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THE LINK BETWEEN DNSH PRINCIPLE IN EUROPEAN STRUCTURAL FUNDS IN ROMANIAN AND ITS MONITORING OR EVALUATION FOLLOWING A NEW SUSTAINABLE AND DEVELOPMENT LOGIC APPROACH

SUZANA ELENA CĂTUȚ
Bucharest University of Economic Studies, Romania
LAURA ELENA MARINAȘ
Bucharest University of Economic Studies, Romania
GHENADIE CIOBANU
National Scientific Research Institute for Labour and Social Protection, Bucharest
Artifex University of Bucharest, Romania
gciobanu017@gmail.com
CĂTALINA ȘERBAN
Bucharest University of Economic Studies, Romania

Abstract:
This article aims to further analyse the link between RRF and CP funds in Romania, as compared to other EU Member States or regions which are similar to Romania considering the practical application of the DNSH principle. The main focus is on the Monitoring and Evaluation (M&E) practical application, spanning from a theory-based approach or logic, in terms of sustainable development.
The paper's general objective is to statistically and economically compare, following an updated Sustainable & Development (S&D) logic, the practical application of the DNSH principle in Romania. The specific objective is to carry out an in-depth comparison, through an econometric model, and to continue previous research on the DNSH application in Romania and other EU (27) Member States.
Continuing the authors' previous research (e.g., ECSDEV 2025 article "A short review of the DNSH principle in Romania, from a sustainable development perspective — theory-based or process evaluation", by Dr. Suzana Elena Cătuț and Dr. Ioana-Maria Crișan), the article further explores methodological approaches such as: S&D logic for DNSH; DNSH application in ESIF or RRF Funds for 2021–2027 and post-2027 (Cohesion Policy or other European Funds).
At the Romanian level, the paper aims to analytically compare, across regions and countries, the level of sustainable development, the DNSH implementation status, and monitoring and evaluation practices, using as benchmarks other similar regions or EU countries. The paper may also support decision-makers or authorities in understanding the links and convergences between M&E approaches (practical or theory-based) and the DNSH principle's application.

Keywords:
S&D logic; DNSH principle; Cohesion Policy; RRF; SDGs; Environmental Public Policy; Governance

1. Introduction

In the context of the DNSH principle within the European Green Deal and its integration in ESIF and RRF frameworks, the relevance of DNSH principle's compliance for sustainable project implementation there are several challenges and opportunities for Romania (as compared with similar EU Member States or regions).
This paper's scope it to introduce a conceptual innovative framework, starting from the introduction of an S&D logic-based monitoring framework.

2. Theoretical and Conceptual Framework

As stated in the article "A short review of the `DNSH` principle in Romania, from a sustainable development perspective – theory-based or process evaluation" (Dr. Suzana Elena Cătuț and Dr. Ioana-Maria Crișan, ICSD 2025), the definition and policy relevance of the DNSH principle's stem from the Regulations 2021–2027 of the European Commission and continue with the current proposals for the Multi Annual Financial Framework (MFF) 2028-2034.
In this context, DNSH principle's application from the inception stage still represent a very important aspect for all EU funded programmes and projects, for their creation, submission, approval, implementation, monitoring and evaluation.
Thus, the evolution of the Sustainable & Development Logic (S&D Logic) as a methodological tool should constitute a good mechanism for the integration of DNSH principle, with a correlation to environmental governance and sustainable development goals.
There might be a literature gap, which acts as a hypothesis for this article and constitutes a justification of this current research.

3. Methodology

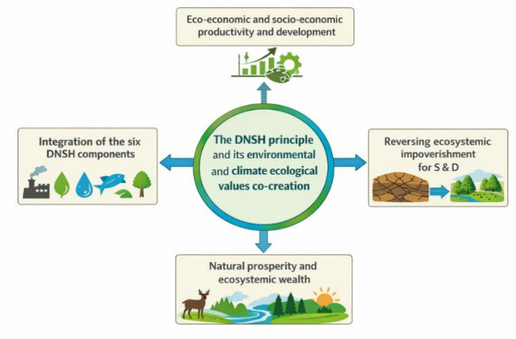
The research design is represented by a comparative analysis between Romania and several other EU Member States or regions (e.g. authors from Finland, Italy, Spain) [The DNSH principle (Do No Significant Harm) in the NRRP, online, 2026; Prezioso M., 2024, online; AFME Finance for Europe, Oliver Wyman (2024), online']. Data sources: Eurostat, DG REGIO open data, national evaluation reports.
The aim is to explore the possibility of creating an econometric model for correlation between DNSH application scores and S&D indicators, while the analytical logic is to include the integration of Sustainable Development 6 principles (already included in the DNSH assessment), into the Monitoring and Evaluation model.
Research Hypotheses:
1. There is a direct correlation between the quality of the national M&E system and the DNSH application level.
2. Regions with a developed S&D logic achieve higher DNSH compliance consistency.

4. Results and Discourse Analysis

As demonstrated by Helkkula and Arnould (2022) in their research, in order to achieve the Sustainable Development Goals (SDG's), a "marketing ecosystem" is necessary, together with using the neo-animism for stakeholders in a Sustainable and Development Model. In their S-D logic model, proposed as a new, neo-animist-inspired understanding of actors who desire to pursuit the SDG's, the "people and rest of the biotic community co-create value", whilst four indexes/variables are of main interest: 1. Eco-economic productivity; 2. Reversing ecosystemic impoverishment; 3. Natural prosperity; 4. Resource recycling and intervention.
Thus, as concerns the discourse analysis for this research, the axiom of services as exchange and value co-created by multiple actors, always focusing on the humans ("people-centred DNSH approach for achieving SDG's") remains valid and also validates the two research hypotheses of this article.

5. Proposed Framework for DNSH Monitoring

The Logical Proposal for a Logic Framework Model (LFM) is tailored for Romanian authorities. Figure no. 1. The "new" Sustainable & Development Logic (LFM Model) for DNSH principle and it values



Source: authors' vision of the values of the DNSH principle to pursue the new S & D Logic, using the LFM Model. Developed starting from Helkkula.A, Arnould E.J. (2022) and Prezioso M. (2024).

6. Public Policy Recommendations based on the literature review and methodology

Strengthen institutional capacity for DNSH verification and evaluation.
Align Romanian systems with European-level M&E standards.
Embed S&D Logic within all CP and RRF project cycles post-2027.
Promote interregional learning exchange (Romania–Italy–Spain).

7. The link of the European level discourse for Romania and findings of the 2026 survey at Romanian level programme authorities

After an in-depth analysis of the survey the authors' gained an in-depth perspective on what applying (especially for the design phase and implementation, phase – apart from Monitoring of Evaluation) of the DNSH principle means for Romania so far. This is mainly because for this year's survey, apart from the regional authorities, both RRF/SCF central coordination units and Cohesion Policy Coordination unit were consulted, and Interreg sent back a wider response (one for each programme). Moreover, all authorities included detailed opinions for the open questions, which provided valuable insights of how the DNSH principle is practically applied for sustainable development, on the one side, and for the actual project or programme management, on the other side.
Findings show that some of the national programmes (such as Human Capital programmes, JTF and large infrastructure programmes or Interreg programmes), use directly the EIA Directive [EIA Directive (2011/92/EU as amended by 2014/52/EU)] in the IT system for pre-selecting projects.
However, a surprising fact that resulted from the surveys was that most of the programmes also use the Strategic Environmental Assessment (SEA) Directive [Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment], which seems too much for small projects and interventions and may create gold-platting at national level (since the scope of the DNSH principle application is, in the authors' view), that of simplifying all the work done by the MAs and IBs.
Considering challenges, most of the authorities referred to the conformity evaluation and selection of projects (even those relying on the pre-selection with the IT system in place). For beneficiaries, they mentioned that it is still a burden to include DNSH principle's criteria in the public or private procurement documents. Also, the complexity of the regulatory framework was mentioned.

8. Conclusions

As per the paper's findings, one should be aware of the fact that ecology and environment is not the only factor to contribute to economic growth and sustainable development and perhaps even this new S & D logic that the authors proposed may become obsolete, since "continuous improvement in human workers' education and AI related/digital skills is expected to have positive impact on employment" (see L.E. Marinaș et al. 2024).
Also, as Helkkula and Arnould (2022) concluded, many institutions contribute, including in Romania, to responding correctly and reacting promptly and also to formulating S & D logic and even SDGs. This may also be validated or further expanded as research focusing on the development, monitoring and evaluation of SDGs or sustainable development indicators and indexes.
The measures of Territorial Impact Assessment (TIA), Cost Benefit Analysis and DNSH principle are inter-linked (as also mentioned and demonstrated my Preciosa M. 2024), using indicators in four main areas: general socio-economic-environmental indicators, European strategies (such as the New Bauhaus or the New Green Deal), territorial cohesion phenomena (such as demographic challenges, territorial cooperation or disasters, leaks of information, wars, pandemics) [see Trinomics (2026), FTSE Russell (2021)].
For territorial qualitative indicators, together with their measured effects on the EU policies objectives, a stronger coordination and programming or a unitary view would be of help for the administrative capacity of the programme evaluation and monitoring units. This is where, as stated by the key findings of our DNSH integration applied research survey stepped in and highlighted, not surprisingly, once again, that only using checklists of trainings are insufficient measures for a successful, efficient and relevant policy making and effective/practical DNSH application in Romania and its regions.

9. References: European Commission (2021–2027) Regulations, Guidance Notes on DNSH, previous ECSDEV articles and research by the authors, survey applied for DNSH principle (same as the one in 2025), relevant academic literature on sustainability evaluation and policy design.