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D5 – DNSH trainings

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DO NO SIGNIFICANT HARM (DNSH) GUIDELINES FOR IMPLEMENT-
ING THE GREEN TRANSITION IN FINLAND

15.12.2023

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1 Introduction

1.1 Developing DNSH guidelines in Finland

This project, funded by the Technical Support Instrument (TSI) of the European Commission, provides guidance to Finnish public authorities on the implementation of the "Do No Significant Harm" (DNSH) principle in public funding decisions, and to funding applicants on how to follow the principle. The project will contribute to the implementation of the European Green Deal by providing the Commission, the EU Member States, as well as the wider community of DNSH practitioners, lessons learned from a variety of pilot cases and clear guidelines.

Specific expected impacts of the project are the following:

- Finnish public sector authorities have a good comprehension of the orientation of public funds towards climate and environmental objectives and understanding of the DNSH principle (at which points environmental harm becomes significant) and have clear guidelines, materials, and efficient data and monitoring systems. Long term impacts are visible in, e.g., clear progress towards reaching national climate and energy targets.

- There is an increased capacity to integrate the DNSH principle into relevant funding/public sector organisations in Finland. This requires clear guidelines, and successful training sessions organised with relevant participants who then have the capabilities to take the knowledge ahead in building the capacities further. Long-term impact is achieved when funding organizations can integrate the DNSH principle into their funding procedures and processes when appropriate.

- The project will contribute to the implementation of the European Green Deal. It is required that the results produced within the context of the project are useful for other EU Member States, good practices and lessons learned are shared, and there are clear follow-up plans to take ahead the results. The long-term impact will be shaped by the progress made by the EU Member States in taking forward the guidelines and the lessons learned.

The project started in July 2022, and it will continue until April 2024. The detailed work plan is described in the Inception Report (D1), which was accepted in October 2022. The work is structured around eight deliverables (D1 – D8) divided over three Work Packages.

The main direct Finnish beneficiaries are the Ministry of the Environment, together with the Ministry of Agriculture and Forestry, the Ministry of Economic Affairs and Employment, and the Ministry of Finance. In addition, the indirect beneficiaries include state agencies and regional authorities.

1.2 Objectives and structure of the report

This report highlights the work completed in D5 – trainings. It will first go through the objectives and methodology of the trainings and webinars organised. Chapters 3-7 will showcase the outlines of the webinars and each of the training sessions, as well elaborates the main training analytics and learnings from each session. Each chapter covers one training track (Chapter 3: Basics webinar and priority law webinars, Chapter 4: Programme level training, Chapter 5: Project level training, Chapter 6: Applicant webinar, and Chapter 7: Clinics as a separate entity) The training materials are explained and listed in Chapter 8.

Chapter 9 goes through the needs to clarify DNSH guidelines created in D3 that were identified in the trainings. This will help any party to organise similar type of trainings after the closure of this TSI project. In the final chapter we will go through needs for further trainings.

Annex 1 of the report includes all the training materials provided during the training series. This includes mostly PowerPoint (PPT) slides in Finnish including also parts of the DNSH assessment templates created in D3, but now translated into Finnish. The training material in Annex 1 is slightly updated based on the comments received from Ministry of Environment. A separate feedback meeting was organised after the trainings and also written detailed comments are incorporated.

2   Overview of the DNSH training

Figure 1 provides an overview of the structure of the trainings. Trainings consisted of 1) webinars and hybrid seminars which were open to all and of 2) a series of training modules targeted to public authorities. Different trainings were organised between December 2022 (starting with the priority law information sharing seminar) and September 2023 (training modules). Figure 2 provides an overview of the number of attendees for each training, seminar and webinar.
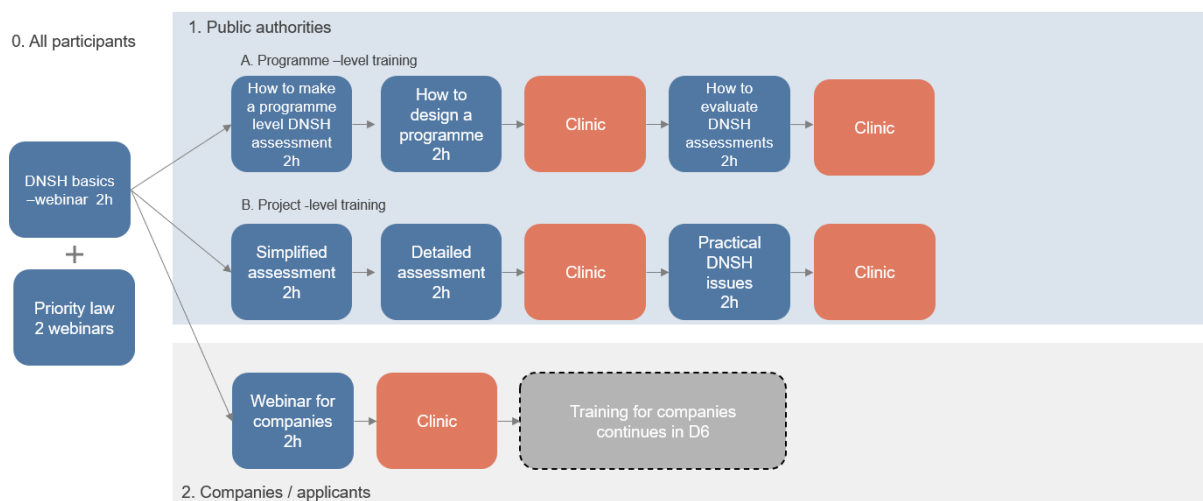

Figure 1: DNSH training structure

Over the course of the TSI project, various open participatory seminars and webinars were organized. The webinars focused on sharing general information on DNSH and served the purpose of awareness creation. The "DNSH basics" webinar is intended to be usable also in the future for general information sharing. The target group for the DNSH basics webinar were all interested parties for who DNSH assessments are or may be relevant. The Finnish priority law preparation and start of the implementation phase created a need for specific information sharing. The project team prepared materials for these seminars and webinars covering the parts of the priority law related to DNSH. Content, target groups, and created awareness materials of different seminars and webinars are described in detail in Chapters 3 and 6.

The dedicated DNSH training was developed based on the two sets of DNSH guidelines developed in D3 (Programme level and Project level guidelines). The purpose of the training sessions was to provide information about the application of the DNSH principle and help public authorities and companies (i.e. funding applicants) prepare for considering DNSH in public funding decisions or when applying for funding.

The DNSH trainings for public authorities consisted of **two separate tracks** (A and B), one for programme level DNSH trainings, and one for project level DNSH training. All participants were expected to participate in the DNSH basics webinar before participating in the rest of the modules. All individual training sessions took 2 hours. Both training tracks included pre-assignments, three training sessions and a clinic session for more hands-on support. The trainings were conducted in Finnish[1] and the interactive Howspace platform was used to implement the trainings. The training outline and prepared materials allow for the trainings to be repeated later for more people if needed.

The applicant track included only one training session and one clinic.

- The primary target group for the programme level DNSH training were those persons working with public funding programmes who are responsible for the programme design.

- The primary target audience for the project level DNSH training were public authorities working with applicants and having responsibilities for conducting or evaluating or DNSH assessments at project level.

- The target group for the webinar for project proponents were those companies who need to take DNSH into account in funding applications.

The identification of target groups for training and their needs started in January 2023 when a preliminary questionnaire of training needs was sent out to 33 public funding organisations that were identified in D3 and have been working with DNSH as a part of RRF or the Cohesion Policy Funds. There were 18 answers from both central and regional governments. Already in the survey the biggest need was identified in the project level trainings and EU funding instruments. The invitation to register for the trainings was forwarded to those organisations that had expressed interest in trainings with the task to forward the invitation to relevant colleagues within their organisation. The aim was to organise the trainings following the train-the-trainer's

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[1] Training team was prepared to have discussions in the training events also in Swedish.

model, hence only 1-5 participants per funding organisation were expected to participate in the trainings.

After the programme and project level trainings were carried out, a training feedback survey was sent out to all participants. Most feedback focused on the project level questions, while significantly less feedback was given at programme level. Therefore, caution should be given to the interpretation of the analytics presented in Chapter 4 and 5 as some of the response rates are rather low. The original feedback survey was sent out in Finnish and translated in English for the purpose of this report.

DNSH basics webinar

Registered: **316**
Participated live: **270**
On top of this, the recording is freely available

Applicant webinar

Registered: **10**
Participated: **4**
No registered participants to separate clinic

Programme level training, registered 22

Training 1 participants: **19**
Training 2 participants: **14**
Training 3 participants: **15**
For each clinic 5-10 participants

Project level training, registered 57

Training 1 participants : **48**
Training 2 participants : **41**
Training 3 participants : **32**
For each clinic, 10-20 participants

Priority law webinars in December 2022 and January 2023 : Approximately 300 attendees in each session

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Figure 2: Overview of the number of participants in different trainings

3 Webinars

3.1 Priority law seminars and webinars

DNSH in Finland project team worked in autumn 2022 with developing DNSH related guidelines for Finnish priority treatment law which gives a priority status in environmental permitting for some green transition projects. The temporary law came into force on 1.1.2023. Details of the law and the developed DNSH guidelines can be found in the D3 report.

An open hearing and information sharing hybrid seminar was organised on 12.12.2022[2]. The seminar was organised by the Ministry of Environment and there was also a possibility to attend on-line. A tentative draft of the priority law implementation instructions was presented, and feedback was collected during the seminar, online, as well as afterwards for finalizing the

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[2] All the documentation related to the preparation of the priority law including also the programme and presentations of the seminar organised on 12.12.2022 can be found from https://ym.fi/en/project?tunnus=YM040:00/2022

instructions. The seminar was open for participation, and during the seminar there were online nearly 300 participants in addition to those around 50 people on-site.

In January 2023 trainings were organised for Finnish environmental administration of the priority treatment practicalities (in Finnish). Environmental administration training services (*ympäristöhallinnon koulutus*) had the main responsibility to organise the trainings and they were marketed through their training activities. Two 3-hour online training sessions were provided with the same content (18.1. and 25.1.2023). The DNSH in Finland project team supported the planning of the training together with Ministry of Environment and Regional State Administartive Agency (AVI). The main target group for the trainings were AVI personnel and the training included DNSH parts as well Q&A sessions. The discussion and questions were used to finalise the instructions that were published on 31.1.2023[3].

3.2 DNSH basics webinar

The DNSH basics webinar was held on 14.6.2023 and it was marketed widely through the private channels of different government intranets and Gaia Consulting's social media channels. The webinar was open for all participants – both applicants and funding authorities. In the end most of the participants were government officials. Table 1 includes the outline and content of the webinar.

The webinar was recorded, and this caused the session to be more of a traditional webinar without participant interaction, apart from the chat function where participants could ask questions. The recorded webinar was accessed from Ministry of Environment's Green Transition web site during fall 2023. Webinar was freely available for any interested parties.

Table 1: DNSH basics -webinar.

DNSH basics -webinar, 2h			
Objectives: After the training the participants:			
1. have received basic information about DNSH principle, it's role as part of taxonomy and how the DNSH principle can be used separately from the Taxonomy**.**			
2. have received basic information on where and how DNSH principle has so far been implemented in public funding in Finland.			
3. have received preliminary information on the guidelines created in the DNSH in Finland -project to be able to participate further trainings focusing on the guidelines.			
- Will have received answers to questions they have about the principle			
Section	**Section name**	**Section goals**	**Section description**
Section 1 10 min	Welcoming words	Set the stage and importance of DNSH	- The session is opened by the representative of the European Commission (Iakovos Dimitriou)

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[3]   https://avi.fi/asioi/yritys-tai-yhteiso/luvat-ilmoitukset-ja-hakemukset/vesi-ja-ymparisto/vihrea-siirtyma-2023-2026

			- Introduction to the DNSH in Finland project is provided
Section 2 40 min	Introduction to DNSH principle	To provide basic information on DNSH principle and its status in Finland	- The session includes introductory-level presentation on the DNSH principle, how and why and where is it implemented and details on the six environmental criteria. - Pre-sent questions are answered by Ministry of Environment and the project team in a Q&A segment. Further questions can be sent out via chat and those will be answered as well.
Section 3 40 min	Guidelines to implement DNSH principle in public funding	To provide preliminary information on the guidelines created in the project for the participants to be able to participate in further trainings	- The session includes introductory-level presentation on the created DNSH guidelines and how they differ from the current EU funding instrument specific guidelines and what is the main goal of the guidelines. - The structure of the guidelines is briefly introduced. - Both pre-sent and live questions are answered in a Q&A segment.
Section 4 15 min	Next steps and ending of the webinar	To introduce the in-depth trainings series to be organised later and provide closing remarks from the Finnish Government.	- The further training programme is introduced and registration for that will be opened. - Ministry for the Environment will provide an ending statement to highlight next steps in DNSH implementation.

4 Programme level DNSH training track (A)

The programme level DNSH training series were aimed at government officials working either in national line ministries or other funding authorities who design funding programs. The aim of the training package was to help participants make a full DNSH programme evaluation and to design a programme call with DNSH assessment requirements in mind. The series consisted of three two-hour long training sessions that were done virtually in Howspace and MS Teams. On top of the three training sessions, two one-hour follow-up clinics were hosted to cover additional questions participants had. In the end, the participants will receive a certificate of participation.

4.1 Training session A1: How to integrate DNSH in programme design

Introduction: Based on the *programme level DNSH guidelines* designed as part of this project (D3 Annex 1), the purpose of the training was to ensure that those participants dealing with programme design can consider DNSH in the process of programme design and be prepared to carry out a programme level DNSH assessment.

Pre-assignment: Before the training, a Howspace assignment was sent out to each participant asking them to identify a sample programme and responsible units to engage in DNSH integration in programme design from their own organisation. Participants also needed to be familiar with the programme level guidelines document and have seen the DNSH basic webinar.

The training session A1 consisted of three sections:

- Section 1: Introduces the programme design and why the DNSH principle is relevant in its context.

- Section 2: Introduces an individual assignment on filling the programme design table. The working session includes Howspace -live room for individual support.

- Section 3: Wraps up the key content and opens a discussion and questions based on reflection of the individual assignment in Section 2

Table 2: Training session A1: How to integrate DNSH in programme design.

Programme level DNSH training			
Training session A1: How to integrate DNSH in programme design 2h			
Objectives: After the training the participants:			
- should be able to take DNSH into account in the process of programme design; - should be able to consider programme level DNSH assessment in the programme design of their own organization. - are able to identify relevant parties in their own organisations to include in the DNSH related decision making			
Section	**Section name**	**Section goals**	**Section description**
Section 1 20 min	Introduction to programme design.	Why DNSH should be considered in programme design? Reasons to apply DNSH principle in programme design?	- The part one includes a brief introduction to the programme design and DNSH integration, as well as group discussion with facilitators.
Section 2 60 min	Individual assignment on DNSH integration and filling out programme design table	How to integrate DNSH principle in programme design?	- The part two allows individual work on chosen programmes and filling of programme design table. - The working session includes a brief introduction through a sample

			programme design template and is continued by participants filling out the templates themselves.
Section 3 20 min	Discussion on open questions from individual assignments	Questions and feedback	- Facilitated group discussion on how the programme design integration fits in to the programme planning in real life.

Training analytics from training session A1

There were 19 participants participating in the first programme level training session. Most participants were from different ministries but a few funding authorities such as Business Finland were also present. The participants worked most of the time individually with their example programme. They were invited to ask for assistance during the assignments. Some participants who had colleagues from the same organisation also worked together on the assignment. The participants expressed that going through the example programme design was useful even if the case was not a real (actual) programme.

After the training session A1, each participant was sent a programme level training feedback survey. The survey responders were asked to assess how well the first programme level training met it´s three objectives (see Table 2) and the usefulness of the working session. Only 2 or 3 responses were received afterwards to each question in the feedback survey. The responses varied between 3 (average) to 5 (excellent), where most of the answers were 4 or 5. Detailed answers can be provided upon request.

4.2 Training session A2: How to make programme level DNSH assessment

Introduction: Based on the *programme level DNSH guidelines* and first (A1) training session, the purpose of this training was to ensure that those participants dealing with programme design have sufficient information to be able to carry out programme level DNSH assessment.

Pre-assignment: Case-assignment to identify materials for pre-selected programmes, to carry out programme DNSH assessment. Cases were to be the same ones that the participants had been working on during the last training.

The training session A2 consisted of three sections:

- Section 1: introduces the programme level DNSH assessment

- Section 2: introduces an exercise to fill the programme level DNSH assessment table

- Section 3: wraps up the key content and opens a discussion and questions based on reflection of the individual exercise in Section 2.

Table 3: Training session A2: How to make programme level DNSH assessments.

Programme level DNSH training			
Training session A2: How to make programme level DNSH assessments, 2h			
Objectives: After the training, the participants are aware of: 1. how to carry out a programme level DNSH assessment; 2. what type of mitigation actions can be taken as part of the programme design			
Section	**Section name**	**Section goals**	**Section description**
Section 1 20 min	Introduction to programme level DNSH assessment	Why to carry out programme level DNSH assessment? When should programme level DNSH assessment be carried out?	- The part one includes a brief introduction to the programme level DNSH assessment as well short group work to introduce the topic.
Section 2 60 min	Individual assignment to practice programme level DNHS assessment in practice	How to carry out programme level DNSH assessment?	- The working session includes a brief introduction through a sample programme level DNSH template and is continued by participants filling out the templates themselves.
Section 3 20 min	Discussion on open questions from individual assignments	Questions and feedback	- Facilitated group discussion on how the programme level DNSH assessment and programme design phases progress parallelly.

Training analytics from training session A2

There were 14 participants taking part to the second programme level training. In the second training, the participants continued with their example programmes when they developed their programme level DNSH assessment. This proved to be more difficult for some programmes than others. This finding was used as an example of a case when it is more useful to conduct the programme level assessment *after* the project applications have been submitted. This was identified as a clarifying need in the programme level guidelines. The most significant challenges with the guideline substance were linked to the levels of significance in a programme level, in particular if the programme deals with land use.

After the training session A2, each participant was sent again a training feedback survey. The survey responders were asked to assess how well the second programme level training met its two objectives (see Table 3) and the usefulness of the working session. Only 3 responses were received afterwards to each question in the feedback survey. The responses varied between 3 (average) to 5 (excellent), where most of the answers were 4 or 5. Detailed answers can be provided upon request.

4.3 Training session A3: Practical DNSH re-lated topics

Introduction: After going through the programme level guidelines, this last session focused on finalizing the whole programme design and features project screening questionnaire and an introduction to project level assessment. The practical sessions focused on applying the screening questionnaire and rehearsing carrying out the detailed DNSH assessment.

Pre-assignment: Filling out missing parts of programme design table based on the programme level assessment.

The training session A3 consisted of five sections:

- Section 1: allows participants to finalize the programme design phase and introduces the project screening questionnaire.

- Section 2: introduces an assignment to practice the use of the project screening questionnaire.

- Section 3: introduces the basics of project level DNSH assessment.

- Section 4: introduces an assignment to apply project level, detailed DNSH assessment.

- Section 5: wraps up the key content and opens a discussion and questions based on the key content of the training session.

Table 4: Training session A3: How to finalize programme level DNSH assessment and the decision to move to project -level DNSH assessment.

Programme level DNSH training			
Training session A3: How to finalize programme level DNSH assessment and the decision to move to project -level DNSH assessment, 2h			
Objectives: After the training, the participants should be aware of: 1. how to finalize the programme design phase 2. what is screening questionnaire and how to use it 3. the basic steps of the project level DNSH assessment			
Section	**Section name**	**Section goals**	**Section description**
Section 1 25 min	Completing programme design	Finalizing the programme design phase in different programmes.	- This section allows participants to finalize the programme design phase - The session is carried out in an interactive manner.
Section 2 10 minutes	Assignment to apply the screening questionnaire in practice	When screening questionnaire can be used?	- In this working session, participants rehearse the use of the screening questionnaire in Howspace with sample cases

Section 3 20 min	Project level DNSH assessment	What are the basics of project level DNSH assessment?	- This session goes through the basic principles of project level DNSH assessment
Section 4 45 min	Assignment to apply project level, detailed DNSH assessment in practice	How to carry out the project level, detailed DNSH assessment	- This working session allows practicing how to apply detailed DNSH assessment in practice through sample cases.
Section 5	Discussion on open questions from assignments	Questions and feedback	- Facilitated discussion about the finalization of the programme level DNSH assessment and moving to project level DNSH assessment.

Training analytics from training session A3

There were 15 participants in the last programme level training. This session emphasized shared discussion more than individual work. The session had a short assignment of sorting different projects into different levels of DNSH assessment which proved to be a great learning experience between the participants. Even though most of the participants agreed on the level of DNSH assessment for the different project, the reasons for choosing the assessment level differed. The assignment was also used as a way to close the programme design phase and go through the different options on how the results of the DNSH assignment on programme level should affect the project level assessment level.

The second part of the training dealt with going through the simplified and detailed project level assessments and what are their differences and similarities. An example answer of the detailed assessment was provided and after that the participants were divided to small groups to practice filling the detailed assessment though an example case. The participants were asked to identify mitigation measures and possible issues that would cause the project to fail the DNSH assessment. Similar, thematic challenges were identified as in earlier trainings; life cycle analysis, climate change adaptation and circular economy seem to form the most challenging topics in each training.

After the training session A3, each participant was again sent a training feedback survey. The survey responders were asked to assess how well the third programme level training met it´s three objectives (see Table 4) and the usefulness of the two working sessions. Only 3 responses were received afterwards to each question in the feedback survey. The responses varied between 3 (average) to 5 (excellent), where most of the answers were 4 or 5. The two working sessions got answers 4 or 5. Detailed answers can be provided upon request.

The survey responders were also asked to assess the successfulness of each programme level training sessions as a whole. In summary, the programme level trainings were assessed to be successful (Figure 3).
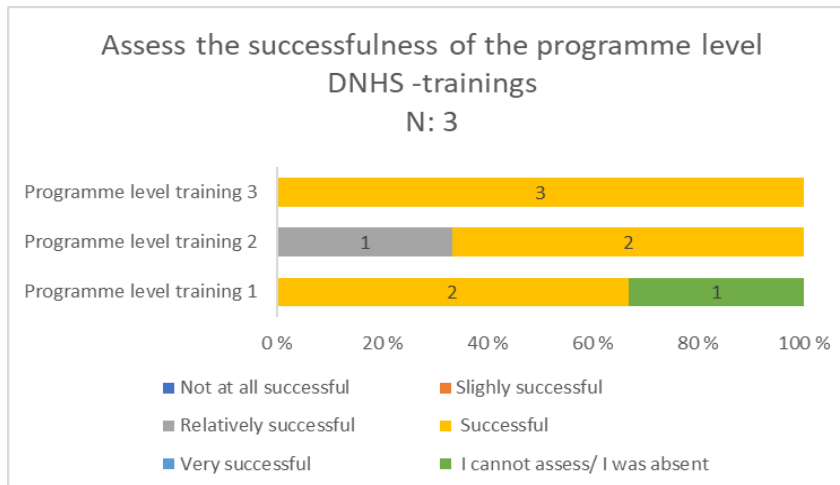
Figure 3: Assess the successfulness of the programme level DNSH training.

5 Project level DNSH training track (B)

The project level DNSH training series were aimed at government officials working either in ministries or other funding authorities who work directly with funding applicants or evaluate applications. The aim of the training package was to help participants to evaluate both the simplified and detailed DNSH assessments and to help the applicants fill out their DNSH self-assessments. The series consisted of three two-hour long training sessions that were done virtually in Howspace and MS Teams. On top of the official trainings, two one-hour follow-up clinics were hosted to cover extra questions participants had. In the end, the participants received an unofficial certificate of participation prepared by the project team.

The trainings were conducted as a training of trainers' format, and so only 1-5 participants from each organization participated in the trainings.

5.1 Training session B1: How to make a simplified DNSH assessment

Introduction: Based on the *project level DNSH guidelines (D3 Annex 2),* the purpose of the training was to ensure that those participants in customer working directly with applicants can identify projects that *only* go through simplified DNSH assessment and evaluate the submitted simplified DNSH assessments.

Pre-assignment: Before the training, participants familiarized themselves with DNSH guidelines and the DNSH basics webinar, to prepare for the first training session.

The training session B1 consisted of three sections:

- Section 1: introduces the simplified DNSH assessment.

- Section 2: introduces a group assignment to practice how to evaluate submitted, simplified DNSH assessments. The working session includes two cases and a Howspace -live room for individual support.

- Section 3: wraps up the key content and opens a discussion and questions based on reflection from the group assignment.

Table 5: Training session B1: How to make a simplified DNSH assessments.

Project level DNSH training			
Training session B1: How to make a simplified DNSH assessments, 2h			
Objectives: After the training, the participants should be aware of the steps of the evaluation of simplified DNSH assessments.			
Section	**Section name**	**Section goals**	**Section description**
Section 1 20 min	Introduction to simplified DNSH assessment	When is requesting simplified DNSH assessment sufficient?	- The part one includes a brief introduction to the simplified DNSH assessment and discusses when simplified DNSH assessment is sufficient.
Section 2 60 min	Assignment to apply project level DNHS assessment in practice through two case examples	How to evaluate submitted, simplified DNSH assessment?	- The working session includes two cases where participants evaluate two sample cases of submitted, simplified DNSH assessments.
Section 3 20 min	Discussion on open questions from assignments	Questions and feedback	- Facilitated group discussion on how to acquire information, what challenges may exist in simplified assessment and what to do when concluding that simplified assessment is not sufficient?

Training analytics from training session B1

There were 48 participants in the first project level training. The participants were divided into five small break-out groups for the group assignment in section 2. Participants were encouraged to work with their colleagues from the same organisation (I.e., people from Finnfund in one group, people from different ELY-centers in one group etc.) to foster their shared understanding of DNSH. After the group task, each group presented what case they were looking into and what kind of questions they had while practicing the simplified assessment. Most difficult criteria were linked to circular economy and climate change adaptation and how to consider the life cycle of the project.

After the training series, each participant was sent a project level training feedback survey. The training participants were asked in the survey how well the first training met its objectives and their opinions of the usefulness of the practical working sessions. There were 10 responses to the feedback survey. Respondents gave feedback that the training session B1 met its objectives well (median of the responses was 4 on 1 to 5 scale where 5 is excellent). The working session was found relatively useful (responses varied from 3 to 5).

5.2 Training session B2: How to make a detailed DNSH assessment

Introduction: The purpose of the training was to ensure that those participants working directly with applicants and dealing with individual project applications can identify projects that *only* go through detailed DNSH assessment and evaluate the submitted, detailed DNSH assessments.

Pre-assignment: Before the training, participants familiarized themselves with material related to detailed DNSH assessments, before they are introduced to the topic during in the training.

The training session B2 consists of three sections:

- Section 1: introduces the detailed DNSH assessment and when a DNSH assessment should be requested.

- Section 2: introduces a group assignment to practice how to evaluate submitted detailed DNSH assessments. The working session includes two cases where the applicants can choose what to focus on.

- Section 3: wraps up the key content and opens a discussion and questions based on reflection of the individual assignment in Section 2.

Table 6: Training session B2: How to make a detailed DNSH assessments.

Project level DNSH training			
Training session B2: How to make a detailed DNSH assessments, 2h			
Objectives: After the training, the participants should be aware of the steps of the evaluation of detailed DNSH assessments.			
Section	**Section name**	**Section goals**	**Section description**
Section 1 **20 min**	Introduction to the detailed DNSH assessment	When should detailed DNSH assessment be requested?	- The part one includes a brief introduction to the detailed DNSH assessment as well short group work to introduce the topic.
Section 2 **60 min**	Assignment to apply detailed DNHS assessment in practice	How to evaluate submitted, detailed DNSH assessment?	- The working session includes two cases where participants evaluate two sample cases of submitted, detailed DNSH assessments.
Section 3 **20 min**	Discussion on open questions from assignments	Questions and feedback	- Facilitated group discussion about challenges, information needs and other considerations for detailed DNSH assessment.

Training analytics from training session B2

There were 41 participants in the second project level training. Some of the participants had missed the first training but were able to take part in the session. The participants were again assigned to smaller groups to work with their colleagues on the assignment. The feedback from participants during the training was positive, the template for detailed assessment felt clear. The most difficult thing for the participants was to identify the taxonomy related criteria for the example project. All participants were able to identify mitigation actions to the project but found it difficult to identify whether or not the project could have some factors that would lead the project not to be DNSH compliant. As with the simplified assessment, here also the most difficult criteria were linked to circular economy and climate change adaptation and how to consider the life cycle of the project.

After the training series, each participant was again sent a feedback survey. The objective of the second project level training was that participants are aware of the steps of the evaluation of detailed DNSH assessment. The responses suggest that the training B1 met its objectives well (8 responses and a median of repsonses 4 with a scale from 1 to 5). According to the survey responses, the working session was relatively useful (only 5 responses since some of the survey respondents had not participated in the working session).

5.3 Training session B3: Practical DNSH related topics

Introduction: Implementing DNSH in projects includes also further practical questions other than how to evaluate the DNSH self-assessments. This last training module covered the project screening questionnaire, environmental permitting, the priority law process, and monitoring.

Pre-assignment: No pre-assignment.

The training session B3 consisted of five sections:

- Section 1: introduces the screening questionnaire and what it can be used for

- Section 2: introduces an assignment to practice the use of the screening question-naire

- Section 3: explains the links between DNSH principle and the environmental permitting processes.

- Section 4: explains the role of monitoring and reporting after project appraisal.

- Section 5: wraps up the key content and opens up a discussion based on the training session key content.

Table 7: Training session B3: Practical DNSH related topics.

Project level DNSH training			
Training session B3: Practical DNSH related topics, 2h			
Objectives: After the training, the participants should be able to recognize other relevant topics related to DNSH assessment.			
Section	**Section name**	**Section goals**	**Section description**
Section 1 **20min**	Project screening questionnaire	When to use the screening questionnaire	- The session introduces the project screening questionnaire and when to use it.
Section 2 **20 min**	Assignment to practice the use of the screening questionnaire in four sample cases	How to screen projects?	- The working session allows participants to practice the use of the screening questionnaire
Section 3 **20 min**	Environmental permitting as part of DNSH and project funding	To understand the links between environmental permitting, DNSH assessments and the priority law	- This part includes a short presentation on the topic and interactive discussion on the topic with real life examples
Section 4 **20 min**	Monitoring and reporting DNSH	To understand the role of monitoring and reporting of DNSH after the appraisal phase	- This part includes a short presentation on the topic and interactive discussion on the topic with real life examples
Section 5 **20 min**	Discussion	Questions and feedback	- Facilitated group discussion on the key content of the training session.

Training analytics from training session B3

There were 32 participants in the third and final project level training. The session differed from the two earlier training sessions, in that it did not have group assignments but an individual assignment in Howspace to decide, what kind of DNSH assessment each of the example project should go through. The task led to a fruitful and great conversation on the different perspectives on what different officials investigate in a project and how significant they think the environmental harms are. Especially discussion about a piloting project for a company revealed interesting points on what could happen if only the piloting activity is investigated and not already the possible scaling of the production. Some participants saw that it is good to make a detailed assessment in the piloting phase and consider the scaling of the production already then and some felt like simplified assessment only for the piloting phase would be enough if detailed assessment is done if and when there would be scaling up activities. This could then lead to the conclusion that the scaling would not pass DNSH assessment and cause the company issues after the piloting.

After the individual assignment and group discussion, matters related to environmental permitting and priority law were discussed with the group. Some participants shared their experiences of how they have used the Environmental Impact Assessment (YVA) documents in the

DNSH process beforehand. A great discussion was had on the equal treatment of the applicants when DNSH is a requirement. Some felt like it would be difficult to know how much they can assist the applicants in making the DNSH assessments and if the applicants could add and supplement the assessments after the project application and DNSH assessment are first submitted.

Again a feedback survey of the training session B3 was sent to the participants. This time there were 7 responses to the survey. According to the responses to the survey, also the third project level training session met its objectives well (median 4) and the working session was useful (median 4).

The participants of the training were also asked to assess the successfulness of each project level training as a whole. In summary, the project level DNSH trainings were mainly seen as relatively successful (3) or successful (4), in a scale where, 1= not at all successful and 5= very successful (Figure 4).
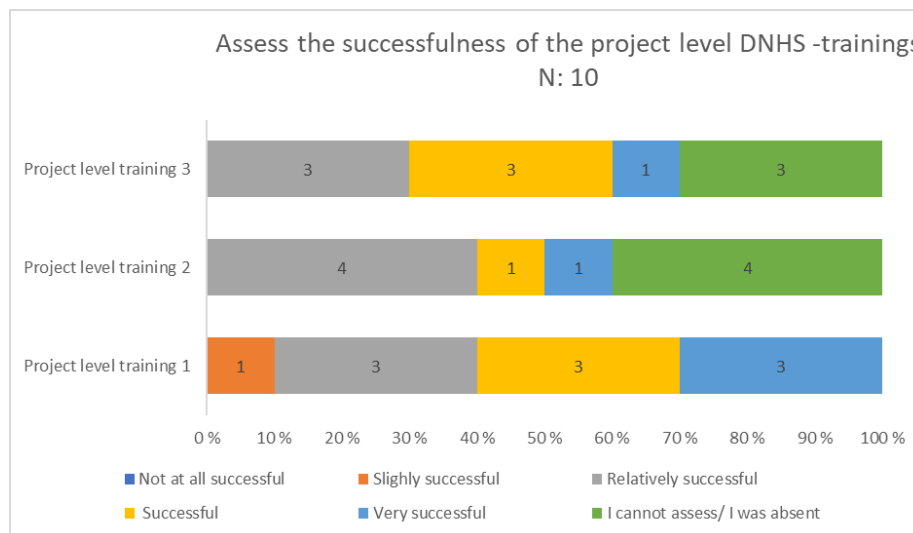

Figure 4: Assess the successfulness of the project level DNSH trainings.

6 Applicant Webinar

Introduction: The overall aim of this webinar was for project applicants to understand the process of the simplified and detailed DNSH assessment, what type of information is required to make the project assessment, and how to prepare for the assessment.

Preparation by applicant before webinar

- There was no preparation needed for the participants. Participants could leave questions to the trainers during their registration.

Training sections

Section 1: Introduction and brief overview of DNSH

Section 2: Similarities and differences between the simplified assessment, detailed assessment and current DNSH assessment templates like in RRF

Section 3: Environmental permitting and priority law

Section 4: Q&A

Table 8: Applicant Webinar on DNSH assessment.

Applicant DNSH training			
Applicant Webinar on DNSH assessment			
Objectives: after the webinar, the project applicants have a good understanding of the simplified and detailed DNSH process and basic information about DNSH and it's current implementations.			
Section	**Section name**	**Section goals**	**Section description**
Section 1 **10 min**	Introduction and overview DNSH	Getting an understanding of webinar content and purpose	Going through participants current knowledge level and experiences with DNSH and their expectations for the webinar.
Section 2 **25 min**	Introduction to DNSH	Getting a good understanding of the DNSH principle and how it is being used in Finnish public funding currently.	The section included a lecture style presentation on DNSH basics since the participants were not required to participate in the DNSH basics webinar held before. The participants were invited to ask questions and comment on the topics during the section to keep it interactive.
Section 3 **40 min**	Similarities and differences between the simplified assessment, detailed assessment and current DNSH assessment templates like in RRF	Getting a good understanding of the guidelines created in the DNSH in Finland project and how they differ from the current guidelines used in EU funding	The section included a lecture style presentation on the structure and logic of the guidelines and how and where they could be used. An example answer of detailed assessment was provided. The participants were invited to ask questions and comment on the topics during the section to keep interactive.
Section 4 **15 min**	Environmental permitting and priority law	To provide the applicants information on the role of environmental permitting and priority law and DNSH:	Participants are provided with lecture style information on the topic and asked to comment or ask clarifying questions during the section
Section 5 **25 min**	Q&A	Allowing questions of attendees to be answered, for them to gain an even better understanding of the topic	Attendees before the webinar can put forward topics/questions/projects that they like to see discussed during the meeting.

Experience from the applicant webinar

10 people registered to the applicant webinar, most of them from other consultancy companies and only 4 people participated in the actual training. All participants were providing consultancy services and were not themselves applying for funding. The participants were mostly working on construction sector, so majority of the questions asked were related to specifically in that sector.

The most significant feedback from the participants was that it is very important for the applicants to know precisely, what they are expected to provide in their application and how detailed the assessment should be in the different assessment levels. The participants welcomed DNSH as a more regular part of the public funding process but recognized the difficulties especially small companies could have with providing quality assessments. The participants provided positive feedback during the training and felt like the information was clear.

7 Clinics

Introduction: During the whole training programme, there were voluntary clinics in between the trainings to cover more in-depth questions the participants have. Clinics were aimed at the participants of the trainings; they were not recorded, were 1 hour long each, and organized as follows:

- Programme guidelines clinic between 2nd and 3rd training

- Project guidelines clinic between 2nd and 3rd training

- Shared clinic for project and programme guidelines after the 3rd training of each group

- Applicant clinic after the applicant training.

Pre-assignment: There was no pre-assignment for the clinics. The participants could submit questions beforehand that they would like to go over during the clinic.

Table 9: Clinics for authorities and applicants.

Clinics for authorities and applicants, 1h long each			
Objectives: Provide additional information on any open questions participants have gotten during the trainings or in between trainings.			
Section	**Section name**	**Section goals**	**Section description**
Section **60 min**	Q&A	Provide answers to participants for questions they have asked during the trainings or in-between the training sessions.	- Participants can leave more complicated questions to be answered in the clinics during the training sessions or in-between the sessions. - During the clinic, the trainers will answer the questions. If there are questions that cannot be answered during that time (they need more information etc), written answers to

			the questions will be posted to training Howspace-pages.

Experiences from the clinics

The clinics were an experimental part of the trainings and ended up not being as needed as was originally thought. No pre-made questions were sent out to the trainers even though participants were encouraged to ask specific questions that they might have, especially if they were currently working with a DNSH assessment to ensure the most value added from the clinics.

For the authority clinics, all three sessions had participants, although fewer than in the actual training sessions. The majority of the participants came only to hear what other participants had in their mind. Since there were no specific cases to be discussed, all three clinics were focused on having more discussions between participants on their recent experiences and possible worries around DNSH assessments. Especially within the project level participants, there was a good level of sharing of practices where different regional level authorities talked about their current practices and were able to discuss possibilities of cooperation in the future. Mostly the clinics focused on pondering DNSH more broadly or going back to any questions the participants had after the previous training sessions.

The Applicant clinic was cancelled due to lack of participants. The participants were asked during the webinar if anybody was still interested in having a follow up discussion, but at the time there was no need for that.

Even though the clinics did not fully function as they were intended, they still added value in being a dedicated additional time for participants to more freely discuss matters related to DNSH's current and future implications and possibly foster further cooperation between authorities. It also provided and opportunity for participants who had missed a session to ask questions about the content of the trainings. A dedicated DNSH clinic would be beneficial to authorities when they have an actual case to assess and need further support in their assessment.

8 Training material and training space

The training materials consist of:

- Power point slides (in Finnish, different webinars and slides used as training material)
- Detailed tasks and guidance through the working sessions (in Finnish, in Howspace interactive learning platform)
- DNSH basics -webinar recording (in Finnish)
- DNSH templates that were used in individual and group tasks (in Finnish, final ones will be submitted as an annex to forthcoming D6 report)

All the PowerPoint slides used in webinars and in the trainings without detailed working instructions of the individual or small group tasks can be found as an Annex 1 of the report.

The DNSH basics -recording can be viewed in the Ministry of Environment's Green Transition web pages, where also the training materials will be stored[4].

The trainings were conducted in MS Teams and Howspace. MS Teams was used for voice connection and materials and assignments were provided and carried out in Howspace. Each of the two training series for different authority groups had their own Howspace page where all training materials were kept and where different tasks were submitted or, in some cases, directly carried out.

Howspace page will remain open for the participants until the end of 2023 and after that the pages will be archived and there will be no direct access to participants. If there is a need for a renewal, the pages can be opened again in the format they were used for trainings and they can be updated or copied if needed. The detailed content of the platform can be opened and demonstrated upon request. The archived Howspace working space is operational at least next 5 years under Gaia's license.

The specific DNSH templates used in the trainings; programme design template, programme assessment template, simplified and detailed assessment templates and scoping questionnaire will be added as an annex to D6 reporting taking into account also other possible revision needs for templates after the piloting phase of the project. Most of the content of the templates is in Finnish on the training material slides.

9 Identifying needs for revising the guidelines

While creating the training materials and translating the guidelines and templates into Finnish, some needs were identified for updating the guidelines created in D3. No major need to change the logic or basic principles of the guidelines was identified. Discussions took place on the possible pros and cons of having two separate levels of project assessments and not just one. Some project level trainees felt like there should always be the need for the detailed assessment, whereas others agreed with the idea behind having two distinctly different levels of assessments.

The most significant feedback during trainings addressed the programme level guidelines. Participants affirmed that the programme level granted them freedom to think about the goals of including DNSH in their programme and to reach those goals in a way that best fit each organisation and situation. They appreciated the focus on making the programme level assessment, and after that making a decision on whether or not to go on to the project level, and if there are other ways to reach the goal of not causing significant harm to the

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environment[5]. It was also highlighted, that in some cases, there is a need to have the project proposals received *before* making the programme level assessment. It was seen important to be clarified in the guidelines that this is possible and, in some cases, desirable, even when some of the benefits in making the assessment before opening the call are lost.

For project level, the feedback on the guidelines themselves was quite neutral since participants didn't really have real life ways of testing them. All participants who had any experiences with DNSH had only experiences with specific EU funding instruments such as JTF or RRF, which were not the subject of the trainings. In those cases, it was somewhat difficult for the participants to imagine a different way of implementing DNSH in the future.

The biggest feedback and need to modify the guidelines in the project level were linked to the wording of the templates and whether it is possible to issue a detailed assessment to applicant if the applicant has already made a simplified assessment.

All direct needs to clarify the guidelines or templates can be found in Table 10.

Table 10: Change needs for DNSH guidelines created in Deliverable 3.

Programme/Project level guideline	Change need	Action to be taken in the guidelines
Programme	Clarification on the different options on when the programme level DNSH assessment can be done and the pros and cons of the different options.	Add a table of different options to programme level guideline in Chapter 2.
Programme	Clarification on the requested documents and their role in the process.	Clarify the table in Chapter 5.4.
Project	Clarification on if the applicant can be requested to make a detailed assessment if they have already made a simplified assessment.	Add text on this to Chapter 1.2.

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[5] This includes, i.e., the use of exclusion lists or putting additional funding criteria for one or several environmental criteria instead of DNSH assessments

Both, all assessment templates	All templates have a question: "*Is the project prepared for extreme weather events (in all material respects)?*", where the desired answer is **yes** instead of **no** like in all other questions. Meaning that if the answer is "no" it needs further clarification and/or mitigation actions. This needs to be clarified.	Change the instruction in all templates.
Programme	Programme design template needs to be revisited and thought. Some work was already done during translating the template, but further development is needed.	Go through programme design template and further develop it.
Both	Minor structural changes were made for all templates:	All templates to be revisited

10 Further training needs

During this project, a total of +20 hours of training was provided in the different modules. The trainings ranged from four-person applicant webinar to over 200 persons DNSH basics webinar and priority law trainings. Most of the learning took place in the two, in-depth training tracks for authorities that had total of 9 hours of training and additional tasks in between the trainings.

It is clear, that if and when, the Finnish government starts requiring DNSH implementation on national, non-EU related funding, there is a need for further training. The guidelines provided in the project, even when revised, are speculative and general in nature and need many clarifications and decisions before they can be implemented in any specific context.

Especially in the programme level training, the focus was on how different organisations should think about DNSH in their own organisation if and when the request comes, to start implementing DNSH in their funding programmes. This organisation specific decision-making needs to be made before the applicants can be expected to provide DNSH assessments or the funding authorities to evaluate the assessments. In order for the individual project level evaluators to know what and how to evaluate and act with the applicants, the organization needs to provide clear, organization specific, guidance on DNSH and possibly further training.

The training materials provided as Annex 1 of this report and the training outlines depicted in the report can provide a basis for those further trainings, as long as they are modified to fit how the organization has decided to use DNSH and to cover the latest information from EC when needed. Using of the training material is also dependent of the status of the guidelines provided in the project. The training materials only cover the content of the guidelines developed during the project and the status of DNSH in the summer/fall of 2023. In other words, the training materials are likely to be outdated when the need for further trainings next presents itself.

At the time of writing this report, the most severe needs for further training relate to the EU funding instruments and their specific targets. There are a still many uncertainties on how to follow up and monitor the projects, and how to evaluate the assessments. The most pressing need is linked to the definition of significant harm and how to evaluate the life cycle of a project. Sector - or organization - specific approach would be needed, to get adequately deep to help the evaluators.

The most significant substance-related need across all trainings were identified in three thematic areas of climate adaptation and risk assessment, life cycle approach and circular economy and extent of the project scope. Typical questions were: What kind of risk assessments would be sufficient for different projects for climate adaptation?; How to consider the life cycle of a project?; What is the role of circular economy in different fields? Can a project use unrecyclable materials if the project itself does not hinder others of using recycled materials or recycling materials?[6].

Some more broad, entry level training could be offered to all government officials and even applicants through virtual training platforms such as eOppiva[7], if the implementation of DNSH starts to effect national funding. More emphasis still needs to be given to the specific implementation cases and making sure that the guidelines are clear to all users. Overall, sector or organization specific approach would be needed, to provide effective level of support.

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[6]Such as the case in some energy investments project that produces renewable energy but require non-recyclable material in its construction.
[7] Government training platform https://www.eoppiva.fi/

Annex 1: Training materials (separate pdf file in Finnish)