

JASPERS

Screening Note N-4

Date	21 st June 2024
JASPERS assignment code	2022 055 PL SCF HOR
Project title	Screening of a Project Pipeline in the Floods and Risk Management Sectors for the FEnKS Programme 2021-2027
Subject	Przebudowa Polderu Zelazna. Etap II. Zelazna Polder reconstruction and modernization. Stage II.
Country	Poland

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1. Introduction

JASPERS screening assignment is intended to provide upstream assistance in project development for a “to be identified” project pipeline covering potential investments in sectors related to water management and flood prevention, climate change adaptation, risk management and disaster resilience. These sectors fall within the scope of the Programme ‘European Funds for Infrastructure, Climate and Environment (FENIKS)’ and are fully in line with Policy Objective 2 (PO 2) of EU Regulation (EU) 2021/1058 on ERDF and CF for the 2021-2027 programming period.

The Ministry of Infrastructure provided the list of potential projects (Project Pipeline) foreseen for financing under FENIKS. The projects subject to screening have been jointly identified and agreed upon by the Ministry of Infrastructure/Polish Waters and JASPERS based on priorities set out by the national authorities.

The screening focuses on key quality elements of the project (technical, financial, economic, environmental and climate) with the aim of assisting the project promoter and relevant authorities in assessing maturity and identifying issues to be addressed before promoting the project for the EU grant funding under FENIKS.

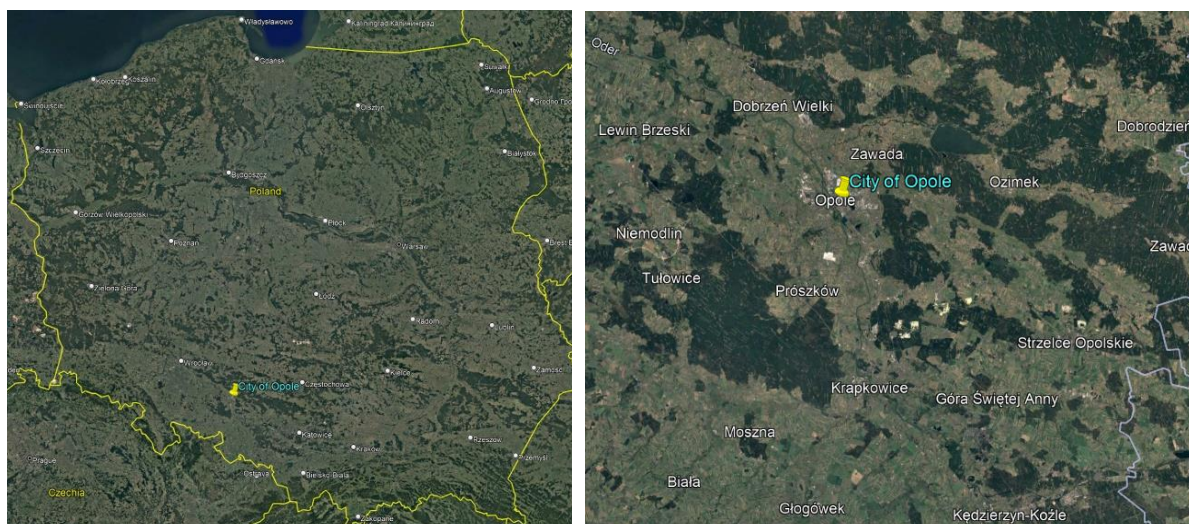
2. The Project

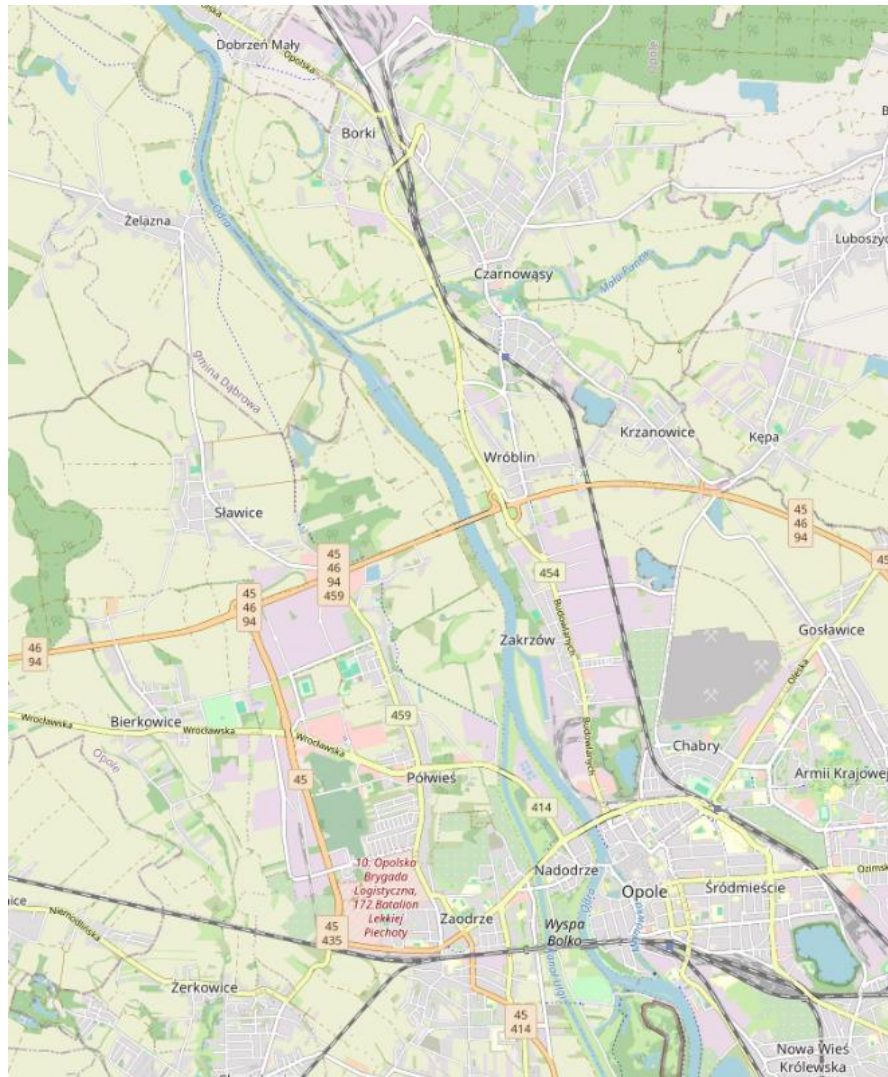
The project concerns the improvement of flood protection in the area to the North of the City of Opole, which is bisected by the River Odra. The project will enlarge the capacity of the existing dry polder (flood retention basin) “Zelazna polder”.

2.1 Project Location

The project is located immediately to the North of the City of Opole. Opole lies on the banks of the River Odra in southern Poland. It is the capital of Opole Voivodeship and the seat of Opole County.

Figure 1 Project Location - City of Opole



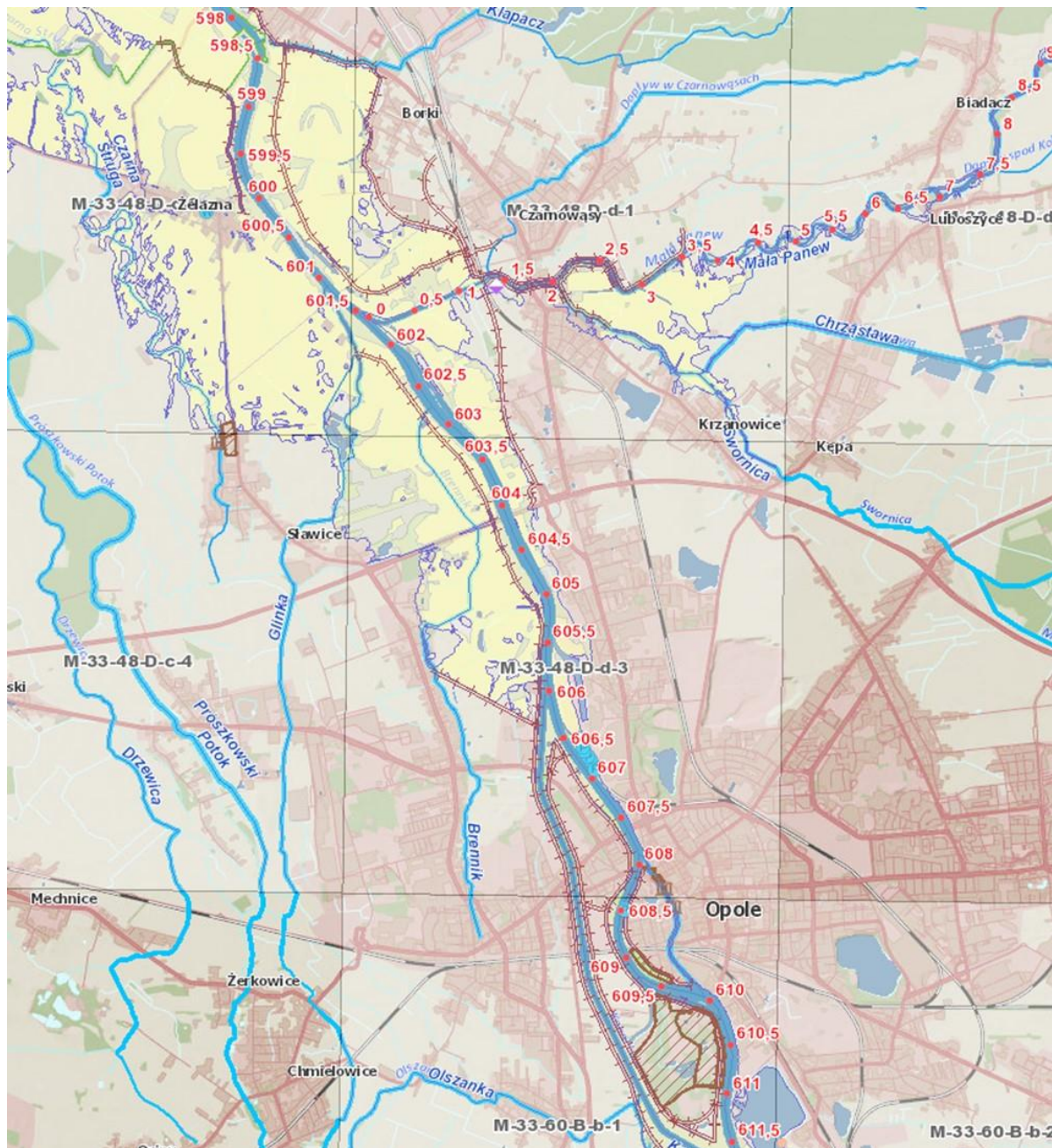


2.2 Existing Situation

More specifically the project concerns the flood risk from the River Odra in the Northern part of the city territory and in the Eastern part of the Dąbrowa municipality.

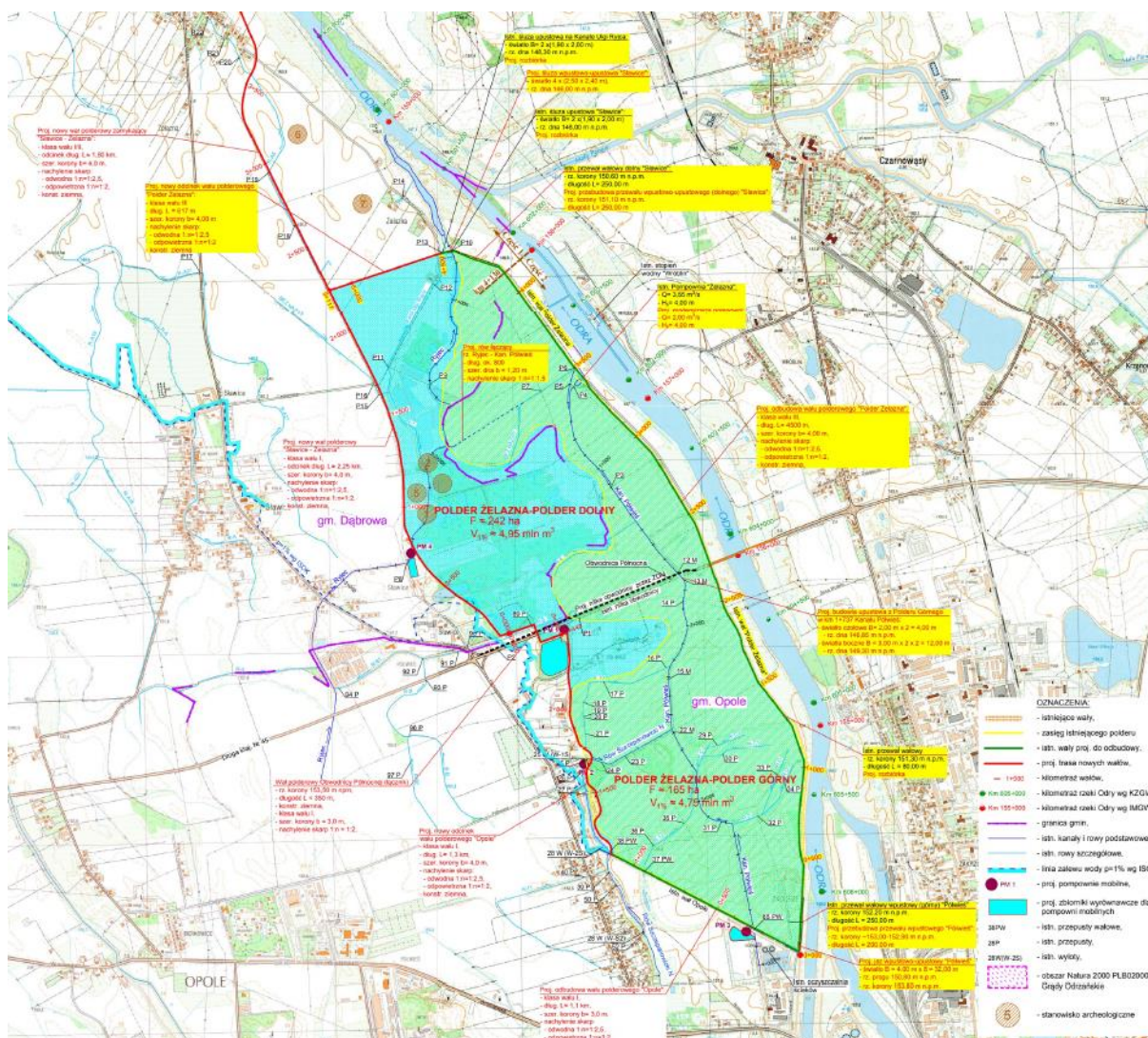
The area is subject to flood hazard and risk under a 1 in a 100-year event scenario.

Figure 2 Flood Hazard Map – Extract from Hydroportal: https://wody.isok.gov.pl/imap_kzgw/?gmap=gpmZP



Current flood prevention measures in the area include the Zelazna polder. The Zelazna polder was constructed in 1939 on the left bank of the River Odra (153,750 – 158,300 km). The existing polder (before Stage I implementation) had a surface area of about 180 hectares and a maximum retention volume of about 1.7 million m³.

Figure 3 Zelazna Polder – Existing Situation



On the southern side, the polder is bounded by an earth embankment of 1.20 km in length, running from ul. Nizinna to ul. Ceglana. Adjacent to the River Odra, the polder is bounded by earth embankments with a length of 4.50 km. On the western side, the polder is not limited by hydrotechnical structures. When large water flows occur, the water spreads uncontrollably leading to the areas to the West of the Polder being flooded.

The DK45 national road, called the northern bypass of Opolo, runs through the existing polder. It is located on a small earth embankment rising near the bridge over the Odra river. The road is often flooded.

2.3 Project Objectives

According to the documents provided, the proposed project, in line with the river basin management plan, intends to modernise and upgrade the existing dry polder (from volume 1.7 million m^3 to 9.7 million m^3 and from less than 200ha to 407ha for both stages) with the aim of providing improved flood protection for up to a 1 in a 100-year flood event ($Q_{1\%}$) with an additional safety margin of 1m height on the embankments. Moreover, the project will potentially have a positive impact on the Odra flood

wave management, but this requires detailed confirmation by the results of hydro-modelling. After implementation, ca 802 people within the city of Opole and municipality of Dąbrowa (village Żelazna) and the following assets/infrastructure will directly benefit from improved flood protection:

	Type	Number
Houses, green areas and infrastructure	Houses and farms	1,640
	Special Economic Zone	44
	National road 45	No data
	Green areas and farmland	No data

2.4 Project Measures

The whole project entails:

- Embankments to expand the off-line dry polder "Żelazna".
- Equipment to allow efficient operation and management of the polder: inlet and outlet structures and pumping facility.
- Additional and augmented embankments to the North of the polder to enhance flood protection in those areas.

The project is being implemented in stages (see below): Stage I was completed at the end of 2023 (financed from the Regional OP), Stage II is to be implemented in 2025-2027 under the FENIKS programme.

Stages	Żelazna Polder	Basic information
Stage I	Implementation period	2019-2023
	Scope	Construction works covered: <ul style="list-style-type: none"> • overflow structure, inlet/outlet structure, • reconstruction of the polder embankment "Polder Żelazna", • modernization of the "Żelazna" pumping station, • reconstruction of the "Opole" polder dike, • construction of the "Sławice-Żelazna" polder dike, • reconstruction of the "Żelazna" polder dike, • modernization of technical infrastructure. Retention volume has been increased to 3.8 million m ³ and the total length of dykes was increased to 11.7 km.
	Budget	PLN 124,94 mln
	Source of finance	Regional OP, City of Opole budget, national budget
Stage II	Implementation period	2025 - 2027
	Scope	Construction works will be a continuation of stage I and will cover: <ul style="list-style-type: none"> • reconstruction and modernization of the existing embankment from km 0+0000-4+130, • construction of the "Półwieś" inlet and outlet structure, • modernization of the upper inlet structure over embankment "Półwieś" • construction of the Upper Polder outlet structure,
	Cost	PLN 60,06 mln
	Source of finance	FENIKS, state budget

In more detail, Stage I was divided into two parts:

Part 1 included:

1. Polder embankment "Polder Żelazna" - km 4+130÷5+117 along with related objects:

A flood embankment with an earth structure and a total length of 987 m, including the length of the rebuilt section of 370 m and the length of the new section of 617 m. The embankment sealed with a vertical anti-filtration barrier (bentonite and cement), 35 cm wide. At the top of the embankment there is a 3.5 m wide communication route, at the foot of the embankment there are access roads to the fields. Additionally, the "Sławice" inlet-outlet embankment (lower), the "Sławice" inlet and outlet lock, the mouth section of the Ulgi Ryjca Canal with a length of 45.0 m, and embankment passages were constructed.

2. The "Opole" polder embankment with a total length of L = 2448 m, including related objects:

A flood embankment with an earth structure and a total length of 2448.00 m, including the length of the modernized embankment 1128.00 m, the length of the new embankment 1320.00 m. The embankment body sealed with a vertical anti-filtration barrier (bentonite-cement), 35 cm wide, h=6.0÷7.0 m. The crown is reinforced with a 2.5 m wide asphalt path with concrete curbs. On the water side, a 4 m wide maintenance strip, on the air side, a 3.5 m wide service road. Additionally, embankment culverts, embankment passages, mobile pump stations and fire pump stations were constructed.

3. The "Sławice-Żelazna" polder embankment (total length L = 4,382 m) along with a connector and related objects:

A flood embankment with an earth structure and a length of 4,382 m. The embankment body is sealed with a vertical anti-filtration barrier (bentonite and cement) 35 cm wide along the embankment axis to a depth of h = 4.00÷8.00 m. The crown is reinforced with an asphalt path. On the water side, a 4.5 m wide strip, on the air side, a 4.0 m wide service road. Additionally, embankment and road culverts, embankment passages, mobile pump stations, a fire pump station, and drainage ditches were constructed.

4. Closing polder embankment "Żelazna" (total length L = 3,254 m) along with related objects:

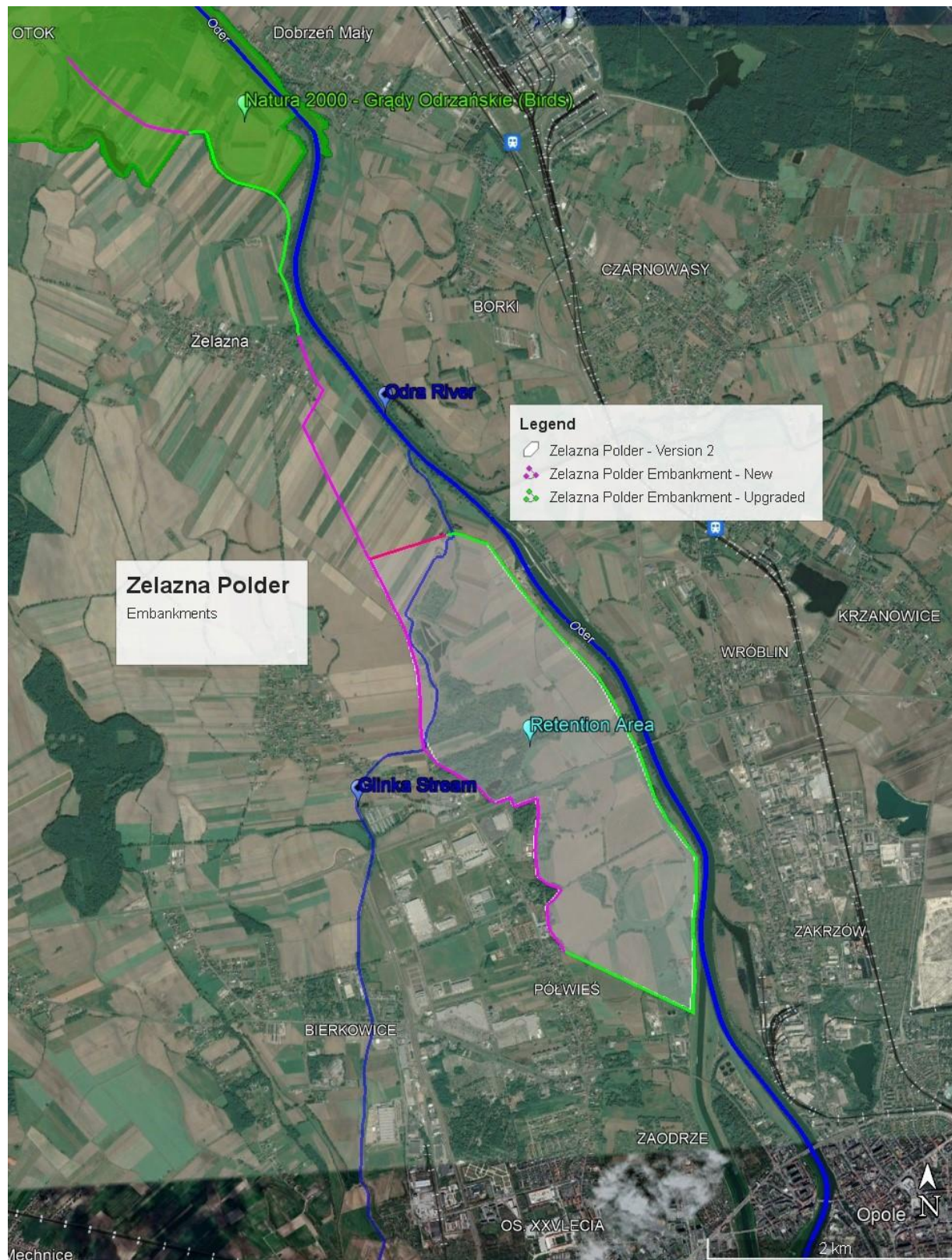
A flood embankment with an earth structure and a length of 3,254 m, including reconstruction (modernization) of the existing embankment, length L = 2,219 m, and a new section of the embankment - 1,035.00 m. The embankment body and are sealed with a vertical anti-filtration barrier (bentonite-cement), 35 cm wide along the axis. embankment to a depth of 3.0 and 5.0 m. On the crown of the embankment, a 3.5 m wide communication route. On the water and air sides, communication routes - access to fields, 4.5 m wide. Additionally, embankment crossings were made.

Part 2 included:

- dismantling the pumping station fittings (6 pump sets).
- primary tank
- inlet structure to the preliminary tank

- outlet structure and channel
- a new ditch (492 m) connecting the river. Ryjec with the Półwieś Canal
- existing ditch (300 m) connecting the river. Ryjec with the Półwieś Canal
- Półwieś Canal with a culvert at km 0+511
- renovation of the pumping station building, including pump fittings
- all external steel elements of the pumping station were protected against corrosion
- embankment culvert (with gate valve and flaps)
- land arrangements
- SCADA systems

Figure 4 Project Area and Proposed Measures



JASPERS Comments

Existing Situation

- General information has been provided (including a detailed inventory) on the existing flood protection infrastructure regarding its condition, functionality, land management, Natura 2000 borders and project effectiveness. However, the project description should be enlarged to ensure clear presentation of the situation before project implementation, phasing justification, information after implementation of Stage I and detailed description of Stage II.
- The project area is subject to flood events and their frequency and intensity/level have not been presented (e.g. 1997, 2000 events). Damages and impacts of flood events have not been assessed from the results of hydro-modelling in regard to local impact and impact of the polder for reduction/management of Odra flood wave downstream.

Project Location

The project concerns modernisation, reconstruction and expansion of an existing polder initiated before 1939. Polder location will stay unchanged however will expand by more than 200 ha. An analysis of options comparing the proposed expansion of this polder with other location/solutions for water retention upstream is not presented.

Project Objectives

Project objectives have been defined for the whole project however the following aspects require additional clarification:

- Reasons for project phasing.
- Objectives and impact of Stage II would need to be specified.
- The impact (if appropriate) of floods waves and high water on Odra River downstream is not considered under the project development scenario.
- Project justification requires using the results of the climate-change scenario and adequate cost-benefit analysis.
- Climate change impact should be considered while updating the Feasibility Study.

Project Measures

- The proposed approach and technologies to be employed can be considered standard.
- The documents submitted do not provide adequate and up-to-date information regarding the impact of the climate change on the levels of protection, protected areas, population and assets at risk. Though it should be noted that the embankments will be constructed with 1m safety margin towards a 100-year flood event (currently expected) which should provide sufficient climate proofing provision.
- Feasibility study should be updated.

3. Project Preparedness

3.1 Feasibility Study and Options Analysis

The feasibility study was prepared under the requirements of Regional Operational Program for Opolskie Region in 2017. The study covers the initial project scope and implementation before the phasing decision was made. JASPERS is of the understanding that the feasibility study for the project will be updated.

There is advanced and well-presented option analysis for the polder modernisation and upgrade supported by the analysis of available technology, although no broader options within the Odra river basin have been presented in the FS. All options involve the provision of Q 1% flood events distinguished by different dyke parameters and location. The study identified four options characterised by different location and length of the dykes (from 9 km to 15 km), different capacity of the dry polder (9.2 million m³ to 10.2 million m³) and costs. Options were selected considering environmental, social, economic, hydrological and geological criteria. There was no hydro-modelling performed for supporting selection criteria. Following that, the document defines a preferred option II that includes technical measures presented under section 2.4 of the report. Furthermore, the study is also presenting different technological options for Zelazna pumping station with final option selection by DGC methodology.

3.2 Project Costs

The beneficiary estimated investment costs at PLN 60,04 million for Stage II (response to JASPERS survey in January 2024). No detailed cost breakdown (for environmental actions, construction, infrastructure, equipment, machinery works, supervision and contingencies) was provided. There is no need of money allocation for expropriation which were made before Stage I of the project. Costs of Phase I amounted to PLN 124,94 million. Originally total costs of the project (both Stages) were estimated at PLN 111 million in 2017 (roughly 70% below current, January 2024, estimates).

3.3 Implementation Plan

JASPERS is of the understanding that the detailed preparation and implementation plan (including up-to-date hydro-modelling, FS, CBA) for the project Stage II has not been prepared yet.

3.4 Financial and Economic Analysis

The feasibility Study (2017) presents the outcomes of the financial and economic analysis of the project based on the data and assumptions available at that time. Identified and quantified economic benefits include fiscal corrections and shadow cost of labour, average avoided annual damages, increased value of land, net income of the construction companies implementing the project.

The analysis presented confirms financial sustainability of the beneficiary and economic viability of the project (ERR = 6.73% and B/C = 1.35).

JASPERS Comments

Options Analysis

The option analysis presented in the 2017 documents for available solutions to expand and rehabilitate Zelazna polder is considered sufficient. The engineering approach for assessing the optimal technical solution is presented in the FS. The CBA outcomes could be considered while assessing project's scope and impact. Nevertheless the analysis of the alternatives for additional water retention to meet the objectives as opposed to the proposed project has not been performed. The role and impact of Zelazna Polder within the Odra river basin would strengthen the case for its expansion in the current location.

The exclusion of any consideration of climate change impacts is considered unacceptable. It could potentially impact the assessment of a 1:100-year flood event, its magnitude and necessary measures. It may also influence the frequency of more intensive flood events that may in turn justify a higher degree of protection to be provided.

The FS should briefly examine the impact of selected option on downstream situation of flood wave passing if adequate. Cumulative impacts should be presented as well.

Project Costs

- With the final project documents costs of the Stage II must be updated according to the 2024 construction price level.
- Due to significant cost increase during the implementation of project Stage I the Stage II budget should include adequate contingences in relation to the construction cost escalation during the period of implementation.

Implementation Plan

Detailed implementation plan for the Stage II still needs to be developed and its feasibility within 2021-2027 MFF framework assessed.

Financial and Economic Analysis

- The CBA needs to be updated and aligned with the current costs estimates and implementation plan.
- Clear and verifiable assumptions should be presented for the economic benefits identification and quantification, ideally supported by the outcomes of the hydraulic modelling or equivalent e.g. it is unclear how the area impacted (protected after the project has been finalised) was defined or flood damages quantified. Some of the benefits or the outcomes of the calculations might also be methodologically questioned e.g. shadow cost of labour, increased value of land, net income of the construction companies implementing the project.
- Updated project's financing sources should be presented.
- Financial sustainability analysis needs to be updated and adequate resources for assets management and maintenance need to be secured.

4. Environment and Climate

4.1 Environmental Impact Assessment

The implementation of the project was split into two financial phases. The current application concerns Stage II.

The project falls under the scope of Annex II of the Revised EIA Directive:

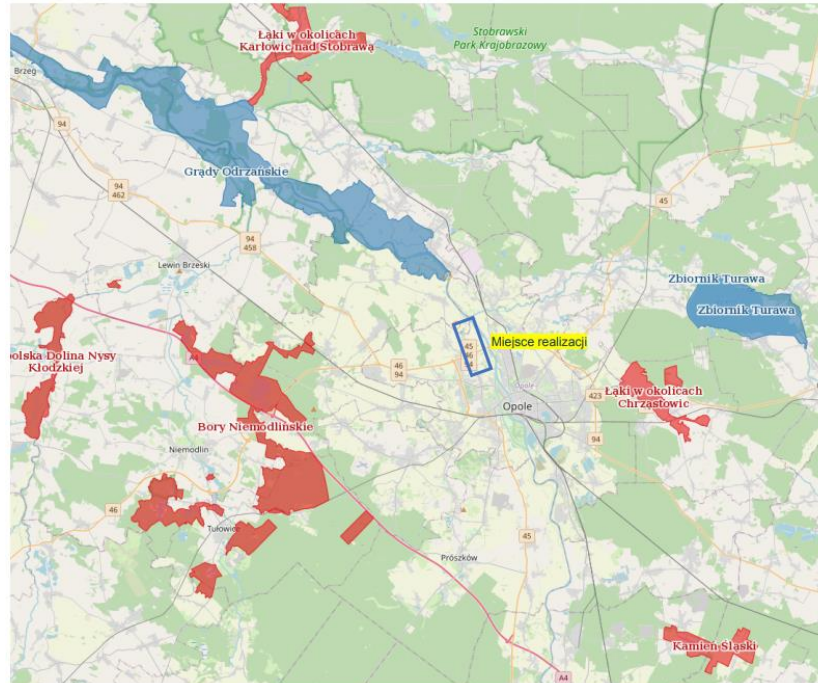
- point 10(f) for the new flood protection structures;
- 10(f), read in conjunction with point 13a for the rehabilitation/reconstruction of the existing flood protection structures.

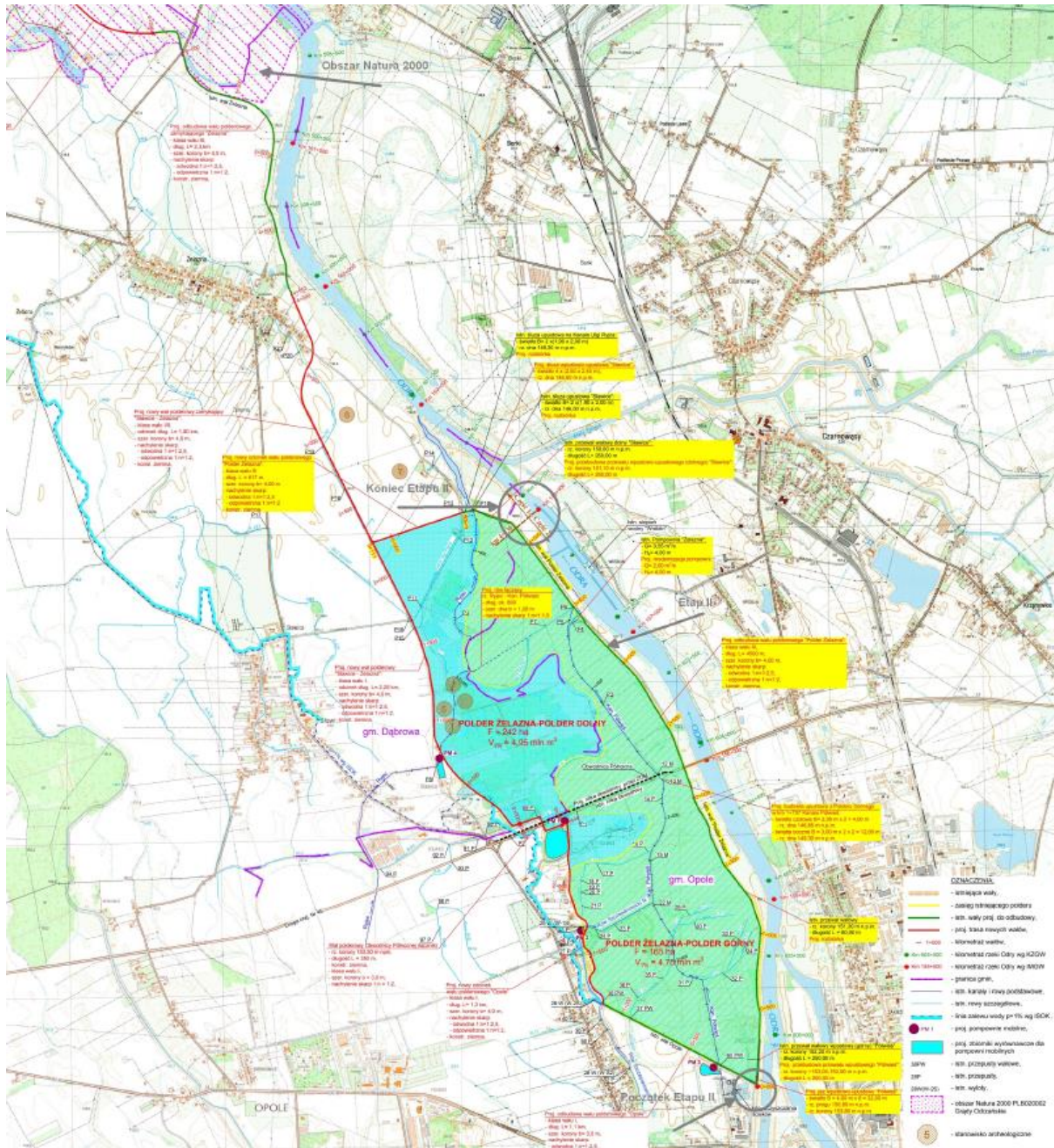
The entire project was made subject to an EIA screening procedure initiated on 19 November 2015 and completed with Decision on the Environmental Conditions (DEC) with ref. No. WOOS.4233.7.2015.IM.15 issued by RDOS Opole on 26 March 2016.

The review of the documents shows that the EIA screening procedure is consistent with the provisions of the Revised EIA Directive. The Beneficiary is only advised to provide evidence that the DEC is available to public.

4.2 Appropriate Assessment

The Stage II of the project will be implemented outside Natura 2000 Network. According to the Natura 2000 Declaration of 06 February 2024 issued by RDOS Opole (ref. No. WPN.6335.19.2024.AK), the closest Natura 2000 site SPA PLB020002 Grady Odrzańskie is at a distance of 3 km.





In line with Polish national legislation, the AA screening was integrated into the EIA screening procedure presented above.

The DEC together with the Natura 2000 Declaration provide sufficient justification for the lack of impacts.

The AA screening was carried in the absence of compliant SSCOs. However, due to the characteristics and the location of the works in Stage II, it could be assumed that even if the AA screening is carried out in view of compliant SSCOs the conclusion will remain valid.

4.3 Water Framework Directive

This aspect of the screening entails consideration of compliance with the Water Framework Directive (2000/60/EC, WFD). In particular the screening needs to consider:

- The water bodies which may be subject to impacts as a result of the project;
- The current and prospective status of the water bodies without the project;
- The prospective status of the water bodies with the project and a comparison with the prospective state under the without project scenario.

Where physical modifications are to be made to the water bodies, consideration must be given to the provisions of Article 4.7 of the WFD, in particular whether the impact of the project on the hydro-morphological conditions in the water body are consistent with (and will remain so) the achievement of the environmental objectives of the WFD (Article 4.1 – including good status and no deterioration).

The screening must also consider the project in relation to the River Basin Management Plan(s) for the Basin(s) in which the project is located.

The proposed project needs to be subject to impact assessment in accordance with the requirements of Article 4.7 of the Water Framework Directive. The Guidance in respect of such assessments should be adhered to:

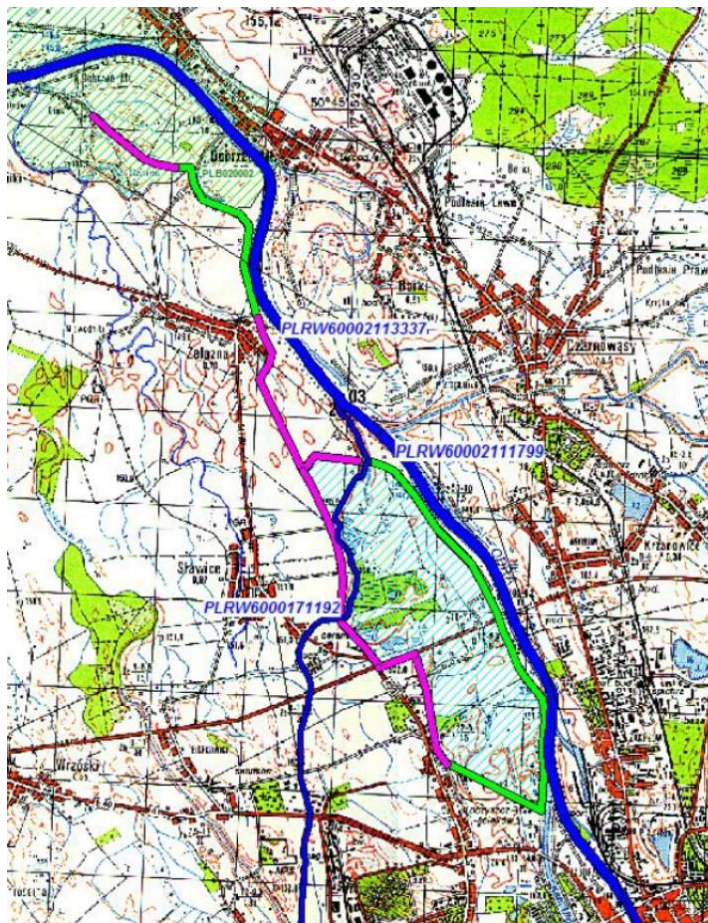
- [CIS Guidance Article 4 7 FINAL.PDF \(europa.eu\)](#)
- jaspers.eib.org/knowledge/publications/water-framework-directive-jaspers-checklist-tool

An assessment of the potential impact of the current project is presented in the document “2015.04 Assessment of the impact of the Reconstruction of the Želazna Polder on water bodies.pdf”

The assessment identifies three surface water bodies and one groundwater body that could be potentially affected by the project.

4.3.1 Water Body Identification

Figure 5 Surface Water Bodies - Figure 1 of the assessment



The three surface water bodies are:

- PLRW6000211799 Odra from Osobłogi to Małej Panwi (33 km)
- PLRW60002113337 Odra from Małej Panwi to the border of Wrocław (93km)
- PLRW6000171192 Glinka (11 km)

The first two water bodies are both elements of a very large lowland river (the Odra) which has a very large catchment. Both have been identified under Article 4 of the WFD as “heavily modified” and hence are subject to objectives defined in terms of ecological potential.

The Glinka is small lowland sandy stream and has a very limited catchment. It is a left bank tributary of the Oder, feeding into the River at the junction of the other two water bodies. The Glinka has not been designated as heavily modified.

The assessment also identifies one groundwater body PLGW6000116 that could potentially be affected¹.

4.3.2 Current Water Body Status

Section 5 of the assessment presents the status of surface water bodies. The status of each key element and the overall status as reported there is reproduced below.

Table 4-1 Reported Status of Surface Water Bodies

Name	<u>Odra from Osobłogi to Matej Panwi</u>	Odra from Matej Panwi to the border of Wrocław	Glinka
Code	PLRW60002111799	PLRW60002113337	PLRW60001711192
Biological	IV	II	
Physico-chemical	II	II	II
Hydromorphological	II	I	
Ecological Potential	Poor	Good	Moderate
Chemical Status	Good	PSD	Good
Overall Status	Bad	Bad	Bad

The assessment also reports the status of the groundwater body (PLGW6000116):

- Quantitative Status: Good
- Chemical Status: Good
- Groundwater Status: Good

4.3.3 Potential impacts arising from the project

The assessment considers the potential impacts of the project on the achievement of the environmental objectives established for each of four water bodies and the difference in the impacts arising from the different variants considered.

The assessment concludes that the impacts are similar in all variants and that they are not significant for any quality element for any water body.

4.4 Costs for the implementation of the proposed prevention and mitigation measures

Not applicable as no prevention and mitigation measures have been prescribed by RDOS Opole.

¹ GIS Data provided by the EEA (2016) does not correlate perfectly. The EEA data indicate a similar (but not identical) groundwater body with reference PLGW6000127. This apparent discrepancy is highly unlikely to affect the outcome of the assessment.

4.5 Development consent

Project received construction permit for the whole scope in 2017 together with water permit (2016) and environmental decision (2016). All decisions remain valid for Stage II of the project and from administrative perspective project is ready for implementation.

4.6 Appeals

JASPERS is not aware of the appeals to the decisions obtained so far.

4.7 Climate Proofing

The submitted documents do not include a climate proofing document.

4.8 Compliance with the DNSH principle

JASPERS is of the understanding that in line with the Do No Significant Harm (DNSH) assessment carried out for FEnIKS Programme 2021-2027 each project should demonstrate that the principle is met through an EIA, AA, assessment for compliance with the WFD and climate proofing.

As the climate proofing has not been completed yet the DNSH principle cannot be considered met for the climate change mitigation and climate change adaptation objectives.

JASPERS Comments

- **EIA/AA/climate proofing and compliance with the DNSH principle**

The EIA and AA screening for the project have been completed and are seen as compliant with the Revised EIA and the Habitats Directives.

The climate proofing of the project is still pending.

- **Water Framework Directive**

Assessments to determine compliance with the requirements of the Water Framework Directive have been undertaken and the conclusions reached (no significant impact) are entirely credible given the nature of the works.

However, it is of note that the assessment was made in 2015. The data used in the assessment, notably the values for current status, will in many cases have been updated since that time. It would be helpful if such updated information could be included in the project documentation.

5. JASPERS Recommendations and Conclusions

5.1 Recommendations

- **Project objectives, measures proposed and budget**

JASPERS recommends that updated hydro-modelling is performed in order to support adequate options analysis and optimal project definition, scoping and costing to be performed.

The feasibility Study and the CBA supporting the project preparation and implementation should also be updated.

• Environment and Climate

Please make sure that the application package is supported with the all the required documents for the approval of the EU co-financing, including:

- a climate proofing document
- evidence that the DEC is available to the public.

In line with Article 9 and Article 73(2) of the Common Provisions Regulation ((EU)2021/1060), JASPERS strongly recommends that the following aspects are verified and confirmed before the approval of the project for EU co-financing:

- Consider adequately all relevant environmental and climate change criteria when selecting the option for implementation. The Options Analysis should provide evidence to that end.
- Demonstrate that the project is implemented as a result of a compliant FRMP and RBMP and that the prevention and mitigation measures envisaged in the SEAs for these plans are fully taken into account in the project.

In line with Article 9(4) and Article 73(2)(j) of the Common Provisions Regulation, the application package should be supported by a **climate proofing document** that covers both pillars: climate change mitigation and climate change adaptation. The climate proofing document should demonstrate that the project is consistent with the energy efficiency first principle and the decarbonisation pathways and that it is resilient to climate change risks during its lifetime. The climate proofing document for the project is completed and is of sufficient quality in line with the available [Commission Notice — Technical guidance on the climate proofing of infrastructure in the period 2021-2027 - Publications Office of the EU \(europa.eu\)](#) and JASPERS Guidance: [Climate proofing of flood and disaster risk management projects \(eib.org\)](#). JASPERS has also supported the Polish authorities for the development of a national Climate Proofing Guidance: [Poradnik weryfikacji inwestycji pod względem wpływu na klimat i adaptacji do zmian klimatu w okresie programowania UE 2021-2027 - Ministerstwo Klimatu i Środowiska - Portal Gov.pl \(www.gov.pl\)](#).

In line with Article 9(4) of the above Regulation, the application package should also demonstrate compliance with the **DNSH principle** for all six environmental objectives. Please note that this means that the project is as a minimum compliant with the EU environmental legislation. The project should demonstrate consistency with the DNSH assessment for FEnIKS. Here it should be borne in mind that projects requiring the application of compensation measures for significant adverse impacts may not be seen as DNSH-aligned. Compliance with the DNSH principle should be demonstrated with:

- For the climate change mitigation and climate change adaptation environmental objectives: a good quality climate proofing document that meets are relevant criteria.
- Water environmental objective: whilst noting the comments elsewhere in the note, it is important to demonstrate compliance with the WFD. As noted above deterioration of ecological status of water bodies or preventing water bodies to reach good ecological status is inconsistent with the DNSH assessment for FEnIKS Programme – explanation / evidence that this will not occur needs to be included in the documentation.
- Circular economy: the project should comply with the circular economy principle, e.g., construction waste should be managed in line with provisions of the Waste Framework Directive.

- Pollution prevention and control: may not be relevant to floods projects in line with the DNSH assessment for FEnKS.
- Nature protection environmental objective: all impacts on nature protection areas are appropriately assessed and all prevention and mitigation measures are in place.

The adaptation measures identified with the climate proofing together with their respective costs should be integrated into the project as proposed for EU co-financing.

• **Water Framework Directive**

The water bodies likely to be impacted by the project have been correctly identified, although it would appear that changes may have been made in the delineation and / or referencing of the water bodies.

The potential impacts of the project have been assessed in respect of the relevant water bodies. In each case all the relevant quality elements have been considered.

As such the assessment has been carried out in line with the JASPERS methodology for Article 4.7 of the WFD.

Given the nature of the project works (solely in riparian zones) the conclusions of the assessments (no significant impact) are entirely reasonable and are not in doubt. However, as with all construction works, the potential for temporary impacts in the course of works implementation is recognised. Appropriate measures need to be taken to minimise these temporary impacts, noting in particular that the timing of temporary impacts can lead to complications in the WFD assessment if a water body appears on the basis of scheduled monitoring results to have deteriorated between two RBMP periods.

No further assessment is required. However, it may be helpful (for the sake of completeness and coherence with the methodology cited above) to update the base data (water body delineation, water body status) to be in accordance with the most recent river basin management plan.

5.2 Conclusions

• **Project objectives and measures proposed**

Project measures proposed, given the information provided, are considered adequate although the analysis need to be updated and supported by the outcomes of the hydraulic modelling to confirm its objectives, scope, location, costing, and outcomes. These should also take into account the outcomes of the updated CBA as well as potential climate proofing implications.

Project's technical feasibility and economic viability could only be ultimately confirmed once the updated Feasibility Study and the CBA has been made available.

• **Environment and Climate**

The completion of the climate proofing exercise is a necessary condition for the approval of the project for EU co-financing.

• **Water Framework Directive**

The current project documentation concludes that there are unlikely to be significant impacts on the relevant water bodies as a result of the project. This conclusion is entirely credible and no further assessment is required.

In case the project seeks lending from a financial institution, it should also meet the requirements of the EU Taxonomy Regulation and the respective Delegated Act:

- General criteria under Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088 (the so called Taxonomy Regulation): eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32020R0852&qid=1712208806942
- The specific criteria for substantial contribution to the climate change adaptation objective and DNSH under Annex II, point 14.2 of Commission Delegated Regulation (EU) 2021/2139 of 4 June 2021 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to climate change mitigation or climate change adaptation and for determining whether that economic activity causes no significant harm to any of the other environmental objectives, as amended: [CL2021R2139EN0020010.0001_cp 1..1 \(europa.eu\)](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021R2139&qid=1712208806942)

6. Sources for screening

6.1 Meetings

One dedicated meeting was held in a hybrid format with project promoters and national authorities on January 18, 2024.

6.2 Documents submitted

The main project related documents submitted to JASPERS include:

- JASPERS checklist for screening of flood protection projects proposed for FEnKS.
- Relevant documents provided by Project Implementation Unit during the period of November 2023 – February 2024.
- Associated maps.
- Beneficiary's comments to SN Draft issued in early May 2024