briefing paper on mitigation, adaption, resilience: managing climate change risk](#)

<sup>23</sup> [Managing authority guidance for low-carbon project appraisal in ERDF](#) and [SEA guidelines for low-carbon project appraisal](#).

### 5.2.4 Climate change adaptation

Adaptation measures are also included in the climate-tracking methodology of the 2014-2020 regulations. The replies to the questionnaire are almost evenly divided between ‘yes’ and ‘no’.

### 5.2.5 Disaster resilience

Disaster resilience is the topic with most ‘no’ replies in the questionnaire.

### 5.2.6 Risk prevention

Less than a third of respondents indicated that risk prevention requirements are integrated outside TO-5. Risk prevention is included in TO-6 in Slovenia as a secondary positive indicator (output indicator: ‘number of water bodies with improved status due to the rehabilitation of watercourses through re-naturalisation actions’). Such actions (e.g. re-naturalisation of floodplains) would in many cases improve the hydrological regime status and the morphological conditions and connectivity of water bodies, but they would also reduce flood risks.

**Why is it so difficult to integrate climate change, disaster resilience and risk prevention across priority axes/measures?**

One reason for the low number of positive replies in this respect could be that respondents consider these aspects to be relevant only for building infrastructure. Such requirements would then be a part of decisions as to where and where not to build, and therefore an issue of national legislation and eligibility.

## 5.3 OPs’ section 11.1 on sustainable development

According to the template and guidelines for the 2014-2020 OPs, section 11.1 on sustainable development (part of section 11 on cross-cutting principles) is to include a description of specific actions taking into account environmental protection requirements, resource efficiency, climate change mitigation and adaptation, disaster resilience and risk prevention and management.

A sample analysis showed that several Member States’ OPs refer in section 11.1 to Article 8 and EU-level policies (including the TFEU, legislation on environmental assessments, Europe 2020, Natura 2000 priority action frameworks, etc.) or to national sustainable development strategies or frameworks, legislation and guidelines (see Box 5) to illustrate the integration of sustainable development in their programmes.

#### **Box 5: Environmental mainstreaming guidelines (BG)**

Two strategic guidelines for environmental integration have been drawn up for the OP managing authorities in Bulgaria. Prepared by the Ministry of Environment and Water, in cooperation with the competent ministries, the guidelines cover the programming and implementation of the partnership agreement and programmes for 2014-2020. In order to meet the legislative requirements, the first part of the document outlines areas of intervention and identifies environmental mainstreaming measures to be included in the programmes. The second part proposes programme-specific criteria that give priority to funding for projects that contribute as much as possible to environmental protection.

The guidelines were approved by the Council of Ministers.

**Further information:** <http://ope.moew.government.bg/en/pages/integrirane-okolna-klimat/89#1>

In some cases, section 11.1 includes very specific integration measures and requirements. In Austria, it is considered that the national policy framework for sustainable development is already well developed and functions as eligibility criteria, so few new elements are added in section 11.1.

In terms of topics addressed in section 11.1 (see Box 6), the focus is on the low-carbon economy (research and innovation, SMEs, sustainable transport, jobs, communities, energy efficiency and renewable energy), nature (including biodiversity, ecosystem-based approaches, green infrastructure) and climate change adaptation.

**Box 6: Cross-cutting selection criteria and guidance for cross-cutting criteria (SE)**

The Swedish OPs apply cross-cutting classification criteria to ensure the integration of the cross-cutting principle of sustainable development. The criteria support the selection process, facilitate monitoring and create a tool for dialogue with project proponents. Chapter 11 of the programmes requires that:

1. the background and project description describes how the cross-cutting principle is used to achieve the goals and objectives of the project;
2. the project's activities and costs clearly show how the cross-cutting principle will be applied in the course of project implementation; and
3. in the follow-up to the project, the project proponent plans to demonstrate how the cross-cutting principle has been applied to achieve the goals and what results have been achieved.

The regional OPs must address two of the cross-cutting conditions. Projects in the national programme are assessed case by case on the basis of how well the cross-cutting criteria are integrated. To support the integration of the criteria, the national managing authority has developed a guide that is intended to support and inspire project proponents in the application process. The guide answers questions relating to resource use, CO<sub>2</sub> emissions, energy efficiency, sustainable transport application of innovative products and methodologies, ecosystem services, cooperation with other regional actors on environmental issues, harmonisation of project objectives and EU and national environmental legislation, etc.

Section 11.1 also refers to instruments used to achieve integration, such as sustainable development indicators (see Box 7), specific national guidelines and green public procurement, and to positive environmental effects, sustainable building standards and awareness-raising.

**Box 7: Sustainable development indicator (Wales, UK)**

In the ESF OP for East Wales, sustainable development result indicator targets will be set at priority axis level to help ensure that operations address the programme's CCT objectives.

For example, 75 % of operations under the 'tackling poverty through sustainable employment' priority and 10 % of operations under the 'skills for growth' and the 'youth employment' priorities will integrate sustainable development into awareness-raising, education and training programmes.

Some Member States refer to the selection of operations and include considerations in section 11.1 that are to be taken into account in the guiding principles for project selection.

Finally, some Member States refer to specific principles, such as the 'polluter pays' principle or the partnership principle.

## 5.4 Strategic environmental assessment

Directive 2001/42/EC<sup>24</sup> (the SEA Directive) requires Member States to assess the environmental effects of certain plans and programmes. Under Article 55(4) CPR, the *ex ante* evaluation must incorporate SEA requirements, where applicable.

In principle, most programmes co-financed by the ERDF and the CF required an SEA, while most of the ESF programmes did not.

An SEA is also required for comprehensive transport plans produced as a precondition for cohesion policy financing of transport infrastructure under TO-7. As such plans provide frameworks for large infrastructure projects, SEAs (if done properly) could significantly reduce their environmental footprint.

There is no legal requirement to adapt programming choices to the outcomes of SEAs. Yet, if done properly, the SEA itself will have an impact on the programming process and ensure open public participation at an early stage. The SEA can help to:

- identify projects and/or types of project likely to have significant effects on Natura 2000 and the coherence of the network;
- assess cumulative effects (some projects should not be implemented and/or should be modified);
- examine alternative solutions (e.g. locations of investments) where a number of options exist;
- propose mitigation measures for different types of project; and
- accelerate project appraisal and absorption (many problems can be avoided if addressed early at a strategic level).

Most of the respondents to the survey (30) judged that the SEA brought added value (see Figure 9).

### The SEA Directive

The SEA Directive requires that certain public plans and programmes undergo environmental assessment before they are adopted.

The Directive applies to a wide range of public plans/programmes (e.g. on land use, transport, energy, waste, agriculture, etc.).

It calls for the drawing-up of an environmental report in which the likely significant effects on the environment and reasonable alternatives are identified, and the carrying-out of consultations (with the public, the environmental authorities and, in the case of transboundary effects, other Member States).

The report and the results of the consultations are to be taken into account before adoption of the proposed plan/programme.

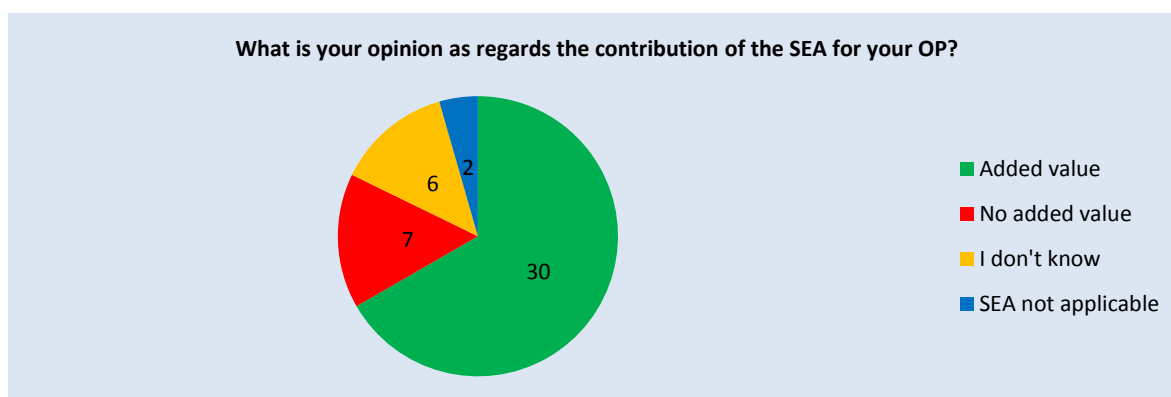
After adoption, the environmental authorities and the public are informed and given access to relevant information.

The Directive also requires monitoring for significant, unforeseen adverse environmental effects at an early stage of plan/programme implementation.

<sup>24</sup> 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 (OJ L 197, 21.7.2001, p. 30).



**Figure 9: Opinions regarding the contribution of the SEA to OPs**

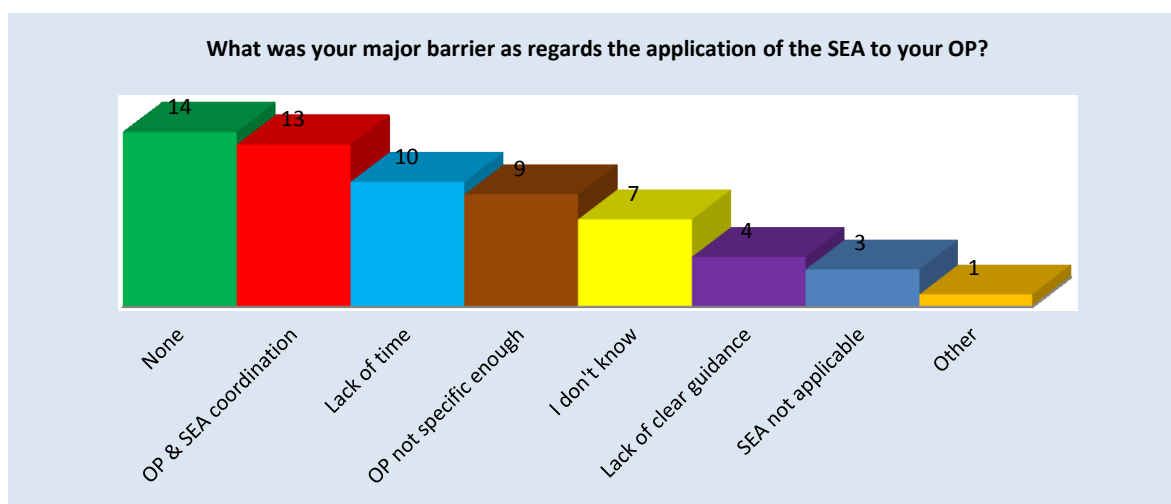


The replies highlighted that the SEA brings in additional independent expertise and local knowledge. They also indicated that the SEA provides strong recommendations for the implementation stage and raises the awareness of the managing authorities across all programmes.

Nevertheless, some respondents considered that the SEA did not bring any added value. They argued that it was just a formality, did not produce any new information and consequently led to few changes to the OP.

As regards major barriers to the application of the SEA to OPs (see Figure 10), many respondents referred to problems in coordinating the programme and the SEA, and lack of time. Surprisingly, however, the largest number of respondents said that they had no problems.

**Figure 10: Major barriers as regards the application of the SEA to OPs**



Finally, it is worth referring to the SEA conclusions and recommendations when implementing OPs and in the monitoring and evaluation stages. In this context, it is sometimes helpful to revisit the SEA declarations (see right), which are often forgotten. This could be done, for example, at the monitoring committee's meetings.

#### SEA declaration

The SEA declaration (Article 9(1)(b) of the SEA Directive) is issued when the programme is adopted, together with information on measures to monitor for significant environmental effects resulting from programme implementation. It summarises how environmental considerations and the opinions expressed during consultations have been integrated into the programme.

## 5.5 Role of partners in integrating sustainable development requirements

The objective of partnership in cohesion policy is to ensure the comprehensive and early involvement of all stakeholders (including environmental authorities, social partners and civil society organisations, e.g. in the field of the environment) in planning, implementing, monitoring and evaluating EU-funded investments. Environmental partners provide unique expertise in questions of environmental sustainability and can support the integration of environmental requirements throughout the project cycle on the basis of their knowledge of particular environmental needs and local challenges. Their involvement can bring various benefits and added value, e.g. enhancing collective commitment and ownership of EU policies and investments, increasing knowledge and sectoral expertise in project design and selection, supporting the mainstreaming of sustainable development principles and efficient project implementation, thus ensuring greater transparency in decision-making processes and preventing fraud and the misuse of taxpayers' money.

### 5.5.1 The European code of conduct on partnership (ECCP)

Article 5 CPR stipulates the introduction of a European code of conduct on partnership (ECCP)<sup>25</sup>. Laid down via a delegated act<sup>26</sup>, the ECCP gives guidance to Member States and promotes best practice in the field of partnership, as regards:

- partners' involvement and dialogue with decision-makers;
- the process of selecting partners;
- access to information, timelines and planning documents;
- reporting on consultations and the partners' role and added value during programming; and
- flexibility on specific procedures, combined with responsibilities in ensuring a transparent and participatory process (including the reporting of action taken in that regard).

The ECCP covers the involvement of partners in the preparation of calls for proposals, progress reports, monitoring and evaluation. Environmental partners play a key role in the integration of environmental and sustainable development requirements by pursuing and promoting an integrated, systematic and coordinated (sectoral and cross-cutting) approach, meeting environmental requirements through all phases of the programming cycle. For example, in the implementation phase, environmental partners contribute significantly to the inclusion of concrete and measurable green criteria and indicators for project selection corresponding to the specificity of each programme.

#### **Box 8: Added value of partnership (UK)**

The *Mainstreaming environmental sustainability* report was produced by key stakeholders with support from consultants. It provided useful recommendations on how to monitor and report and these are referred to in the ERDF and ESF OPs. The governance structures include members representing the field, who will provide input and respond to reports as the programmes start to deliver.

The report provided added value and used analysis of previous performance and methods, plus stakeholder interviews and consultations to provide recommendations. This would not have been the case if that level of partnership had not been involved. Having additional environmental scrutiny through the governance structures adds a perspective that differs from those that are mainly concerned with the more economic and social drivers.

<sup>25</sup> <http://ec.europa.eu/social/main.jsp?langId=en&catId=89&newsId=2019&furtherNews=yes>

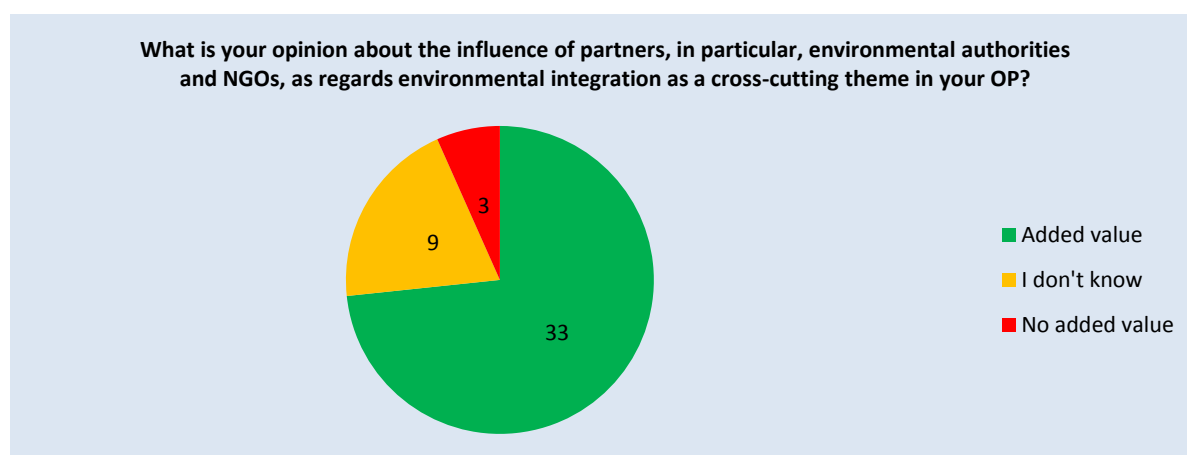
<sup>26</sup> Commission Delegated Regulation (EU) No 240/2014 of 7 January 2014 on the European code of conduct on partnership in the framework of the European Structural and Investment Funds (OJ L 74, 14.3.2014, p. 1).

The ENEA-MA survey confirms that the overwhelming number of respondents see partnership as bringing added value to programmes (see Figure 11). Positive aspects mentioned include:

- expert input and background materials;
- partners' contribution to preparing and launching programmes, developing evaluation criteria, selecting projects and monitoring;
- strengthening the environmental dimensions of projects; and
- creating a sense of partnership.

However some doubts persist as to whether partnership brings significant added value, given that the strict legislative framework leaves little scope for substantial improvement. In some cases, the partnership principle might be followed only to meet formal obligations. Further challenges are a lack of time and resources, no real interaction between partners and authorities, and a lack of feedback from partners.

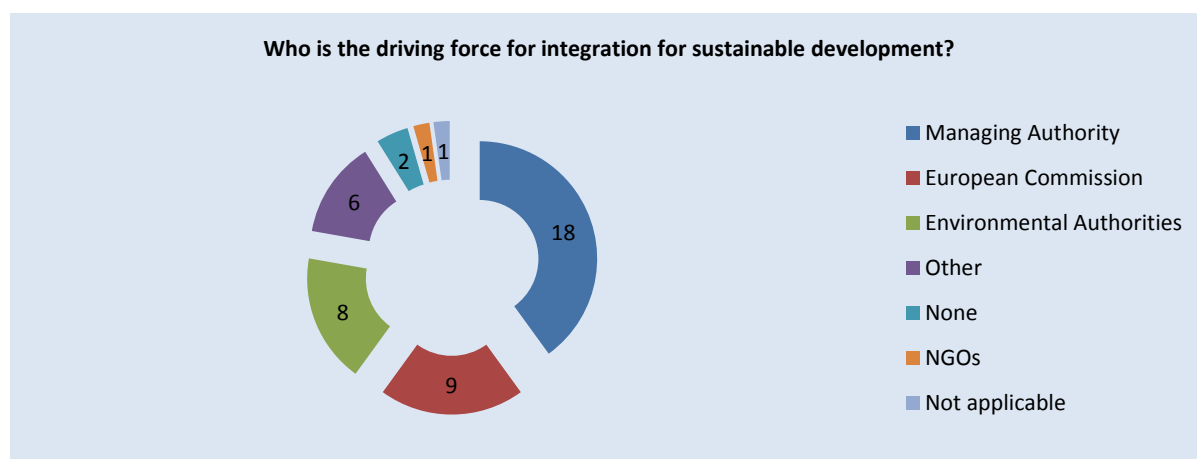
**Figure 11: Opinions regarding the influence of partners on the environmental integration in OPs**



### 5.5.2 The role of environmental authorities in environmental integration

The survey found that managing authorities are seen as a driving force supporting environmental integration in OPs and that environmental authorities contribute significantly to the integration of sustainable development (see Figure 12).

**Figure 12: Driving forces for environmental integration.**



The designated environmental authorities can have different functions in the programming cycle. While there is no clear definition of their duties or powers, the examples of the Spanish Environmental Authorities Network (see [Section 5.6](#) and [Annex 3](#)) and the Italian equivalent (see [Section 5.6](#)) demonstrate a whole range of possible roles.

In all phases of the programming cycle, the environmental authority can act as the main contact point for all stakeholders (i.e. managing authorities, the Commission, control units) on environmental issues, for example:

- providing a quantitative overview of all environmental and climate measures and putting this into the context of regional needs in order to make strategic use of available resources;
- establishing environmental integration criteria and approaches within the various EU-funded sectors, thus helping to overcome sectoral silos;
- checking whether (non-environmental) measures comply with environmental policies and requirements;
- acting as responsible body for the SEA and its monitoring and reporting requirements;
- promoting the cross-cutting environmental criteria and developing a list of environmental indicators which could further be integrated in the SEA processes;
- approving environmental evaluations;
- communicating with the public and other environmental authorities on programme-specific issues;
- driving national networks supporting environmental integration;
- participating in monitoring committees in order to integrate the cross-cutting principle of sustainability;
- contributing to national and regional environmental protection strategies;
- assessing planned biodiversity and nature conservation measures in national and regional OPs and making links to the priority action frameworks in order to maximise synergies; and
- diagnosing and being consulted on the integration of biodiversity aspects.

These are only examples. The duties of environmental authorities within the cohesion policy are not clearly defined at EU level, so the national interpretation depends on the authority's influence in the process. In any case, environmental authorities bring clear added value as regards strengthening the environmental dimension of cohesion policy funding (see Box 9).

**Box 9: Added value of environmental authorities (IT)**

In Italy, the environmental authority ensures the integration of environmental considerations into the development, management, implementation and monitoring of processes, and the evaluation and assessment of OPs in term of sustainability. Its duties are set out in Law No 116 (approved on 11 August 2014), Article 12(4a) of which provides that '[...] in order to accelerate the expenditures and simplify the procedures, the environmental authorities (as part of the Network of National Environmental Authorities) shall cooperate systematically with the responsible cohesion policy representatives in supporting the mainstreaming of sustainable development principles not only in the programmes, but also in the monitoring and implementation of interventions'.

**Further information:** <http://reteambientale.minambiente.it/link/istituzioni-nazionali-regionali/>

### 5.5.3 Involving non-governmental organisations

Partnership with civil society strengthens democracy and a consensual policy culture, and supports the (sometimes limited) administrative capacity of public administrations in the area of environmental protection.

According to the ENEA-MA survey, partners are mainly involved through monitoring committees and working (advisory) groups. Partnership is also fostered through specific environmental groups, online platforms, national road shows, meetings, consultants' support networks, open days and targeted networking.

However, civil society organisations and non-governmental partners face a number of difficulties in their efforts significantly to improve the mainstreaming of environmental protection requirements in partnership agreements and OPs. In order to comply with the ECCP and reap the full benefits of efficient partnership, it is important that partners are involved not only in programming, but also in the implementation and monitoring of EU regional development funding. For this to be effective, it is important to:

- enable timely access to all relevant information;
- involve partners in decision-making;
- include partners in strategic discussions; and
- increase stakeholders' capacity.

#### *5.5.3.1 Enable access to all relevant information*

Member States should use a central website to post all relevant information, such as preparatory documentation, project selection criteria and processes, the composition of committees, project proposals, selected projects, beneficiaries, auditing, monitoring and evaluation criteria and reports. Processes for making, implementing and enforcing decisions should be clear and accessible by all.

Material presented at monitoring committee meetings should be published on the relevant authorities' websites as soon as possible after the meeting. National authorities should publish, on their websites, the names of monitoring committee members and the organisations they represent.

#### *5.5.3.2 Involve partners in decision-making*

All participants should be aware that monitoring committees are responsible for the overall programme and are not decision-making bodies for individual projects. To increase the committee's influence at project level, its remit should extend to adopting changes to the relevant programming and implementation documents, dealing with the 'cross-cutting' performance of programmes, and selecting and evaluating projects. Teams assessing and scoring projects applying for support should include NGO experts.

#### *5.5.3.3 Include partners in strategic discussions*

The programming cycle usually starts with strategic discussions of national and regional development plans and objectives, for specific sectors or particular regions. Planning documents are then developed on the basis of those wider political considerations. Partners should be involved 'at an early stage': this includes participation in strategic discussions and decision-making processes prior to cooperation on partnership agreements and OPs. This is particularly important in the context of the MFF mid-term review and preparations for the next financial perspectives.

#### **5.5.3.4 Increase stakeholders' capacity**

Article 17 of the ECCP provides that 'support [...] may take the form of, *inter alia*, dedicated workshops, training sessions, coordination and networking structures or contributions to the cost of participating in meetings on the preparation, implementation, monitoring and evaluation of a programme'.

Full use (e.g. through overall grant schemes or technical assistance projects) should be made of the legal options for funding NGOs' involvement in implementation and monitoring (Article 5 CPR in combination with the ECCP).

### **5.6 Environmental networks to support environmental integration**

Throughout the EU, (formalised and informal) pan-European and national networks bring together programme stakeholders to share information and experience, and coordinate action to green cohesion policy.

Through these networks, those working on economic development and environmental issues cooperate to support the efficient mainstreaming of environmental issues in cohesion policy at the programming, implementation and evaluation stages. The networks are important mechanisms for integrating environmental issues in cohesion policy programmes' economic and social objectives.

#### **5.6.1 Pan-European networks**

At European level, two networks support the integration of environmental aspects into cohesion policy: the [European Network of Environmental Authorities-Managing Authorities \(Enea-MA\)](#) and the [Energy and Managing Authorities \(EMA\) Network](#).

##### **5.6.1.1 Enea-MA**

Enea was set up in September 2004. Its main goal is to contribute to the integration of environment and sustainable development in cohesion policy programmes and projects. In 2009, its membership was extended to managing authorities and it became Enea-MA. The restructured network brings together environmental and managing authorities and other European organisations active in the field of environment and cohesion policy (e.g. Bankwatch/Friends of the Earth, the Regional Environmental Center for Central and Eastern Europe). It is co-chaired by DG Environment and DG Regional and Urban Policy, and meets annually/bi-annually for its plenary sessions. It also forms specific working groups as necessary (such as the one preparing this report).

##### **5.6.1.2 EMA Network**

The EMA Network supports EU countries in the efficient use of cohesion policy funding to promote renewable energy, energy efficiency and smart energy infrastructure. It brings together representatives of national energy authorities and cohesion policy managing authorities dealing with energy, in order to share good practices, knowledge and information on relevant developments and issues regarding energy-related programmes and projects. EMA is co-chaired by DG Energy and DG Regional and Urban Policy. Within the network, it is possible to set up specific working groups to address particular concerns requiring more in-depth work.

## 5.6.2 National networks

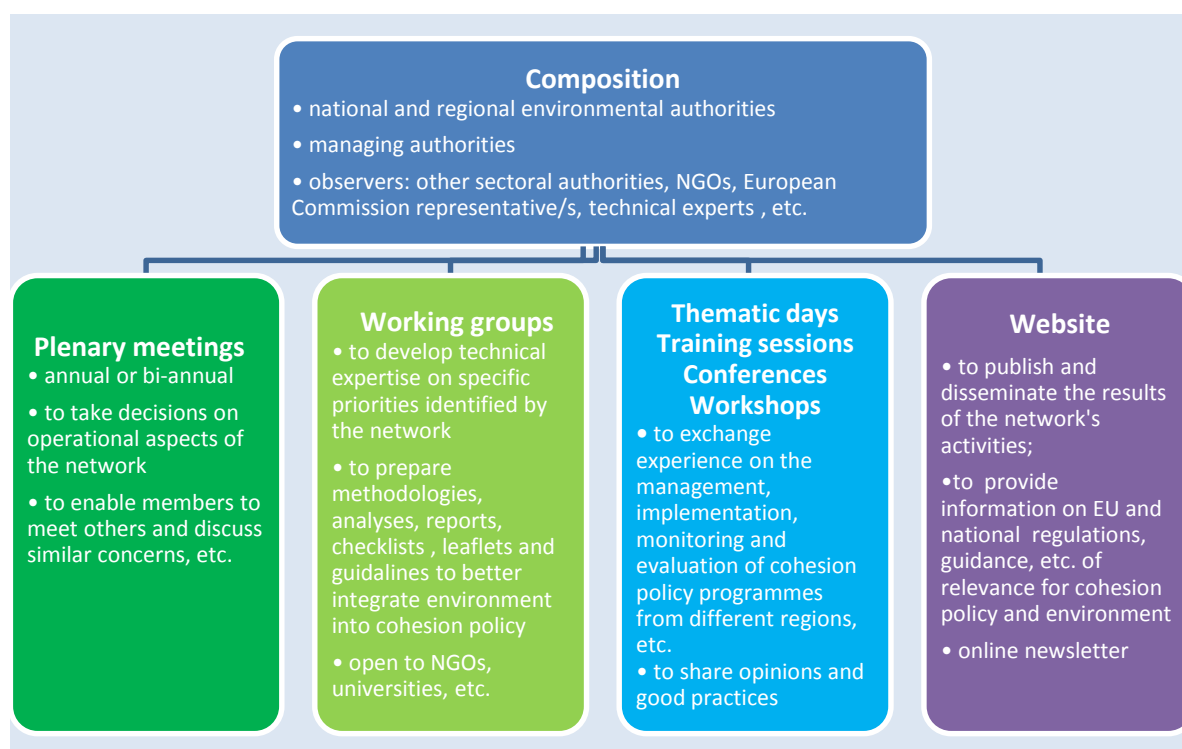
### 5.6.2.1 Formalised networks

There are four formal active environmental networks in the EU (in Greece, Italy, Poland and Spain). They all seek to:

- disseminate environmental information relating to cohesion policy funds;
- promote exchanges and sharing of experience, knowledge, best practices, problems and needs among actors at different administrative levels;
- promote environmental integration in non-environmental programmes and projects;
- monitor expenditure on environmental aspects of OPs;
- strengthen interconnection and cooperation with other national and EU networks; and
- provide tools and guidelines to address environmental issues.

The networks have similar structures and working methods. Figure 13 shows a generic example reflecting the networks' organisation and most common practices.

**Figure 13: Composition and working methods of national networks (generic example)**



[Annex 4](#) includes an overview of recent action taken by the national networks to support environmental integration in the 2014-2020 programming period.

### 5.6.2.2 Informal networks (at different levels)

Informal networks are unofficial fora in which environmental and other representatives exchange information on environmental issues. This could just take the form of a series of meetings where regional programmers work together. Such a network exists in Germany, for example.

## 6. Environmental integration at the implementation stage

Following an introduction on linkages between the programme and project level, this chapter is split into sections devoted to major and non-major projects (distinguished on the basis of total eligible costs). The former is limited to an overview of procedures common to all major projects across the EU and their environmental appraisal; the latter follows the stages in the projects' lifecycle, from the call for proposals and the selection of projects, through implementation to monitoring and evaluation.

### 6.1 From programmes to projects

The policy objectives of cohesion policy funding are translated into OPs which are implemented through projects. Because of this interdependence, the integration of environmental considerations into projects is linked closely to the OP framework, which in turn is influenced by several factors before the actual project cycle starts:

- most OPs have been subject to an SEA (an 'environmental pillar' of *ex ante* evaluation for OPs). At this stage, each OP should have been aligned with environmental considerations. A well-prepared OP should integrate various dimension of sustainable development and provide entry points and guiding principles for the identification and selection of projects;
- OPs have been developed in partnership with the competent regional and local authorities, and other partners, including 'environmental partners' (Article 5 CPR). The environmentalists' input might have helped to overcome potential strategic flaws and solve practical conflicts between the set priorities and objectives and environmental considerations;
- Member States have to comply with applicable EACs, e.g. as regards the EU's environmental *acquis*, and to develop and implement action plans to address any gaps; and
- OPs have been subject to negotiations with and approval by the Commission, which has to ensure that Union law, including sustainable development requirements and alignment with overarching strategies such as Europe 2020, is properly applied in the Member States.

Therefore, the process of integrating environmental considerations into projects does not start in a vacuum, but at the programme development stage. Nevertheless, the project cycle can offer a range of opportunities to operationalise environmental mainstreaming.

Annex I CPR<sup>27</sup> requires Member States and managing authorities to ensure, **in all phases of implementation**, the full mainstreaming of sustainable development into the ESIFs, respecting the principle of sustainable development, the obligation to integrate environmental protection requirements, and the 'polluter pays' principle. Accordingly, '[m]anaging authorities shall undertake actions throughout the programme lifecycle to avoid or reduce environmentally harmful effects of interventions and ensure results in terms of net social, environmental and climate benefits. Action to be taken may include:

- directing investments towards the most resource-efficient and sustainable options;
- avoiding investments that may have a significant negative environmental or climate impact, and supporting actions to mitigate any remaining impacts;

---

<sup>27</sup> Annex I CPR, section 5: cross-cutting principles referred to in Articles 5, 7 and 8 and cross-cutting policy objectives, in particular section 5.2 (sustainable development).



- taking a long-term perspective when lifecycle costs of alternative options for investment are compared; and
- increasing the use of green public procurement.<sup>28</sup>

The above legal requirements form the basis for the further development of processes, mechanisms and tools for integrating cross-cutting environmental sustainability into the project's lifecycle, i.e. calls for proposals, selection of projects, implementation, and monitoring and evaluation.

## 6.2 Major projects

Major projects remain investments of strategic importance in the 2014-2020 programming period and account for a substantial proportion of ESIF funds. Therefore, the legislators of the ESIF regulations considered that they should be listed in the OPs and subject to specific approval procedures (see Articles 100 to 103 CPR).

Article 100 CPR defines major projects as follows:

'As part of an operational programme or operational programmes, which have been subject to a Commission decision under Article 96(10) of this Regulation or under Article 8(12) of the ETC Regulation, the ERDF and the Cohesion Fund may support an operation comprising a series of works, activities or services intended in itself to accomplish an indivisible task of a precise economic or technical nature which has clearly identified goals and for which the total eligible cost exceeds EUR 50 000 000 and in the case of operations contributing to the thematic objective under point (7) of the first paragraph of Article 9 where the total eligible cost exceeds EUR 75 000 000 (the "major project"). Financial instruments shall not be considered to be major projects.'

For the 2014-2020 programming period, the financial threshold for a 'major project' is based on 'total eligible costs', rather than 'total costs' (as in 2007-2013).

In addition, the CPR provides for a new alternative procedure for Member States to submit major projects to the Commission and special provision has been made for phased projects<sup>29</sup>. The new procedure entails new types of document (see Article 102(1) CPR). The Member State cannot submit the new documents to the Commission until it has ensured that the major project in question has undergone an independent quality review (IQR) and received a positive IQR report. Article 102(1) CPR sets out the information to be submitted with the positive IQR report.

Member States can choose to use this new alternative procedure (Article 102(1) CPR) or continue to submit the whole set of documents as in the past (Article 102(2) CPR)<sup>30</sup>.

The OPs show that Member States are planning about 640 major projects (including 172 in the water and wastewater sector and 34 in the energy and solid waste sectors), with Poland planning the most. Not all major projects planned have been indicated in the OPs, since there are additional selection procedures and final numbers will be known only later.

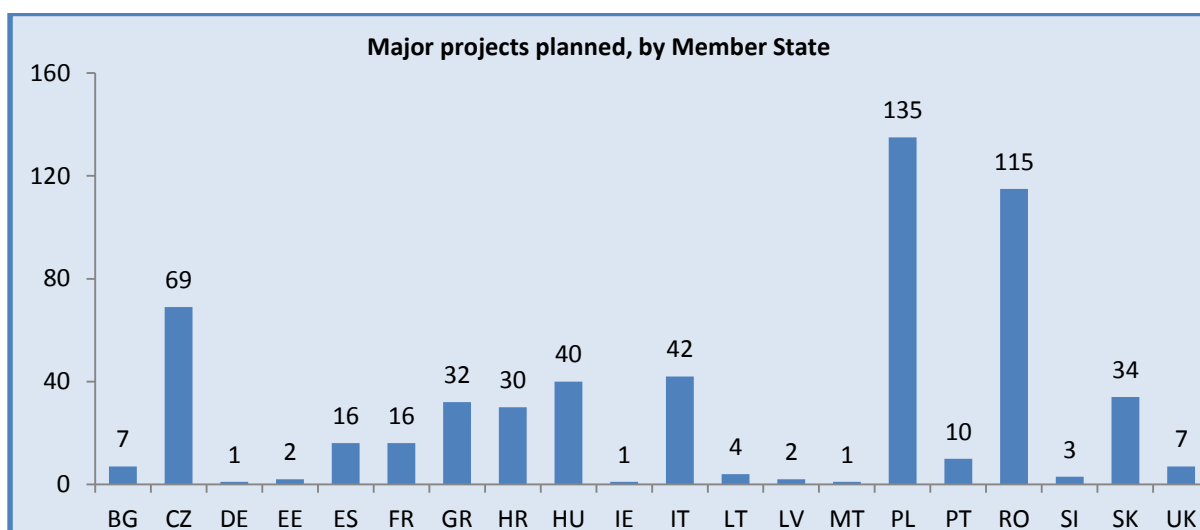
---

<sup>28</sup> *Ibid.*

<sup>29</sup> Phased projects are those that start in one programming period and are continued and completed in the next.

<sup>30</sup> In previous programming periods, Member States submitted standard application forms accompanied by other documents (feasibility studies, cost-benefit analysis, non-technical summaries of EIAs, etc.).

Figure 14: Distribution of major projects by Member State, based on approved 2014-2020 OPs



Source: European Commission (DG REGIO)

Article 101 CPR<sup>31</sup> requires *inter alia* that major projects undergo ‘an analysis of the environmental impact, taking into account climate change adaptation and mitigation needs, and disaster resilience’. These requirements are further developed in Annex II to Commission Implementing Regulation (EU) 2015/207<sup>32</sup> (‘major project application form’), where the format and content of the environmental and climate change related requirements (see right) are spelled out in detail.

We can conclude that, as far as major projects are concerned, environmental requirements remain an important guarantee that objectives can be achieved at the same time as avoiding or limiting damage to the environment.

We considered it important to test in the context of this study whether experience with major projects has been used to strengthen the environmental dimension of non-major projects. For this purpose, our questionnaire included the following question: ‘Do you use the experience from major projects as regards compliance with the EU environmental legislation and environmental integration as a cross-cutting principle to strengthen the environmental dimension of non-major projects?’. The highest percentage of respondents chose ‘not applicable’ (see Figure 15). Although it is therefore impossible to draw a conclusion, the fact that only 5 % of respondents said ‘yes’ indicates a risk that

#### Summary of environmental and climate change requirements for major projects (section F of the major project application)

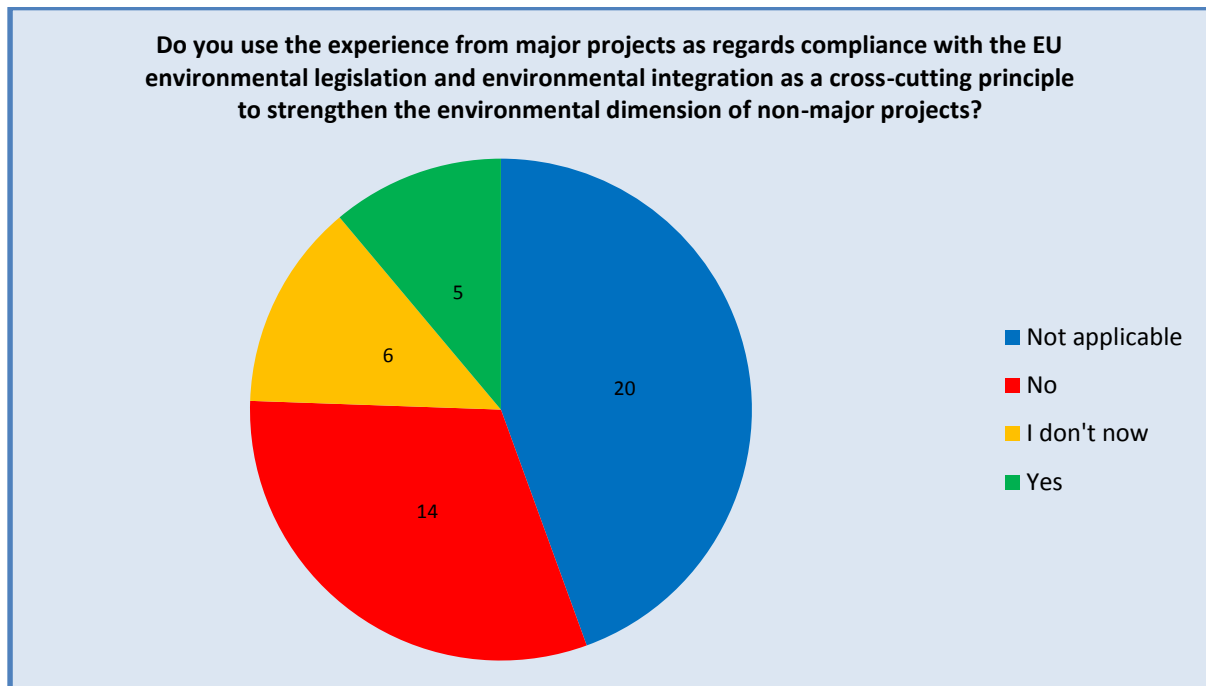
1. Consistency of project with environmental policy
2. Application of SEA Directive
3. Application of EIA Directive
4. Application of Habitats Directive
5. Application of Water Framework Directive
6. Compliance with other environmental directives (where applicable)
7. Cost of measures to mitigate and/or compensate negative environmental impacts
8. Climate change adaptation and mitigation, and disaster resilience

<sup>31</sup> Article 101 concerns information necessary for the approval of a major project.

<sup>32</sup> Commission Implementing Regulation (EU) 2015/207 of 20 January 2015 laying down detailed rules implementing Regulation (EU) No 1303/2013 of the European Parliament and of the Council as regards the models for the progress report, submission of the information on a major project, the joint action plan, the implementation reports for the Investment for growth and jobs goal, the management declaration, the audit strategy, the audit opinion and the annual control report and the methodology for carrying out the cost-benefit analysis and pursuant to Regulation (EU) No 1299/2013 of the European Parliament and of the Council as regards the model for the implementation reports for the European territorial cooperation goal (OJ L 38, 13.2.2015, p. 1).

opportunities have been lost. The matter could be looked into further, with a new questionnaire and additional target groups, to better map the situation and see how the situation can be improved.

**Figure 15: Transferring the environmental integration experience from major projects to non-major projects.**



## 6.3 Non-major projects

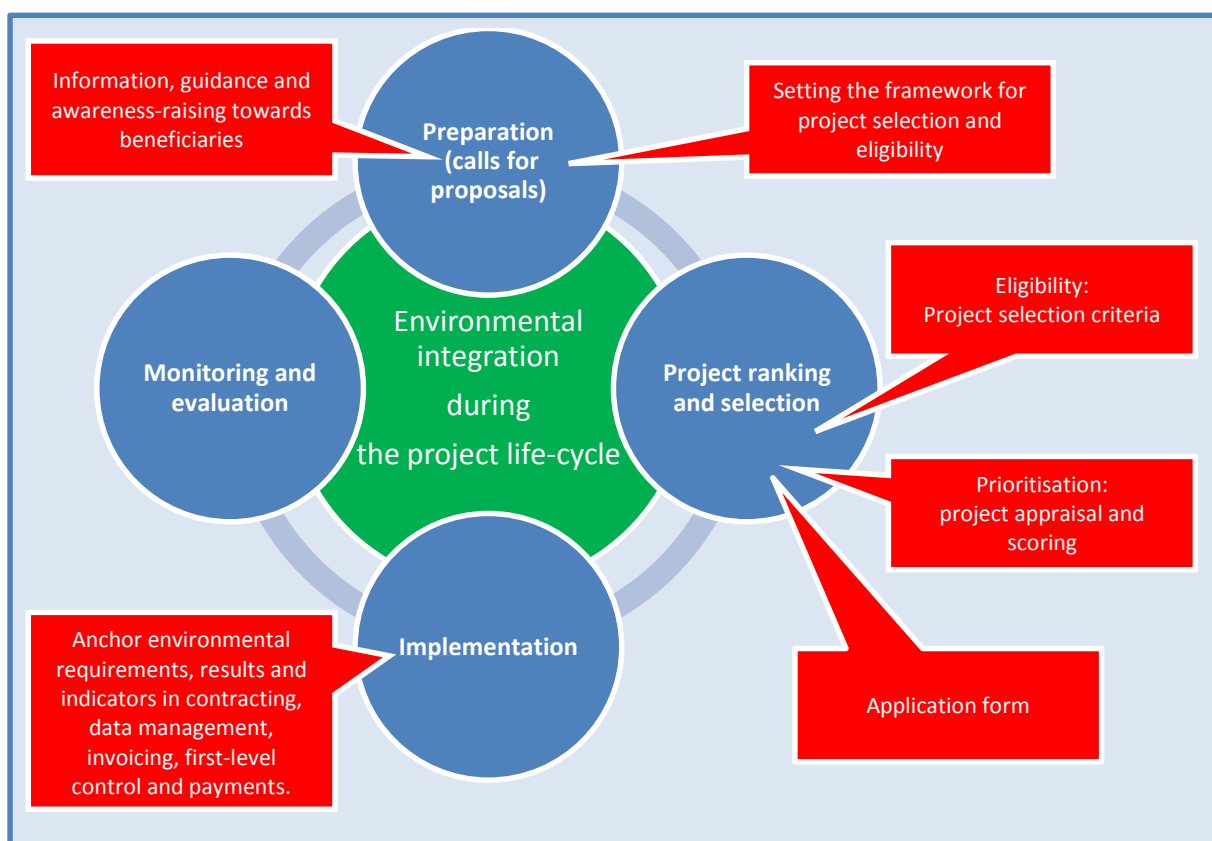
### 6.3.1 The project cycle

Managing authorities can ensure that a number of formal and institutional measures for environmental integration are established during the project cycle, even before the call for project proposals, e.g. eligibility and appraisal criteria as regards project sustainability, etc.

The project cycle, on which the selection of projects and their further financing depend, consists of four main phases (see Figure 16):

1. preparation (project identification and preparation);
2. selection (appraisal of project applications);
3. implementation; and
4. monitoring and evaluation.

Figure 16: Environmental integration during the project cycle



### 6.3.2 The preparation phase

Once the call for project proposals is launched, applicants must follow the rules, including the environmental requirements. Thus, the formulation of the calls for proposals should already contain environmental mainstreaming conditions.

The call for proposals sets key frameworks for OP implementation. If the national strategic documents to which the OP refers are not specific enough, managing authorities can compensate this with more specific conditions in the call. The call can be formulated so as to:

- ensure a positive approach to taking environmental considerations into account;
- highlight the programme's environmental requirements;
- provide additional information to project proponents on how to comply with programme's environmental requirement; or
- provide economic incentives to promote sustainable development (see Box 10).

**Box 10: Economic incentives to promote the adoption of voluntary commitments for sustainability and low-carbon economy in SMEs (Ceuta, ES)**

In the Autonomous City of Ceuta (Spain), there is a **mechanism to promote the adoption of voluntary commitments** for sustainability and low-carbon economy in SMEs.

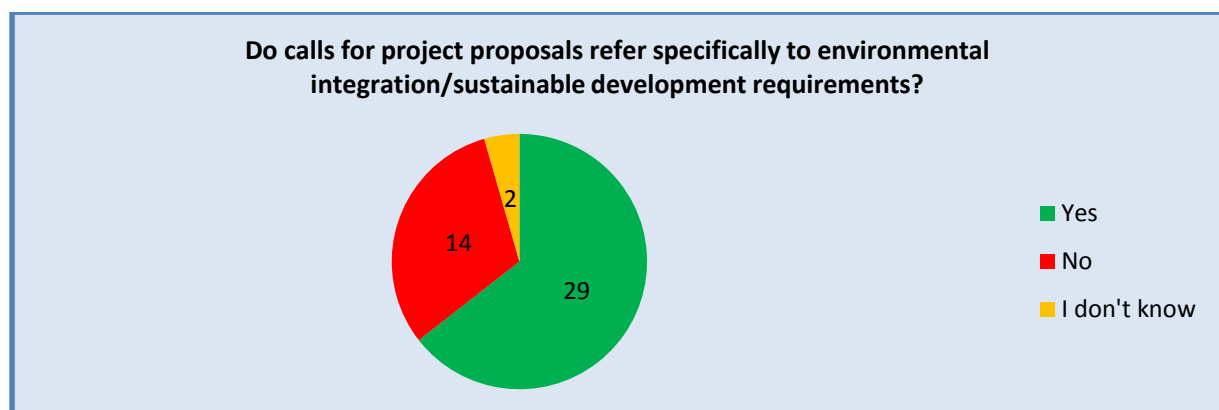
The system is based on the inclusion, in SME competitiveness calls for proposals, of economic incentives for enterprises that make a voluntary **sustainability and low-carbon economy commitment**. The commitment is formalised with a **helpdesk** specialised in giving environmental advice to enterprises, which is publicly available to all SMEs applying for ESIF funding.

This mechanism boosts enterprise sustainability within calls for proposals, raises awareness among SMEs and promotes more sustainable action, thereby contributing to European sustainability targets.

**Further information:** see [Annex 5](#).

The ENEA-MA survey confirms that a large number of managing authorities introduce environmental requirements at this stage (see Figure 17). Accordingly, the majority of respondents (29 out of 45) stated that calls for proposals addressed environmental integration/sustainable development requirements.

**Figure 17: Environmental integration requirements in calls for project proposals**



For this purpose, the managing authorities include environment-related questions in their project application forms (an element of calls for proposals), as well as requiring administrative, technical and financial data. Some application procedures require the inclusion of additional environmental information in annexes, the completion of questionnaires on the environmental performance of projects (see [Annex 6](#)), the provision of data on specific sustainability indicators or commitments from beneficiaries to take specific environmental integration measures (see Box 11).

**Box 11: Cross-cutting integration of environmental sustainability in 2007-2013 (HU)**

In the first part of the 2007-2013 period (until 2011), the same system was **implemented for all projects** (except major projects and priority projects selected directly by the government) that were submitted for **any call for proposal under any OP** in Hungary financed from the Structural Funds. It was obligatory (i.e. an admissibility criterion) for applicants to **provide data on the following sustainability indicators** in the application forms:

| Production companies   | Service providers   |
|--|---|
| a) Water consumption [m <sup>3</sup> ] / production unit)  |   |
| b) Energy consumption [kWh] / production unit))  |   |
| c1) GHM emission (CO <sub>2</sub> e) [t/year]  | c2) Supply and use of combined and energy- and resource-efficient office equipment [pieces] |
| d1) Ratio of recycled and recovered waste to total waste (t)   | d2) Ratio of recycled paper use (boxes of recycled paper / all boxes of paper)              |
| e) Ratio of employed people living in the micro-region (number of the employed people living in the micro-region /total number of employees)   |   |
| f) Ratio of employees who participated in knowledge-sharing on sustainability (the number of employees who participated in a knowledge sharing regarding sustainability (person/year) / total number of employees (person/year)) |   |

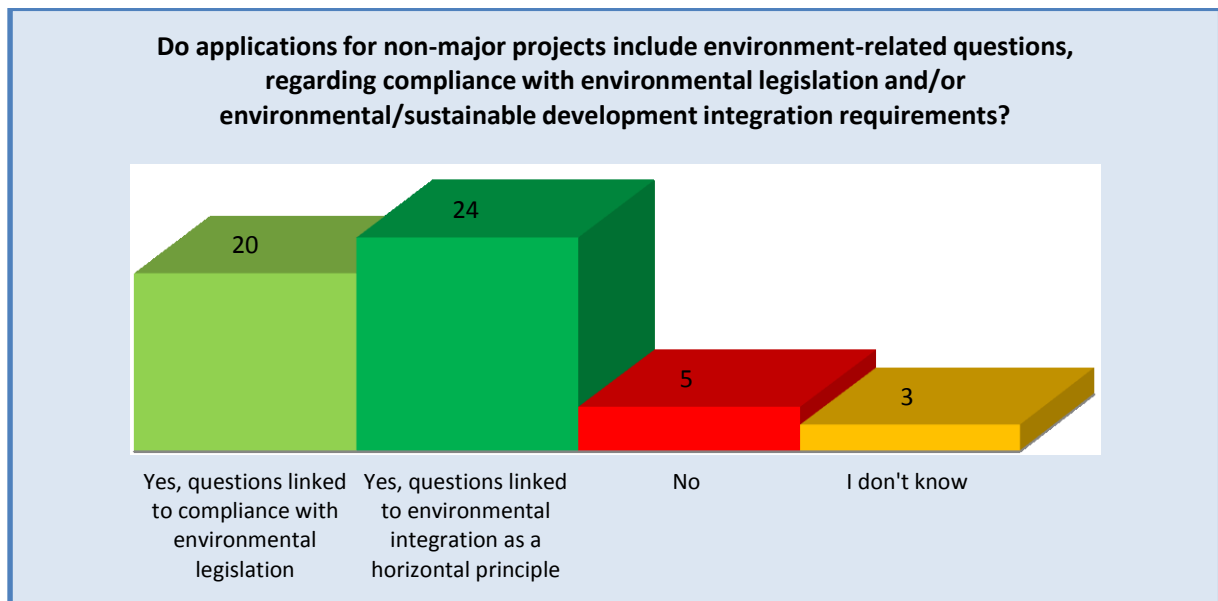
The applicants also had to choose at least two measures ('commitments') either from a list of criteria containing the measures (see [Annex 7](#)) or from a shorter list with only the commitments most relevant to the object of the call for proposals. These measures were designed to improve mainly environmental, but in some cases also social, sustainability of the submitted project, or targeted the day-to-day operation of the beneficiary organisation in the field of environmental and social sustainability. The measures fell into two categories according to the project lifecycle phase: I. environmentally conscious management and planning; II. forms of implementation and maintenance serving the sustainability objectives. Each measure had a value of 0.5 points and the applicants could choose between two (i.e. one point) and 10 sustainability commitments (five points); projects were scored out of 100 points in the evaluation. This means that applicants who committed themselves to implementing additional environmental measures in connection with their project gained an advantage already in the evaluation phase. However, if their applications were successful, the chosen commitments were transferred from the application form to the subsidy contract and so became binding.

The list of measures also contained a detailed explanation on how the commitments could be fulfilled and what would be accepted as proof of fulfilment. The managing authority's project managers were available for consultation by the beneficiaries also on issues concerning environmental commitments, but there was no dedicated assistance or professional advice available for their implementation.

**Further information:** see [Annex 7](#).

In the majority of cases (44 of 52 responses to the ENEA-MA survey), application forms had questions linked to compliance with environmental legislation, e.g. EIA requirements, or cross-cutting environmental integration, e.g. inclusion of environmental project appraisal criteria, (see Figure 18).

**Figure 18: 'Environmental' questions (on compliance and cross-cutting environmental requirements) in application forms**



Box 12 contains examples of questions linked to environmental integration as a cross-cutting principle:

**Box 12: Examples of questions regarding environmental integration as a cross-cutting principle**

**DE** (part of the questionnaire on sustainable development):

Describe the contribution of the project to reducing GHGs:

- reduction of CO<sub>2</sub> impact for the environment;
- reduction of the impact of other gases for the air;
- other contribution;
- not relevant.

**PL:** Indicate the impact of the project, *inter alia*, as regards the cross-cutting principle of sustainable development. Is the impact positive, negative or neutral? Explain your reply.

**UK:** Describe in detail how the operation will align with and support all relevant policies and strategies, objectives, indicators and associated targets.

In the preparation phase, the criteria (including environmental ones) to be applied by the managing authority's staff, when appraising and selecting projects for financing, are spelled out in the 'catalogue' of selection criteria that is approved by the monitoring committees. The calls for proposals should therefore translate the OP's environmental requirements into specific, hopefully more sustainable, project designs.

### 6.3.3 Project ranking and selection

Among the project selection criteria set out in calls for proposals (see above), a distinction can be made between 'project eligibility' and 'project appraisal' criteria, as follows (the terminology and criteria differ across Member States and OPs, so it is difficult to generalise):

- **project eligibility** (or 'project admissibility') **criteria** are those that a project must fulfil to be eligible for funding. They act as gateway criteria for projects to be screened-in for

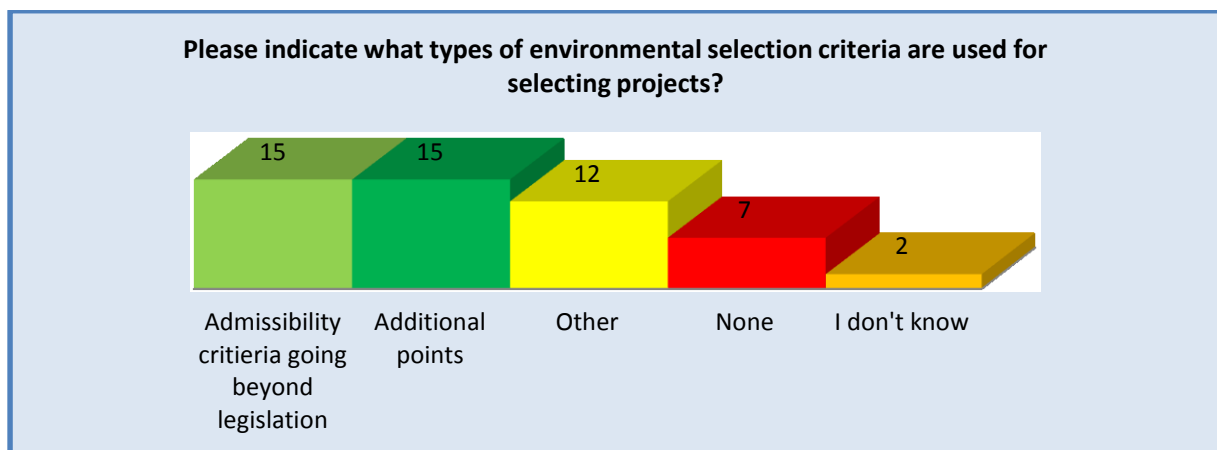
further evaluation on the basis of appraisal criteria. Environmental eligibility criteria would normally address compliance with environmental legislation. The challenge is to design acceptable criteria that go beyond this, e.g. by requiring energy- or resource-efficiency measures; and

- **project appraisal** (or ‘project selection’) **criteria** help to guide the application process and rank projects. Environmental project appraisal criteria could promote the integration of environmental aspects into projects to avoid or minimise environmental impact.

For the purposes of project appraisal, specific **scores/weights** are assigned to individual criteria. Projects are then **scored** on the basis of the criteria in evaluation matrices. The challenge is to ensure that the environmental criteria are given adequate weight. For example, systems commonly give a total score of 100; if there are four appraisal criteria and an environmental criterion is worth a maximum of 10 points, the incentives to strengthen the environmental dimension of a project might be insufficient.

The ENEA-MA survey confirmed that many authorities integrate environmental requirements in both the eligibility and the appraisal criteria (see Figure 19).

**Figure 19: Selection criteria supporting the selection of projects.**



In all, 15 respondents said that they use environmental admissibility criteria going beyond legislative compliance (see Box 13). The same number said that additional points were given to projects on the basis of environmental considerations as part of the appraisal criteria. A number of replies (12) referred to other criteria (e.g. an exclusion criterion for projects that would have negative impacts as regards the cross-cutting principle of sustainable development).

One can also differentiate between quantifiable criteria, e.g. CO<sub>2</sub> emission reductions (measured in tonnes), and non-quantifiable criteria, e.g. a requirement to apply best available techniques (BATs) for a given measure. [Annex 8](#) contains links to different types of criterion, as provided by respondents and Bankwatch.



**Box 13: Different types of admissibility criteria going beyond compliance with environmental legislation**

**BE:** Action is taken to increase companies' economic development by stimulating the rational use of resources through 'circular economy' measures and projects. Such action will also aim to preserve the environment and support the transition to a green economy by limiting the consumption of resources or damage to the environment.

**BG:** Priority is given to project proposals that make a greater contribution to environmental and climate change policy.

**EE:** The project must have a favourable (or at least neutral) impact on regional development, nature conservation, development of civil society, equal opportunities, uniform state governance or development of the information society, as applicable.

**FI:** The application form includes a set of questions relating to sustainable development. Sustainable development is one of the selection criteria at the level of a specific objective. The aim of the selection criteria is to highlight the special priorities of the programme and to enable the implementing bodies to prioritise applications.

**HU:** The following general criteria apply to every call for project proposals: social, environmental and, above all, financial sustainability of the product to be developed as a result of the actions taken to address resource-efficiency, low emissions and environmental pressures, environmental awareness (e.g. achieving energy-efficiency through the projects). The planned development should reduce GHG emissions, if possible, or increase them as little as possible.

**NL:** The sustainable development criterion measures ecological sustainability (efficient use of resources, environmental measures, climate adaptation and mitigation, recovery, risk).

**SI:** Reduction of pollutant emissions into the atmosphere beyond the applicable Community standards or stricter requirements according to the new EU requirements.

**UK:** All projects must contribute to the CCTs, including sustainable development.

**Project appraisal criteria** can play an important role in motivating applicants to design, and ensuring the selection of, projects with the best possible environmental performance. However, it is important to make sure that they are well targeted and formulated. In this context, one can distinguish between a 'passive' and an 'active' approach (see right).

In the course of **project appraisal**, the managing authority reviews and assesses applicants' detailed project analysis in the requested, pre-defined application forms, including the cross-cutting and sustainability elements. The environmental authority's role in this process at the beginning of the programme implementation phase is to formulate reasonable and easily understandable criteria and appraisal questions.

The final **project selection** is the technical procedure of ranking and choosing projects on the basis of the results of the scoring exercise, the project identification and the appraisal procedure.

**Formulating appraisal criteria: 'passive' versus 'active' approaches**

A 'passive' approach relies on the applicant's project description and answers on general indicators such as:

- have you included sustainability considerations in the project planning?
- does the project contribute to the climate goals?

The more 'active' approach calls for an explicit presentation of environmental benefits and results. The targeted technologies are quite clear, so very precise quantifiable information could be required, e.g.:

- how many cubic meters of wastewater should be treated?
- what energy class will the building qualify for after being insulated?

The cross-cutting appraisal criteria used for Austria's ERDF/ESF OP (see Box 14) provide an example of the more 'active' approach to formulating criteria. Another Austrian case-study, from the EAFRD programme, can also be used as a good reference for environmental appraisal criteria. As this report focuses on cohesion policy, the EAFRD case-study is included in [Annex 9](#).

**Box 14: Cross-cutting selection criteria and guidance for cross-cutting criteria in the ERDF/ESF OP (AT)**

For 2014-2010, Austria reduced its programmes to two large programmes, one for ERDF/ESF and one for EAFRD. The regions contribute to the programmes with their funding instruments, but had to incorporate several selection and eligibility criteria to integrate the cross-cutting principles.

A general principle for eligibility for funding in Austria is compliance with all legal norms and regulations, including national and EU funding instruments. In all instruments, all necessary permits are checked as part of the appraisal, so no non-environmental project will be financed without complying with all national environmental obligations. In addition, cross-cutting criteria have to be met to obtain EU financing. For each project proposed, applicants are required to prepare a detailed project analysis in the requested pre-defined forms, as responses to specific questions. This appraisal includes the cross-cutting questions, the answers to which can be used later in the selection process.

All applicants have to give sustainability indicators. The environmental criteria (agreed at the first meeting of the monitoring committee) concern applicants, their previous performance and the projects themselves; they are as follows:

- Does the applicant have an environmental label (EMAS, ISO)?
- Would the project have a positive effect on the climate? (further specified according to the type of action)
- Does the applicant have a nomination or certificate for equal opportunities in his/her enterprise?
- Does the project meet the non-discrimination criteria? (accessibility)

These criteria are part of all selection spreadsheets and are linked to additional points in the scoring process. In addition, all ERDF applicants have to fill in a questionnaire on the cross-cutting principles. The questionnaire is compulsory for the appraisal process, but the answers are not taken into account in the selection process. However, the plan is to store the questionnaire results and use them in the evaluation of the cross-cutting questions.

Another example of environmental project selection criteria is given in Box 15.

**Box 15: Selection criteria in the 2014-2020 Friuli-Venezia Giulia regional OP, ERDF (IT)**

The selection of project proposals takes into account the explicit principles of non-discrimination and equal opportunities, as well as sustainable development.

Environmental sustainability has to be ensured through:

- efficient use of resources and rational use of energy;
- best available techniques for the reduction of GHG emissions and hazardous waste;
- an eco-efficient management of process and product/service, also attested by environmental certifications (ISO 14000, EMAS);
- the use of low environmental impact techniques in cases of intervention in natural habitats;
- reuse of structures and specific 'dedicated' criteria designed to protect biodiversity, also in application of conservation measures on Natura 2000 sites.

With particular reference to environmental selection criteria relating to the circular economy, axis I ('strengthening research, technological development and innovation') and axis II ('promoting competitiveness of SMEs') of the regional OP for 2014-2020 include the following criteria that contribute to environmental sustainability:

- the use of environment-friendly materials, the reuse of process waste, reduction and recycling of waste, the reduction and abatement of air pollutants; and
- saving of energy and water resources, energy-efficiency and use of renewable energy sources.

### 6.3.4 Project implementation

'Project implementation' in this context refers to the process after approval of the project; it involves the following phases:

- contracting;
- data management;
- invoicing;
- first-level control; and
- payments.

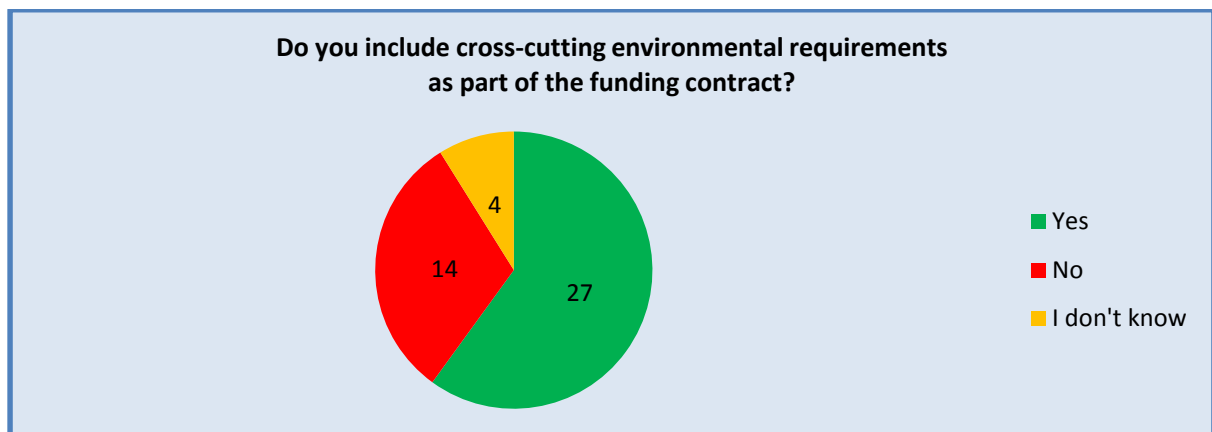
These phases are often regarded as being less important in terms of environmental integration, but changes in project implementation (which affect almost all projects) could lead to a degree of environmental sustainability that differs significantly from that envisaged at the project appraisal stage.

#### *Contracting*

The funding contract has to stipulate all required environmental results and any additional environmental requirements. Applicants will not react to (costly) suggestions, but only to contractual requirements to which sanctions are attached.

The results of the ENEA-MA survey confirm that contracts for the majority of surveyed OPs (27) contain environmental clauses (see Figure 20).

**Figure 20: Environmental clauses in funding contracts**



Box 16 includes examples of standard environmental clauses in project contracts.

**Box 16: Standard environmental clauses incorporated in contracts**

**BG:** 'In implementing the project, the beneficiary is obliged to respect the cross-cutting principles and policies set out in the approved project.'

**DK:** 'When carrying out the project, [the beneficiary] must ensure compliance with environmental requirements and promotion of resource efficiency, mitigation of and adaptation to climate change, promotion of biodiversity, disaster resilience and promotion of risk prevention and risk management.'

**EL:** Minimisation of waste associated with the contract; efficient use of resources such as electricity and water on site; the contractor must use reusable containers or packaging to transport products; reduction of CO<sub>2</sub> or other GHG emissions associated with transport; products or packaging have to be taken away for reuse, recycling or appropriate disposal by the contractor.

**FI:** 'As regards the monitoring of the objectives, activities, results and outputs of the project: implementation of the cross-cutting principles (sustainable development, equality between men and women and non-discrimination), as laid out in Regulation (EU) No 1303/2013 (CPR) and in the programme, has been evaluated in the approved project plan. The implementation of these principles must be covered in the monitoring reports issued with the payment claims and in the final project report. The implementation of cross-cutting principles will also be monitored during the on-the-spot verification.'

**SK:** 'The commitment to fulfil the planned indicator figures is incorporated in the funding contract. In the light of the OP objectives, the indicators are directly connected to environmental objectives or are monitored specifically, such as air-quality-related indicators in the case of priority axis 4 (low-carbon economy - energy sector).'

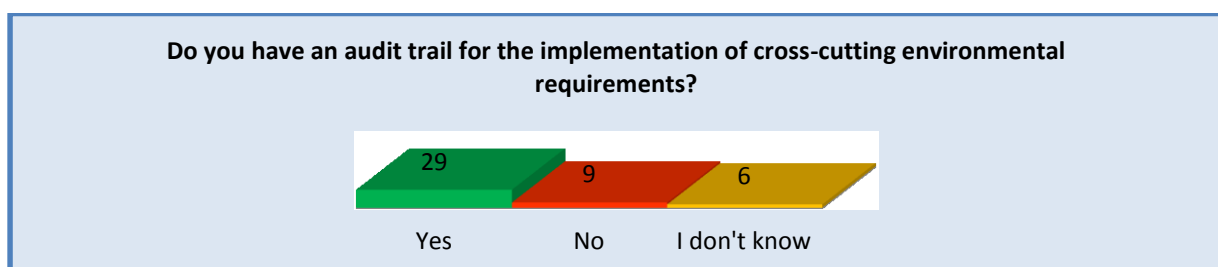
**UK:** 'When carrying out the operation, you must:

- (i) comply with our guidance relating to the cross-cutting themes, copies of which can be obtained from WEFO's website or by telephoning our helpline on 0845 010 3355;
- (ii) comply with the requirements regarding: ...
  - (d) sustainable development, as set out in Article 8 of Regulation (EU) No 1303/2013, and as a central organising principle for the Welsh Government ...

You accept responsibility to ensure that the cross-cutting theme requirements are passed onto anyone else contracted to deliver the operation and that a lead person is identified as being accountable for the cross-cutting themes.'

In addition to standard environmental clauses, the managing authorities also include provisions in contracts under which beneficiaries have to report on the implementation of cross-cutting environmental requirements. Of the respondents to the survey, 29 confirmed that they have **audit trails** for the **implementation of cross-cutting environmental requirements** (see Figure 21).

**Figure 21: Audit trails to follow-up on environmental requirements**



## Data management

There is a need to ensure that data on the contracted projects and on indicators (including those for sustainable development) is stored in a computerised system as defined in the managing authorities' system for ESIF management and control (see Article 72 CPR).

## Invoicing

Depending on the environmental requirements, additional environmental expertise (as provided by the environmental authorities) may be necessary to identify eligible environment-related costs.

## First-level control

The first level of control covers the managing authorities' management and control system (see Article 72 CPR) for all OP investments co-financed under the ESIFs; this includes management, monitoring and control procedures. Therefore, the cross-cutting sustainable development principle must be integrated in advance into project implementation. The first-level control simply checks for compliance with the general implementation rules and the relevant funding contract.

## Payment

Before payment is executed, it is important thoroughly to check compliance with the environmental requirements in the contract and the environmental indicators. The results of audit trails for the implementation of cross-cutting environmental requirements are expected to provide useful information in this respect.

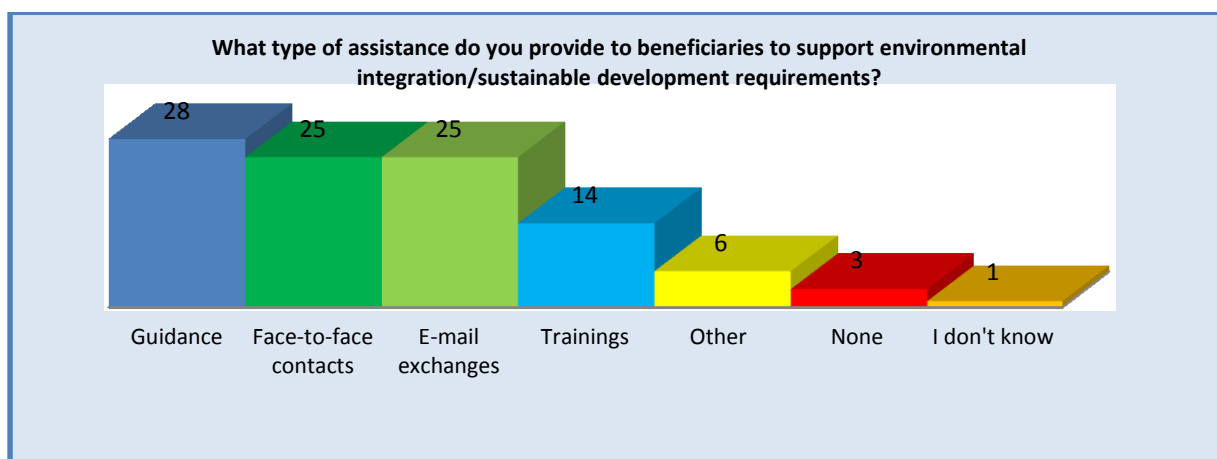
## 6.4 Helping project applicants

This section reviews the assistance provided to project applicants to strengthen the environmental dimension of projects, i.e. the channels and tools used for integrating environmental aspects at project level in different policy areas and at various stages of the project cycle.

### 6.4.1 Types of assistance

In our survey, 28 respondents said that in most cases the guidance documents are the most common and effective form of assistance to project beneficiaries; followed by face-to-face contacts and e-mail exchanges (see Figure 22). Also, 14 said that training and other forms of support (e.g. telephone exchanges, provision of general information on the cross-cutting principles and specialised information on specific themes such as the low-carbon economy, etc.) can be useful.

**Figure 22: Types of assistance available to project beneficiaries**



Box 17 gives examples of the guidance documents referred to by respondents. These cover many issues, including sustainable development as a cross-cutting principle, but also specific questions as regards climate change, environmental assessments, etc.

**Box 17: Guidance documents to support applicants in addressing environmental requirements**

**BG:** The Ministry of Environment and Water developed *Guidelines on mainstreaming environment policy and climate change policy in CP, CAP and CFP Funds (2014-2020) – phase I: programming of the CSF funds and Phase II: implementation of the partnership agreement and the 2014-2020 programmes.*

**Source:** <http://ope.moew.government.bg/en/pages/integrirane-okolna-klimat/89#1>

**EL:** The Ministry of Reconstruction, Production Environment and Energy drew up guidelines on many environmental issues. These are reflected in the SEA, the annual report and the OP, and subsequently in the application form and the relevant evaluation criteria.

**FI:** The description of environmental integration and principle of sustainable development form the basis for national guidelines. They are complemented by the instructions for applicants and the selection criteria. The electronic application has a set of questions relating to sustainable development. The applicant (beneficiary) can view these in the IT system.

**Source (in Finnish):**

<http://www.rakennerahastot.fi/documents/10179/43217/Hankkeiden+yleiset+ja+erityiset+valintaperusteet.pdf/bd89c630-f48c-4f38-82e9-b9a706604bce>

**SK:** The implementation of the cross-cutting principles of sustainable development for 2007–2013.

**Source:** <http://www.hpisahptur.gov.sk>

**UK:** The CCT guidance from the Welsh European Funding Office explains how to enhance the outcomes of funded activity and how to monitor CCT activity.

**Source:** <http://gov.wales/funding/eu-funds/2014-2020/applying/cross-cutting-guidance/?lang=en>

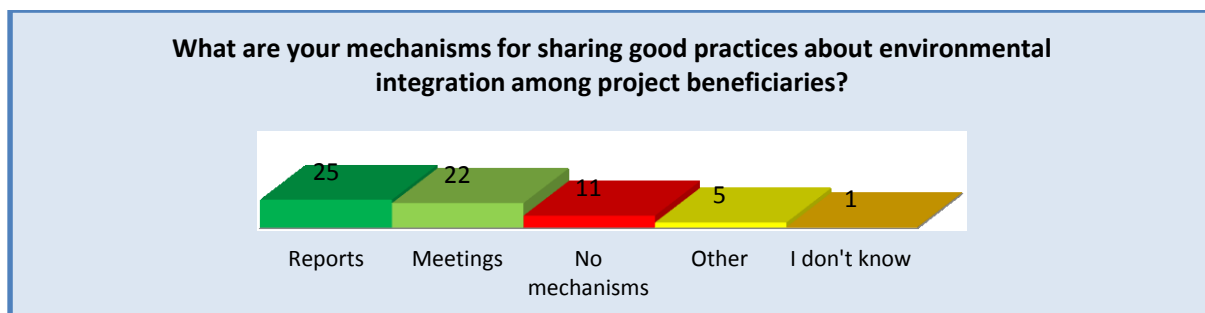
### 6.4.2 Mechanisms for sharing experience

Achieving environment-friendly projects and improving the quality of project implementation requires that beneficiaries share their experiences in various ways.

Experience and best practices, including lessons learned from project implementation, should be recorded and shared among all potential applicants in order to help improve the quality of future projects. This has the potential to stimulate new ideas and lead to improved project performance in terms of sustainable development.

Of the mechanisms for sharing experience and good practices in environmental integration (see Figure 23), 25 respondents preferred publications/reports. Meetings are cited by 22 as another useful mechanism. Other tools (5) include websites (3), factsheets/newsletters and conferences.

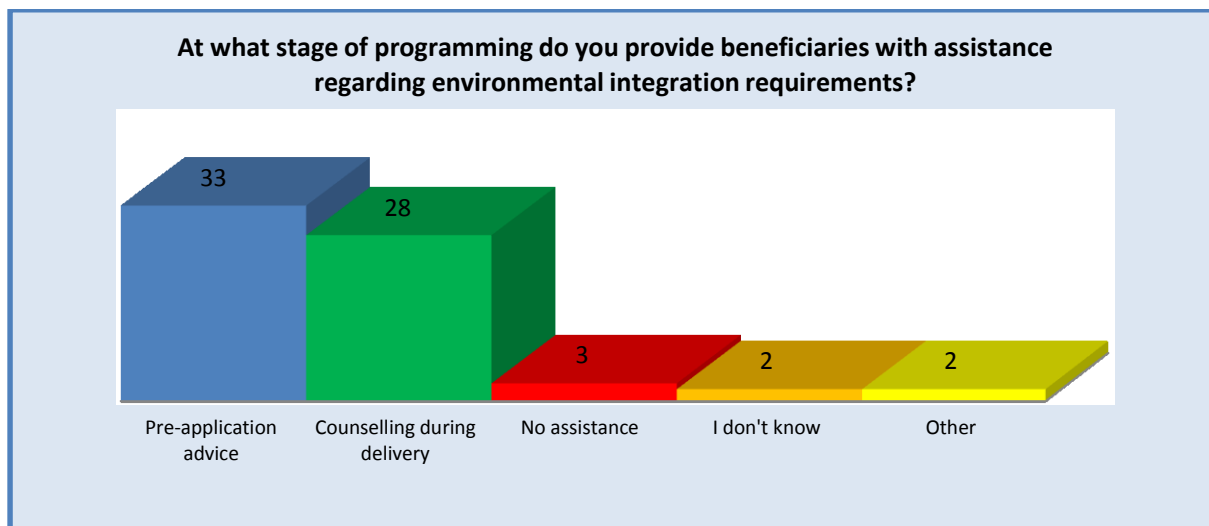
**Figure 23: Mechanisms for sharing good practices among project beneficiaries**



### 6.4.3 Timing of assistance

According to the majority of respondents (33), assistance for project beneficiaries is most commonly provided at the pre-application stage (see Figure 24), followed by environmental counselling at the project delivery stage (28).

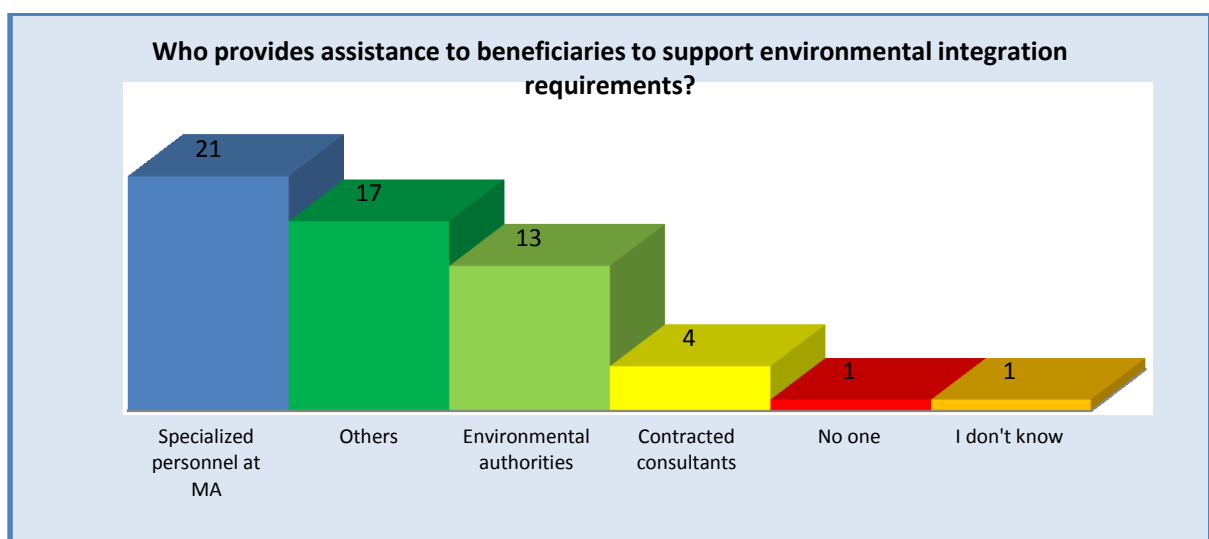
**Figure 24: Timing (programming stage) of assistance provided to beneficiaries**



### 6.4.4 Who provides assistance

The actors responsible for providing guidance and counselling on integrating environmental concerns into cohesion policy differ across Member States. One might expect the environmental authorities to take the lead here, but the perception of respondents is that the managing authorities (21) are the main providers of such assistance (see Figure 25). This is probably because responsibility for supporting environmental integration as a cross-cutting principle lies with the managing authorities. The respondents who answered 'others' (17) referred to intermediate and implementing bodies under different OPs, the EU funds contracting agency, employees of the European funds information centres and the joint technical secretariats (for ETC OPs). One respondent in this group said that 'the majority of beneficiaries have built up a lot of knowledge on sustainable development, with some having a lot of internal expertise and guidance already in existence now'.

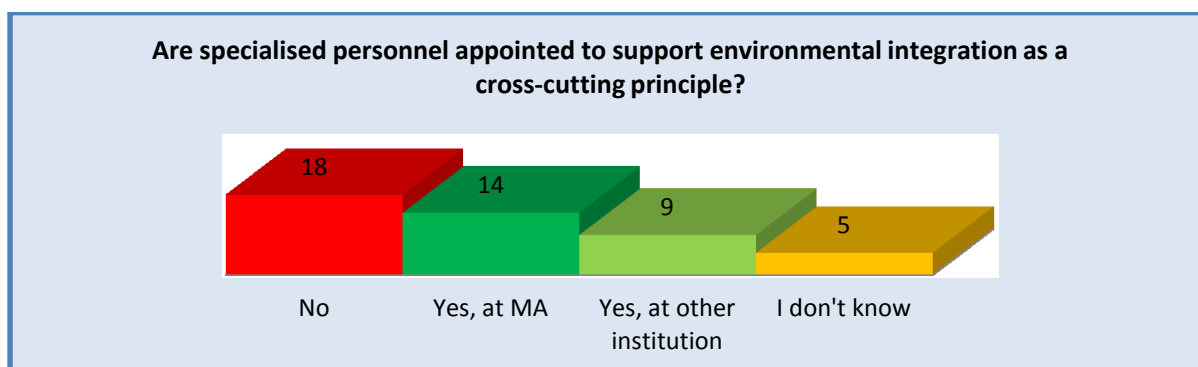
**Figure 25: Providers of assistance to beneficiaries**



### 6.4.4.1 Specialised personnel

As regards **specialised personnel** specifically responsible for supporting environmental integration (see Figure 26), 18 respondents stated that there were no such personnel. If such staff exist, they are more likely to be working for the managing authority (14) than for other institutions (9). In several cases, although such experts exist, they do not have specific environment-related job titles.

**Figure 26: Existence of specialised personnel to support beneficiaries**



In several Member States, posts have been created for environmental/sustainability advisors, managers or officers within the managing authority or other authorities in order to make EU-funded programmes and projects more resilient and check them from an environmental perspective. Box 18 contains examples of the titles and responsibilities of such managing authority staff.

#### **Box 18: Specialised managing authority staff with responsibility for environmental integration**

**DE:** environmental officer: duties include preparing guidelines, training colleagues involved in examining applications, analysing indicator data and drafting reports.

**ES:** coordinator of environmental matters: handling questions on environmental issues, coordinating the environment thematic network (the secretariat is provided by the Ministry of Agriculture, Food and Environment).

**FI:** senior advisor: part of duties is to specialise in environmental issues, sustainable development and the low-carbon economy.

**HU:** horizontal rapporteur based in the MA monitoring unit: responsible for monitoring cross-cutting principles and objectives in proposals, and liaising with project counterparts; manager dealing with sustainability and rapporteurs drafting calls for project proposals (Competitive Central Hungary OP).

**PL:** environmental manager: monitoring environmental aspects of OPs to ensure fulfilment of obligations towards the Commission, including analysing and resolving issues affecting OP environmental projects; responsibility for environmental protection issues, presenting the Department's position by issuing opinions on legislation and strategy; planning, preparation and implementation of OP SEAs.

**UK:** environmental sustainability adviser based at the Welsh European Funding Office: tasks include:

- ensuring that current Structural Fund projects are delivering on their environmental sustainability commitments, as agreed on approval and during ongoing assessment and review;
- providing support on the environmental sustainability contribution required for the current programme annual implementation reports, etc.; and
- contributing to the advice given to the programme monitoring committees (PMC) on progress as regards the programmes' environmental sustainability objectives, etc.

**Further information:** [Annex 10](#) includes terms of reference for the environmental sustainability adviser.

As mentioned above, support for beneficiaries on environmental integration is provided not only by the managing authorities, but also by a wide range of other, mostly environmental authorities,



including regional environmental authorities, national or regional environmental fund authorities, and even the prime minister's office (see Box 19). However, such assistance does not exclusively address CF beneficiaries, but a wider target audience.

**Box 19: Specialised staff in other institutions with responsibility for environmental integration**

**DE:** experts working for various bodies, including:

- environmental experts in regional governments: acting as project application advisors who can be consulted. Their main duty is not to support environmental integration as a cross-cutting objective at the managing authority exclusively, as they look after other (EU/national/regional) development programmes. They can provide support when approached, however;
- manager of the cross-cutting principle of sustainable development: main responsibilities include counselling, providing advice, recommendations, training, general support for OP actors, including the managing authority, NGOs, etc.; and
- environmental management officer at the environment department: responsible for all environmental issues in the ERDF, paid through technical assistance.

**HU:** expert in the Prime Minister's Office: appointed to coordinate issues in connection with cross-cutting objectives, managing working groups, etc.

**PL:** experts based at the Regional Fund for Environmental Protection and Water Management in Zielona Góra, Department of European Funds, second-level intermediate body for priority axis III (Lubuskie regional OP for 2007-2013). Responsibilities include:

- disseminating information on applications and results of competitions;
- receiving and verifying applications submitted by potential beneficiaries within calls;
- monitoring the state of project preparation;
- submitting positively verified applications to the managing authority;
- managing the committee responsible for assessing projects, preparing and signing co-financing contracts with beneficiaries;
- ongoing monitoring of project implementation;
- formal and substantive verification of beneficiaries' applications for co-financing; and
- executing payments to beneficiaries; recovering unduly paid amounts; performing on-the-spot controls; performing controls of public procurement procedures.

**SK:** coordinator for the cross-cutting principle of sustainable development: activities include drawing up the 'system of HP SD implementation for 2014-2020'.

#### 6.4.5 Specific assistance for SMEs

The ENEA-MA survey also looked specifically at the types of support available to SMEs, as an important target group among cohesion policy beneficiaries. Good practices include giving SMEs additional points for applying green procurement and setting requirements for energy efficiency. In the UK (among other countries), investment and support for SMEs encompasses environmental advice and support in the context of any business planning or investment.

## 7. Monitoring and evaluation of environmental integration

### 7.1 Monitoring and evaluation in 2014-2020 cohesion policy – emphasis on results

For the 2014-2020 programming period, there is an emphasis on the importance of **results**<sup>33</sup>. This is a significant change from the previous period, when absorption dominated discussions on the performance of programmes. The role of **monitoring and evaluation** is to show what programmes have achieved and at what cost. This should cover both intended and unintended impacts and consequences.

**Monitoring** involves collecting information on the amount of funds spent (*absorption*), the activity performed and products created by spending the funds, such as the length of roads built, the amount of water treatment capacity built or the number of persons trained (*outputs*).

**Evaluation** involves assessing the contribution of investments to the objectives set in the programme, such as reduced travel time, improved water quality or increased employment attributable to the programme (*results*), and what happened as a consequence of these results (*impact*), such as reduced health risks attributable to increased employment rates or healthier water. It may also involve assessing whether the objectives set at the beginning of programme implementation are still strategically relevant.

*Unintended results* of the programme should also be monitored and evaluated to ensure that implementation does not result in more harm than good.

Monitoring and evaluation covers, *inter alia*, the environmental quality of programme implementation, i.e.:

- how well the project selection criteria serve environmental objectives;
- how projects contribute to preserving and improving the environment;
- what environmental, social and economic benefits are secured as a result of the spending; and
- the ratio of benefits to costs, i.e. how efficient was the spending in creating environmental added value?

### 7.2 Indicators

The CPR refers to financial, output and result indicators. Financial indicators are outside the scope of this report, but it is useful to look at output and result indicators.

An **output indicator** describes the ‘physical’ product of spending resources through policy interventions (e.g. the length of roads/railways built). A **result indicator** describes a specific aspect of a result, a feature that can be measured (e.g. the time needed to travel from A to B at an average speed, as an aspect of mobility)<sup>34</sup>.

To monitor progress at EU level, **common output indicators** were defined in Annex I to the ERDF Regulation, the CF Regulation and the ESF Regulation. These are to be used in all programmes, where appropriate. The purpose of the common output indicator system is to encourage Member States to deliver the kind of output that can be measured by the indicators and capture as much of

---

<sup>33</sup> *Guidance document on monitoring and evaluation – European Cohesion Fund, European Regional Development Fund (concepts and recommendations)*, March 2014; [http://ec.europa.eu/regional\\_policy/sources/docoffic/2014/working/wd\\_2014\\_en.pdf](http://ec.europa.eu/regional_policy/sources/docoffic/2014/working/wd_2014_en.pdf)

<sup>34</sup> *Ibid.*

the investment output as possible. The indicators are not specific indicators that could help directly in monitoring the implementation of the sustainable development cross-cutting principle; rather, they focus *inter alia* on monitoring outcomes of traditional environmental projects, e.g. additional population served by improved water supply or wastewater treatment, additional waste recycling capacity, total surface area of rehabilitated land, etc.

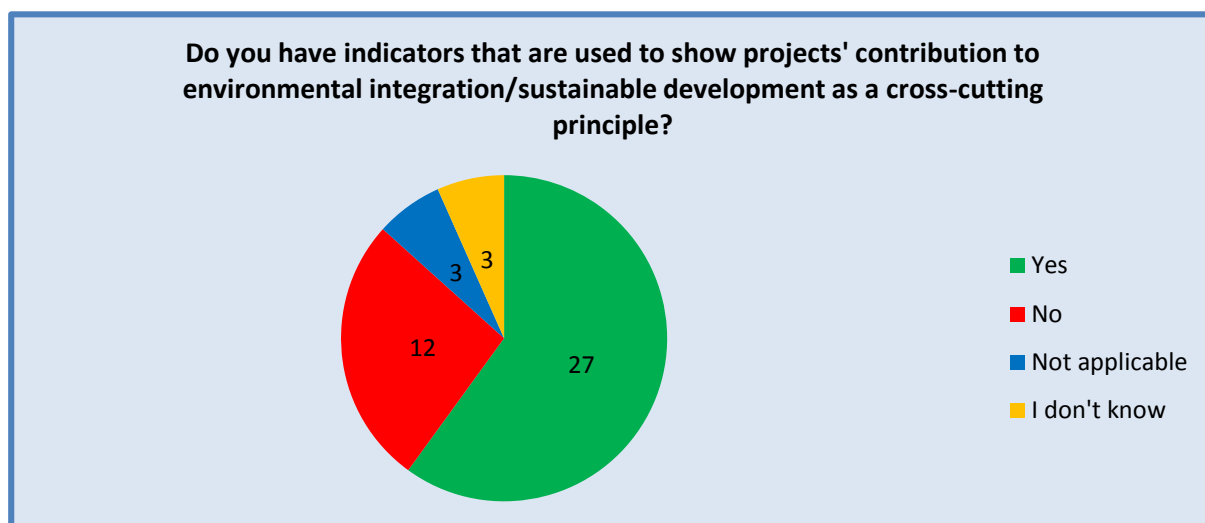
Member States may define **additional output indicators** to monitor programme elements not covered by the set of common output indicators.

No **common result indicators** have been set.

### 7.2.1 Indicators for measuring contributions to cross-cutting sustainable development

One of the aims of the ENEA-MA survey was to collect experience of using indicators to show programmes'/projects' contribution to sustainable development as a cross-cutting principle (see Figure 27).

**Figure 27: Indicators for measuring projects' contributions to the environmental integration principle**



In all, 27 respondents from 15 Member States said that they had such indicators for some OPs. Some provided examples of traditional environmental output indicators used for OPs or of common indicators, or they referred to the climate-tracking requirements under the Implementing Regulation. Other replies, providing examples of good practice, are summarised in Box 20.

**Box 20: Indicators for monitoring programmes'/projects' (positive/negative) contribution to sustainable development as a cross-cutting theme**

**BE:** Result indicators: users of alternative transportation (instead of cars); number of companies with a strategy for the rationale use of energy.

Output indicators: surface of solar panels; length of cycle paths; number of beneficiaries having installed CHP (co-generation) systems.

**EL:** Contribution to energy saving and RES promotion; surface of Natura 2000 areas covered by transport infrastructure.

**FI:** All ERDF priority axes contain indicators that measure the amount of renewables, energy efficiency and/or low-carbon economy development.

**PL:** Number of enterprises supported within the eco-innovation area; employment rate in communities where development is limited by Natura 2000 (%).

**SK:** Due to the scope of support from the Quality of the Environment OP, all of the indicators are relevant for the cross-cutting principle of sustainable development. The contribution to environmental issues is a pre-condition itself due to the nature of the OP and the scope of support, especially within priority axes 1 and 2. Moreover, in some areas, indicators directly connected to other priorities of the QE OP are monitored specifically, e.g. within priority axis 4 (low-carbon economy - energy sector), special attention is paid to air quality requirements, especially in projects aimed at the use of biomass. For these projects, air quality related indicators have also been introduced.

**UK:** Green infrastructure - monitoring the amount of hectares that are supported and the impact that has on those using and accessing this infrastructure.

Result indicator: 'positive rating of satisfaction with the quality of green infrastructure in urban areas in Scotland'.

Low-carbon transport indicators in relation to changing behaviour and encouraging use of ultra-low emission vehicles (ULEVs) and active travel modes.

Low-carbon targets in relation to employment in low-carbon-related activity and resource-efficiency savings in supported entities.

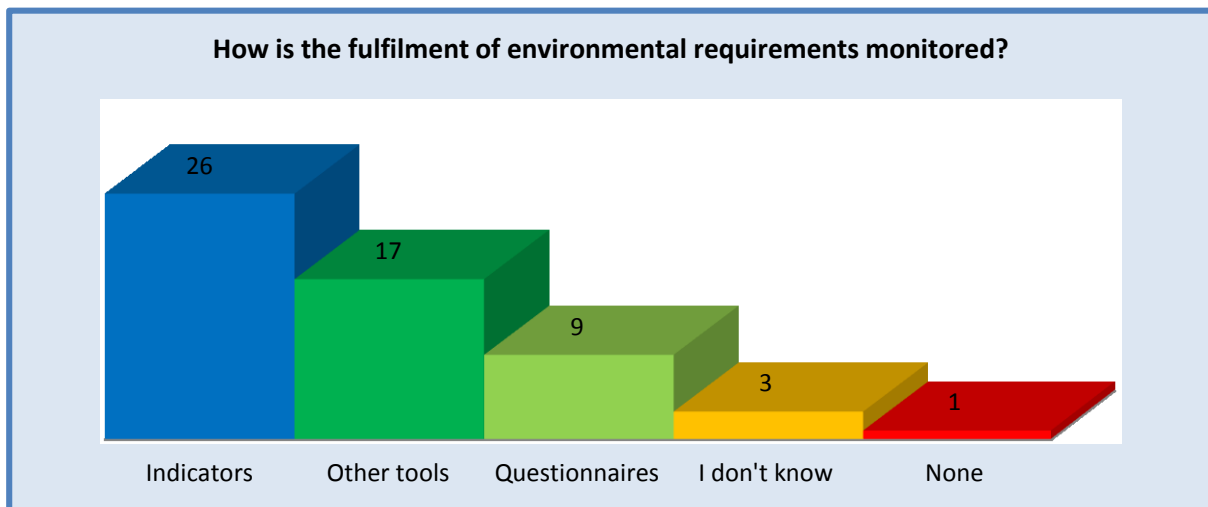
Indicator: number of enterprises adopting or improving their sustainable development strategies (ERDF) or 'operations' integrating sustainable development into awareness-raising, education and training programmes (ESF).

Qualitative indicators showing the projects' contribution to the use of alternative energy, energy efficiency and environmental protection/resource conservation/risk prevention.

## 7.2.2 Going beyond indicators to measure contributions to cross-cutting sustainable development

While indicators remain the most common tool for measuring programmes'/projects' contribution to the cross-cutting sustainable development principle, the survey also looked at other available tools (see Figure 28). For example, the use of questionnaires is also popular (9 respondents). Several respondents (17) use other tools such as project reports (DE) or on-the-spot checks (CZ).

**Figure 28: Tools for monitoring compliance with cross-cutting environmental requirements**



The Welsh European Funding Office (WEFO), which manages the delivery of the EU Structural Funds programmes in Wales (UK), identified a number of other outcomes that can be considered in the context of monitoring environmental integration (see Box 21):

**Box 21: Other outcome contributing to environmental/sustainable development agenda – Welsh European Funding Office (UK)**

In addition to sustainable development indicators, outcomes that have been identified as contributing to the environmental/sustainable development agenda:

- acknowledgement of the Well-Being of Future Generations Act (2015);
- development of an organisational EcoCode (practical tips and reminders for saving energy, conserving water and encouraging improved waste management);
- operations developing local supply chains;
- operations integrating green and blue infrastructure;
- activity supporting biodiversity on a site funded through the Structural Funds;
- development of an organisational travel plan;
- resource-efficiency measures integrated into activity;
- BREEAM excellent;
- [CEEQUAL](#) (Civil Engineering Environmental Quality Assessment and Award Scheme certificate);
- SUDS (sustainable drainage systems);
- good practice stakeholder engagement activity;
- promoting the CCT in organisations by developing champions, etc.;
- operations integrating social clauses into activity (detail); and
- CCT toolkits, health checks, training packages, applications, etc.

### 7.3 The role of the monitoring committee

As mentioned in chapter 3, the CPR (Article 110(1)(g)) has given monitoring committees a clear responsibility to examine ‘actions to promote sustainable development’ in 2014-2020. Accordingly, ‘[t]he monitoring committee shall examine in particular: ... actions to promote sustainable development’. Although there was no such requirement in 2007-2013, there are some examples of good practice from various Member States (see Box 22).

**Box 22: The role of monitoring committees in supporting sustainable development**

**BG:** In Bulgaria, Decision No 3/2016 of the Council of Ministers approving *Guidelines on the mainstreaming of environmental policy and climate change policy into ESIF - phase 'implementation of the 2014-2020 partnership agreement and programmes* (the *mainstreaming guidelines*) provides an opportunity for the monitoring committees for ESIF 2014-2020 programmes to examine sustainable development actions implemented by the managing authorities.

The Decision instructs the ministries responsible for the ESIF programmes to include environmental criteria from the *mainstreaming guidelines* in the list of project selection criteria. Following approval by the monitoring committee, these would apply to the project selection procedure under the respective programme. If their inclusion is not applicable, they can be included as conditions for the submission of project proposals or during implementation. The Ministry of Environment and Water representatives on the monitoring committees can provide opinions on the compliance of the project selection criteria with the specific environmental criteria in the *mainstreaming guidelines*.

The Decision also stipulates that justification must be provided for the inapplicability of environmental criteria in the monitoring committees' conciliation procedure or during implementation of Article 52 CPR.

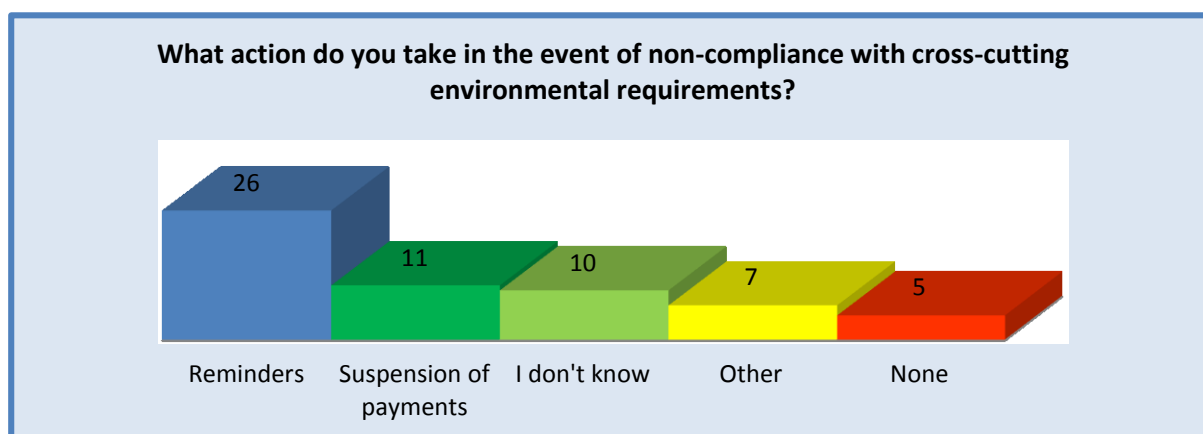
The ministers responsible for the implementation of programmes must report to the monitoring committee plenary sessions on action taken to implement the *mainstreaming guidelines*.

**HU:** For the 2014-2020 programming period, Hungary has set up a partnership agreement monitoring committee comprising members from civil society, academia, regional partners, the Commission, managing and coordinating authorities, and line ministries. Its role is to monitor the implementation of cross-cutting principles and policies, and ensure synergies across OPs. It has passed resolutions on the rules for implementing cross-cutting principles, reviews the annual report on their implementation and has a dedicated workgroup on indicators for monitoring progress in implementing sustainable development and non-discrimination principles.

## 7.4 Actions to address non-compliance with cross-cutting environmental requirements

Under Article 8 CPR, the principle of sustainable development must be integrated in the preparation and implementation of partnership agreements and programmes. Sometimes, beneficiaries fail to comply with this obligation at the level of individual projects and managing authorities have to step in. Most respondents (26) to the survey (see Figure 29) use reminders in such cases. Some (11) suspend payments if this does not work. Some use other approaches, such as recovering grants or terminating contracts.

**Figure 29: Tools to address non-compliance with cross-cutting environmental requirements**

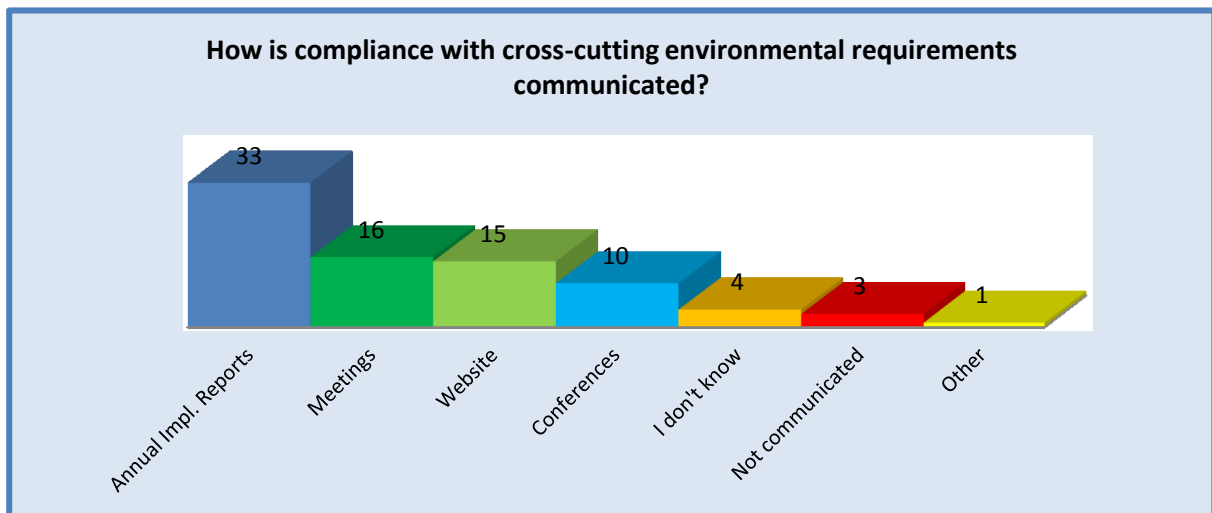


## 7.5 Communicating compliance with cross-cutting environmental requirements

Article 11(4)(f) CPR requires that '[t]he **annual implementation reports** submitted in **2017** and **2019** may, depending on the content and objectives of operational programmes, set out information and assess the following: ... actions taken to promote sustainable development in accordance with Article 8'. A similar requirement applies to partnership agreement progress reports (due by 31 August 2017 and 31 August 2019) under Article 52(2)(i) CPR: 'The progress report shall set out information on and assess: ... a summary of the actions taken in relation to the application of the horizontal principles referred to in Articles 5, 7 and 8 ...'.

These obligations go significantly beyond the provisions for 2007-2013, which involved no specific requirements as regards monitoring and evaluation. Nevertheless, managing authorities used various tools to communicate compliance with cross-cutting environmental requirements. The survey (see Figure 30) found that annual implementation reports were used most commonly (33 replies) for this purpose, followed by meetings (16), websites (15) and conferences (10). Several OPs used a number of tools at the same time.

**Figure 30: Means of communicating compliance with cross-cutting environmental requirements**



## 8. Conclusion

Despite the 'shoe-string' and informal nature of this report, it presents an inspiring set of administrative innovations and solutions for addressing the challenging task of integrating environmental requirements into cohesion policy. An in-depth, EU-wide comprehensive review, at regular intervals, would provide us with a better understanding of what happens on the ground and how the process can be assisted.

The examples show that Member States have already accumulated some experience and that this experience is worth sharing. This opportunity for mutual learning needs to be cultivated.

Another lesson from this report is that environmental integration is successful in countries where integration measures are incorporated at every step of the implementation cycle, from planning, through project selection, to monitoring, evaluation and learning. Relatively little information is available on the efficiency and efficacy of environmental integration efforts. This is an area that deserves more attention in the future.

The legal environment for integrating sustainable development principles and policies in the 2014-2020 programming period is more explicit and therefore a better vehicle for change on the ground. Better integration now requires programme- and project-level commitment and close monitoring and follow-up to see where improvements and assistance may be needed.



## Annexes

### Annex 1: Survey on environmental integration in cohesion policy

#### INFORMATION ABOUT THE RESPONDENT

\* 1. Member State

- AT    BE    BG    CY    CZ    DE    DK    EE    EL    ES  
 FI    FR    HR    HU    IE    IT    LT    LU    LV    MT  
 NL    PL    PT    RO    SE    SI    SK    UK

\* 2. Institution

- Managing Authority  
 Environmental Managing Authority  
 Environmental Authority  
 Other

If you represent 'Managing Authority', please complete the following details: 1) name of your Operational Programme and 2) funds it covers (e.g. ERDF, CF, ESF).

If you represent 'Environmental Managing Authority', please complete the following details: 1) name of your Operational Programme and 2) funds it covers (e.g. ERDF, CF, ESF).

If you represent 'Environmental Authority', please complete the following details: 1) name of your authority and 2) the function/responsibilities it performs within Cohesion Policy.

If you represent 'other' institution/organisation, please complete the following details, if applicable: 1) name of your institution/organisation; 2) function it performs within Cohesion Policy; 3) name of relevant Operational Programme/s; and 4) funds it covers (e.g. ERDF, CF, ESF).

### INTRODUCTORY QUESTIONS

\*3. What is your understanding of environmental integration/sustainable development requirements as a horizontal principle?

\*4. Do any legal instruments or other arrangements exist in your Member State to apply the environmental integration/sustainable development requirements as a horizontal principle according to Article 8 of the [Common Provisions Regulation](#)?

*between 1 and 2 choices*

- Yes, legal instrument/s
- Yes, other arrangements e.g. internal guidelines
- No
- I don't know

If 'yes' to 'legal instruments', please summarise its scope and/or provide a link to a specific reference.

If 'yes' to 'other arrangements', please describe and/or provide a link (if available).

\*5. Do you have an audit trail defined for the implementation of horizontal environmental requirements?

- Yes
- No
- I don't know

If 'yes', please explain.

\*6. Who is the main driving force supporting environmental integration in your Operational Programme?

- None
- European Commission
- Environmental authorities
- Environmental non-governmental organisations
- Managing Authority
- Not applicable
- Other

If 'other', please describe.

\*7. Are environmental integration/sustainable development requirements applied to every priority axis and measure?

- Yes, to all priority axes
- No, only to some priority axes
- Not applicable
- I don't know

\*8. Are environmental integration/sustainable development requirements customized to various types of projects (e.g. depending on the priority axis, measure, size or types of projects)?

- Yes
- No
- I don't know

If 'yes', please provide some examples.

#### PROJECT PREPARATION, APPRAISAL AND CONTRACT REQUIREMENTS

\*9. Do calls for project proposals refer specifically to environmental integration/sustainable development requirements?

- Yes
- No
- I don't know

If 'yes', please provide some explanations and/or examples.

\*10. Do applications for non-major projects include environment related questions, regarding the compliance with the environmental legislation and/or environmental/sustainable development integration requirements?

*between 1 and 2 choices*

- Yes, questions linked to compliance with environmental legislation
- Yes, questions linked to environmental integration as a horizontal principle
- No
- I don't know

If 'yes' to 'questions linked to compliance', please provide these questions or their summaries.

If 'yes' to 'questions linked to environmental integration', please provide these questions or their summaries.

\*11. Please indicate what types of environmental selection criteria are used for selecting projects?

*between 1 and 3 choices*

- Admissibility criteria going beyond legislation limiting funding to projects which fulfil pre-defined environmental integration criteria
- Additional points awarded for fulfilling environmental integration criteria
- Other
- None
- I don't know

If 'yes' to 'admissability criteria', please specify.

If 'yes' to 'additional points', please specify.

If 'yes' to 'other', please specify.

12. Please provide an Internet link (in the box below) and/or attach an example of environmental integration criterion/ia as approved by the Monitoring Committee for your Operational Programme, where applicable.

Please upload your file

\*13. Do you include horizontal environmental requirements as part of the funding contract?

- Yes
- No
- I don't know

If 'yes', please provide some examples.

**ASSISTANCE TO PROJECT BENEFICIARIES**

\*14. Do you have regional or national guidelines to support environmental integration requirements?

- Yes
- No
- I don't know

If 'yes', please list their titles and links (if publicly available) and/or download below.

Please upload your file

\*15. What type of assistance do you provide to beneficiaries to support environmental integration /sustainable development requirements?

*between 1 and 5 choices*

- None
- Trainings
- Guidance
- Face-to-face contacts
- E-mail exchanges
- I don't know
- Other

If 'other, please describe.

\*16. At what stage of programming do you provide assistance regarding environmental integration requirements to beneficiaries?

*between 1 and 4 choices*

- No assistance provided
- Pre-application advice
- Counselling during project delivery
- I don't know
- Other

If 'other', please describe.

\*17. Who provides assistance to beneficiaries to support environmental integration requirements?

*between 1 and 4 choices*

- No one
- Specialised personnel at the Managing Authority
- Environmental authorities
- Contracted consultants
- I don't know
- Other

If 'other', please describe.

\*18. Is there specialised personnel appointed with a responsibility to support environmental integration as a horizontal objective at the Managing Authority or another institution/organisation?

*between 1 and 2 choices*

- Yes, at Managing Authority
- Yes, at another institution/organisation
- No
- I don't know

\*If personnel 'at Managing Authority', please write its official title (e.g. sustainability theme manager), and describe main responsibilities, funding source, etc.

\*If personnel at 'other institution', please write its official title (e.g. sustainability theme manager), and describe main responsibilities, funding source, etc.

\*19. What are your mechanisms for sharing good practices about environmental integration among project beneficiaries?

*between 1 and 3 choices*

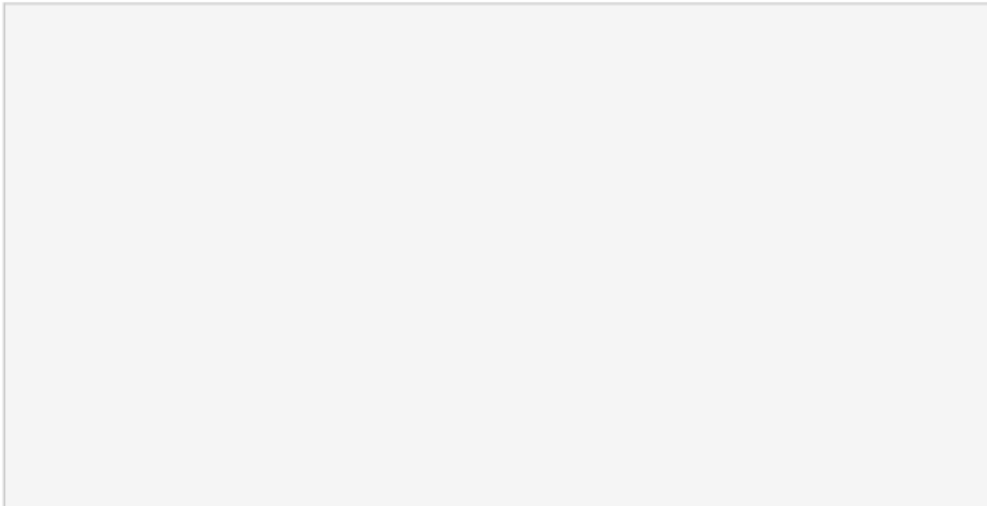
- No mechanisms
- Meetings
- Reports
- Other
- I don't know

If 'other', please describe.



## PARTNERSHIP

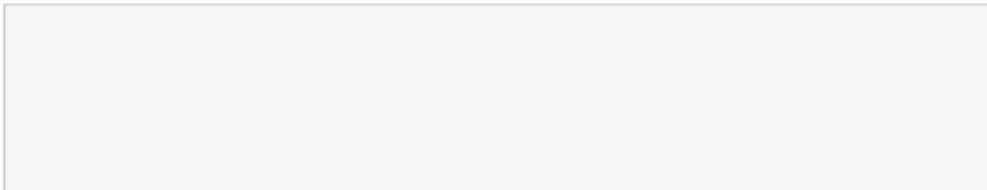
- \*20. How you involve partners (according to Article 5 of the [Common Provisions Regulation](#)) in preparing, implementing and monitoring horizontal environmental requirements (e.g. structures to bring together different partners, working groups, networks, etc.)?



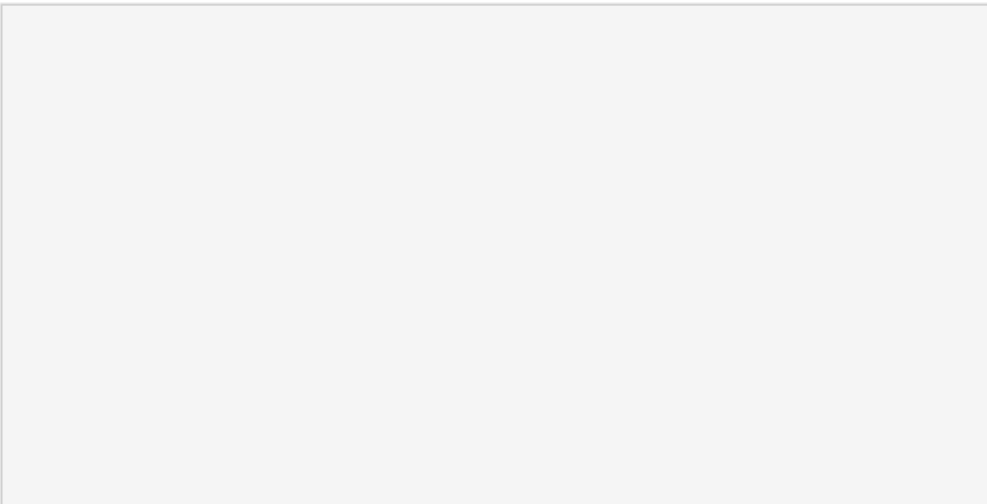
- \*21. What is your opinion about the influence of partners, in particular, environmental authorities and non-governmental organisations, as regards environmental integration as a horizontal theme in your Operational Programme?

- No added value
- Added value
- I don't know

If 'no added value', please explain why.



If 'added value', please give an example how partners strengthen the environmental dimension of the Operational Programme (preparation, implementation and/or monitoring).



## MONITORING AND EVALUATION

\*22. Do you have indicators which are used to show the contribution made by projects towards environmental integration/sustainable development as a horizontal principle (please do not refer to [com mon indicators](#) used to measure direct investments)?

- Yes
- No
- Not applicable
- I don't know

Please provide examples.

\*23. How is the performance of environmental requirements monitored?

*between 1 and 3 choices*

- No monitoring
- Questionnaires
- Indicators
- Other tools
- I don't know

If 'other tools', please describe.

24. If you evaluate environmental integration requirements, please give examples of questions .

\*25. What actions do you take if horizontal environmental requirements are not implemented?

*between 1 and 3 choices*

- None
- Reminders
- Suspension of payments
- Other
- I don't know

If 'other', please describe.

\*26. How is the performance of horizontal environmental requirements communicated?

*between 1 and 5 choices*

- Not communicated
- As a part of annual implementation reports
- Meetings
- Conferences
- Website
- Other
- I don't know

If 'other', please describe.

#### ASSISTANCE TO SMALL AND MEDIUM-SIZED ENTERPRISES (SMEs)

27. What were the environmental integration measures most frequently applied by SMEs supported by your Operational Programmes? Please provide an example/s, if applicable.

\*28. Do you have assessments investigating the environmental performance of EU funded SMEs in relation to their profitability?

- Yes
- No
- I don't know

If 'Yes', please provide a link to the study (if available) or download it below.

Please upload your file

STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA)

\*29. What is your opinion about the contribution of the SEA for your Operational Programme?

- SEA not applicable
- I don't know
- No added value
- Added value

If 'no added value', please explain why.

If 'added value', please give an example how the SEA strengthened the environmental dimension of the Operational Programme.

**\*30. What was your major barrier as regards the application of the SEA to your Operational Programme?**

*between 1 and 5 choices*

- SEA not applicable
- None
- I don't know
- Lack of time
- Lack of clear guidance
- Difficulties in coordinating the development of the Operational Programme and SEA
- Operational Programme not specific enough to deliver a good SEA
- Other

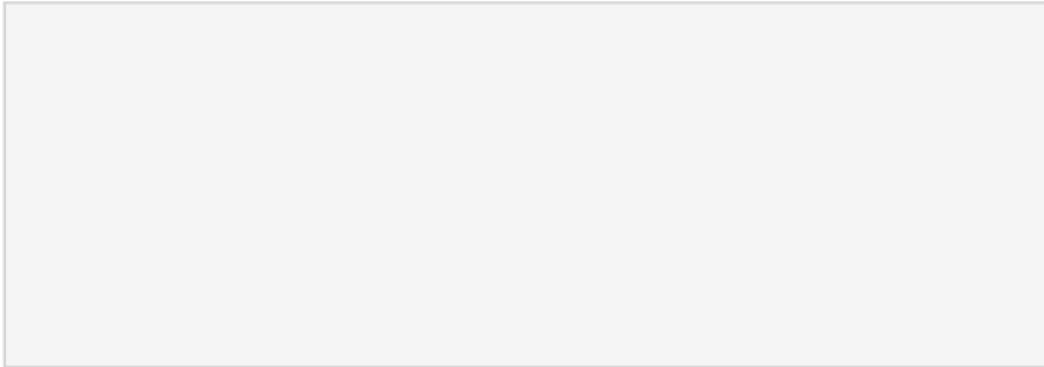
If 'other, please describe.

ADDRESSING RESOURCE EFFICIENCY, CLIMATE CHANGE MITIGATION AND ADAPTATION, BIODIVERSITY, DISASTER RESILIENCE AND RISK PREVENTION AND MANAGEMENT [issues specifically listed in the Article 8]

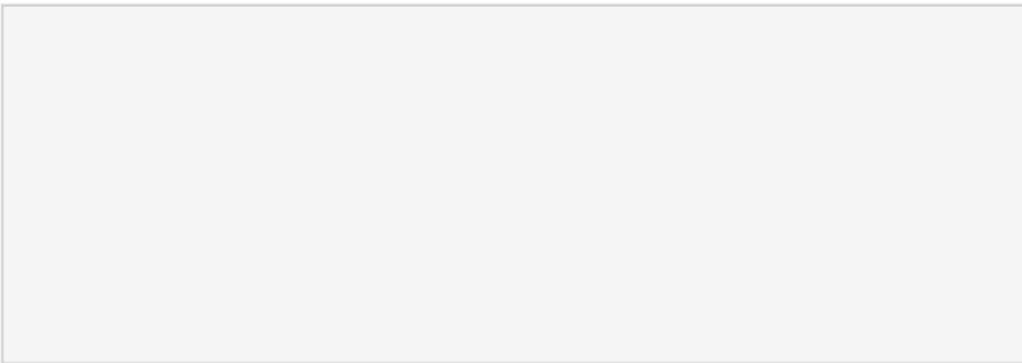
**31. Do you have any specific requirements to integrate the following issues across different priority axes /measures?**

|  | Yes                   | No                    | I don't know          |
|--|-----------------------|-----------------------|-----------------------|
| *Resource efficiency<br>(outside Thematic Objective 6)       | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| *Biodiversity<br>(outside Thematic Objective 6)              | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| *Climate change mitigation<br>(outside Thematic Objective 4) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| *Climate change adaptation<br>(outside Thematic Objective 5) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| *Disaster resilience<br>(outside Thematic Objective 5)       | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| *Risk prevention<br>(outside Thematic Objective 5)           | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

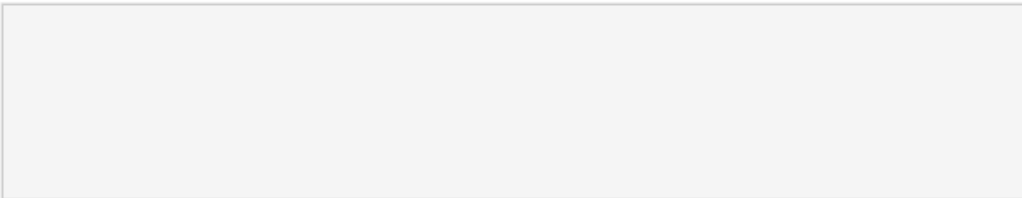
If 'yes', could you please give good practice examples regarding resource efficiency and/or provide Internet links.



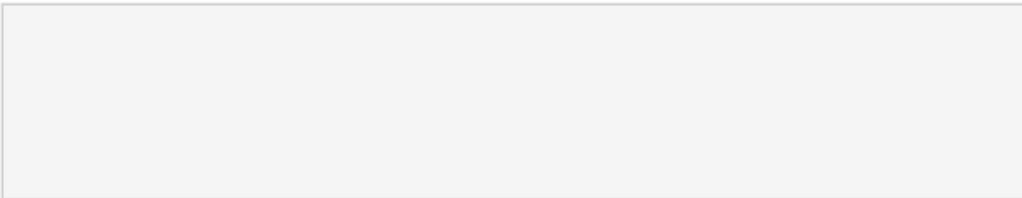
If 'yes', could you please give good practice examples regarding biodiversity and/or provide Internet links.



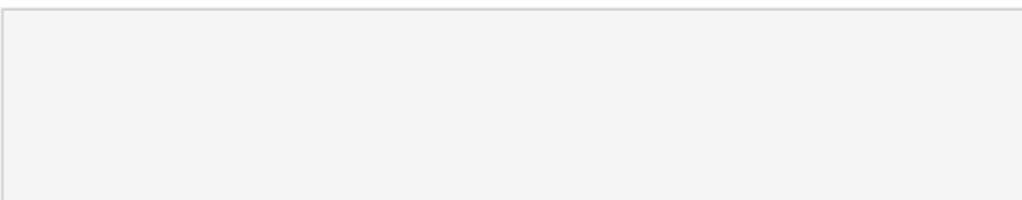
If 'yes', could you please give good practice examples regarding climate change mitigation and/or provide Internet links.



If 'yes', could you please give good practice examples regarding climate change adaptation and/or provide Internet links.



If 'yes', could you please give good practice examples regarding disaster resilience and/or provide Internet links.



If 'yes', could you please give good practice examples regarding risk prevention and/or provide Internet links.

#### TRANSFERRING EXPERIENCE FROM MAJOR PROJECTS

\*32. Do you use the experience from [major projects](#) as regards compliance with the EU environmental legislation and environmental integration as a horizontal principle (e.g. climate proofing) to strengthen the environmental dimension of non-major projects?

- Not applicable
- Yes
- No
- I don't know

If 'yes', please describe.

#### CLOSING QUESTIONS

\*33. What is the biggest barrier to environmental integration in your Operational Programme?

*between 1 and 4 choices*

- Lack of understanding of environmental integration requirements as a horizontal objective
- Lack of specialised staff
- Lack of interest
- I don't know
- Other

If 'other', please describe.

34. If you have any further comments and/or internet links as regards environmental integration requirements as a horizontal priority, please provide these below.

35. Do you have good experience in environmental integration from other Funds (EAFRD, EMFF, Connecting Europe Facility, etc.)? Please describe and/or provide any relevant Internet links.

\*36. Would you be ready to provide further information/clarifications on good practice examples, if needed?

- Yes
- No

If 'yes', please provide your name, email address and/or telephone number (optional).



## Annex 2: Key references to environmental integration in the 2014-2020 regulations

| Key references                                       |   |
|--|---|
| Common Provisions Regulation (CPR) (EU) No 1303/2013 |   |
| Article 6  | Compliance with Union and national law<br><i>'Operations supported by the ESI Funds shall comply with applicable Union law and the national law relating to its application ("applicable law").'</i>  |
| Article 5(1)(c)                                      | Partnership and multi-level governance<br><i>'1. For the Partnership Agreement and each programme, each Member State shall in accordance with its institutional and legal framework organise a partnership with the competent regional and local authorities. The partnership shall also include the following partners:<br/>(a) competent urban and other public authorities;<br/>(b) economic and social partners; and<br/>(c) relevant bodies representing civil society, including environmental partners, non-governmental organisations, and bodies responsible for promoting social inclusion, gender equality and non-discrimination.'</i>  |
| Article 8  | Sustainable development<br><i>'The objectives of the ESI Funds shall be pursued in line with the principle of sustainable development ... The Member States and the Commission shall ensure that environmental protection requirements, resource efficiency, climate change mitigation and adaptation, biodiversity, disaster resilience, and risk prevention and management are promoted in the preparation and implementation of Partnership Agreements and programmes. ...'</i>  |
| Article 9  | Thematic objectives<br><i>'[...] each ESI Fund shall support the following thematic objectives:<br/>(4) supporting the shift towards a low-carbon economy in all sectors;<br/>(5) promoting climate change adaptation, risk prevention and management;<br/>(6) preserving and protecting the environment and promoting resource efficiency;'</i>  |
| Article 96(7)(a)                                     | Content, adoption and amendment of operational programmes under the Investment for growth and jobs goal<br><i>'Each operational programme [...] shall, [...] include a description of a) the specific actions to take into account environmental protection requirements, resource efficiency, climate change mitigation and adaptation, disaster resilience and risk prevention and management, in the selection of operations;'</i>   |
| Article 55(4)  | Ex ante evaluation<br><i>'Ex ante evaluations shall incorporate, where appropriate, the requirements for strategic environmental assessment set out in Directive 2001/42/EC of the European Parliament and of the Council, taking into account climate change mitigation needs.'</i>  |
| Article 101  | Information necessary for the approval of a major project<br><i>'Before a major project is approved, the managing authority shall ensure that the following information is available: [...]<br/>(f) an analysis of the environmental impact, taking into account climate change adaptation and mitigation needs, and disaster resilience;'</i>  |
| Annex I (common strategic framework) Section 5.2     | <i>'Managing authorities shall undertake actions throughout the programme lifecycle, to avoid or reduce environmentally harmful effects of interventions and ensure results in net social, environmental and climate benefits. Actions to be undertaken may include the following:<br/>(a) directing investments towards the most resource-efficient and sustainable options;<br/>(b) avoiding investments that may have a significant negative environmental or climate impact, and supporting actions to mitigate any remaining impacts;<br/>(c) taking a long-term perspective when 'lifecycle' costs of alternative options for investment are compared;<br/>(d) increasing the use of green public procurement.'</i> |
| Cohesion Fund (CF) Regulation (EU) No 1300/2013      |   |
| Article 2(1)(a)                                      | Scope of support from the Cohesion Fund<br><i>'The Cohesion Fund shall [...] support:<br/>(a) investment in the environment, including areas related to sustainable development and energy which present environmental benefits;'</i>   |
| Article 4(c)   | Investment priorities<br><i>The Cohesion Fund shall support [...]<br/>(c) preserving and protecting the environment and promoting resource efficiency by:<br/>(i) investing in the waste sector to meet the requirements of the Union's environmental acquis and to address needs, identified by the Member States, for investment that goes beyond those requirements;</i>   |

|   |   |
|---|---|
|   | <p>(ii) investing in the water sector to meet the requirements of the Union's environmental acquis and to address needs, identified by the Member States, for investment that goes beyond those requirements;</p> <p>(iii) protecting and restoring biodiversity and soil and promoting ecosystem services, including through Natura 2000, and green infrastructure;</p> <p>(iv) taking action to improve the urban environment, to revitalise cities, regenerate and decontaminate brownfield sites (including conversion areas), reduce air pollution and promote noise-reduction measures;'</p>  |
| <b>European Regional and Development Fund (ERDF) Regulation (EU) No 1301/2013</b> |   |
| <b>Article 3(1)(c)</b>  | <p>Scope of support from the ERDF</p> <p>'1. The ERDF shall support [...]</p> <p>(c) investment in infrastructure providing basic services to citizens in the areas of energy, environment, transport and ICT;'</p>   |
| <b>Article 5(6)</b>   | <p>Investment priorities</p> <p>'The ERDF shall support [...]</p> <p>(6) preserving and protecting the environment and promoting resource efficiency by:</p> <p>(a) investing in the waste sector to meet the requirements of the Union's environmental acquis and to address needs, identified by the Member States, for investment that goes beyond those requirements;</p> <p>(b) investing in the water sector to meet the requirements of the Union's environmental acquis and to address needs, identified by the Member States, for investment that goes beyond those requirements;</p> <p>(c) conserving, protecting, promoting and developing natural and cultural heritage;</p> <p>(d) protecting and restoring biodiversity and soil and promoting ecosystem services, including through Natura 2000, and green infrastructure;</p> <p>(e) taking action to improve the urban environment, to revitalise cities, regenerate and decontaminate brownfield sites (including conversion areas), reduce air pollution and promote noise-reduction measures;</p> <p>(f) promoting innovative technologies to improve environmental protection and resource efficiency in the waste sector, water sector and with regard to soil, or to reduce air pollution;</p> <p>(g) supporting industrial transition towards a resource- efficient economy, promoting green growth, eco-innovation and environmental performance management in the public and private sectors;'</p> |
| <b>European Social Fund (ESF) Regulation (EU) No 1304/2013</b>                    |   |
| <b>Article 3(2)</b>   | <p>Scope of support</p> <p>'2. Through the investment priorities listed in paragraph 1, the ESF shall also contribute to the other thematic objectives listed in the first paragraph of Article 9 of Regulation (EU) No 1303/2013, primarily by:</p> <p>(a) Supporting the shift towards a low-carbon, climate-resilient, resource-efficient and environmentally sustainable economy, through the improvement of education and training systems necessary for the adaptation of skills and qualifications, the up-skilling of the labour force, and the creation of new jobs in sectors related to the environment and energy;'</p>   |
| <b>Article 12(1)</b>  | <p>Specific provisions on the treatment of particular territorial features</p> <p>'2. As a complement to ERDF [...], the ESF may support sustainable urban development through strategies setting out integrated actions to tackle the economic, environmental and social challenges affecting the urban areas identified by the Member States on the basis of the principles laid down in their respective Partnership Agreements.'</p>  |
| <b>European Territorial Cooperation (ETC) Regulation (EU) No 1299/2013</b>        |   |
| <b>Article 8(7)(a)</b>  | <p>Content, adoption and amendment of cooperation programmes</p> <p>'Each cooperation programme shall, where appropriate and subject to the relevant Member States' duly justified assessment of their relevance to the content and objectives of the programme, include a description of:</p> <p>(a) the specific actions to take into account environmental protection requirements, resource efficiency, climate change mitigation and adaptation, disaster resilience and risk prevention and risk management, in the selection of operations;'</p>   |

## Annex 3: The Spanish Environmental Authorities Network

### 1. BACKGROUND

The Spanish Environmental Authorities Network was established in 1997 as a response to Regulation (EEC) No 2081/93 on the Structural Funds, under which environmental protection requirements had to be integrated in the development and implementation of other sectoral European policies. In doing so, Member States were to create links between national and regional environmental authorities in the programming and implementation stages of the regional OPs.

The Network has two main objectives:

- cooperation in the implementation of European environmental policy and regulation; and
- cooperation to establish environmental integration criteria in economic sectors co-financed by EU funds.

The Network is composed of environmental and managing authorities responsible for Structural Funds from the regional, national and European institutions.

It usually holds two plenary meetings per year, each accompanied by a thematic information day on a specific environmental topic relating to European financing. It sets up working groups (WGs) on specific programming issues.

The Network's secretariat participates in several different fora, such as other networks relating to ESIFs, ENEA-MA and ETC, and in monitoring committees in order to integrate sustainability as a cross-cutting principle.

### 2. 2014-2020 PROGRAMMING PERIOD

Since 2014, the Network has focused its efforts on trying to integrate environmental criteria in the new programming period. Three WGs are currently active in this area:

#### ***a) WG on climate change in the 2014-2020 programming period***

The WG is focused on:

- analysis of the contribution of intervention codes to climate change mitigation pursuant to the Implementing Regulation and identifying operations programmed under the various TOs and OPs that contribute to climate change mitigation and adaptation; and
- establishing common methodologies to monitor the contribution of co-financed operations to reducing GHG emissions, especially in the 'diffuse sectors'.

#### ***b) WG on environmental assessment of OPs and their actions***

This WG's initial objective was to compile a list of environmental indicators for the 2014-2020 ERDF OPs that comply with EU requirements and reflect the various features required by the OP SEAs. The WG presented a list of indicative indicators for the regions to consider, on a voluntary basis, in their SEA procedures. This was finally approved and used by many of the regions.

The WG also analysed the degree of consistency among SEA documents, OPs and selection criteria.

It is now working on guidelines on the environmental monitoring of the ERDF OPs.

#### ***c) WG on biodiversity, nature conservation and European funds***

*Inter alia*, this WG has analysed the extent to which Natura 2000 priority action framework measures have been integrated in programming documents and issued recommendations for the various ESIFs to promote the inclusion of operations relating to biodiversity and nature conservation.

## Annex 4: Overview: national networks' actions to support environmental integration into 2014-2020 cohesion policy

| Greek Environmental Network  | Italian Network of Environmental and Managing Authorities  | Polish Network of Environmental Authorities 'Partnership for Environment'   | Spanish Network of Environmental Authorities   |
|--|--|---|--|
| A working group has been set up to accelerate and coordinate action for each river basin management plan (RBMs), as required by Article 11 of the Water Framework Directive. | A formal partnership agreement has been set up and signed by environmental authorities and managing authorities for the 2014-2020 OPs, at regional and national levels, to ensure institutional cooperation to better address environmental integration within cohesion policy and improve the decision-making processes, organisational structures and activities of all institutions involved in the governance of national and regional programmes. | Support for the drawing-up of strategic documents (e.g. national waste prevention and wastewater treatment programmes). | The Network sits on the OP monitoring committees to assure their compliance with the sustainable development cross-cutting principle (Article 8 CPR).  |
| Support for the evaluation of the annual OP environmental reports, as required under the SEA Directive.  | A dynamic 'platform of knowledge' website <sup>35</sup> has been established. It collects the best EU co-financed environmental practices <sup>36</sup> in Italy to promote and disseminate knowledge of solutions, procedures, methodologies, approaches and technologies, encouraging their replicability by regional/local authorities and private entities.<br> |   | The climate change working group analysed the thematic concentration requirements on low-carbon economy in the OPs and assessed the contribution of the co-financed operations to the reduction of GHG emissions.        |
|  | The CO <sub>2</sub> MPARE model <sup>37</sup> has been upgraded for the 2014-2020 ERDF programming period, to assess the CO <sub>2</sub> impact of regional OPs in order to facilitate the inclusion of environmental and climate considerations in regional development decisions.<br>   |   | The environmental assessment working group proposed a list of environmental indicators to be considered on a voluntary basis in the OP SEA process. It also analysed consistency among SEAs, OPs and selection criteria. |

<sup>35</sup> <http://www.pdc.minambiente.it/en>

<sup>36</sup> In the context of LIFE, Horizon 2020, Competitiveness and Innovation Framework Programme – ECO Innovation, Intelligence Energy Europe, the Seventh Research Framework for Research and Innovation and the Alpine Space Programme.

<sup>37</sup> DG REGIO commissioned and financed the CO<sub>2</sub>MPARE model for the 2007-2013 programming period to support national and regional authorities in making balanced decisions for their investment portfolio under their regional OPs, by assessing the emission impact per euro spent for a given type of activity and multiplying this by the amount spent on the activity.

## Annex 5: Economic incentives in calls for proposals to promote the adoption of voluntary commitments for sustainability and the low-carbon economy in SMEs (Ceuta, ES)

On the basis that calls for proposals for SMEs present public administrations with an opportunity to work on bringing about the necessary cultural shift among SMEs towards a low-carbon economy, Ceuta has developed a new way of working more closely with enterprises in the city to promote their action in the field of sustainability.

**The objective is to increase:**

- the effective integration of the sustainable development principle in the actions carried out; and
- the weighting given to enterprise sustainability in calls for proposals, so as to contribute to the European sustainability target mainly as regards the low-carbon economy.

### Incentive

The aim of this double objective is to develop a system that encourages voluntary efforts on sustainability by means of an additional 2 % of funding allocated to enterprises that demonstrate a commitment to sustainability.

|                              | FUNDING ACCORDING TO TYPE OF PROJECT/ENTERPRISE (%) |   |             |   |
|------------------------------|---|---|-------------|---|
|                              | Micro SMEs and small enterprises                    |   | SMEs        |   |
|                              | Creation  | Expansion, diversification and transformation | Creation    | Expansion, diversification and transformation |
| Fixed minimum incentive      | 15 %  | 15 %  | 15 %        | 15 %  |
| Creation / expansion         | 15 %  | 10 %  | 5 %         | 3 %   |
| Job creation (maximum)       | 3 %   | 3 %   | 3 %         | 3 %   |
| Environmental responsibility | 2 %   | 2 %   | 2 %         | 2 %   |
| <b>Maximum funding (%)</b>   | <b>35 %</b>   | <b>30 %</b>                                   | <b>25 %</b> | <b>23 %</b>                                   |

Hence, there are three possibilities:

- enterprises with a responsible environmental background (demonstrated by an environment/energy management system certificate) receive an additional 2 % funding;
- enterprises that undertake to seek by environment/energy management system certification receive an additional 2 % funding; and
- enterprises that sign an environmental responsibility commitment with the relevant helpdesk specialising in giving environmental advice to enterprises receive an additional 1 % funding.

Experience shows that normalised certification is not viable for micro-SMEs. A personalised advice helpdesk has therefore been launched that allows enterprises to draw up and formalise, with the public administration, a commitment on the basis of which their environmental performance can be appraised and verified.

The incentives raise SMEs' interest in sustainability and the fight against global warming. The helpdesk service generates awareness and sustainable actions.

### The helpdesk service

This will take on the following tasks:

- provide information on legal requirements relating to SME management; this is useful for both new and expanding enterprises;
- provide information on the environmental and economic benefits of eco-efficiency;
- provide information on possible measures to ensure more sustainable enterprise management;
- draw up an action proposal – if this requires any initial investment, this is added, if possible, to the investment project submitted in response to the call for proposals. Again, this should encourage the promotion of innovative technological solutions relating to sustainability and the low-carbon economy; and
- once the enterprise and the administration reach an agreement, an environmental commitment document is drawn up and the sustainability department proposes the allocation of the incentive.

In this way, it is possible to transform an originally non-environmental project into a sustainable and competitive one that is in line with the sustainable growth priority of the European 2020 strategy.

## Annex 6: Cross-cutting environmental integration in the ERDF regional economic incentives programme (ES)

### I. Background

The ERDF regional economic incentives programme provides non-recoverable financial funding for productive investments in order to promote business activities in certain less-favoured industrial areas. It also helps to create and maintain employment and the settlement of industrial fabric.

The programme is open to projects involving the creation of new facilities, the enlargement of an existing activity, inception of a new activity by the applicant company, and the modernisation of facilities. The main requirements are as follows:

- projects must not involve the initiation of the activities for which funding is being applied for;
- 30 % self-financing; and
- technical and financial feasibility.

The application, along with a project report, is to be submitted to the regional competent authority for the programme.

### II. Role of the Environmental Authorities Network

The Ministry of Agriculture, Food and Environment cooperates with the Ministry of Finances and Public Administration, within the Environmental Authorities Network, in the evaluation of applicant projects as regards environmental integration.

The Network secretariat issues reports based on analysis and assessment of the environmental measures in the project proposal that go beyond the regulatory requirements applicable to the applicant's industrial activity. The measures taken into account relate to waste management, wastewater, atmospheric emissions and any other modification of the project, not required by law, aimed at preventing potential negative effects of the activity on the environment. Reports are based on the responses given to the following environmental questionnaire (included in the project proposal template):

### III. Environmental questionnaire to be filled in by the applicants

#### 1. Environmental impact assessment (if applicable)

- Is the project subject to an EIA under Article 7 of Law No 21/2013 of 9 December on environmental assessment?
- If so, do you have the relevant environmental authorisation?
  - Refer to the edition of the *official gazette* in which it was published or provide the relevant documents.

#### 2. Waste management

- Waste features – type and quantity
- Does the activity produce dangerous waste?
  - Indicate the amount.
- Does the project include measures to reduce the danger/volume of waste?
  - Describe them and provide technical and economic justification for their adoption. Specify the estimated reduction as compared with production.
- Does the project include measures aimed at separate waste collection?
  - Describe them and provide technical and economic justification for their adoption.
- Does the project include measures to reduce the volume of non-hazardous waste?
  - Describe them and provide technical and economic justification for their adoption. Specify the estimated reduction as compared with production.

#### 3. Wastewater

- Characteristics of the discharges:
  - Nature
  - Main pollutants
  - Estimated volume
- Does the company system include wastewater treatment not required by law?
  - Type of treatment
  - Type of pollutants reduced
  - Does the project include measures to reduce the danger/volume of discharges?

#### 4. Emissions

- Describe their features
  - Type
  - Quantification
  - Origin

- Does the project include measures to reduce emissions levels further than required by law?
  - Describe them and provide technical and economic justification for their adoption.
- Compare the maximum emissions levels established by law with the estimated emissions levels after adoption of environmental measures.

#### 5. Noise pollution

- Describe its features
  - Type
  - Quantification
- Does the project include measures to reduce noise pollution?
  - Describe them and provide technical and economic justification for their adoption.

#### 6. Soil pollution

- Does the project include measures to avoid discharges and filtrations that go beyond regulatory requirements?
  - Describe them and provide technical and economic justification for their adoption.

#### 7. Building conditions (if applicable)

- Does the project include environmental measures in the building process?
- Describe the environmental measures that go beyond regulatory requirements as regards building conditions. Provide technical and economic justification for their adoption.
- Describe the environmental measures of the project that go beyond regulatory requirements as regards heating systems in buildings. Provide technical and economic justification for their adoption.
- Do the facilities have energy efficiency certification as required by regulation?

#### 8. Landscape integration (specially for new buildings)

- Does the project include measures to reduce the visual impact of the buildings?
  - Describe them and provide technical and economic justification for their adoption.

#### 9. Reduced consumption of resources

- Does the project include measures to reduce any of the following?
  - Raw materials
  - Energy
  - Water

#### 10. Use of renewable energy

- Does the project include the use of renewable energy?
- If so, justify its technical and economic installation. Where appropriate, indicate:
  - Type of installed energy
  - Generated power
  - Percentage of renewable energy compared with total energy consumption
  - If solar panels are installed to obtain hot water/heating, indicate the extent to which the installation exceeds the minimum requirement of the Technical Building Code.

#### 11. Reuse, recovery and recycling

- Does the project include measures to encourage the reuse or recycling of the waste produced?
  - Describe them and provide technical and economic justification for their adoption.

#### 12. Environmental management systems (EMS)

- Has the company implemented an official EMS?
  - Provide a copy of the certificate in force
  - In the case of new facilities intended to implement an official EMS, indicate what measures are planned to obtain the certification.

#### 13. Environmental jobs

- Are there any employees in charge of tasks relating to the environmental improvements?
  - Indicate the number of employees and describe the tasks. Quantify the working hours dedicated to those tasks as compared with total daily working hours.

#### 14. Other issues

- Indicate any other improvement that contributes to the environmental sustainability of the activity that has not been reflected (environmental measures during the work stage if applicable; integrated product management;

eco-labelling, etc.)

#### IV. Criteria for the environmental integration assessment of projects submitted under the regional economic incentives programme

On the basis of the information provided by applicants in the questionnaire, an environmental integration report is developed according to the following criteria:

| Assessment                               | Criteria  |
|--|---|
| Impossible to assess                     | The file does not include the environmental questionnaire   |
| Does not integrate environmental aspects | a) The project does not include any environmental improvement<br>If reference is made to an environmental improvement, this is not sufficiently justified to enable assessment and/or it is not coherent with the type of activity of the project.<br>b) The questionnaire has not been completed   |
| Low environmental integration            | The project includes environmental improvements that: <ul style="list-style-type: none"><li>• are isolated and therefore do not constitute an environmental strategy for the activity; and/or</li><li>• do not take sufficient account of environmental considerations during the works stage (where applicable).</li></ul>   |
| Intermediate environmental integration   | The project includes environmental improvements that: <ul style="list-style-type: none"><li>• are coherent with the activity and with the works stage (if applicable); and</li><li>• involve a substantial modification of the project from the environmental perspective.</li></ul> However, not all aspects of the activity that might have an impact on the environment have been addressed. |
| High environmental integration           | The project includes environmental improvements that: <ul style="list-style-type: none"><li>• address all or most of the possible environmental impacts of the activity, and the design and building works (where applicable); and</li><li>• constitute a coherent and ambitious environmental strategy.</li></ul>  |

#### V. Rationale for the assessment

The environmental improvements declared in the projects must be sufficiently justified and quantified in order to be assessed.

When the improvements are not quantified (e.g. in terms of percentage of energy savings), the assessment will be based only on the qualitative justifications given.

Only measures that go beyond legal requirements will be positively taken into account in the assessment. The assessment is therefore based on voluntary measures, since compliance with the law is considered an obligation.

Where no evidence is available as to the voluntary nature of the proposed measures, these will not be taken into account.

Projects that intrinsically have an environmental aim (e.g. a recycling plant or a biomass factory) will not obtain a better assessment for that reason.

Reports will give credit for environmental measures relating to the company's productive activities and measures to minimise possible environmental impacts in the design and works stages.

Ministry of Agriculture, Food and Environment reports for the ERDF regional economic incentives programme do not determine whether a project is subject to an EIA, nor whether an official statement is required to the effect that it does not affect the Natura 2000 network. Both matters are subject to legal procedures and are consequently considered compulsory. Nevertheless, the report will assess positively any voluntary corrective measures included in projects subject to the legal procedures in question.



## Annex 7: Cross-cutting integration of environmental sustainability in 2007-2013 – list of available environmental measures (HU)

(This annex is linked to [Box 11](#)).

The full list of available environmental measures (criteria) is used as a 'menu' for:

- project applicants to choose (at least two) measures as their 'commitments'; or
- developing a shorter list of measures containing only those commitments that are most relevant to the subject of the call for proposal.

1. The organisation is operating according to an environmental certification scheme (EMAS or ISO 14001)
2. Already has a sustainability plan or programme (Local Agenda 21) or is ready to produce one.
- 3.a) Ready for the review and the implementation of its environmental programme.
- 3.b) Already has a municipal environmental fund or is ready to establish one.
- 3.c) Has an employee responsible for environment/sustainability or environmental education (if this is not a basic legal requirement for the company).
- 3.d) Introduction of the regular environmental performance review.
- 3.e) Yearly environmental audits.
- 3.f) The ratio of employees who have participated in knowledge-sharing regarding sustainability.
- 3.g) Ensure the accessibility of environmental data beyond the obligatory level.
4. Analyse and take account of potential environmental impacts during product and service development.
5. The project results in a more favourable situation for the stakeholders as regards environmental impacts.
6. The ratio of expenditure on eco-efficiency, environmental health and raising environmental awareness during the development period.
7. The product/service qualifies (or will qualify) under an approved environmental and sustainability certification scheme.
8. The project includes the expansion of knowledge to environmental protection and sustainability.
9. The chosen circumstances of the knowledge-sharing (training, workshops, conferences, meetings, etc.) reflect environmental awareness
10. BAT technologies are applied in a voluntary manner.
11. Environmental considerations are taken into account in the procurement of devices, products and raw materials.
12. Devices and consultancy/educational services are ordered from suppliers applying an EMS.
13. Suppliers use few natural resources.
14. Consultations, training and human resource development include the expansion of knowledge of environmental protection and sustainability.
15. The project includes other developments regarding sustainability.
16. Partnerships are built in the course of project planning and implementation.
17. The project is implemented in a socially and economically disadvantaged region.
18. Conservation values or protected natural areas are not affected by the project.
19. The project contributes to the preservation of landscape / townscape / natural / cultural / architectural values.
20. Brownfield investment or the project area is currently used for economic purposes.
21. The project involves additional green-area development as compared with the minimum required ratio of green areas.
22. Native plant species and compositions suitable for the landscape are favoured in the course of green-area formation.
23. The urban planning ensures sustainable mobility.
24. Sites are selected so as to favour environment-friendly transport (accessibility).
25. Specific water consumption is reduced.

26. Specific energy consumption is reduced.
27. Number of buildings with better energy efficiency characteristics.
28. Energy savings achieved with the use of energy-saving lighting and devices with A or A+ energy-efficiency labelling.
29. The specific material input (amount of material per unit in production or in providing services) is reduced.
30. The amount of packaging material is reduced.
31. Consumption of renewable energy as a proportion of total energy consumption is increased.
32. The supply and application of combined and resource- and energy-efficient office equipment.
33. The amount of waste transmitted to utilisation.
34. More secondary inputs as a proportion of total inputs.
35. Launch of or increase in the use of recycled paper in the offices.
36. Lower intensity of road transport.
37. Reduced use of cars.
38. 'Living streets' are developed in city centres, or shelter-belts, tree and shrub lines are planted along roads/railways to protect the natural habitat and mitigate pollution.
39. The area temporarily taken up and affected by the construction works is minimised.
40. Measures to alleviate traffic load on roads around the new establishment.
41. The use of hazardous material is reduced and it is substituted with non-hazardous or less hazardous materials.
42. The proportion of waste transmitted to disposal is reduced.
43. The amount of total generated waste is reduced.
44. The amount of hazardous waste as a proportion of total generated of waste is reduced.
45. GHG emissions are reduced.
46. Specific sewage emissions are reduced.
47. The content of pollutants in sewage is reduced.
48. Environmental and health risk assessments are conducted regularly on a voluntary basis.
49. Healthy local or bio-food is used in catering.
50. The level of employee benefits (as part of the payment package) for the purpose of recreation and healthcare is increased.
51. Fixed assets for occupational safety and health are purchased in order to improve working conditions and health protection, beyond the obligatory measures prescribed by law.
52. The number of employees using public transport (financed partly by the employer) is increased, while maintaining the proportion of local employees.
53. Additional services and benefits for local residents.
54. The employment rate among the local (or micro-regional) population is increased.
55. The average salary is increased (in relation to the minimum salary defined by law).
56. A healthy and clean environment is maintained in the area of the operation.
57. Use of local (or micro-regional) energy resources.
58. Number of solutions launched to increase the level of social trust.
59. Environmental sponsoring.
60. Number of events for partners and the (local) community to learn about eco-consciousness or sustainability.

## Annex 8: Links to environmental project appraisal/selection criteria

| Member State          | Examples and links to environmental project appraisal/selection criteria  |
|-----------------------|---|
| FI                    | <a href="http://www.rakennerahastot.fi/documents/10179/43217/Hankkeiden+yleistaja+erityiset+valintaperusteet.pdf/bd89c630-f48c-4f38-82e9-b9a706604bce">http://www.rakennerahastot.fi/documents/10179/43217/Hankkeiden+yleistaja+erityiset+valintaperusteet.pdf/bd89c630-f48c-4f38-82e9-b9a706604bce</a> (in FI)   |
| NL                    | OP South Netherlands, ERDF: <a href="http://www.stimulus.nl/opzuid/wp-content/uploads/sites/4/2015/02/OPZuid-Toelichting-Beoordelingskader.pdf">http://www.stimulus.nl/opzuid/wp-content/uploads/sites/4/2015/02/OPZuid-Toelichting-Beoordelingskader.pdf</a> (in NL)<br>OP West Netherlands ERDF: <a href="http://www.kansenvoorwest2.nl/files/beleidsregel-versie-23-maart-2015-sc-final-definitief-250315.pdf">http://www.kansenvoorwest2.nl/files/beleidsregel-versie-23-maart-2015-sc-final-definitief-250315.pdf</a>  |
| PL                    | Podlaskie Voivodeship regional OP for 2014-2020:<br><a href="http://www.rpo.wrotapodlasia.pl/pl/dowiedz_sie_wiecej_o_programie/dowiedz_sie_o_instytucjach_w_prokomitet_monitorujacy/uchwaly-komitetu-monitorujacego.html">http://www.rpo.wrotapodlasia.pl/pl/dowiedz_sie_wiecej_o_programie/dowiedz_sie_o_instytucjach_w_prokomitet_monitorujacy/uchwaly-komitetu-monitorujacego.html</a>   |
| RO                    | Applicants' packs (for 2007-2013 and 2014-2020) for the Romania-Bulgaria Cross-Border Cooperation OP:<br><a href="http://www.cbcrromaniabulgaria.eu">www.cbcrromaniabulgaria.eu</a> (in EN)   |
| SE                    | <a href="http://eu.tillvaxtverket.se/kunskapsbanken/guideforhorisontellakriterier.4.2fb5ad0e14c58098b74d77f9.html">http://eu.tillvaxtverket.se/kunskapsbanken/guideforhorisontellakriterier.4.2fb5ad0e14c58098b74d77f9.html</a> (in SE)   |
| SI                    | OP for the implementation of EU cohesion policy 2014-2020 – selection criteria:<br><a href="http://www.svrk.gov.si/fileadmin/svrk.gov.si/pageuploads/Dokumenti_za_objavo_na_vstopni_strani/Merila_JM_14_20_17.4.2015.pdf">http://www.svrk.gov.si/fileadmin/svrk.gov.si/pageuploads/Dokumenti_za_objavo_na_vstopni_strani/Merila_JM_14_20_17.4.2015.pdf</a> (in SI)<br>Managing authority's guidelines for planning, decision-making, monitoring, reporting and evaluation:<br><a href="http://www.eu-skladi.si/dokumenti/navodila/navodila-ou-za-nacrtovanje-odlocanje-o-podpori-spremljanje-porocanje-in-vrednotenje-izvajanja-2014-2020.pdf">http://www.eu-skladi.si/dokumenti/navodila/navodila-ou-za-nacrtovanje-odlocanje-o-podpori-spremljanje-porocanje-in-vrednotenje-izvajanja-2014-2020.pdf</a> (in SI)   |
| SK                    | ESF OP: <a href="http://www.employment.gov.sk/sk/esf/programove-obdobie-2014-2020/monitorovaci-vybor-op-ludske-zdroje/">http://www.employment.gov.sk/sk/esf/programove-obdobie-2014-2020/monitorovaci-vybor-op-ludske-zdroje/</a> (in SK)<br>Information Society OP: <a href="http://www.opis.gov.sk/hodnotiace-a-vyberove-kriteria-opis/">http://www.opis.gov.sk/hodnotiace-a-vyberove-kriteria-opis/</a> (in SK)  |
| Various Member States | Criteria focusing on specific sectors (compiled and/or elaborated by <a href="http://www.bankwatch.org">Bankwatch</a> ):<br><b>Biomass</b><br><a href="http://bankwatch.org/documents/briefing-biomass-criteria-SK.pdf">http://bankwatch.org/documents/briefing-biomass-criteria-SK.pdf</a><br><a href="http://bankwatch.org/documents/briefing-biomass-criteria-HU.pdf">http://bankwatch.org/documents/briefing-biomass-criteria-HU.pdf</a><br><b>Renewable energy sources, energy efficiency in buildings, air quality</b><br><a href="http://bankwatch.org/documents/briefing-project-selection-PL.pdf">http://bankwatch.org/documents/briefing-project-selection-PL.pdf</a><br><b>Waste</b><br><a href="http://bankwatch.org/documents/briefing-waste-criteria-SK.pdf">http://bankwatch.org/documents/briefing-waste-criteria-SK.pdf</a> (in SK only)<br><b>Biodiversity</b><br><a href="http://bankwatch.org/documents/briefing-biodiversity-proofing-CEEWEB2014.pdf">http://bankwatch.org/documents/briefing-biodiversity-proofing-CEEWEB2014.pdf</a> |

## Annex 9: Cross-cutting selection criteria and guidance for cross-cutting criteria in the EAFRD programme (AT)

In the EAFRD programme, the main elements for the successful implementation of the CCTs are the selection criteria which form the basis for approval of the projects and are used to determine whether a project is fit for EU funding or receives only national funding (i.e. a reduced grant).

The tables and spreadsheets for all priorities were approved by the management committees, but the criteria are subject to further interpretation at the level of the specific funding instruments. By way of example, the following table shows the technical questions for biomass district heating:

| The project has to score at least <b>5 out of 10 points</b> to qualify as an EAFRD project. |                   |                |               |                                       |
|---|-------------------|----------------|---------------|---------------------------------------|
| Selection criteria  | Parameter         | Maximum points | Actual points | Demonstrated by                       |
| Positive environmental effect: CO <sub>2</sub> reduction (t/yr)                             | > 500 t/yr        | 4              |               | Application form and technical sheets |
|   | > 100 to 500 t/yr | 3              |               |                                       |
|   | > 50 to 100 t/yr  | 2              |               |                                       |
|   | below 50 t/yr     | 1              |               |                                       |
| Proportion of forestry products (wood chips)  | > 80 %            | 3              |               | Application form                      |
|   | > 25 to 80 %      | 2              |               |                                       |
|   | below 25 %        | 1              |               |                                       |
| Regional economic benefit<br>Proportion of biomass within 50 km                             | > 50 %            | 2              |               | Application form                      |
|   | > 0 % to 50 %     | 1              |               |                                       |
|   | 0 %               | 0              |               |                                       |
| Improvement of efficiency compared to existing system                                       | Yes               | 1              |               | Application form and technical sheets |
|   | No                | 0              |               |                                       |
| <b>Total points:</b>  |                   | 10             |               |                                       |
| <b>Threshold:</b>   |                   | 5              |               |                                       |

Further spreadsheets for measures in the agricultural programme are available for EAFRD criteria for:

- renewable energy projects;
- local climate projects;
- photovoltaics at farms; and
- implementation of rural township development projects.

The results of the appraisal are documented in the funding contract and therefore subject to control and monitoring.

## Annex 10: Terms of reference for the environmental sustainability manager – Welsh European Funding Office (UK)

- Ensure that current Structural Fund projects are delivering on their environmental sustainability commitments, as agreed at approval and during ongoing assessment and review. Specifically, this involves support for WEFO project development officers and direct support for WEFO project sponsors where required. Provide strategic support for the evaluation of environmental sustainability within project applications while taking account of potential economic and social synergies/implications.
- Provide support on the environmental sustainability contribution required for the current programme annual implementation reports, including analysis of environmental sustainability indicator progress data and reporting of results.
- Support for the provision of advice to programme monitoring committees (PMCs) on progress towards the environmental sustainability objectives in the OPs, their environmental strategies, strategic environmental appraisals and the related recommendations for programme delivery.
- In collaboration with Natural Resources Wales, Welsh government departments and other bodies, e.g. Wildlife Trust, ensure that the specific environmental sustainability guidance is regularly updated and promoted for the major Structural Fund programmes.
- Networking internally and externally – including with Natural Resources Wales – to ensure effective consultation and input on specific projects that have significant environmental implications, including those under the Habitats and EIA Directives.
- Cooperate with those representing other WEFO CCTs (equal opportunities) to promote sustainable development.
- Promote environmental sustainability opportunities that are consistent with corporate plans within Natural Resources Wales strategies, including those for education, and the Welsh government’s sustainable development scheme.
- Assist in training on CCTs for WEFO, regional engagement teams, project sponsor staff and others.

