

DNSH in future Interreg

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Online

Interact



**Co-funded by
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Interreg

Meeting objectives



To reflect on the envisaged approach for DNSH in post 2027

To discuss what is clear and not so clear

To discuss what it means for Interreg & shortlist key messages

To plan next steps

Agenda

01

**Intro &
objectives**

02

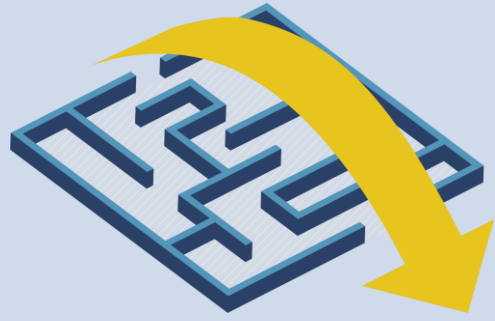
**Envisaged EC approach – overview
& DNSH in post 2027 Interreg**

**Joint reflections & key messages
for Interreg**

03

Outro

**Wrap up &
Next steps**



Envisaged approach for applying DNSH, in post 2027



The consultation on the DNSH principle



Consultation on **envisaged approach** for applying DNSH principle under post2027 framework



The purpose of the consultation – to help the EC in preparation **(by January 2027) a single and simple** guidance on the application of the DNSH principle



The consultation is open for your feedback **until 16 September** to ensure that the approach is **clear, balanced and implementable**



The **concept paper outlines** the envisaged approach

The **consultation in EU survey** is based on this concept paper

A **separate targeted consultation** with implementing partners will be carried out on DNSH conditions **for third countries after the summer**

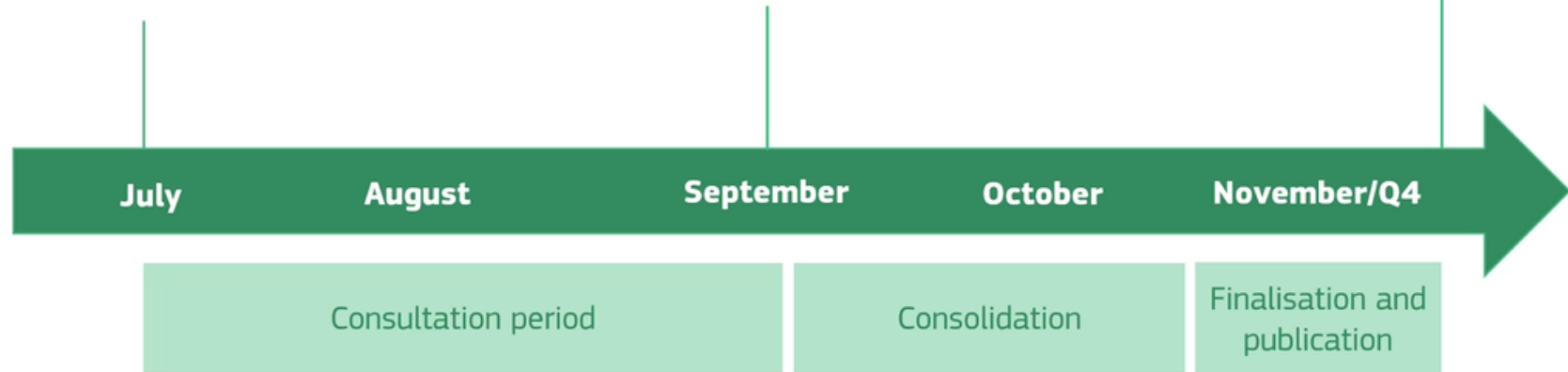
The consultation on the DNSH principle

Next steps

15 July – publication
targeted consultation
(9 weeks)

16 September: end of
consultation

COM adoption



Consultation: [Performance Regulation - European Commission](#)

For further information, EC-DNSH-GUIDANCE-FMB@ec.europa.eu



The DNSH guidance...



aim: to define a clearer, more predictable and more enforceable framework for applying DNSH



will replace the current fragmented approach applied under the 2021-2027 budget

Peer2Peer DNSH Community – Policy Recommendations 2026

Key messages from the DNSH Recommendations

Simplify and harmonise DNSH rules: Future DNSH guidance should provide clearer, simpler and more harmonised rules across EU funds, while respecting proportionality.

Avoid duplication with existing environmental procedures: SEA, EIA and existing environmental permits should be better linked to DNSH, so that authorities do not repeat assessments already carried out under EU environmental law.

Apply a proportionate, risk-based approach: DNSH requirements should reflect the scale, nature and environmental relevance of interventions, with lighter requirements for low-risk or small-scale operations.

Define clear criteria, exclusions and exemptions: The guidance should provide clear sector-specific DNSH criteria, exclusion lists for harmful activities and exemption lists for interventions with no likely significant harm.

Integrate DNSH monitoring into existing systems: DNSH monitoring should be embedded in regular project monitoring and focus only on clearly defined DNSH conditions, avoiding additional administrative burden.

Interact survey results



Programmes **welcome reduction of administrative burden:**

- List of harmful areas and carve-outs
- Linking of the DNSH criteria to the individual intervention fields, instead of single operation level assessment



Only a limited list of intervention fields should require DNSH assessment.
Most **Interreg cooperation activities** (cooperation, governance, capacity building, studies and research, knowledge exchange, pilot actions) have negligible environmental impacts should be **presumed DNSH-compliant**.
Especially **intervention field 142** should be considered DNSH-compliant by default



DNSH requirements designed for large infrastructure projects are often disproportionate for small-scale Interreg operations.
Assessment should reflect: **scale of activity, environmental risk, territorial context** (e.g. joint ecosystems)



Recognise existing environmental procedures and avoid parallel assessments covering the same issue
DNSH should build on and accept: SEA, EIA, Natura 2000 assessments and national permits and environmental procedures.

Interact survey results – other IFs suggested:

- **#343** 'Technology transfer and cooperation between enterprises, research centres and higher education sector': no large investments are to be expected.
- **#377** 'Research and innovation processes, technology transfer and cooperation between enterprises, focusing on environment (including industrial pollution mitigation, circular economy and biodiversity): This intervention field focusses on the environment. The intervention field itself safeguards that no significant harm to environmental objectives would occur.
- **#378** 'Research and innovation processes, technology transfer and cooperation between enterprises, focusing on climate objectives': This intervention field focusses on climate objectives. The intervention field itself safeguards that no significant harm to environmental objectives would occur.
- **#274** 'Mixed grey and nature-based resilience measures' + **# 275** 'Nature-based climate resilience measures': intervention fields is about climate resilience. This is of high public interest and an important Union policy priority.
- **#446** 'Adaptation of workers, enterprises and entrepreneurs to change': no large investments or even more general large-size activities are to be expected.
- **#95** 'Tourism financial support for sustainable tourism activities': This intervention field focusses on supporting sustainable tourism. The intervention field itself safeguards that no significant harm to environmental objectives would occur.

Legal background



[Article 33.2\(d\) of the Financial Regulation \(Regulation 2024/2509\)](#) – programmes & **activities** shall where **feasible and appropriate** in accordance with the relevant sector-specific rules be implemented to achieve their set objectives without **doing significant harm** to the environmental objectives (...) as set out in [Article 9 of the Taxonomy Regulation \(Regulation 2020/852\)](#)



Article 33.2(d) requirement operationalised by [proposed Performance Regulation \(PERFREG\) – Article 5](#)

the Commission is to issue **a simple and single guidance** on the application of the **DNSH** principle.

Recital (5) - the Commission should provide this guidance by **1 January 2027**.

The DNSH principle should also take into account (proposal Article 5 PERFREG)



The need to achieve objectives of the programme



Avoid duplication with requirements under existing EU law (& national law)



Consider the administrative and reporting burden of [authorities and beneficiaries](#)

DNSH Concept paper



General principles applicable to the DNSH approach



DNSH areas and criteria



Application of DNSH to different management modes and programmes

DNSH Concept paper



General principles applicable to the DNSH approach



Reduced administrative burden and proportionality



Where feasible or appropriate



Climate change adaptation

DNSH Concept paper



General principles applicable to the DNSH approach



Reduced administrative burden and proportionality(1/3)

- the need to achieve the objectives of the relevant programmes (in line with the Union's policy priorities)
- the need to avoid duplication with existing requirements under Union law
- the administrative and reporting burden on authorities and beneficiaries and
- the principle of proportionality

DNSH Concept paper



General principles applicable to the DNSH approach



Reduced administrative burden and proportionality(2/3)

- The DNSH guidance will link **specific DNSH criteria** directly to **intervention fields** (specific criteria would only be applicable to limited set of **activities** that are considered doing significant harm, while the rest are considered to not be significantly harmful)
- **Proportionality shall be ensured in relation to:**
 - The size of an activity
 - It's climate and environmental aspects
 - The territorial characteristics or where the activity is implemented
 - Including third countries

DNSH Concept paper



General principles applicable to the DNSH approach



Reduced administrative burden and proportionality (3/3)

In consequence the DNSH guidance:

- Will contain **limited number** of targeted **general principles and criteria**:
 - to avoid significant harm that would be detrimental to the sound financial management of the budget,
 - With different approaches according to type and size of activities
- Set out a **differentiated approach** for certain territories
 - targeted exceptions for outermost regions
 - separate set of DNSH criteria adapted to operation of EU funds in third countries
- **Certain activities** (because of their nature or scope), **will be covered by a specific approach** (in application of the proportionality principle and to limit administrative burden, **certain activities, because of their nature or scope, will be covered by a specific approach**).

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General principles applicable to the DNSH approach



Where feasible or appropriate (1/2)

- Article 5(3) of the proposed PERFREG contains **a non-exhaustive list** of situations where the application of the DNSH principle **is not feasible or appropriate**, such as:
 - crisis situations,
 - other reasons of overriding public interest (ROPI), and
 - defence and security
- the guidance will not preclude the Commission from exceptionally considering that it is not feasible or appropriate to apply the DNSH principle to certain duly justified cases,

DNSH Concept paper



General principles applicable to the DNSH approach



Where feasible or appropriate (2/2)

Application of the 'where feasible and appropriate' principle:

- in case of activity when application of the DNSH may be not feasible or appropriate each MS shall provide a justification **in line with the DNSH guidance**
- The justification should be provided at the moment **of submission of plans** or for **measures** included at the later time **when a plan is amended**
- **No justification would be required** when a plan is amended in case **of crisis situations** and when support is provided under the **emerging challenges** and **priorities cushion**

DNSH Concept paper

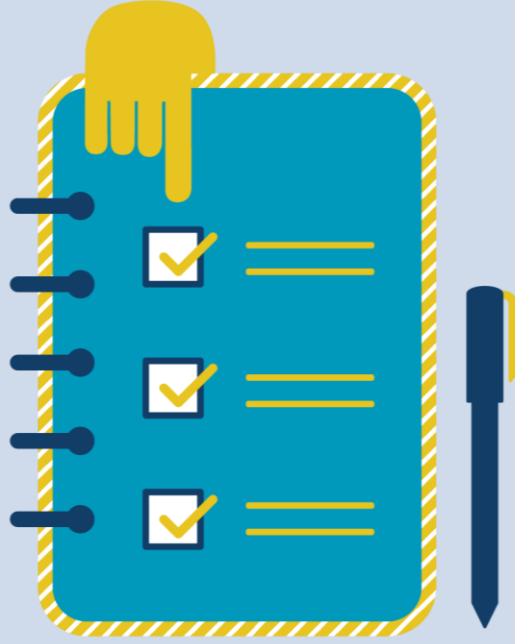


General principles applicable to the DNSH approach



Climate change adaptation

The EC **will explore** whether the single DNSH guidance should include **additional criteria** for climate change adaptation for some categories of activities in view of their **exposure** and **size**.



Key messages important for Interreg



DNSH Concept paper



DNSH areas and criteria



DNSH criteria for EU Member States



DNSH approach to third countries

DNSH Concept paper



DNSH areas and criteria



DNSH criteria for EU Member States

The list of 18 **areas(?)** – could be envisaged to be a to DNSH **specific criteria** in line with article 5 (2) of proposed PERFREG

- based on 2021-2027 experience
- resulting in a more limited number of **clearer and more targeted DNSH criteria while still taking account of the climate and environmental objectives**

This list is exhaustive and no additional DNSH criteria would apply.

For Intervention Fields not identified in the guidance – DNSH would be considered to occur, and the DNSH principle would be fulfilled (+ where feasible and appropriate exceptions)

DNSH Concept paper



DNSH areas and criteria



DNSH criteria for EU Member States

18 (?)

Exceptions:

- Areas proposed to be carve out;
 - Unless..
 - Until...

DNSH Concept paper



DNSH areas and criteria

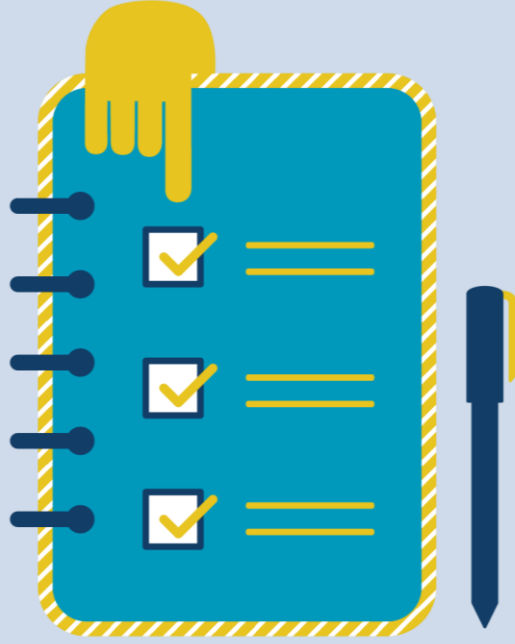


DNSH approach to third countries

A differentiated, two-staged, approach for third countries

The approach:

- targeted set of DNSH criteria
- for activities that do not fall under the set of DNSH criteria – case-by-case screening.



Key messages important for Interreg



DNSH Concept paper



Application of DNSH to different management modes and programmes

According to **Article 13** (shared management) of the proposed PERFREG plans implemented by MS (...) have to integrate a **DNSH assessment at the level of the activities** in their plans in line with Article 5.

Also, the proposed NRRP Reg foresees that Member States explain the control and monitoring mechanisms in place to comply with the principle across the lifetime of the plan(...)

Managing authorities should be responsible for ensuring compliance with the principle throughout the implementation phase.

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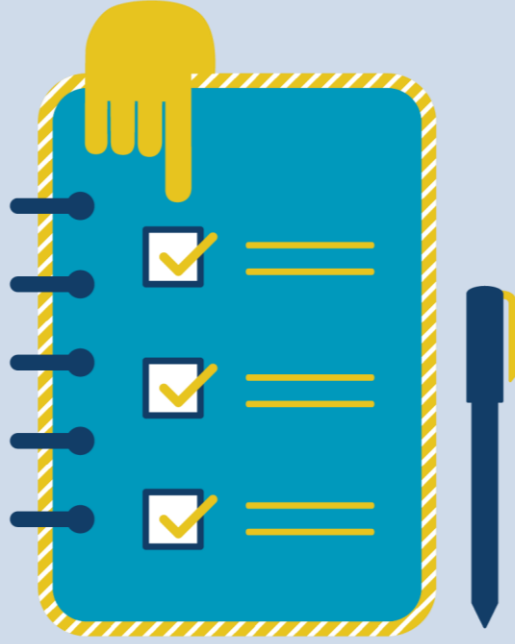
Application of DNSH to different management modes and programmes

Annex – Template for the Interreg Plan Chapter 2. Measures of the Interreg Plan chapter

(d) Do No Significant Harm assessment of the measure

Reference: Article 13 of Regulation XX [Performance regulation]

Measure ID	Intervention field	DNSH assessment [1 000]
Measure ID 1	IF1	
	IF2	
Measure ID 2		



Key messages important for Interreg



Thank you for being here!

Your opinion matters to us.

Please take a few minutes to provide us with feedback to help us improve our services.

DNSH in future Interreg; 08 Sept
2026; online



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Post2027

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