



*Ministero dell'Ambiente
e della Tutela del Territorio e del Mare*

DIREZIONE GENERALE PER IL CLIMA, L'ENERGIA E L'ARIA

Il Direttore Generale

Alla Direzione generale per la crescita sostenibile
e la qualità dello sviluppo
SEDE

Oggetto: Procedura di VAS del Programma Interreg Alpine Space - comunicazione di avvio della fase di consultazione pubblica.

In merito alla richiesta di contributi da parte di codesta Direzione Generale per la consultazione in oggetto (Prot. n. 108538 del 23/12/2020) si rappresenta quanto segue.

With regards to the “Environmental report of Strategic Environmental Assessment (SEA) for the Alpine space programme 2021+” reference to the European Air Quality directives currently contained in point c of paragraph (2) should be completed by Directives 2004/107/CE and 2015/1480/EC.

Moreover par. 3 with description of the “state of Environment, Environmental Trends and Key Environmental objectives” should be completed with regards to point c “Climate/Air” in particular to the sector “Air” adding more information about air quality level of all pollutant regulated by AQ Directives (including for instance pah and benzo(a)pyren) and not only for the four pollutant with emission ceilings; it should also be considered role of biomass combustion as source of air pollution.

The last but not the least separate the treatment of the specific objective “climate/Air” in two: “climate” and “Air” to have a more exhaustive evaluation of the Strategy under discussion.

Referring to climate change, it is suggested to take into account the National Adaptation Strategy (Strategia Nazionale di Adattamento ai Cambiamenti Climatici) adopted in June 2015 by a Directorial Decree, which analyzes the state of scientific knowledge on impacts and vulnerability to climate change for the major socio-economic and natural sectors, included mountain areas.

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