

CIRF input to Call for evidence Guidance on the application of the ‘do no significant harm’ principle

March 2026

CIRF (Italian Center for River Restoration) welcomes the opportunity to contribute to the call for evidence for a guidance on the application of the ‘do no significant harm’ (DNSH) principle under the 2028-2034 Multiannual Financial Framework (MFF).

CIRF conducted a survey on the application of the DNSH principle in flood risk mitigation interventions funded by the PNRR (Piano Nazionale di Ripresa e Resilienza), the Italian implementation of the NextGenerationEU programme. Following the findings of this survey, we strongly support the inclusion of the DNSH principle in the new MFF. However, its concrete implementation requires significant improvements compared to its current application.

For flood risk mitigation interventions, the European taxonomy requires, in relation to the protection of water resources, a thorough assessment of all potential impacts on the state of water bodies within the same river basin and on protected habitats and species that directly depend on water.

Our analysis (attached, in Italian) highlighted how the application of the DNSH principle to this type of interventions, in Italy, was merely formal and indicate that many of the implemented measures have likely caused significant damage to river ecosystems and might even have locally compromised the achievement of the objectives of the Water Framework Directive.

In our opinion, this inadequate assessment can be directly traced back to:

- a merely formal interpretation of the DNSH principle, the application of which was seen as yet another bureaucratic requirement, not reflected in any concrete change of approach in river management;
- the inadequacy of the checklists, none of which is specifically dedicated to flood risk mitigation measures and water resources use (e.g. the very critical category of building new reservoirs) Therefore, all projects adopted checklist no. 5, "General construction and building site interventions not related to the construction/renovation of buildings," which makes no reference to the complexity of the issues and regulatory objectives related to water bodies, particularly the objective of achieving good ecological status as set out in the WFD.

Venezia, 1st april 2026