

CITIZENS INITIATIVE “NE DAMO NI LIPE”/WE ARE NOT GIVING UP ON OUR LINDEN TREES

Coordinated by *Eko Pan*, An association for Environmental and Nature Protection from Karlovac, Stjepana Radića 12, 47000 Karlovac, Croatia.

Petition and request for verification of compliance of the project "ITU - Reconstruction of Ban Jelačić Square and improvement of urban mobility in Zvijezda" Karlovac (Croatia) with the obligations of climate proofing and the Do not significant harm principle (DNSH).

Submitted for the attention of:

- CFCA – Central Finance and Contracting Agency (intermediate body responsible for assessing eligibility and controlling EU funds expenditure). Address: Ulica grada Vukovara 284 (C), 10000 Zagreb. E-mail: info@safu.hr
- Ministry of Regional Development and European Union Funds (Managing and Coordinating Authority for the implementation of the ITU mechanism within the Integrated Territorial Programme 2021–2027). Mr. Ivan Bota, Director of the Department for Regional Development. E-mail: ivan.bota@mrrfeu.hr
- City of Karlovac – Department for Implementation of the ITI Mechanism (Intermediary Body for the Selection of Operations – PTOO). Ms. Anita Trbuščić, Head of Unit. E-mails: anita.trbuscic@karlovac.hr, itu@karlovac.hr
- European Commission, Directorate General for Regional and Urban Policy (DG REGIO). MS Aida Liha Matejcek, Head of Unit, Croatia and Romania (REGIO.E.2). Aida.LIHA-MATEJICEK@ec.europa.eu

1. Introduction and legal interest

The citizens' initiative "We Are not Giving Up on Our Linden Trees", coordinated by the Association for Environmental and Nature Protection Eko Pan from Karlovac, on behalf of other informal associations, experts and citizens, expresses serious doubts about the compliance of the above-mentioned project with the obligations arising from its financing from the European Regional Development Fund (ERDF) as part of the Integrated Territorial Program 2021–2027.

According to official announcements from the City of Karlovac, the project is financed in the amount of approximately 4.6 million euros for the intervention on Ban Jelačić Square itself, with 67% co-financed through the ITI mechanism from ERDF funds. The intervention on the square is part of a wider integrated project with a total value of over 13 million euros. Since it is an infrastructure investment financed from EU funds in the 2021–2027 programming period, the project is subject to the obligation of climate proofing and compliance with the “do no significant harm” principle (DNSH).

2. Legal and regulatory framework

The obligation of climate proofing results from the following documents:

- Technical guidance on the climate proofing of infrastructure in the period 2021-2027 (Commission Notice 2021/C 373/01);
- National Climate Proofing Guidance for Investment Preparation in the EU Programming Period 2021–2027 in the Republic of Croatia.
https://mzozt.gov.hr/UserDocsImages/klimatske_aktivnosti/Smjernice-za-klimatsko-potvrdivanje-03042024.pdf;
- Regulation (EU) 2021/1060 (Common Provisions Regulation) that stipulates in Article 9, Paragraph 4, the respect of the DNSH principle as a horizontal principle for all cohesion policy funds;

- Article 17 of Regulation (EU) 2020/852 (Taxonomy), which defines what constitutes “significant harm” in relation to the six environmental objectives;
- Commission Notice 2021/C 58/01 – Technical guidance on the application of “do no significant harm”.

Accordingly, the investor (City of Karlovac) is required to prepare a Climate Proofing Assessment containing a statement on climate neutrality (mitigation) and a statement on climate change resilience (adaptation), and the evaluation body is required to verify their validity before making a funding decision.

3. Worries about compliance

Given that public procurement has already been carried out for the project "ITU - Reconstruction of Ban Jelačić Square and improvement of urban mobility in Zvijezda" and that the cost estimate of the public procurement clearly foresees pulling down of a large number of trees on the square in question, the Initiative draws attention to the fact that the obligation of climate verification and the principle of DNSH in this project are not taken particularly seriously. We draw attention to three specific points:

3.1. Negative score of green infrastructure and loss of CO₂ absorption capacity

According to the cost estimate available in the Electronic Public Procurement Advertisement, the project envisages the removal of 42 trees, with the planting of only 18 new trees – a negative score of 24 trees. The removal of 42 adult linden trees permanently reduces the annual carbon sequestration capacity. With a conservative estimate of 20–30 kg CO₂ per tree per year, this is a reduction in sequestration of approximately 0.8–1.3 tons of CO₂ per year, which newly planted young trees cannot compensate for a number of years. The question arises as to how, with such a score, a statement of climate neutrality could be credibly formulated.

3.2. Absence of analysis of alternatives – tree-preserving variant available

The DNSH principle and the technical guidelines specifically require consideration of less harmful alternatives. The City of Karlovac itself has confirmed that the Urban Development Plan for Zvijezda envisages an alternative solution for the square without an underground garage, with which the existing trees can be retained. Since the Investor has abandoned the construction of the garage, an alternative that preserves the trees objectively exists in the valid town planning documentation. The implementation of an operation that removes an entire row of trees, with the existence of an available and less harmful alternative that has not been seriously considered, directly calls into question the credibility of a climate neutrality statement and compliance with the DNSH principle.

3.3. Climate change resilience – heat islands and stormwater

The technical guidelines in the context of climate change adaptation explicitly mention the expansion of green and vegetated areas as a measure to reduce the urban heat island (UHI) effect. Mature trees in the square create shade, reduce surface temperatures, retain stormwater and improve the local microclimate. Removing the tree line works against the goal of adaptation, which makes it questionable how the statement on climate change resilience could have been formulated on a sound basis.

We also note that the argument about alleged tree disease does not justify a negative green infrastructure score, since possibly diseased trees can be replaced by planting an equal number of healthy mature trees, which is an acceptable cost within the project.

3.4. Assessment at the level of the integrated project does not cancel out local harm

We are aware of the possible argument that compliance with the DNSH principle can be assessed at the level of the entire integrated project (which includes other components in addition to the square, including greening at other locations), and not at the level of an individual intervention on the square. Such an approach, however, cannot cancel out the concrete and measurable damage at the location of the square itself. The ecosystem services of a mature tree line – cooling and reducing heat islands, retaining rainwater and improving the microclimate – are linked to a specific micro-location and cannot be replaced by planting in a distant location. Therefore, we ask that it be explicitly shown that the principle of “doing no significant harm” was respected specifically for the intervention on Ban Jelačić Square, and not only collectively at the integrated project level.

4. Analysis by environmental objectives of the DNSH principle (Article 17 of Regulation (EU) 2020/852)

The principle “do no significant harm” is assessed against the six environmental objectives set out in Article 17 of the Taxonomy Regulation. Below we provide an overview of the relevant objectives, the impacts of the project in question and the reasons why we are concerned about the project compliance with the DNSH principle:

Environmental goal (Art. 17.)	The intervention impact on the square	Why the assessment might not be adequate
1. Climate change mitigation	Removing 42 adult trees permanently reduces annual CO ₂ sequestration by approximately 0.8–1.3 t; 18 young seedlings do not compensate for this for years.	The climate neutrality statement must contain a quantification of the lost carbon sink and a time frame for compensation.
2. Climate change adaptation	Loss of shade, intensification of the urban heat island (UHI) effect, reduced retention of rainwater and deterioration of the microclimate in the square.	The technical guidelines explicitly mention the expansion of green spaces as an adaptation measure; the intervention has the opposite effect.
3. The sustainable use and protection of water and marine resources	Reduced natural retention and infiltration of precipitation due to loss of canopy and root system.	The impact on rainwater management must be considered, and compensatory measures must be proposed.
4. The circular economy	Removed biomass and material; the issue of disposal and the possibility of re-use.	A less critical goal, but the cost estimate does not specify management of the removed green mass.
5. Pollution prevention and control	Loss of vegetation that filters particles and pollutants from the air in the city centre.	The reduced air purification capacity must be considered when assessing the impact.
6. Protection and restoration of biodiversity and ecosystems	Permanent loss of habitat for birds and insects; degradation of the established urban tree-lined ecosystem.	An assessment of the impact on habitats and species must be carried out and equivalent compensation at the location must be demonstrated.

For compliance with the DNSH principle, it is sufficient that the project causes significant harm to at least one objective. We believe that this is not excluded for objectives 1, 2 and 6. Based on the documents available in the public procurement procedure for the project, we believe that the self-assessment of the intervention at the Ban Jelačić Square in Karlovac is deficient and requires revision.

5. Demands

Based on the above, the Citizens' Initiative requests that the competent authorities:

1. To pay special attention to the project documentation and verification of the Climate Proofing Assessment, climate neutrality and resilience statements, and assess them with regard to the stated negative tree balance;
2. To ensure that the prescribed DNSH test is carried out in the project preparation and assessment process, including an analysis of the available alternative without removing the tree line;
3. To consider suspending the project implementation activities related to the tree line removal until the project is approved, to avoid irreversible damage and the possible risk of unacceptability of the cost;
4. To consider amending the project in the direction of retaining healthy existing trees and demonstrably equivalent compensation for the removed greenery, thus bringing the project into line with the legal and regulatory framework.
5. To report in writing to the Initiative on the results of the review and the measures taken.

We emphasize that the protection of existing trees in an EU-funded infrastructure project is not an "added value" or decoration, but a clear obligation of the investor according to the legal and regulatory framework, no less binding than the cultural heritage conservation conditions that the City refers to.

Karlovac, 3rd of July 2026.

For the Citizens' Initiative "We Are not Giving Up on Our Linden Trees"
Eko Pan, An association for Environmental and Nature Protection from Karlovac, Croatia

Ivana Francišković Olrom,
president of Eko Pan



(name, surname and position of the responsible person)