

MEPA notes that the Interreg Europe Programme is a high strategic level document. Due to its scope and nature, the resulting environmental impacts are likely to be indirect and depend mainly on the focus, purpose and nature of the proposals coming forward at a later stage and how these proposals are taken forward in subsequent plan-level and project-level decisions. However, despite its high strategic level, MEPA considers that the Environmental Report has made important conclusions and recommendations. In particular, we share the same opinion on the following issues:

- 1) The programme needs to improve integration between all specific objectives to ensure that proposals which are promoted, directly or indirectly, as a result of the Interreg Programme, do not have adverse impacts on the environmental Investment Priorities of the same programme, such as Priority 6(c) regarding the conservation and protection of natural and cultural heritage, and other EU environmental objectives.
- 2) Although Specific Objective 3.1 (Low-carbon economy) is expected to have positive indirect impacts on the environment, e.g. less generation of GHG emissions and reduction of air pollution, caution is required due to the likely negative impacts that particular renewable energy sources could have on environmental resources (e.g. biodiversity, landscape and water). Examples include potential impacts of windfarms on the landscape and wildlife (e.g. birds) and impacts of PV farms on land use and the landscape.
- 3) Further to the above, environmental resources and objectives need to be mainstreamed (i) across all priority areas, and (ii) at all stages of the Interreg Programme, including the process for selecting eligible proposals, implementation of pilot projects and integration of the learning outcomes of Interreg projects into lower-tier plans and projects. The Environmental Report notes that ‘Whether the effects and contributions will be finally realised depends on decisions and influences outside INTERREG EUROPE. The Programme provides mechanisms and information which, as described above, create opportunities to realise positive effects and contributions. Same counts for the question if certain effects have to be assessed at another level or in the frame of another programme (e.g. regional programmes). This ‘tiering’ of the assessment is implicit because no direct effects will be realised by the Programme. The closer the programming comes to the end of the impact chain the more crucial and detailed the assessment of the likely significant environmental effects must be.”

Therefore, we note the conclusions in the Environmental Report for the Interreg Europe Programme 2014 - 2020 and consider that the SEA recommendations should be taken into account in the following stages of the programme and its implementation.