



TRANSNATURE

Ethics Plan

Deliverable 6.5

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This Ethics Plan has been authored by Federica Cittadino, Institute for Comparative Federalism, Eurac Research. The author wishes to acknowledge Liise Lehtsalu and all project partners for providing their input to an early draft of this document.



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Executive Summary

This Plan identifies the main ethical issues emerging in TRANSNATURE concerning human participation, stakeholder engagement, and data quality. It also identifies a common approach to deal with the main ethical issues arising in the project based on widely recognized principles, privacy legislation standards, and common practice. The main approach for engaging with human participants in TRANSNATURE is obtaining their free prior and informed consent. All researchers in TRANSNATURE are required to follow these guidelines.

1 About TRANSNATURE

The TRANSNATURE project explores the transboundary governance of biodiversity in Europe. Through a comparison of four selected cases, the project examines how transboundary biodiversity governance incorporates different stakeholders, how cooperation mechanisms among these stakeholders can improve biodiversity conservation, and how transboundary biodiversity protection can promote the prevention and enforcement of cross-border pollution and wildlife crime. To this end, research methods in the project combine desk research on relevant legal and policy documents for each case study with interviews and focus groups with key stakeholders as well as stakeholder engagement activities. Stakeholders are consulted throughout the course of the project for inputs on the project's methods, data collection, and feedback on policy recommendations. Their involvement in the project also aims to accommodate different views, interests, and needs of the communities concerned.

PROJECT DURATION

01/03/2023 – 28/02/2026

PROJECT PARTNERS

Institute for Comparative Federalism, Eurac Research, Bolzano/Bozen, Italy
(project leader) - Eurac

Faculty of Law, Ghent University, Ghent, Belgium - UGhent

Arctic Centre, University of Lapland, Rovaniemi, Finland - ULapland

Department of Public Law - The Tarragona Centre for Environmental Law Studies
(CEDAT), University of Rovira i Virgili, Tarragona, Spain - URV

CASE STUDIES

1) EGTC ZASNET and the Transboundary Biosphere Reserve 'Meseta Iberica' (Spain-Portugal) (hereinafter ZASNET) – URV in charge;

2) Prealpi Giulie Park and Triglavski Narodni Park (Italy/Slovenia) (hereinafter Julian Alps) – Eurac in charge;

3) Westerschelde (Netherlands-Belgium) – UGhent in charge; and

4) Baltic to Barents (Sweden-Norway-Finland) – ULapland in charge.

2 About the Ethics Plan

2.1 Objectives

TRANSNATURE will engage in fieldwork and exchange activities with different kinds of research participants and stakeholders at different levels. All cases analyzed in the project are characterized by the presence of different typologies of authorities and actors that contribute to the transboundary management of natural resources and protection of biodiversity. Examples of the research participant/stakeholder typologies with which researchers in the project will engage are: park management authorities, municipal authorities, local NGOs, and civil society at the local level; subnational authorities at the intermediate level where applicable; national ministries and commissions at national levels; bilateral bodies and commissions, as well as transboundary organizations at the transboundary level; EU authorities and regional organizations at regional European level; and international authorities and organizations at international level. Each partner is responsible for engaging with relevant stakeholders in their case studies (see box above).

The objective of the TRANSNATURE Ethics Plan is to both discuss the ethical implications of human participation and stakeholder engagement activities in the project and provide a common approach to deal with the main ethical issues arising in the project (section 3). This will allow the TRANSNATURE consortium to build and consolidate trust with the research participants involved in the research design. Trust is a precondition for conducting any social science research.

After touching upon the main responsibilities in assessing the project's ethical impacts in the introduction, section 3 describes the main ethical risks identified for TRANSNATURE and refers to relevant ethical principles, as well as applicable legislation and procedures. Section 4 discusses the protection of personal data when collecting data from the abovementioned stakeholders, as well as the voluntary nature of their engagement in the project. Additional ethical considerations apply to more general issues concerning quality standards common to any research project, which are considered in section 5. Finally, section 6 briefly examines the occurrence of unexpected findings in the research work.

2.2 Responsibilities

The assessment of ethical aspects is part of WP6 of the project, which focuses on project management. Eurac, and in particular TRANSNATURE Project Coordinator Federica Cittadino (federica.cittadino@eurac.edu), is leader of this WP and related activities, including the elaboration of this Ethics Plan.

All partners are collectively obligated to collaborate closely with the WP leader. This collaboration entails constantly sharing information about engagement with stakeholders in their case study, as well as reporting on any ethical issue that might emerge. It is also every partner's responsibility to follow both these ethical guidelines and their own institutional ethical procedures (see section 3.2.1, 3.2.2, 3.2.3, and 3.2.4). This collaborative approach aims to foster consistency in and quality of the research work.

It is furthermore specified that every researcher involved in the project is personally responsible for their scientific misconduct (see section 5.2 below).

3 Description of Ethical Impacts and Procedures

3.1 Identification of main ethical risks

The main ethical risks in TRANSNATURE derive from the presence of activities that require human participation in the project, i.e. stakeholder engagement activities and fieldwork. Every research task requiring human participation needs to be handled carefully to meet basic ethical and legal standards, such as for instance to ensure that all participants engage voluntarily in research activities and are aware of how their contribution will be used. This is especially true for TRANSNATURE, which plans to engage with very different sets of stakeholders, some of which might be in a more vulnerable position due to their different institutional roles and power imbalances among groups involved in transboundary biodiversity protection. The following table details the different typologies of activities requiring human participation and the groups of stakeholders involved in these activities. For the participation in all these activities, consent will be required (see sections 3.2 and 4.1).

Activity	Participants
4 sets of parallel stakeholder engagement meetings for each case study (October-November 2023)	<p>ZASNET: EGTC Director and officer.</p> <p>Julian Alps: Prealpi Giulie and Triglav park officers; officers of municipalities; members of tourism and environmental associations; officers of EUROPARC Federation.</p> <p>Scheldt Estuary: Dutch and Flemish representatives of the Flemish-Dutch Scheldt Commission (VNSC) and chair of the Scheldt Council (representing broad stakeholder groups).</p> <p>Baltic to Barents: officers of the institutions involved in the transboundary cooperation at state and municipal level and herding associations.</p>
Videos to be published on the project's website	<p>ZASNET: EGTC Director.</p> <p>Julian Alps: Prealpi Giulie and Triglav park officers.</p> <p>Scheldt Estuary: (planned) nature organizations: Natuurpunt and Bnd beter Leefmilieu.</p> <p>Baltic to Barents: possibly officers from relevant institutions, local authorities and NGOs.</p>
Interviews in the case studies	<p>ZASNET: (list to be completed from December 2023)</p> <p>Julian Alps: Prealpi Giulie and Triglav park officers; officers of municipalities; officers of neighboring parks; members of tourism associations, and environmental and conservation groups; officers of EUROPARC Federation; officers from Region Friuli Venezia Giulia; officers from national environmental ministries and other governmental agencies.</p>

	<p>Scheldt Estuary: Ministries (represented via the Flemish-Dutch Scheldt Commission) and chair of the Scheldt Council (representing broad stakeholder groups), International Scheldt Commission, Nature organizations, farmers organizations, citizens, representatives of the harbors, provinces, and where appropriate experts (universities).</p> <p>Baltic to Barents: transboundary cooperation officers, national and local authorities involved and members of the local communities including Sámi indigenous communities (reindeer herders/fishermen).</p>
Interviews with international and European stakeholders	Officers of cross-border cooperation, international and EU organizations, such as EUROPARC Federation, IUCN, UNEP, EU Commission (DG ENV), the Convention on Biological Diversity (CBD), and others.
Focus groups	A combination of participants of the interviews.
Feedback on policy recommendations	Same as for the interviews.

3.2 Compliance with ethical principles, relevant legislation, and procedures

Any research work is founded on academic freedom, protected inter alia under article 13 of the European Charter of Fundamental Rights of the EU.¹ Freedom of research, however, is equally subject to some constraints, including the respect for research participants' fundamental rights. These include all human rights safeguarded in human rights instruments, such as the UN Declaration of Human Rights,² the abovementioned EU Charter of Fundamental Rights, and the European Convention on Human Rights.³ The general respect for these rights is of fundamental importance also in the context of TRANSNATURE and has some ethical repercussions.

To respect human dignity and integrity to the fullest, the general approach of TRANSNATURE when engaging with research participants and stakeholders is to obtain their free prior informed consent. For this consent to be truly free, prior, and informed, the following ethical principles need to be fulfilled: transparent communication with research participants throughout their engagement in the project; respect for privacy and confidentiality (see section 4); particular attention to vulnerable individuals and groups; promotion of inclusiveness; adherence to minimum harm and maximum benefit approach.⁴

Concerning transparency, it is of paramount importance to ensure that consent is based on the full understanding by research participants of the aims of the project, the purposes of their participation, the respect of their privacy, and the storage of the data collected.⁵ To this end, an informed consent form

¹ https://www.europarl.europa.eu/charter/pdf/text_en.pdf.

² <https://www.un.org/en/about-us/universal-declaration-of-human-rights>.

³ https://www.echr.coe.int/documents/d/echr/convention_ENG.

⁴ These principles are adapted from *Ethics in Social Sciences and Humanities* (European Commission, 2021), available at https://ec.europa.eu/info/funding-tenders/opportunities/docs/2021-2027/horizon/guidance/ethics-in-social-science-and-humanities_he_en.pdf, at 6.

⁵ On storage policies, see TRANSNATURE Data Management Plan, available at <https://zenodo.org/communities/transnature/?page=1&size=20>. Art. 13 and 14 GDPR (see next footnote) list the mandatory information to be provided by the data controller, Eurac, to the data subjects or research participants, respectively when personal data are collected and when they are not.

template has been developed and needs to be adapted to the different circumstances of both the project activities and of the case studies (see Annex).

Taking into consideration possible sources of vulnerability is also very important in TRANSNATURE, since as mentioned TRANSNATURE involves different kinds of actors, from public authorities to indigenous peoples and civil society organizations. TRANSNATURE acknowledges that power imbalances among these research participants may influence the result of the research and will strive to maintain a balance in the involvement of institutions and more informal actors. Concerning for instance the engagement with Sámi people in the Baltic to Barents case, an anthropologist with a long-term experience with field research with these people is part of the consortium to ensure that trust is strong and traditional practices and particular sensitivities are respected (see more in sections 3.2.4 and 4.1).

Inclusiveness implies that TRANSNATURE will take all possible measures to take into account power imbalances also to ensure that less powerful and more marginalized groups or persons are able to participate in the project if they wish to do so. This means for instance paying particular attention to the language that is used to communicate with human participants; allowing participants to engage in their own mother tongue should be always preferred, if feasible and whenever cost effectiveness is fulfilled. Particular attention is also paid to a careful mapping of all relevant participants when carrying out both stakeholder engagement activities and fieldwork. Furthermore, young people (not underage) will be specifically targeted by involving NGOs and CSOs where they are more active.

The minimum harm maximum benefit approach requires that particular attention is paid to avoid participants' fatigue. This means that: (1) participants will be involved only when strictly necessary for achieving the research project's goals or if some of them request to be involved in research/stakeholder engagement activities; (2) the modalities of this involvement should take into account participants' logistical needs concerning for instance where meetings/interviews take place and in which modalities (online or in presence); participant involvement requires careful preparation in order for meetings/interviews to be as productive as possible and to avoid duplication of necessary meetings. Researchers in any event will be available for any necessary follow-up.

In addition to these common principles, the General Data Protection Regulation (GDPR)⁶ represents a common legal reference that is mandatory on all project partners when processing personal data.⁷ Relevant national legislation also applies to each partner in the application of the GDPR. In Italy, Legislative Decree no. 196/2003, as modified by Legislative Decree no. 101/2018, applies to data processing carried out by Eurac. In the Netherlands, the GDPR is implemented via the 'General Data Protection Regulation Implementation Act', in Belgium this Regulation is implemented via the (amended) Law of 8 December 1992 on the protection of the personal sphere with respect to the processing of personal data. In Spain, the GDPR was implemented through Organic Law 3/2015, of 5th of December, on the Protection of Personal Data and Guarantee of Digital Rights. In Finland, the Data Protection Act (1050/2018) specifies and supplements the EU's General Data Protection Regulation and its national application.

Due to the small size of the consortium and the typologies of research activities in TRANSNATURE, the project will not establish an Ethics Committee. Instead, all project partners adhere to the ethical principles and rules mentioned in this section and respect the additional ethics procedures detailed below, whenever needed.

⁶ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

⁷ See art. 2 and 3 on the material and territorial scope of GDPR.

3.2.1 Eurac

Eurac's newly established facultative Ethics Review Board will be operational only from mid-2024, after TRANSNATURE and the stakeholder engagement activities have started. For this reason, the specific ethics procedures adopted by Eurac will not apply to TRANSNATURE. The Project Coordinator, Federica Cittadino, is however in close contact with Liise Lehtsalu (Research Support Office), expert at Eurac of ethics requirements. In addition, the Project Coordinator is in close contact with the Eurac Privacy Office since before the project started. Research Support Office and Privacy Office in Eurac Research have developed a documented workflow to ensure research project's compliance with key ethics principles and privacy legislation; the Project Coordinator has completed this workflow. Eurac activities within TRANSNATURE are pursued in accordance with the Eurac Research Core Ethics and Integrity Principles⁸. According to national law, non-medical and non-clinical research is not subject to review by ethics committees established by law.

3.2.2 URV

URV has an established Ethics Committee. Accordingly, the URV team followed the URV internal procedure. In accordance with what the institution asks, the members of the URV answered an initial questionnaire where, based on the given answers, was determined where the project aligns, and which branch is going to approve the project's ethics. TRANSNATURE has been presented to the Ethical Committee concerning Research into People, Society and the Environment (CEIPSA). CEIPSA is the body responsible for assessing the methodological, ethical and legal aspects of R&D&I activities carried out at the URV that involve:

- the participation of human beings (including the processing of personal data)
- the use of biological agents, genetically modified organisms and risk factors of relevance to people, society and the environment
- the consideration of social and environmental issues

The committee is composed of a multidisciplinary group working impartially and independently, with scrupulous respect for the principle of confidentiality to which they are bound with regard to the protocols they assess.

The initial round of evaluation has been addressed to seek the approval of the Data Protection Officer (DPD, in the Catalan acronym). Only when the DPD approved the project, was the URV team allowed to submit the project to receive the approval of the Committee. In sum, the project complies with the requirements of CEIPSA and has made available for its participants 1) the Information sheet; 2) the informed consent for both research methods; and 3) the consent for registering images and videos during the stake holders meeting, all complying with the Data Protection requirements.

3.2.3 UGhent

The Faculty of Law and Criminology has a 'Faculty Ethics Committee'. The main task of the FPPW Ethics Committee is to advise researchers on ethical issues and review research applications. The ethics committee applies a procedural approach to research ethics by providing a General Ethical Protocol. UGhent proposal followed the default procedure via a questionnaire to discuss the projects ethics issues.

3.2.4 ULapland

ULapland does have an internal Ethics Committee in place but reviews are not compulsory. According to *The Ethical Principles of Research with Human Participants and Ethical Review in the Human Sciences in*

⁸ See <https://www.eurac.edu/en/about-us-eurac-research/policies-about-us>.

Finland (2019), reviews are compulsory when the research is deviating from free, prior and informed consent, or may affect physical integrity, or the subject are under 15, or if in the research may be used strong stimuli, or if the research may cause mental harm or if it amounts to a security risk. In all other cases when doing research with human participants, respect for ethical principles is subject to no other requirement than to obtain informed consent. If consent is lawfully obtained, no external ethics review is required.⁹ Should the research condition change, it is possible to seek advice from the Ethics Committee also later on.

4 Protection of Personal Data

As mentioned above, protection of personal data is regulated in the EU by GDPR that fully applies to the processing of personal data in TRANSNATURE. The following subsections describe how consent is lawfully obtained and the consequences of consent withdrawal, anonymization and pseudonymization procedures to ensure privacy, data storage policies, and the rights of data holders concerning data accessibility. Additional details on data storage, data sharing, and data restrictions can be found in the TRANSNATURE Data Management Plan.¹⁰

4.1 Consent

Pursuant to article 6 GDPR, obtaining consent from the data subjects (those providing personal data) is one of the ways to process personal data in a lawful way in the EU. Personal data will be processed in TRANSNATURE only after obtaining the consent of data subjects. This means that participation in research and stakeholder engagement activities in TRANSNATURE is strictly voluntary. Potential participants will not be pressured to participate and it will be made clear that consent can be withdrawn at any time.

Consent must be obtained explicitly and be preceded by the acknowledgement, either in writing or orally, of the conditions under which personal data will be treated (anonymization and pseudonymization below), for which purposes (why it is useful for research to collect data), where and for how long data will be stored, and whether and how they will be shared.

For this purpose, a template for informed consent has been prepared and is included in the Annex of this Ethics Plan. If consent is obtained in writing, this informed consent form must be signed by the data subjects involved in the project. If consent is expressed orally, the template for informed consent must be shared with the data subjects. These are ways to prove that consent has been obtained lawfully, as requested under article 7(1) GDPR. The annexed template should ideally be translated in the mother language of the research participants or in a language that is fully intelligible to them to be fully understood.

Only persons able to give informed consent will be included as participants: this means that neither minors nor persons without legal capacity will be included as participants. No sensitive data according to article 9 GDPR will be processed in the project, so special conditions for obtaining consent will not apply. The only exception to that concerns engagement with Sámi representatives. Data collected from them will reveal their ethnic origin; thus an *ad hoc* consent will be needed. ULapland will make sure to obtain and document this consent.

⁹ The ethical principles of research with human participants and ethical review in the human sciences in Finland (Finnish National Board on Research Integrity, 2019), at 61.

¹⁰ See footnote 5.

Consent will be also explicitly required when audio or video recording of events and presentations is requested.

4.2 Withdrawal of consent

According to article 7(3) GDPR, participants have the right to withdraw their consent to participation (and consequent data processing) at any time. This is made clear in the annexed informed consent template and it will be repeated before engaging with stakeholders, for instance before and after interviews take place. As stated in the TRANSNATURE Data Management Plan, in case consent is withdrawn, no further data will be collected, and any data related to the participant already collected and not yet anonymized will be destroyed. This means in practice that data should be anonymized as soon as possible after processing them.

4.3 Pseudonymization and anonymization

According to article 5(1)(e) GDPR, the identification of data subject should be limited to what is strictly necessary for the purposes of data processing. In line with this, the general approach of TRANSNATURE is that information and opinions collected cannot be traced back to the original data subjects that provided them. This will be made possible through pseudonymization and anonymization of interviews and focus groups.

According to article 4(5) GDPR, pseudonymization means “the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person”. Every partner will therefore separate personal data from their specific interview or contribution to focus group, in order for these contents to be not attributable to specific individuals if not with additional information. To that end, personal information like names, affiliations, countries of activity, etc. will be substituted by specific keys or codes, and correspondence between keys and personal information will be kept separately and will be accessible only to the interviewer(s) in each group. Pseudonymization will be applied to data from different case studies shared among project partners.

Complete anonymization will rather apply to publications and documents shared with the general public, such as interviews and focus group reports, if published, and different kinds of project outcomes including journal articles. Anonymization requires that contents are not anymore attributable to the original data subjects.

This general approach does not fully apply to the case study on which ULapland will focus when interviewing Sámi people. As stated in the Data Management Plan of TRANSNATURE, ULapland will adopt a discipline-specific approach for ethnographic data, proposed by the European Association of Social Anthropologists (EASA) and by the International Arctic Social Sciences Association (IASSA).¹¹ The default for the data is not anonymizing but acknowledging the intellectual property of the authors by keeping data in their name unless they explicitly consent for anonymizing. This is particularly so when interviewing, for example, Sámi authorities from the Sámi Parliament for whom failing to recognize them as Sámi would

¹¹ <https://www.easaonline.org/downloads/support/EASA%20statement%20on%20data%20governance.pdf>. See also: <https://iassa.org/about-iassa/research-principles>. The same document is also available as an Annex of the TRANSNATURE Data Management Plan.

nullify their struggle to reach this recognition: i.e. Sámi cultural identity. Embargo and confidentiality over materials that cannot be anonymized will be kept.

In general, personal data will not be concealed if interviewees explicitly ask not to do so or if consent is explicitly obtained on this point.

4.4 Data storage

As stated in the TRANSNATURE Data Management Plan, personal data will be stored by the partner producing them. Only pseudonymized interview/focus group data will be shared among partners. Three years after the end of the project, pseudonymization keys will be anyway canceled and data will therefore be completely anonymized.

4.5 Data accessibility

Additional important rights of data subject are, according to articles 15 and 16 GDPR those of access and rectification of personal data. Human participants will be able at any time to access their personal data and ask to rectify them. Furthermore, they will be able to ask clarifications about the purposes of the processing, as well as the storage of their data.

5 Data quality

Ensuring data quality in research is fundamental. TRANSNATURE acknowledges that qualitative research may be affected by researchers' personal opinions and preferences. In order to avoid personal bias to play a too decisive role in the project, especially for the fieldwork part, TRANSNATURE has developed a common methodology to guide the work of researchers in a consistent way and in a way that is informed primarily by the project's research questions and objectives rather than on personal preferences.¹² This will allow the project to both achieve consistency and improve the robustness of data that is required in a qualitative research project.

Since the above will not completely eliminate biases, researchers are invited to disclose these biases both with TRANSNATURE participants and with fellow researchers in order to support a better interpretation of the results. Furthermore, researchers must always be ready to revise their assumptions if data prove that these are wrong.

Robustness and data quality is further increased by the inclusive approach of TRANSNATURE to stakeholder engagement and the recruitment of human participants, described above in section 3.2. Additional quality checks are discussed in the following. These concern the relevance of the research work and data truthfulness.

¹² The Methodology Guidelines will be published on Zenodo in the first half of 2024.

5.1 Relevance of research

TRANSNATURE is a research project that aims to have repercussions on policy. Relevance, therefore, needs to be ensured both in the academic realm and in the policy realm. In the first respect, the project will contribute to the study of biodiversity protection in transboundary contexts and through transboundary management schemes. These issues are largely understudied in the literature, especially concerning European cases. In particular, the project will enlighten the exact combination of authorities and actors involved in transboundary biodiversity protection, as well as the relationship between these complex governance schemes and effective biodiversity protection.

Concerning relevance in policy terms, TRANSNATURE will have specific impacts on and contribute to policy making at different policy levels. At the international level, it is relevant for the discussions on the post-2020 global biodiversity framework in the context of the CBD (CBD/WG2020/1/5), which in turn has repercussions on all international treaties on biodiversity. At the EU level, it is in line with the objectives of the EU Biodiversity Strategy for 2030, which foresees an assessment by the Commission of different governance mechanisms to protect biodiversity. In particular, the project will evaluate what kind of cooperative mechanisms enable connectivity and transboundary biodiversity conservation in neighboring Natura 2000 sites. This will also have implications for the new Environmental Action Programme under elaboration, and the Fit for 55 Package under the European Green Deal. At national level, the project may contribute to the update of national biodiversity strategies pursuant to art. 6 of the CBD.

All selected cases will have policy repercussions for the governance of the areas under scrutiny and for similar cases across Europe. Research work will be slightly adapted to each case study's needs and problems. For this purpose, a stakeholder engagement meeting is performed in each case study at the beginning of the project. Furthermore, research results will be actionable because case studies will benefit from recommendations to enhance the transboundary governance of biodiversity protection targeted to their particular situation. Moreover, they will benefit from the identification of best practice examples in the other case studies.

When approaching the main stakeholders in the case studies, it is recommended to adopt an approach that is highly respectful of the contextual reality of each case, for instance by taking into serious account the political equilibria among the different authorities and actors involved in transboundary biodiversity protection. This means that actors need to be engaged in appropriate settings and at appropriate times, without forcing their availability. Researchers must avoid disrupting ongoing cooperation among the actors of each case study or taking sides with some of the stakeholders. Additionally, researchers must avoid giving false hopes to the stakeholders, for instance by providing easy solutions to complex problems.¹³

Finally, publishing in open access and creating a on open access Zenodo community with the main research outputs¹⁴ is a way to ensure the accessibility of the research work both to inspire future research and to avoid useless duplication in the future.

¹³ This last point is discussed in *Ethics Process and Plan* (Digital Scotland, 2018), available at <https://resources.mygov.scot/assets/images/service-design-guide-images/Ethics-doc.pdf>.

¹⁴ See <https://zenodo.org/communities/transnature/?page=1&size=20>.

5.2 Fabrication, falsification, and plagiarism

Another important quality check concerns the need to ensure accuracy and originality of the contents produced by the project, in line with the principles of research integrity, reliability, and respect of the *European Code of Conduct for Research Integrity*.¹⁵

Ensuring accuracy means that researchers must avoid that research materials or results are made up to make them appear as if they were real (fabrication), manipulated, changed, omitted, or suppressed without justification (falsification).

Originality implies avoiding both plagiarism, that is when researchers use other researchers' publications without crediting the original source, and auto-plagiarism, that is when researchers reproduce their already published contents word by word. Plagiarism may also infringe other authors' intellectual property rights.¹⁶

While TRANSNATURE will oversee that fabrication, falsification, and plagiarism are avoided in the project, every researcher involved in the project is personally responsible for their scientific misconduct in accordance with the accountability principle cited in the *European Code of Conduct for Research Integrity*.

6 Unexpected findings

TRANSNATURE acknowledges that unexpected findings may emerge in the research work, especially during the fieldwork. The unintentional discovery of information may concern for instance the existence of legal disputes between different public authorities or between public authorities and indigenous peoples or regional or local NGOs, or the existence of behaviors that are criminally relevant.

In case of discovery of legal disputes or any other unexpected findings, information will be treated with the required confidentiality that is promised to participants as part of the informed consent procedure. In particular, the source of information will be protected, unless they want to reveal their identity. All partners must ensure that people are reminded again of the consent procedure and their right to withdraw consent at any time.¹⁷ The piece of information will be used if relevant for the research project, if it is not offensive and not disrupting any ongoing public procedure.

Another form of unexpected findings can occur when research activities reveal improprieties or criminal acts. In such cases, the Legal Office of Eurac will be contacted and other partners will be informed to decide how to proceed. Ethics procedures of partners will be initiated (sections 3.2.1, 3.2.2, 3.2.3, and 3.2.4) whenever relevant.

¹⁵ *The European Code of Conduct for Research Integrity* (ALLEA, 2023), available at <https://allea.org/wp-content/uploads/2023/06/European-Code-of-Conduct-Revised-Edition-2023.pdf>, at 5.

¹⁶ See also *Ethics Plan, Matilde Deliverable 1.7* (2020), available at <https://bia.unibz.it/esploro/outputs/report/Ethics-Plan-MATILDE-Deliverable-17/991005772600301241>.

¹⁷ *Ethics Plan, LEGITIMULT Deliverable 9.1* (2022).

7 Bibliography

Ethics in Social Sciences and Humanities (European Commission, 2021), available at https://ec.europa.eu/info/funding-tenders/opportunities/docs/2021-2027/horizon/guidance/ethics-in-social-science-and-humanities_he_en.pdf.

Ethics Plan, LEGITIMULT Deliverable 9.1 (2022).

Ethics Plan, Matilde Deliverable 1.7 (2020), available at <https://bia.unibz.it/esploro/outputs/report/Ethics-Plan-MATILDE-Deliverable-17/991005772600301241>.

Ethics Plan, TIMEPAC Deliverable 6.4 (2022), available at <https://timepac.eu/reports/ethics-plan/>.

Ethics Process and Plan (Digital Scotland, 2018), available at <https://resources.mygov.scot/assets/images/service-design-guide-images/Ethics-doc.pdf>.

The Ethical Principles of Research with Human Participants and Ethical Review in the Human Sciences in Finland (Finnish National Board on Research Integrity, 2019), available at https://tenk.fi/sites/default/files/2021-01/Ethical_review_in_human_sciences_2020.pdf.

The European Code of Conduct for Research Integrity (ALLEA, 2023), available at <https://allea.org/wp-content/uploads/2023/06/European-Code-of-Conduct-Revised-Edition-2023.pdf>



TRANSNATURE

8 Annex

Template for informed consent

Information notice on the research project TRANSNATURE and on the processing of personal data

Dear participant,

(to be adapted depending on the partner seeking human participation)

Eurac Research – a private, not-for-profit research center in Bolzano/Bozen, Italy – is conducting as lead partner a research within the European project “TRANSboundary governance models of biodiversity protection: case studies for an enhanced protection of NATURAL resources in Europe” (TRANSNATURE), funded by the European partnership Biodiversa+ together with participating national authorities,¹ in collaboration with the partners of the project: University of Lapland, Finland, University Rovira i Virgili, Spain, and University of Ghent, Belgium.

Through this document, we inform you about the project’s main steps and the protection of the personal data collected during the research. Participation in the research is entirely voluntary.

The staff of the project thanks you for your collaboration and contribution. For further information, please contact: Federica Cittadino, e-mail: federica.cittadino@eurac.edu, phone: +39 0471 055 269.

I Research project

TRANSNATURE is a European project, which aims to study the transboundary governance of biodiversity to respond to the following research questions: 1. To what extent and how do transboundary conservation areas involve different types of managing authorities and stakeholders in effective governance mechanisms to enhance conservation? 2. To what extent and how does the stratification of different governance mechanisms in the same natural areas, such as World Heritage sites, European Groupings of Territorial Cooperation (EGTCs), national management authorities, subnational authorities and indigenous and community conserved areas, trigger processes that strengthen biodiversity conservation? Are there cooperation mechanisms or mechanisms of conflict resolution in place among the different actors involved? 3. To what extent can transboundary conservation areas contribute to stop ecological degradation by improving the prevention of both cross-border pollution and transnational wildlife crime in the EU?

To respond to these questions, the project will analyze in detail and compare the following case studies: (1) ZASNET EGTC and transboundary biosphere reserve Meseta Ibérica (Spain/Portugal); (2) Prealpi Giulie Park and Triglavski Narodni Park (Italy/Slovenia); (3) Westerschelde (Netherlands/Belgium); (4) Baltic to Barents (Finland/Sweden/Norway).

TRANSNATURE will contribute to policy making at the international, European, national and conservation area levels, since it has repercussions on the CBD post-2020 global biodiversity framework, the EU Biodiversity Strategy for 2030, the Fit for 55 Package under the European Green Deal as well as national biodiversity strategies and the management regulations of the study areas included in the project. Policy impact is ensured through a specific stakeholder engagement plan.

Desk research on relevant legal and policy documents adopted at different governance levels (international, European, national and sub-national) will be combined with semi-structured interviews of and focus groups with key stakeholders (empirical research method). Interviews and focus groups will be conducted, in presence or online, and recorded. Stakeholders will engage in project activities also through the participation in dedicated stakeholder events. Stakeholders will be asked to subscribe to a periodic newsletter, prepared by the project team, with updates on project activities and outputs. The project website also displays important updates on the project and is freely accessible.

¹ Please note that the national funding authorities are indicated in the footer.

1. Purpose and scope of your involvement

In the context of this research, we ask for your collaboration to *[explain the reasons that justify participation]*. You are contributing towards this research by helping us *[explain the results of the participation]*. The results will help us to *[explain the impact on the project]*.

This collaboration will imply participating in *[explain the phases and types of participation]*. *Optional:* Your participation may involve the following risks or inconveniences: ...

Your participation is entirely voluntary. If you decide to take part, you need to sign the consent form at the end of this document. However, you are free to withdraw at any time by notifying in writing the Project Coordinator, Federica Cittadino (see contact above). You also have the right to access your personal data and request that they are updated (see data subject's rights below).

All information collected will be kept strictly confidential (see data policy below).

2. Typologies of data collected

The following data will be collected *(to be changed in line with typologies of data to be collected and purposes of contact)*:

- Name and surname of participants;
- Affiliation;
- Contact data, such as emails;
- Personal images and voices in case of recorded interviews and in case of recordings of stakeholder events;
- Knowledge about the case studies;
- Opinions and evaluations relevant to the research aims;
- Additional contacts possibly interested in being interviewed.

3. Data policy *(to be changed depending on the purpose of participation)*

Personal data will be anonymized and not shared with other research partners, unless this is strictly necessary to fulfill the research purposes or unless interviewees request to be specifically quoted in research outputs. The interviews and the focus groups will be used only to fulfill the project's research goals and to ensure its policy impacts.

Interviews and focus groups will be transcribed and published in the form of anonymized reports. Contents of interviews and focus groups might be quoted in an anonymized form in project-related publications (reports, blog posts, scientific journal articles, policy recommendations, ...). The same content will be analyzed to respond to the project's research questions and published in many forms (see previous list between round parentheses), also on the project's website and Zenodo community, always in an anonymized form.

Personal data, such as names, affiliations and contacts, will be collected also with the purpose of organizing relevant stakeholder meetings or with the aim to disseminate research results, through newsletter or other forms of communication.

Personal images, such as photos at events or videos may be collected during online events or to produce specific communication/dissemination materials. In order not to be filmed or recorded during virtual events, you will always be able to disable the webcam and/or mute the microphone.

Within the framework of the project, special categories of personal data may also be processed in accordance with Art. 9 GDPR. These are personal data revealing ethnic origin regarding those individuals that are part of indigenous peoples, and data of minors, for instance of activist organizations of underage

individuals. These data will only be revealed in an aggregate manner (ex. an interviewee belonging to indigenous peoples/groups/organizations or a minor/a representative of this minors organization).

II Data Privacy Statement

In accordance with current data protection regulations, we hereby provide you with information about how your data is processed. All personal data is dealt with in compliance with EU Regulation No. 2016/679 (GDPR) and the national legislation. The processing of personal data by researchers is based on principles of integrity, legality, transparency, and confidentiality.

1. Data Controller and Data Protection Officer (DPO)

Data Controller: Eurac Research – Viale Druso/Drususallee, 1 – 39100 Bolzano/Bozen, in the person of the legal representative

You can contact the DPO under the following e-mail address: privacy@eurac.edu.

2. Purpose and Legal Basis for the Data Processing

Personal data in the possession of the Controller, or that may be requested by the Controller, are necessary for the following purposes *(to be changed according to context)*:

- participation in the research study and thus use of the data for research purposes, as specified under section I;
- communications via e-mail (including newsletters or invitation to project-related events);
- documentation for institutional archiving and communication purposes, including but not limited to presentations, reporting documents, creation of informative material, communication activities using any forms and media, such as web pages and social networks.

The data collected are adequate, relevant and limited to what is necessary for the purposes of the processing.

The legal basis for the processing of your personal data for the purposes indicated above is your consent to the processing of your personal data (art. 6, par. 1, lett. A).

3. Recipients of the Data Processed and transfer of data

The recipients of the data are the employees of the Institute for Comparative Federalism - Eurac Research - persons in charge of data processing activities, authorized and instructed by the data controller to data processing activities. Personal data may be communicated to external service providers (e.g. sending e-mails and analyzing the functional capability of the website), which typically process personal data on behalf of Eurac Research as data processors.

(Optional: Personal data may possibly also be communicated - exclusively for the research purposes - to the project partners who undersigned the Data Sharing Agreement in order to fulfil the project's research purposes.)

The scientific results (e.g. publications of scientific papers) may be disseminated only in aggregated and anonymized form or rather in such a manner that it is impossible identify the individuals, unless specific individual interviewees wish to be directly and personally quoted in the project's research products.

(Optional depending on context: For virtual events Eurac Research uses Zoom (for further information: <https://zoom.us/privacy>), Microsoft Teams (for further information: <https://support.office.com/en-us/article/teams-free-support-and-privacy-statement-9116c829-c8fa-4822-96a3-1e89b2911ba5>).

For questionnaires Eurac Research uses Survey Monkey (for further information: <https://www.surveymonkey.com/mp/legal/privacy/>).

For the transcription of interviews Eurac Research uses NVivo.)

To provide certain services Eurac Research and the Free University of Bolzano manage together the scientific platform Scientific Network South Tyrol which connects their data centers. Eurac Research and the Free University of Bolzano are Joint Controllers of the personal data processed in this context and, accordingly, have entered into an agreement pursuant to art. 26 of the GDPR.

Your data is stored within the European Union and Eurac Research does not intend to transfer your data to third countries or international organisations. Some personal data could be transmitted to third countries outside of the EU but only if the transmission of personal data is connected to the performance

of the institutional activities of Eurac Research. Where data is transferred to a third country, this will be done on the basis of the European Commission's standard contractual clauses (SCC) with supplementary measures and in accordance with the legal requirements.

4. Information on the Retention Period of Personal Data

Personal data will be stored no longer than for the time strictly necessary to achieve the goals of the project or any follow-up research projects, and in any event in a way to comply with the Applicable Law (articles 2946-2947 Italian Civil Code). At the end of this period, the data shall be deleted or made anonymous.

5. Mandatory or Voluntary Communication of Data and Possible Consequences of a Failure to Provide it

The provision of personal data is voluntary, but refusal could interfere with the correct performance of the purposes, thus rendering the contribution to the project impossible.

6. Automated decision-making processes

There are no automated decision-making processes that could produce an adverse legal effect on the data subject or have a similarly significant negative impact upon them.

7. The Data Subject's Rights

At any time the data subject has the right to request access to their personal data, and to correct or delete that data, or to limit its processing. In addition, the data subject has the right to lodge a complaint with a supervisory authority. When the data processing is based on consent, the data subject has the right to withdraw that consent at any time. The data subject may also exercise all other rights pursuant to current data protection regulations (articles 15 ff GDPR) by writing to the e-mail address: privacy@eurac.edu.

I. CONSENT TO PARTICIPATE IN THE PROJECT

The _____ undersigned

DECLARES

to have understood the contents and objectives of the above-mentioned project and to participate voluntarily in the project.

Consent may be revoked in writing at any time without giving reasons, with the consequence that the interview may no longer be used. Publications that have already taken place are not affected by the revocation.

Place, date _____ Signature _____

II. CONSENT to the processing of personal data

The Undersigned/data subject (adult in case of interview to minors)

OR

The Undersigned/ data subject (person with parental responsibility for the minor)

DECLARES

to have read the Information about personal data handling and is aware of this notice as drawn up pursuant to EU Reg. 2016/679 and national legislation and **CONSENTS** to the processing of his/her personal data and in particular special categories of personal data (.....).

Place, date _____ Signature _____

III. PHOTOGRAPHING, AUDIO AND VIDEO RECORDING AUTHORIZATION FORM

The undersigned authorizes hereby, according to articles 96 and 97 of Law No 633/1941 (Copyright law) Eurac Research (and any person acting under the authority of Eurac Research) to take photos (also group photos), video and sound recordings of the undersigned during recording of videos/or stakeholder meeting, in the framework of the project TRANSNATURE., which will take place on for the purposes of this project, and may be used, communicated, published and/or disseminated in any manner or media, including the use on web pages. The undersigned hereby grants Eurac Research permission to use the photos, videos and audio recordings free of charge for an unlimited period of time.

The undersigned declares that he/she will have no claims against Eurac Research with respect to the above and waives all rights, claims and/or actions arising out of the present authorization.

Place, date _____ Signature _____