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**Documenti tematici di
Progetto e buone pratiche**

Poliedra – 29 Settembre 2025

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Contenuti

- Presentazione dei **documenti tematici**:
 - **principio DNSH**
 - **verifica climatica** delle infrastrutture
- Panoramica sulle **buone pratiche** raccolte:
 - principio DNSH
 - verifica climatica
 - Tassonomia EU
 - Finanziamenti innovativi per la transizione sostenibile delle PMI

Obiettivi e destinatari dei documenti tematici

I documenti tematici forniscono una **panoramica dei risultati delle attività del partenariato GreenGov** sul principio DNSH e sulla verifica climatica.

I documenti sono **rivolti** in primo luogo **alle Autorità Pubbliche** a livello regionale, nazionale o locale, che offrono supporto finanziario a beneficiari pubblici o privati e **che devono applicare il principio DNSH e la verifica climatica delle infrastrutture**.

La **realizzazione di documenti tematici** è prevista **per tutti i temi di progetto** (DNSH, Verifica climatica, Tassonomia EU, Green bonds, Green budget, finanziamenti innovativi per la transizione sostenibile delle PMI). I documenti, integrati e arricchiti da esempi pratici, buone pratiche e nuovi strumenti, andranno a formare una **guida per le regioni sull'implementazione della finanza green e delle sue buone pratiche**.



Documento tematico: principio DNSH

DO NO SIGNIFICANT HARM (DNSH) PRINCIPLE

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GreenGov is an Interreg Europe project that promotes sustainability by fostering the implementation of the **EU Taxonomy** and improving European Regions' sustainability financing schemes

Regulatory basis of the DNSH principle



The DNSH principle has been introduced at EU level and specified in the Taxonomy Regulation (Regulation (EU) 2020/852), which defines criteria for classifying economic activities as sustainable. Although initially aimed at economic activities, it has also been introduced as a horizontal principle in public European Funds, such as the Recovery and Resilience Facility (RRF) and the European Structural and Investments (ESI) Funds.

The DNSH principle stipulates that an economic activity or other initiative/action must not cause significant harm to any of the following environmental objectives: **climate change mitigation and adaptation**, sustainable use and protection of **water** and marine resources, **pollution prevention** and control, **circular economy**, waste prevention and recycling, protection and restoration of **biodiversity** and ecosystems.

What is considered to cause "significant harm"?

According to the EU Taxonomy Regulation, an activity or asset is considered to do significant harm to:

CLIMATE CHANGE MITIGATION



if it leads to significant greenhouse gas (GHG) emissions

POLLUTION PREVENTION AND CONTROL



if it leads to a significant increase in emissions of pollutants into air, water or land

CLIMATE CHANGE ADAPTATION



if it leads to an increased adverse impact of the current climate and the expected future climate, on the activity or asset itself or on people, nature or assets

CIRCULAR ECONOMY, WASTE PREVENTION AND RECYCLING



if it leads to significant inefficiencies in the use of materials or in the direct or indirect use of natural resources or if it significantly increases the generation, incineration or disposal of waste, or if the long-term disposal of waste may cause significant and long-term environmental harm

SUSTAINABLE USE AND PROTECTION OF WATER AND MARINE RESOURCES



if it is detrimental to the good status or the good ecological potential of bodies of water, including surface water and groundwater, or to the good environmental status of marine waters

PROTECTION AND RESTORATION OF BIODIVERSITY AND ECOSYSTEMS



if it is significantly detrimental to the good condition and resilience of ecosystems, or detrimental to the conservation status of habitats and species, including those of interest to the Union interest

DO NO SIGNIFICANT HARM (DNSH) PRINCIPLE

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The DNSH principle is one of the main topics investigated in GreenGov. The objective is to turn its implementation into an opportunity to improve the governance of the project partners' financing schemes

DNSH principle: Taxonomy vs EU Funds

The role of the DNSH principle differs between the EU Taxonomy and EU public funding instruments: the EU Taxonomy is a transparency tool for private finance that establishes a classification of environmentally sustainable activities with the aim to support sustainable investments, while EU public funding instruments apply the DNSH principle to ensure that supported activities do not cause a significant negative impact on the environment.



Implementation of DNSH in ESI Funds

For ESI Funds, the Regulation 2021/1060 links the DNSH principle with the sustainable development horizontal principle. Before the EU funding programmes are approved, it is necessary to assess whether the types of actions included in the programmes comply with the DNSH principle (ex ante assessment). Compliance with the DNSH principle should also be guaranteed throughout programme implementation, by selecting for funding only those operations that are aligned with the ex ante assessment and that comply with national and EU legislation.

Due to the presence of Managing Authorities of ESI Funds in GreenGov, the partnership is particularly interested in focusing on the implementation of the DNSH principle in the context of such funds

CHALLENGES AND AREAS OF IMPROVEMENT

The GreenGov partnership has identified the main challenges faced by EU regions and local authorities in effectively implementing the DNSH principle, along with potential actions to address them. These challenges fall into three key areas for improvement:

AWARENESS RAISING

METHODOLOGY AND CRITERIA

GOVERNANCE



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GOVERNANCE

Challenges

- **Lack of uniformity** in the application of DNSH (the EU Taxonomy's technical screening criteria are limited and not mandatory for EU funds) and potential uneven burden on beneficiaries
- **New burdens** on public authorities managing funds and on public and private beneficiaries, lack of personnel and competence
- **Lack of tools** for ex-ante, ongoing and ex-post assessments available for funds managing authorities
- **Engagement of stakeholders** and insufficient collaboration between public authorities and the private sector

- **Risk of redundancy** between the assessment of the DNSH principle and other environmental procedures set by EU law (e.g. SEA, EIA, etc.)

Actions

Public Administrations

- **Harmonize DNSH criteria** across EU countries, or at least within individual countries
- **Clearly identify the responsibilities** for implementing the DNSH principle at each stage of the programme/project cycle (e.g. by establishing or reinforcing a dedicated office or by establishing a steering committee composed by a contact person in the different departments involved)
- Create **internal regulations** for the DNSH implementation enhancing intersectoral cooperation between environmental and fund management functions
- Consider, for the next programming period, to hire **additional staff** with competences on environmental sustainability or provide external assistance
- **Build capacity and provide trainings** for public officials and staff involved in the implementation of the programme, covering all phases
- **Develop guidelines** targeted to public officials and **check lists** to be used before financing a project (project assessment) and after the completion of the project (monitoring/control)
- Establish a **national coordination body** among different public administrations to ensure consistent approaches
- **Avoid duplicative checks** in multiple procedures (e.g. SEA, EIA, DNSH etc.), having the same criteria checked just once
- **Stakeholder and beneficiaries**
 - Recognise local **business advisors** as key actors to assess the DNSH at enterprise level
 - Offer specific **training and guidelines** for consultancies, business advisors, professional associations and trade associations, with concrete examples
 - **Establish connections** between the PAs and the professional associations that offer training for professionals/technician, helping to match skills with requirements
 - **Provide advisory services** for SMEs financed with public funds (non-financial support) for relevant projects subject to the DNSH principle, or **recognise the costs** for **external assistance** for funding applications as **eligible expenses**



Documento tematico: verifica climatica

CLIMATE PROOFING OF INFRASTRUCTURE

Climate Proofing is the result of years of joint climate action, guided by landmark frameworks like the Paris Agreement, the European Climate Law, and the EU Adaptation Strategy.

Climate Proofing

It is a process that integrates **measures for climate change mitigation and adaptation** into the development of infrastructure projects. It is aimed at:

- ensuring that the principle of **energy efficiency** is respected as a priority and that the level of greenhouse gas emissions (GHG) of the project is consistent with the **2050 climate neutrality objective - mitigation pillar**.
- avoiding the vulnerability** and improving the resilience of infrastructures to current and future potential climate impacts, such as heavy rainfall, flooding, heat waves, windstorms, etc - **adaptation pillar**.

Regulatory framework

In the period 2021-27, climate proofing of infrastructure is a requirement for investments under several EU Regulations, including: the InvestEU Regulation, the Common Provision Regulation, the Resilience and Recovery Facility Regulation. Technical guidance is provided in the Commission Notice 2021/C 373/01.

What do we mean by infrastructure?

Source: European commission
Technical guidance on the climate proofing of infrastructure in the period 2021-2027

- network infrastructure (transport, ICT, water and energy infrastructure)
- buildings (private homes, schools, industrial facilities)
- nature-based infrastructures (green roofs, walls, green spaces, drainage systems)
- other physical assets (emergency services, finance, government, health, education, research)
- systems to manage waste (collecting points, recycling facilities, incinerators and landfills)

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CLIMATE PROOFING OF INFRASTRUCTURE

The Commission's technical guidance provides a two-pillar methodology for climate proofing of infrastructure. The methodology is structured in two phases for both pillars: a preliminary screening, followed by a detailed analysis, if necessary.

The mitigation pillar

Mitigating climate change involves **decarbonisation, energy efficiency, energy savings, and the development of renewable energy sources**. It requires taking action to **reduce GHG emissions** or increase GHG sequestration, in line with EU policy objectives and emission reduction targets for 2030 and 2050.

The climate neutrality **screening phase** consists in a **preliminary assessment of the project's expected level of emissions**, either through a specific quantitative analysis, or via a comparative/qualitative approach, using data from similar past projects or other reputable sources.

If a project is expected to generate absolute and/or relative **GHG emissions exceeding 20,000 tons of CO₂ equivalent/year** (positive or negative), in a typical year of operation, a **detailed analysis** is necessary, that includes:

- carbon footprint quantification** and, where applicable, **monetization** of GHG emissions, to support a possible cost-benefit analysis or other forms of economic assessment of the investment;
- assessment of the compatibility** of the investment with the EU's emission reduction targets for 2030 and 2050. For projects with an expected lifespan beyond 2050 the assessment includes the project's compatibility with operation, maintenance and final decommissioning under the conditions of climate neutrality.

Types of projects that are exempted from the mitigation analysis are listed, as they are not expected to exceed the 20,000 tons of CO₂eq/year (e.g. R&D, telecommunication, property development).

The adaptation pillar

The climate **resilience assessment** aims to ensure that the infrastructure is **resilient to the impacts of climate change** throughout its entire life cycle. It addresses both **extreme events** (e.g. storms, floods, heatwaves, droughts) and **chronic trends** (e.g. sea level rise, changes in humidity and precipitation patterns).

The **screening phase** includes:

- sensitivity analysis** to identify relevant **hazards for a specific project type**.
- exposure analysis** to identify potential **climate risks based on the project's location**, and
- a vulnerability analysis**, which combines the previous two analysis. If **vulnerabilities are low** or negligible, the **infrastructure is considered resilient**.

If **medium or high vulnerabilities** are detected, a **detailed risk assessment** is required. The aim of this second step is to identify longer cause-effect chains between climate hazards and project performance.

The risk assessment includes:

- probability analysis** of hazard occurrence over the infrastructure's lifespan,
- impact analysis**,
- risk quantification** by combining probability and impact.

For each significant risk, appropriate **adaptation measures** should be assessed and integrated into design and operation to enhance climate resilience and reduce risk to an acceptable level.

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CLIMATE PROOFING OF INFRASTRUCTURE

CHALLENGES AND PROPOSED ACTION

The GreenGov partnership has identified the main challenges faced by EU regions and local authorities in effectively climate-proofing infrastructure, along with potential actions to address them. These challenges fall into three key areas for improvement:

- Awareness and commitment**
- Technical complexity and data availability**
- Governance**

Challenges

Insufficient political commitment
Political will is essential to drive systemic change and prioritize climate resilience in policy and funding decisions.

Weak institutional climate culture
A lack of understanding, concern, and proactive behaviour around climate change leads to resistance.

Viewing climate proofing as a burden rather than a strategic necessity
CP is often perceived as a threat to the economic competitiveness of project (especially for micro-SMEs). Many beneficiaries are unaware that CP not only helps infrastructure withstand climate change impacts but also offers long-term cost savings and resilience benefits.

Actions

Shift the narrative around Climate Proofing
Overcome the perception that CP is a long, complex, and bureaucratic process, as perceived by both administrations and beneficiaries and promote effective awareness campaigns highlighting the benefits of CP.

Provide practical examples and showcase good practices
Share concrete examples of successful CP projects, demonstrating their real benefits across different project types and scales.

Focus on targeted and local communication
Disseminate messages tailored to the specific local context and emphasise "visible" climate change effects, such as severe local storms, to make the issue more tangible and relatable.

Create a guide for local communities
Explain what CP is, why it is important, and how communities can get involved and benefit from it. Encourage community engagement to increase awareness and adoption of climate-proofing practices.

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Documento tematico: verifica climatica

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CLIMATE PROOFING OF INFRASTRUCTURE

CHALLENGES AND PROPOSED ACTION

Technical complexity and data availability

Challenges

Contexts-specific demands
CP must be tailored to each region's specific climate risks, economic realities, and social factors, requiring a flexible and phased approach.

Climate data availability and access
The lack of open, accessible and reliable climate historical data and future scenarios can jeopardize the design of effective adaptation measures.
For certain hazards (heavy rainfalls, windstorms) climate models need to be further developed and implemented.

Lack of clear guidance and available tools
Beneficiaries often lack clear instructions, practical tools, and standardized methodologies, resulting in inconsistent implementation, and reduced effectiveness.

Actions

Provide guidance and methodologies
Create and disseminate standardized, accessible and user-friendly guidance to improve consistency, confidence, and quality across CP applications.

Develop practical tools, such as:

- Web-based guides, forms and checklists for climate proofing
- Interactive maps displaying potential climate risks exposure
- Collection of methods to assess vulnerability
- List of adaptation measures proven to be effective for different climate risks, types of infrastructure and local contexts, with a strong focus on Natural Based Solutions.
- Open-source data, databases, or a guide to existing data

Apply simplified methodologies and tools for small infrastructure for the adaptation pillar:

- Tools applicable by designers (architects, engineers) without needing a climate expert
- Considering the links with existing plans and legislation (e.g. EU Floods Directive)

For the mitigation pillar:

- Pre-screening at regional level for small scale projects
- Use of energy certification for buildings as evidence of CP.

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CLIMATE PROOFING OF INFRASTRUCTURE

CHALLENGES AND PROPOSED ACTION

Governance

Challenges

Limited human and technical resources
The CP process is time-consuming and requires skilled staff, which is often lacking in both public administrations and among project beneficiaries.

Low administrative competence on CP
As CP is a relatively new process, many administrations are only beginning to build the knowledge base needed for sound decision-making and effective implementation.

Demand for expertise
Effective CP requires interdisciplinary expertise and alignment with long-term project cycles, which many regions are not fully equipped to manage.

Lack of certification on CP and certified providers
To date, there is no established pathway to become a CP expert at the European level.

Actions

Offer training and capacity building for public administration (PA)
Develop specialized training programs for PA staff focused on climate mitigation, adaptation, and risk assessment. Use practical workshops, case studies, and simulations to improve understanding and application of CP procedures.

Promote capacity building for professionals
Provide professional training, with a specific focus on sensitivity assessment, use of climate data in the design process, integrating adaptation measures into project design and developing architecture for adaptation (e.g. green roofs).

Use certification for professionals or agencies
Develop systems to ensure that CP is carried out by professionals with the right competences: certification systems at national level; certified training programs; list of accredited experts etc.

Support knowledge-sharing among professionals and public authorities
Create platforms or repositories accessible to all relevant stakeholders. Develop concrete guidance documents providing dos and don'ts and innovative approaches.

Foster intersectoral collaboration both in PAs and in designers' teams
Establish formal partnerships between climate specialists (scientists, consultants) and managing authorities. Create interdisciplinary teams to address climate-related issues holistically within projects and policies.

Integrate climate proofing and environmental assessment
Embed climate proofing into existing processes like Environmental Impact Assessments (EIAs).

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CLIMATE PROOFING OF INFRASTRUCTURE

ABOUT US

GreenGov Project

GreenGov is a **Interreg Europe** project selected under the Governance topic that promotes sustainability by supporting the implementation of the EU taxonomy and improving financing schemes in European regions. The project started in April 2024 and will conclude in June 2028.

The partnership, lead by Ile de France Region, includes 9 territorial partners, 1 discovery partner and 1 associated policy authority, and is supported by Poliedra, the advisory partner. The partnership covers the 4 geographical zones of the Interreg Europe programme. The project partners exchange their experiences and best practices to help local public authorities to adapt their projects in a more sustainable way, including aligning their strategies to the EU taxonomy, implementing the Do No Significant Harm principle and climate proofing of infrastructure, exploring green bonds and green budget.

The aim and target audience of the thematic brief

This thematic brief provides an overview of the results from the GreenGov partnership's thematic activities on Climate Proofing. It is intended for Public Authorities at national, regional, local level that are dealing with the climate proofing of infrastructure, including the European Structural and Investment Funds (ESI Funds) Managing Authorities.

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Le buone pratiche del Progetto GreenGov

Una Buona Pratica è *un'iniziativa legata alla politica di sviluppo regionale che si è dimostrata efficace in una regione e che può essere di interesse per altre regioni*. La raccolta delle buone pratiche è un'azione fondamentale dei progetti Interreg EU e uno degli elementi che contribuiscono maggiormente al miglioramento degli strumenti di policy dei partner di progetto.

Principio DNSH:

- Sessioni di **formazione sul DNSH** per il rafforzamento delle competenze **del personale dell'Autorità di Gestione** nella Transizione Verde (Sud-Ovest Oltenia)
- L'**approccio** adottato nell'attuazione multifondo 2021-2027 per garantire la conformità allo **sviluppo sostenibile e al principio DNSH** (Bassa Sassonia)
- Istituzione di un **sottocomitato per lo sviluppo sostenibile** nell'ambito del programma multifondo FESR/FSE+ (Bassa Sassonia)
- **Restauro** della storica Sinagoga di Seini in centro culturale ed educativo, **integrando i principi DNSH**, la sostenibilità e il coinvolgimento della comunità (Romania Nord-Ovest)

Le buone pratiche del Progetto GreenGov

Verifica climatica delle infrastrutture:

- Definizione della **procedura da seguire per la verifica climatica** delle infrastrutture (Bassa Sassonia)
- Creazione di una **procedura semplificata** di verifica climatica per il pilastro adattamento di edifici e piccole infrastrutture (**Regione Lombardia**)



Tassonomia EU

- **Verifica della coerenza** con la Tassonomia dell'UE mediante gli strumenti normativi (Ile de France)
- Istituzione di un **servizio di consulenza per i comuni** a sostegno della «Renovation Wave» (Regione Moravia Meridionale)

Finanziamenti innovativi per la transizione sostenibile delle PMI:

- **Iniziativa di Finanza Sostenibile per supportare le PMI** nella transizione verso un modello economico sostenibile (**Finlombarda + Regione Lombardia**)



Grazie!