

INTERREG VI-A HUNGARY-SLOVAKIA

PROGRAMME 2021–2027

ENVIRONMENTAL STATEMENT

July 2022

Introduction

In accordance with the SEA Directive (*Directive 2001/42/EC of the European Parliament and of the Council on the assessment of the effects of certain plans and programmes on the environment*), a Strategic Environmental Assessment (SEA) was conducted for the Interreg VI-A Hungary-Slovakia Programme to assess the likely significant effects of the programme on the environment.

This environmental statement provides an overview of the SEA process and results, including a summary of:

- the Interreg VI-A Hungary-Slovakia Programme (HUSK Programme),
- the Strategic Environmental Assessment (SEA) methodology and assessment,
- the consultation process and how feedback from the environmental authorities and the public was incorporated into the SEA and the HUSK Programme,
- the main results and a summary of how the environmental considerations and recommendations of the environmental report were taken into account.

As laid down in Article 9 of the SEA Directive, following the adoption of the programme the final environmental statement will be made available to inform the environmental authorities and the public. This statement should be read together with the HUSK Programme and the environmental report.

Interreg VI-A Hungary-Slovakia Programme

The subject of the assessment was Interreg VI-A Hungary-Slovakia Programme.

The EU's earmarked contribution for this programme is **129 000 000 EUR** and the total programme budget (including national contributions) is **161 250 000 EUR**.

The programme aims to tackle common challenges identified in the cross-border region and to strengthen cooperation in selected priorities that are linked to the EU objectives.

In compliance with these EU objectives, the programme focuses on the following priority axis:

- **Priority Axis 1 (PO2): Green cooperations** by enhancing protection and preservation of nature, biodiversity and green infrastructure, including in urban areas, and reducing all forms of pollution (35% of the programme budget)
- **Priority Axis 2 (PO4): Social cooperations** by enhancing the effectiveness and inclusiveness of labour markets and access to quality employment through developing social infrastructure and promoting social economy (54% of the programme budget)
- **Priority Axis 3 (ISO1): Institutional cooperations** by building up mutual trust, in particular by encouraging people-to-people actions (11% of the programme budget)

Methodology of the Strategic Environmental Assessment

The Strategic Environmental Assessment identified, described and assessed the direct and indirect impacts of the programme on a number of environmental issues such as soil, air, noise vibration, water, natural values, climate, landscape, human health and environmental consciousness.

The SEA set out the likely significant environmental impacts of the programme and whether the environmental situation is expected to improve, worsen or remain unaffected – especially in comparison to the scenario in which the programme is not implemented.

The time frame of the assessment was primarily the funding period 2021–2027. However, the subsequent period within which all projects funded under this programme are expected to be completed, i.e. by 2029, was also taken into account.

The programme defines potential activities in a broad manner, hence only a qualitative assessment was possible. Potential impacts on the environment will depend on the precise nature and scope of projects to be funded.

Throughout the assessment process the programme managing authority, the programming and the SEA teams exchanged information continuously in order to improve the programme and eliminate possible sources of negative environmental impacts, as well as to enhance provisions and activities protecting the environment.

Through the iterative improvement of the programme the improved and latest version of the programme document represents the best possible alternative.

How were the environmental considerations and recommendations of the environmental report incorporated into the IP document?

Through close cooperation between the programming and SEA teams, some of the proposed activities in the draft IP document were slightly adjusted to prevent and minimize any significant negative environmental impact.

The comments received during the consultation with environmental authorities were also taken into account when revising the draft IP document. All comments and opinions received from the consultation were documented and integrated into the environmental report as an annex ("Annex IV and Annex V. of the SEA report).

An additional specific assessment on the "do no significant harm" principle (DNSH assessment) was also conducted and added to the environmental report, in accordance with the EU Taxonomy Regulation (EU) 2020/852, and following the requirements stated in the Commission explanatory note on the application of the principle under Cohesion Policy which was issued on 27 September 2021.

Potential environmental impacts of the SKHU programme

Based on the results of the environmental assessment performed, it can be stated that **the HUSK Programme contains no actions the implementation of which would specifically endanger the status of any environmental element or system.** On the contrary, **a significant part of the activities implemented within the framework of the Programme directly or indirectly aims to reduce the use and pressure on environmental elements and systems, as well as to improve human health and quality of life** in line with environmental concerns.

Table 1 presents a detailed matrix showing how the programme is expected to affect the environmental issues concerned and the impact assessment made by the SEA team.

Table 1: Environmental impacts of the actions in the Programme

Actions	Soil	Air	Noise, vibra-	Water	Natural values	Climate	Built env.,,	Human health	Env. con-
1.1.1. Resource and waste management	+2	?	?	+2	?	+2	?	0	+2
1.1.2. Short supply chains	+2	+1	0	+1	0	+2	0	+1	+1
1.2.1. Protection and preservation of the natural capital	+3	+2	+1	+3	+3	+3	+3	+2	+3
1.2.2. Joint risk management	+2	+1	0	+3	+2	+3	+2	+2	+2
2.1.1. Social innovations for disadvantaged and vulnerable groups	0	0	0	0	0	0	0	+2	0
2.2.1. Inclusive and quality education	0	0	0	0	0	0	0	+2	0
2.3.1. Family and community-based health care services	0	0	0	0	0	+2	0	+3	+1
2.3.2. Cross-border development of healthcare institutions	0	0	0	0	0	+2	0	+3	0
2.4.1. Preservation of the local heritage	0	0	0	0	0	+1	+3	+2	+1
2.4.2. Complex development of tourism destinations	-1	-1	0	-1	-2	-2	?	?	0
3.1.1. Eliminating border obstacles	0	0	0	0	0	0	0	0	0
3.2.1 Small project fund	0	0	0	0	0	0	0	+1	0

Legend

+3	positive environmental impact with a high probability
+2	positive environmental impact with a medium probability
+1	positive environmental impact with a low probability
0	no identifiable environmental impact
-1	negative environmental impact with a low probability
-2	negative environmental impact with a medium probability
-3	negative environmental impact with a high probability
?	direction of the environmental impact depending on the Programme implementation

Strategic Environmental Assessment consultation process

In accordance with the SEA Directive, the citizens and authorities who are likely to be concerned with the environmental effects of the SKHU Programme were consulted on the scoping report and the environmental report in the period July-December 2021.

In Hungary, the Scoping Report has been shared with environmental authorities for consultation on 19 July 2021. In accordance with Gov. Regulation No 2/2005 on the assessment of the effects of certain plans and programmes, environment environmental authorities had the opportunity to provide their comments to the Scoping Report within 30 days, i.e. by 19 August 2021. Comments and feedbacks have been received from 41 organisations, that have been duly taken into consideration when compiling the Draft Environmental Report.

The Draft Environmental Report has been circulated towards national environmental authorities of Hungary as defined by the national legislation on 25 November 2021, asking for their comments and opinions by 31 December 2021. Received feedbacks are summarized in Annex I of the current document, also indicating how the comments have been addressed by the SEA team.

In Slovakia, in line with national legislation, the Ministry for Investment, Regional Development and Informatisation (hereinafter: MIRD I) has been responsible for coordinating consultation of the Scoping Report. Based on outcomes of the consultation process with Slovak environmental authorities, they have defined the scope of assessment of the Programme based on comparison of two variants: zero option and the proposed strategy included in the programme document. Accordingly, MIRD I has defined specific points to be taken into account during the preparation of the Draft Environmental Report. No additional comments have been received to the scope of assessment during its public consultation.

For the consultation of the Draft Environmental Report in Slovakia Member States took advantage of the Espoo contact/focal network of the SEA Protocol, and requested the national SEA contact point/focal point of the Slovak Republic, i.e. the Ministry of Environment (hereinafter: MoE) to initiate the SEA consultation procedure required by country specific laws by distributing the documents to whom it may concern within the country. Feedback, comments and all remarks were expected through the same channel.

Accordingly, MoE published the Draft Environmental Report on the respective Slovak online platform (www.enviroportal.sk) on 9 December 2021, and a public hearing was organized on 21 December 2021. Besides, MIRD I, being responsible for managing the Programme as National Authority, has directly forwarded the Draft Environmental Report to the concerned authorities with a call for delivery of an opinion. Written comments of environmental authorities have been requested within 21 days following the publication of the documents. MoE has then summarized the feedbacks collected by MIRD I from Slovak environmental authorities to the Draft Environmental Report and sent them to the Hungarian contact point to the SEA Protocol. Received feedbacks are summarized in Annex II of the current document, also indicating how the comments have been addressed by the SEA team.

At the same time, in accordance with Slovak legislation (No. 24 / 2006 Coll.), MoE has appointed an independent expert to draw up its final opinion as regards the environmental impact assessment of the Programme. The final opinion has been completed on 24 March 2022.

Parallel to the above consultation process with national environmental authorities, the Draft Environmental Report, along with the draft version of the Interreg programme document have been published on the official website of Interreg VI-A Hungary-Slovakia (www.skhu.eu) in

national languages and open for public consultation from 25 November 2021 to 31 January 2022. However, no comments relevant for the SEA were received.

The Final Environmental Report has been compiled by taking into consideration all comments and feedbacks provided by Hungarian and Slovak authorities throughout the above described consultation process of the Draft Environmental Report.

Main results of the SEA assessment

Based on the results of the environmental assessment performed, it can be stated that **the Programme contains no actions the implementation of which would specifically endanger the status of any environmental element or system**. On the contrary, **a significant part of the activities implemented within the framework of the Programme directly or indirectly aims to reduce the use and pressure on environmental elements and systems, as well as to improve human health and quality of life** in line with environmental concerns.

By its nature, actions with a positive environmental impact are primarily included in the "Green Cooperation" priority axis. The vast majority of activities eligible here, although to varying degrees, contribute to improving the status of almost all environmental elements. From environmental, nature and landscape protection point of view, it is beneficial that the Programme supports the implementation of awareness raising programmes in several environmental and sustainability related topics. This statement is valid despite the fact that only a moderate environmental impact of this type of action was found in the evaluation, as their environmental effectiveness is also influenced by many external circumstances independent of the Programme. On the other hand, it should be noted and explained that in the case of the "Development of Circular Economy" action under Priority Axis 1, the possibility of a slightly increasing local pressure or stress cannot be completely ruled out or justified in the same way for some environmental elements. The reason accounting for this is primarily the relatively low level of detail of the Programme due to its strategic nature, and the fact that even the cleanest production implies some stress and pressure on environmental elements. It is emphasized that this does not mean at all that there would be an increased risk of adverse effects, moreover, the circular approach makes it even likely that the pressure on environmental elements will decrease; based on the Programme content, this issue cannot currently be settled though.

The only intervention direction within the whole Programme that may lead with a certain likelihood to increasing pressure and stress of environmental elements and systems is tourism development. It is well known that tourism can also cause adverse environmental effects, above all by growing transport demands, tourism facilities operation and disturbance of natural, semi-natural habitats, flora and fauna. At the same time, the volume of developments that can be implemented during the Programme makes it probable that **the Programme actions aimed at tourism development will not result in a high pressure and stress level on environmental elements and systems**. However, special attention will have to be paid for its prevention during the Programme implementation, recommendations for which are provided by the current environmental report.

Finally, **it should be noted that most of the Programme actions are not directly related to environmental values protection**. In particular, funding areas under Priority Axes 2 and 3 fall into this category. However, this does not mean that even these actions could not have indirect environmental effects, either positive or negative. In particular, the aimed improvement of the general living conditions via increasing skill levels, integrating vulnerable groups and creating new employment opportunities can make a significant contribution to ensuring

that people living in the Programme area place greater emphasis on the protection of environmental and natural values and so adjust their lifestyle. At the same time, it cannot be ruled out that the rising standard of living has been shown to carry the risk of increased environmental pressure and stress, although the awareness raising activities widely supported by the Programme, as well as empowerment of local communities play an important role in the prevention thereof.

Considering the expected extent of the effects of the Programme on various environmental elements and systems, it can be stated that **the most favourable influences are likely in the fields of climate protection and adaptation, as well as protection of human health.** The Programme also promotes significantly the protection of surface water and groundwater, soil, as well as natural and semi-natural habitats. The least progress can be expected in the field of prevention of noise and vibration pollution during the Programme implementation, however, such pressures are not considered to be essential in the area covered by the Programme.

Monitoring Provisions

As the primary goal of the SKHU Programme's monitoring system is to record the scope of jointly implemented activities, regardless of the development area of activities, the SEA report is proposing to establish a register of the main characteristics of environmentally relevant developments. Indicators recommended to be collected and recorded are the following:

- exact location and extent of areas affected by a development, in ha or m² depending on the project
- land use classification of areas affected by a development, identification of potentially affected protected natural areas and Natura2000 areas;
- extent urban green spaces established, in ha, if relevant
- area of the paved surfaces, in m², if relevant
- number of implemented cultural or tourist events, day / year, if relevant
- total number of municipalities involved in the cross-border integrated transport system
- total length of newly built or modernized cycle paths (km)
- total length of newly built or modernized tourist trails (km)

The collection of the above indicators is required for projects under actions with a potentially significant environmental impact, namely:

- all actions under the "Green Cooperation" priority
- 2.4.1. Preservation of local heritage
- 2.4.2. "Complex development of tourism destinations"

It is recommended that all comprehensive evaluations of the Programme (if possible already mid-way through the programme cycle) include a detailed assessment of the environmental, sustainability aspects and identification of the environmental, sustainability impacts of the Programme, based on the above databases.

Comments and recommendations of the Hungarian environmental authorities on the draft environmental report of the strategic environmental assessment of the SKHU programme

Area of responsibility	Organisation sending the comment	Comment	Answer
No comments or objections raised			
protection of the built environment	Szabolcs-Szatmár-Bereg County Government Office, Office of the Chief State Architect		
nature and landscape conservation	Aggtelek National Park Directorate		
protection of the built environment	Pest County Government Office, Office of the Chief State Architect		
soil protection	Heves County Government Office Department of Agriculture, Division of Plant and Soil Protection		
protection of the built environment	Heves County Government Office, Office of the Chief State Architect		
forest protection	Pest County Government Office Department of Agriculture, Division of and Forest Surveillance		
environment and urban health	Komárom-Esztergom County Government Office Department of Public Health		
soil protection	Komárom-Esztergom County Government Office Department of Agriculture, Division of Plant and Soil Protection		
environment, nature and landscape protection	Pest County Government Office Department of Environment Protection, Nature Protection, Waste Management and Mining Supervision		
soil protection	Nógrád County Government Office Department of Agriculture, Division of Plant and Soil Protection		
environment and urban health	Szabolcs-Szatmár-Bereg County Government Office Department of Public Health		

Area of responsibility	Organisation sending the comment	Comment	Answer
protection of the built environment		Capital City Government of Budapest, Office of State Chief Architect	
soil protection		Borsod-Abaúj-Zemplén County Government Office Department of Agriculture, Division of Plant and Soil Protection	
environment, nature and landscape protection		Győr-Moson-Sopron County Government Office Department of Environment, Nature Protection and Waste Management	
environment, nature and landscape protection		Nógrád County Government Office Department of Environment, Nature Protection and Waste Management	
environment and urban health		Szabolcs-Szatmár-Bereg County Government Office Department of Public Health	
protection of the built environment		Győr-Moson-Sopron County Government Office, Office of the Chief State Architect	
surface water and groundwater protection		Ministry of Interior, National Directorate General for Disaster Management, Prevention and Licensing Service	
environment, nature and landscape protection		Komárom-Esztergom County Government Office Department of Environmental Protection, Nature Conservation and Waste Management	
cultural heritage protection		Capital City of Budapest Government Office Department of Construction and Heritage Protection	
environment, nature and landscape protection		Heves County Government Office Department of Environment, Nature Protection and Waste Management	
environment and urban health		Capital City of Budapest Government Office Department of Public Health	
forest protection		Borsod-Abaúj-Zemplén County Government Office Department of Agriculture Division of Forestry	

Area of responsibility	Organisation sending the comment	Comment	Answer
protection of the built environment	Borsod-Abaúj-Zemplén County Government Office, Office of State Architect		
protection of the built environment	Komárom-Esztergom County Government Office, Office of State Architect		

Technical comments ¹			
nature and landscape conservation	Hortobágy National Park Directorate	Missing from both documents (although it is referred to in many places, but maybe it is there, but we just missed it) is the Council Decision on the approval of the first and second amendments to the UN/ECE Espoo Convention on Environmental Impact Assessment in a Transboundary Context, which should be in the document, at least at the level of a mention.	The main national, Community and international legislation relevant to the preparation of the Environmental Report has been added (Chapter 1.1)
		Textual suggestions for the content of Figure 4	The comment concerns the first column of Figure 4, which contains the objectives of the listed Community and national strategy documents, therefore we are not in a position to change their wording.
		Annex II, Chapter 3.1.4: ... national park directorate located ... The official name of each national park is the Directorate!	In our opinion, the addition of the word "Directorate" to the name of the national parks in the chapters referred to is not justified, since the aim is not to list administrative bodies but natural areas of national importance protected by specific legislation.
		4.1.6 Chapter B, Action 1.2.1: The document identifies 3 main areas. Grassland could be included.	The comment concerns the presentation of the Programme. Given that the Programme does not include the grassland by name, we are not in a position to include it here.

¹ Several organisations (Borsod-Abaúj-Zemplén County Government Office Chief Architect's Office, Komárom-Esztergom County Government Office Chief Architect's Office, Borsod-Abaúj-Zemplén County Government Office Department of Environmental Protection, Nature Conservation and Waste Management, Bükk National Park Directorate, Self-Government of Heves County) have drawn attention to typos and chapter numbering errors in the Hungarian translation of the Environment Assessment Report. As these do not apply to the English version, they are not published here, but have been corrected in the Hungarian translation.

		Chapter 7: The NUTS codes for Budapest and Pest county are: 110 and 120.	The error has been corrected.
		Annex I, part for Hungary: the Satu Mare-Bereg Landscape Protection Area (21.891,7 ha) is excluded	The reported shortfall has been closed.
nature and landscape conservation	Bükk National Park Directorate	The number of actions in the table on page 7 of the Environmental Assessment Report is incorrect.	The error has been corrected.
		On pages 56 and 65, there are typos and unnecessary punctuation.	The errors have been corrected.
Comments on content			
environment and urban health	Heves County Government Office Department of Public Health	In the case of the action "Complex development of tourist destinations", it is recommended to include in the documentation the assessment of the environmental impact of the effluents generated in the unsewered areas, in connection with the planned investments, accommodation, tourism and other facilities, in order to protect human health and preserve the quality of drinking water, also during the period of the Programme's negotiation.	The comment does not concern the Environmental Report, but the Programme itself. Nevertheless, we agree with the proposal and have included it in the Environmental Report (chapter 4.1.4).
soil protection	Győr-Moson-Sopron County Government Office Department of Agriculture, Division of Plant and Soil Protection	The assessment report basically identifies the soil degradation processes that reduce soil functions in the project area, but further investigation may be required to determine the action plan required in case of extreme soil water management in the project area. Considering that approximately 2/3 of the Carpathian Basin is classified as nitrate sensitive, it could be appropriate to introduce Good Agricultural Practices to maintain soil fertility and preserve soil functions in order to protect surface and groundwater quality.	The Environmental Report (chapter 4.1.1.) has been supplemented in line with the comment.
environment, nature and landscape protection	Borsod-Abaúj-Zemplén County Government Office Department of	Suggested textual additions and clarifications to Chapter 3.1.4, paragraph 3.	The sentence has been amended to reflect the comment.
		Proposal to delete the last sentence of paragraph 3 in Chapter 3.1.4.	In line with the comment, the sentence has been deleted.

	Environment, Nature Protection and Waste Management	<p>In point 7, under the heading 'Recent environmental conflicts and problems in the area covered by the Programme and their likely evolution without the implementation of the Programme', replace point 4 ('Degradation and conversion of vegetation, spread of invasive alien species due to climate change and human activities in recent decades.')), we believe that the main environmental conflict and the greatest threat is the irresponsible and irresponsible human management that is not prudent, exploits natural resources, destroys habitats, damages and restricts species' habitats.</p>	<p>In line with the comment, the above statement has been added.</p>
		<p>P02-SO(VII) Industrial, water treatment and water engineering installations near the border can only be installed with appropriate technical noise protection. Industrial areas and industrial zones should be designated as far away from the border as possible. The impact of noise emissions from planned installations should be taken into account when assessing the impact on residential buildings beyond the national border.</p>	<p>The Environmental Report has been completed in line with the comment (chapter 4.1.3.)</p>
		<p>It is proposed to base the programme monitoring system on simple, comprehensible and accessible data, not excluding the possibility of defining specific programme indicators in the final analysis.</p>	<p>We fully agree with this comment, which is why the Environmental Report proposes to use the existing regional and national databases, based on a common protocol, to assess and evaluate the environmental impacts of the Programme.</p>
nature and landscape conservation	Bükk National Park Directorate	<p>We agree with the assessment of the studies summarised in the table in Chapters 2.3 and 2.4.2, with the comment that some developments associated with Action 2.4.2 may also have potentially conflicting environmental effects with Actions 1.2.1.</p>	<p>Consistent with the comment, Figure 5 of the Environmental Report shows that the combination of Actions 2.4.2 and 1.2.1 could lead to potentially conflicting environmental impacts.</p>
		<p>Textual addition to paragraph 3 of Chapter 3.1.4 and proposal to delete the last sentence of this paragraph.</p>	<p>The parts of the Environmental Report requested in the comments have been added or deleted. (Chapter 3.1.4.)</p>

		Textual proposal for an addition to Chapter 3.2, paragraph 3, indent 3.	The Environmental Report has been completed in line with the comment (Chapter 3.2)
		Proposals to add to the list of protected landscape areas in Annex I.	The Environmental Report has been supplemented in line with the comment (Annex I)
environment and urban health	Borsod-Abaúj-Zemplén County Government Office Department of Public Health	Environmental conflicts and problems often have a cross-border impact. The main environmental issues in the programme area are water and waste management, waste water treatment and air pollution. Air quality has a significant impact on human health and ecosystems. Air pollution, particularly seasonally high levels of particulate matter, is a major challenge in the border region of the programme area and a major health risk for all its inhabitants, leading directly to various diseases and premature death.	The Environmental Report has been amended to include the issue of air pollution, as requested by the comment, and the other problems mentioned have been included in the list (chapter 3.2)
nature and landscape conservation	Hortobágy National Park Directorate	Chapter 6: For monitoring, where a survey concerns the natural environment, efforts should be made to develop a standard protocol	We fully agree with this observation, which is why the Environmental Report proposes the use of existing regional and national databases, based on a common protocol, to assess and evaluate the environmental impacts of the Programme.
		Annex I, Hungary section: international protected categories (Natura 2000 and Ramsar) are not included.	Annex I has been supplemented.
environment and urban health	Győr-Moson-Sopron County Government Office Department of Public Health	The largest current waste management item in Hungary is the disposal of demolition and construction waste. In the county of Győr-Moson Sopron, the use of this type of segregated waste in the construction of transport roads is becoming more and more common as a good practice. This practice could be continued, especially in the context of cooperation between countries in the implementation of tourism objectives.	The Environmental Report has been completed in line with the comment (chapter 4.1.7.)

		In project selection procedure, attention should not only be paid to the waste management of the area to be developed. We consider it important that the evaluation criteria should include among the tourism objectives, for example, waste bins placed on the bicycle route, the possible establishment of mobile toilets, the placement of more lockable, separated waste bins and their regular emptying and maintenance.	The Environmental Report has been completed in line with the comment (chapter 4.1.1.)
local environment and nature protection	Self-Government of Heves County	In the chapter "1.1 Purpose of the Strategic Environmental Assessment" on page 6 of the document, the Report refers only to Directive 2001/42/EC of the European Parliament and of the Council as the legal background. However, the chapter "1.3 Incorporation of comments and suggestions made during the SEA process" refers in general terms to the application of national legislation in the planning process. It is suggested that chapter 1.1 should also specifically list national legislation.	The Environmental Report has been completed in line with the comment (Chapter 1.1)
Comments not on the Environmental Report but on the Programme			
protection of the built environment	Komárom-Esztergom County Government Office Office of the Chief State Architect	An increase in the use of solar PV systems is expected due to the planned increase in renewable energy use for objective P02 (to promote the transition to a circular and resource-efficient economy). The protection of the built landscape and the harmonious appearance of the landscape or landscape outcrop or view will be a priority for the installation of solar panels. It is considered appropriate to draw up guidelines for this in the framework of the programme, with the assistance of a landscape architect.	It should be noted that the Programme does not explicitly support the expansion of renewable energy use, and the PO2 objective mainly encourages industrial symbiosis and sustainable waste management.
environment, nature and landscape protection	Borsod-Abaúj-Zemplén County Government Office Department of Environment, Nature Protection and Waste Management	The chapter on "Sustainable waste management and waste prevention" should be clarified as follows: The aim of the measure is to increase the proportion of solid waste that is reused or recycled in relation to the amount generated, and... It is proposed to explain in more detail what measures are being taken to reduce the increasing amount of construction and demolition waste generated in Hungary.	-

environment urban health	and Borsod-Abaúj Zemplén County Government Office Department of Public Health	<p>With regard to the intervention areas, special attention should be paid to activities, interventions and measures for the protection, preservation and improvement of surface and groundwater, which are used directly or indirectly for drinking water abstraction, and for the protection of long-term water sources, surface and groundwater.</p> <p>Within the framework of the Cross-Border Cooperation Programme, priority and special attention should be given to the water quality of the rivers crossing the border, the establishment of water quality monitoring systems, the protection of water resources, and the harmonization of relevant regulations.</p> <p>The planned interventions include improving the quality of surface and groundwater. The water quality of many cross-border rivers (the Danube, the Ipoly, the Sajó, the Hernád, the Bodrog and the Tisza) can and should be maintained through monitoring and prevention.</p> <p>Addressing the environmental damage caused by waste water and waste requires cross-border cooperation. The focus areas are river valleys crossing the borders, which are at risk of pollution.</p>	<p>In our view, the Programme pays due attention to the areas identified in the comment, within the limits of its possibilities.</p>
		<p>With regard to the development of monitoring systems to be defined in the future, I consider it important to develop additional pollution monitoring systems (air, water, soil), to develop the IT and technical possibilities of linking existing official monitoring systems and monitoring systems operated by utility providers, and to develop notification systems for cross-border pollution, with special regard to the protection of surface and groundwater and drinking water sources.</p>	-
		<p>The availability of good quality human services (health, social care, education, public administration) is an important prerequisite for the quality of life of the population living in the region. In line with demographic trends, particular attention should be paid to the development of institutions for the elderly. It is important to ensure that a wide range of health and social services are available locally, and to improve the quality of these services so that they can adapt to the changing needs of the population in the area.</p>	<p>In our view, the full range of proposed improvements cannot be supported under the Programme.</p>

environment and urban health	Győr-Moson-Sopron County Government Office Department of Public Health	In the project selection point (1.2.6. Lessons learned from previous experiences- 13, o-,) Monitoring Committee members should not only be more actively involved, but we also recommend to expand the circle of participants with representatives of the specialised fields with experience and experts in epidemiology, project monitoring, informatics.	-
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Comments and recommendations of the Slovak environmental authorities on the draft environmental report of the strategic environmental assessment of the SKHU programme

Organisation sending the comment	Comment	Answer
Ministry of Finance of the Slovak Republic, European Funds Department	Requests that the name of the Fisheries Fund listed on page 17, subchapter 1.2.8, and states that for the programming period 2021-2027 the name shall be the European Maritime, Fisheries and Aquaculture Fund	The comment concerns the Programme and not the Draft Environmental Report.
	Proposes the deletion of the relevant information, covering both the third and fourth paragraphs of the third and fourth paragraphs of the first subparagraph; 59, in Chapter 7.2, where it is stated that the Joint Secretariat will be financed from the technical assistance of the programme and the text will be adapted accordingly.	The comment concerns the Programme and not the Draft Environmental Report.
The Bratislava District Office, Section of environmental care, Department of Nature Protection and Selected Environmental Components of the Region	The Report is purely formal in terms of nature protection, without any specific activities/projects and with only generally evaluated impacts.	Since the Programme, as intended, does not contain project-level information (see detailed characteristics and locations of the developments to be supported), the Environmental Report can only make general statements.
	The Report states that no areas of the Program have been identified that would be in conflict with the objectives of environmental protection. In its opinion, however, given the planned activities at least in the area of improving transport infrastructure and developing tourism, conflicts with the interests of nature protection can be expected.	In our opinion, chapter 4.1.5 of the Environmental Report, in particular point D), addresses the potential negative impacts of tourism developments on wildlife, but we have nevertheless expanded this chapter and clarified its wording. We have also changed the relevant score in the summary table (from -1 to -2).
	Chapter 2 does not take into account all major planning programs, e.g. Action Plan of the Slovak Republic for Wetlands for the years 2019-2021, Care Program for the Protected Bird Area Košice Basin for the years 2018-2047.	The Action Plan of the Slovak Republic for Wetlands for the years 2019-2021 is not relevant for strategic document as its covering 2021-2027. The Care Program for the Protected Bird Area Kosice Basin is one of more than 90 Care programmes, and it

Organisation sending the comment	Comment	Answer
		is beyond the capacity of the Report to include other documents than the ones at the level of NUTS1 to NUTS3.
	For the Green Cooperations priority axis, the directorates of national parks and nature parks are included among the beneficiaries, but small protected areas of various categories and areas belonging to the European Natura 2000 network are also located outside the national parks, so it recommends that nature protection organizations are included among the beneficiaries.	The comment concerns the Programme and not the Draft Environmental Report, but it is recommended to follow this request.
	In Chapter 5, for activities that may have any impact on nature protection interests, there is no measure on the appropriateness of consulting and cooperating with the territorially competent nature protection office, and a measure on the use of native species when planting in areas outside the built-up area of municipalities. (from non-native plant species only species that are listed in Annex 3 to the Decree of the Ministry of Environment of the Slovak Republic No. 170/2021 Coll., implementing the Nature Protection Act). At the same time, it is necessary to add a notification on the obligation to implement projects in accordance with the valid legislation of the Slovak Republic.	The Environmental Report has been amended in line with the comments (Chapter 4.1.5. and 5.)
	Chapter 7 states "... within the ongoing or subsequent evaluation of the Program, the impact of the implemented development activities on individual aspects of the environment can be identified." From the point of view of preventing negative impacts, it considers this method of their identification to be unacceptable.	The Environmental Report has been amended in line with the comment (Chapter 6. and 7.)
	Activity 1.2.1 Protection of natural capital states that it does not contribute to the preservation of cultural heritage. It should be noted that the activity generally does not contribute to the preservation of cultural heritage, because there are cases in Slovakia where they do (e.g. NPR Šomoška, PP Soví hrad, etc.).	The Environmental Report has been amended in line with the comment (Chapter 4.1.7.)

Organisation sending the comment	Comment	Answer
	<p>Formally, the Report can be criticized for the incorrect use of the term "alien invasive species", the correct term is "non-native invasive species".</p>	<p>The wording has been corrected.</p>
	<p>It has the following comments on the specific requirements of the scope of the assessment concerning the interests of nature and landscape protection:</p> <p>No. "2.2.2. Add the indicators "total number of municipalities involved in the cross-border integrated transport system" and "total length of newly built or modernized cycle paths and tourist trails" in the evaluation report - not considered fulfilled.</p> <p>No. "2.2.5. Include in the evaluation report a list of protected areas located in the eligible area of the program" - partially fulfilled. Only large-scale protected areas are listed, and special protected parts of the national and European network of protected areas are omitted. It notes that Slovakia has developed a proposal to supplement the national list of sites of Community Importance, which is in the process of approval.</p> <p>No. "2.2.6. Thoroughly assess the potential environmental impacts that may result from the implementation of the strategic document, in particular in relation to the protected areas of the national and European network, the territorial system of ecological stability and other nature protection interests" - not fulfilled. Evaluation of impacts on protected areas is only general and the assessment of the effects on the territorial system of ecological stability and other nature protection interests is lacking.</p>	<p>Both indicators indicated in comment No. 2.2.2 are included in the indicators listed in Chapter 6 of the Environmental Report.</p> <p>A list of Natura 2000 sites has been added to the Annex I of the Environmental Report. In our opinion, the inclusion of any other types of protected areas is not justified, as they should be taken into account in the preparation of specific projects under the Programme, not in the preparation of the Programme itself.</p> <p>Since the Programme, as intended, does not contain project-level information (see detailed characteristics and locations of the developments to be supported), the Environmental Report can only make general statements. However, the chapter on nature conservation and wildlife has been added, within the limits of the information available in the Programme.</p>
	<p>In the form that the Environmental Report Interreg VI-A Hungary-Slovakia Cross-Border Cooperation Program was submitted, it is not possible to take an expert opinion on it. It can only be stated in general that when evaluating individual projects/activities of the strategic document, it is necessary to ensure a thorough assessment of their environmental impacts in accordance with the Impact Assessment Act. When preparing specific projects, it recommends not interfering in protected areas, their protection zones and ÚSES elements</p>	<p>In line with the above response, it is also noted here that the level of detail of the Programme does not allow for a detailed impact analysis. We fully agree with the recommendation in the comment that in the preparation and implementation of projects under the Programme, particular attention should be paid to the assessment of environmental impacts under the</p>

Organisation sending the comment	Comment	Answer
	<p>and proposing activities that will not have a negative impact on the interests of nature protection. Cooperation with territorial competent offices of the Slovak State Nature Protection is advisable in this case.</p>	<p>existing legislation, including consultation with the relevant environmental authorities. Reference to the latter is made in several places in the Environmental Report.</p>
	<p>Common cross-border solutions are needed in the areas of flood protection, disaster relief, water quality improvement and pollution remediation.</p>	<p>The comment concerns the Programme and not the Draft Environmental Report, but it is recommended to follow this request.</p>
	<p>At the level of border areas, address extreme weather conditions that pose a serious hydrological threat, extremely destructive storms, hail, drought with a lack of drinking water.</p>	<p>The comment concerns the Programme and not the Draft Environmental Report, but it is recommended to follow this request.</p>
	<p>Include sections on water management and climate in surveys assessing the tourism potential of water bodies. Take into account changes in water resources and water quality for the coming decades and the impacts of climate change.</p>	<p>The comment concerns the Programme and not the Draft Environmental Report.</p>
	<p>The next stage of the strategic document must be prepared in accordance with the approved conceptual and planned documents of the Ministry of Environment of the Slovak Republic, in compliance with the general provisions of Act No. 364/2004 Coll. on Waters and on the Amendment to the Act of the Slovak National Council No. 372/1990 Coll. on Offences, as amended, and in compliance with the provisions of § 39 of the Water Act, laying down the general conditions for the handling of pollutants and subsequently the Decree of the Ministry of Environment of the Slovak Republic No. 200/2018</p>	<p>The comment concerns the Programme and not the Draft Environmental Report, but it is recommended to follow this request.</p>
<p>District Office of the Dunajská Streda, Department of Environment</p>	<p>The office calls for full compliance with environmental legislation and implementation of the proposed measures</p>	<p>This request results from the law, the Draft report supposes that the processes given by the law will be followed.</p>

Organisation sending the comment	Comment	Answer
District Office of Trebišov, Department of Environment	In Chapter 3.1 Environmental characteristics of the area that are likely to affect the objectives of the program, in subchapter 3.1.1. Landscape structure, there is an inaccurate name of the area in which the Latorica Protected Landscape Area is located as the Great Danube Plain, while the Hungarian name is much more accurate, Felső - Tisza síkság, which could be translated as the Upper Tisza Plain.	The term Great Danube Plain on the map in Chapter 3.1.1 refers to the entire lowland macro-region in the central part of the Carpathian Basin. The Upper Tisza region in the northern part of this area is indeed far from the Danube river, but it still belongs to the macro-region called the Great Danube Plain.
	In the subchapter 3.1.3. Water resources, rivers, water management, the largest river that stands at the origin of the river Bodrog is omitted, i.e. the river Latorica.	The Environmental Report has been amended in line with the comments (Chapter 3.1.3.)
Public Health Authority of the Slovak Republic	The authority states that it agrees with the environmental report of the draft strategic document "Interreg VI-A Hungary-Slovakia cross-border cooperation program" and agrees with the draft strategy document; but seeks to apply its comments that can be found in their statement. Comments are listed below.	See responses below.
	1. Create a register of the main characteristics of environmentally relevant development activities, which will enable easier assignment of data registered in national databases to the development activities of the Program.	In Chapter 6 of the Environmental Report, a list of environmentally relevant actions has been added.
	2. From the hydrogeological point of view, the Aggtelek Karst and the Slovak Karst form single unit. Groundwater resources are interconnected and directly affect each other. In the interest of water resources protection, we propose to implement the objectives of the Protocol on Water and Health into the Program.	The comment concerns the Programme and not the Draft Environmental Report, but it is recommended to follow this request.
3. In implementing the individual activities of the Program, we recommend paying increased attention to minimizing transport needs due to the fact that environmental noise and especially road traffic noise remains a significant environmental problem that affects the health and well-being of millions of people in Europe. The increasing intensity of road traffic, combined with the growing rate of urbanization in recent decades, is also changing a person's perception and attitude towards noise, which affects the quality of life and health of individuals.	The comment concerns the Programme implementation and not the Draft Environmental Report, but the Report recommends to follow this request in SEA/EIA of particular projects (Chapter 4.1.3. and Chapter 5)	

Organisation sending the comment	Comment	Answer
	<p>4. Between the border river Ipeľ and the river Hron in the south-eastern part of the Levice district, there are no water sources of suitable quality for the public supply of drinking water to the population. It is also necessary to solve the appropriate sewerage of agglomerations in this area so that the quality of groundwater and surface water is not negatively affected.</p>	<p>The comment concerns the Programme and not the Draft Environmental Report, but it is recommended to follow this request in the next phase.</p>
	<p>5. The largest source of noise in the Levice district is the intensive cross-border road traffic in Šahy (across the Šahy-Parassapuszta border crossing). In terms of reducing the noise pollution of the population of Šahy and the surrounding municipalities, an important solution would be to relocate the road of international importance I/66 Šahy - Zvolen (road R3) with the bypass of municipalities: Šahy, Hrkovce, Horné Semerovce, Hokovce. This intention is also addressed in the territorial documentation of the Nitra self-governing region.</p>	<p>The comment concerns the Programme and not the Draft Environmental Report, but it is recommended to follow this request in the next phase.</p>
	<p>6. Add the negative effects of the circular economy on health and quality of life in Chapter 4.1.9 Human health and quality of life. This chapter only lists positive and neutral effects on health and quality of life. Given the changes in waste management and the expansion of the use of waste for energy purposes (incinerators, BPS), a negative impact of odours on the population can be expected, which is also acknowledged in the report on air pollution: "However, all industrial developments aimed at waste management can potentially lead to certain emissions of air pollutants, including potential air pollution by odours". Furthermore, the report itself states "... the activity also covers those directions of technological development for which, on the basis of the available information, it cannot be stated with certainty that their implementation does not present any risk of noise or vibration (e.g. noise emissions from waste management can be reduced but not completely eliminated). This is because the Program, in line with its intention, does not specify the sectoral classification, type and technology of the sites to be developed". In chapter 4.1.9. Human health and quality of life, the report states at the outset that the development of the circular economy does not affect human health and quality of life. Chapter 4.1.9. Human health</p>	<p>Based on the comment, to ensure consistency within the Environmental Report, Chapter 4.1.8 on human health and quality of life has been supplemented with a description of the human health impacts of the action 1.1.1. "Resource and waste management".</p>

Organisation sending the comment	Comment	Answer
	and quality of life therefore contradicts the previous text of the report, which is deliberately quoted and we therefore call for it to be supplemented.	
Office of the Nitra Autonomous Region, Department of Strategic Activities	The evaluation report and the draft strategy paper, "Cross-border cooperation programme International Slovak Republic-Hungary", must not conflict with the Territorial Plan of the Nitra Region.	We consider that the Environmental Report is in line with Territorial Plan of the Nitra Region.
District office Lučenec Department of Environment	Requires compliance with universally binding legislation.	We fully agree with this observation and the environmental report stresses the importance of this in several places.
District Office of Veľký Krtíš, Department of State Atmosphere Protection	The proposed strategic objectives, which have an impact on quality, requires to implement in accordance with the universally binding legislation on the protection of consumers.	We fully agree with this observation and the environmental report stresses the importance of compliance with legislation in several places.

No comments or objections raised

Ministry of Economic Affairs of the Slovak Republic, Department of Bilateral Trade Cooperation

Ministry of Labour, Social Affairs and the Family of the Slovak Republic, Department of International Relations and European Affairs

Ministry of Health of the Slovak Republic, Office of the Secretary-General of the Service Office

District Office Košice-okolie, Department of Environment

District Office of Nitra, Department of Environment, Department of State Water Management And selected environmental components of the country

District Office Nové Zámky, Department of Environment

District Office Poltár, Department of Environment, Department of State Water Management

District Office Revúca, Department of Environment, Department of State Water Management

District office of Revúca, Department of Environment, Department of State Atmosphere protection

District Office of Rimavská Sobota, Department of Environment, Department of State Waste Management Administration

District Office of Rimavská Sobota, Department of Environment, Department of State Water Management

District office of Rožňava, Department of Environment, Department of State Atmosphere Protection

Municipality of Rožňava, Department of Environment, Department of State Water Management

District Office of Šaľa, Department of Environment, Department of State Waste Management

District Office Zlaté Moravce, Department of Environment

Office of the Trnava Autonomous Region, Department of Strategic Activities and projects