

Opinion about the Strategic Environmental Assessment of the Euro-MED Programme 2021-2027

Country : Malta

Name of the Environmental Authority : Environment and Resources Authority (ERA)

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Section of the report	Proposal to amend the text	Comment/remark
Chapter 1 – Framework and Programme background		N/A
<ul style="list-style-type: none"> • General presentation of the cooperation area 		N/A
<ul style="list-style-type: none"> • The SEA procedure 		N/A
<ul style="list-style-type: none"> • Structure of the environmental report 		N/A
<ul style="list-style-type: none"> • Presentation of the Programme strategy 		N/A
Chapter 2 - Context analysis, environmental indicators, and characteristics of the area to be significantly affected		N/A
<ul style="list-style-type: none"> • Climate change adaptation and associated risks 		N/A
<ul style="list-style-type: none"> • GHG emissions 		N/A
<ul style="list-style-type: none"> • Inland water quality and supply 	Pg. 29 – Inland water quality. Statement in the Report: <i>"Cyprus has one river basin district, with an ecological status of good to moderate, while much of the status of the river</i>	Malta would like to clarify that data on inland water quality will be updated on the basis of new monitoring data collected and through the

	<i>basin in Malta (Malta and Gozo Islands) is unknown."</i>	publication of the 3rd WCMP for the period 2022-2027.
<ul style="list-style-type: none"> Inland and biodiversity and ecosystem 		N/A
<ul style="list-style-type: none"> Marine ecosystem and natural resources 		N/A
<ul style="list-style-type: none"> Soil quality and land use 	<p>Pg. 48 – Soil degradation and artificial soils and surfaces.</p> <p><u>Proposed Amendments:</u> “Malta is a specific case, with more than 156% of artificial soil.”</p> <p>Also the legend of the Figure should read “soil sailing sealing”</p>	N/A
<ul style="list-style-type: none"> Technological risks 		N/A
<ul style="list-style-type: none"> Air quality and Health 		N/A
<ul style="list-style-type: none"> Energy 		N/A
<ul style="list-style-type: none"> Waste management 		N/A
Chapter 3 - Integration with other environment and sustainable development policies in the cooperation area		N/A
<ul style="list-style-type: none"> Coherence with the community-level policies 		N/A
<ul style="list-style-type: none"> Coherence with strategic policies for the cooperation area 		N/A
Chapter 4 - Environmental protection objectives		N/A
Chapter 5 - Likely significant effects on the environment		N/A
<ul style="list-style-type: none"> Methodology for assessment 		N/A
<ul style="list-style-type: none"> Interactions between the programme and environmental objectives 		ERA welcomes the shift in focus from infrastructural investment towards actions

		<p>which are more related to networking, planning and information sharing.</p>
<ul style="list-style-type: none"> • Environmental effect of priority axes 		<p>Priority 1 – Smarter Med (Specific Objective i)</p> <p>Whilst the priority actions for objective SO (i) are generally not infrastructure-oriented, it is noted that some of the proposed actions could still involve some development interventions. The eventual implementation of any development proposals or other physical site interventions as part of this objective, would need to be reviewed further at project stage to avoid adverse environmental impacts.</p> <p>Priority 2 – Greener Med</p> <p>(Specific Objective vi)</p> <p>It is recommended that proposals which are intended to prevent and mitigate environmental impacts, involving infrastructural interventions onto the physical environment, should steer away from actions that could have other consequential environmental effects, such as mitigation measures involving significant modifications to the natural coast.</p> <p>Moreover, it is noted that one of the proposed actions under this objective is to '<i>support deployment of renewable energy</i>'. Caution is required due to the possible impacts that certain renewable energy facilities could have on the environment, such as impacts from windfarms and PV farms on land, biodiversity and the</p>

		<p>landscape, especially if located at inappropriate locations which are environmentally sensitive.</p> <p>The Programme intends to <i>'Improve connection of urban and inland/remote areas, including islands, paying particular attention to tourism'</i>. It must be ensured that such action does not promote environmentally damaging interventions onto the physical environment or increase tourism pressure onto pristine or remote rural/natural areas. The natural environment could still be impacted by additional major infrastructural works under the pretext of improving connectivity. In addition, proposals intended to improve tourism should be subjected to suitable controls and safeguards in order to ensure that such proposals do not create unnecessary pressures onto natural areas and the countryside, such as demand for new tourism accommodation, formal car parking areas, visitor facilities, etc., with consequential impacts on further land take-up and impacts on the landscape and natural sites.</p> <p><i>'Awareness raising and promotion of environmental culture'</i>, such as the creation of a water-saving culture among the population is welcomed. It is also suggested that such action should also be clearly linked to activities that use significant amount of water in their operations such as industry, agriculture and tourism.</p>
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<ul style="list-style-type: none"> • Environmental cumulative and transnational effects 		<p><i>Waste and energy</i> : Whilst noting the expected positive effects associated with this priority, ERA emphasises that waste reduction should be the first priority for the management of waste. Moreover, caution is required regarding the implementation of renewable energy facilities, so as to ensure that such infrastructure does not result in adverse impacts on the natural</p>

		<p>environment, the landscape and protected natural areas.</p> <p>Tourism : The Environmental Report states that the cumulative effects of tourism on particular sectors such as inland and marine ecosystems, water, and landscape and cultural heritage are not well known at this stage but cannot be excluded. Therefore, it must be ensured that adequate preventive measures are taken into consideration during the next phases, such as preparation of subsequent plans and implementation of projects emerging from this programme, so that adverse environmental impacts from tourism projects are avoided and suitably mitigated from the start. Suitable safeguards should be integrated in plans and project-level decisions to ensure that any development and infrastructural projects emerging from this Programme do not jeopardise the natural environment, the rural landscape and protected natural sites.</p>
<p>Chapter 6 - Elements for an Appropriate assessment of Natura 2000 sites</p>		<p>The Environmental Report states that an in-depth assessment of significant effects of the Programme on Natura 2000 sites is not possible at this stage, since the Programme covers a broad area and does not define local actions. Therefore, any subsequent plan/policy and development and infrastructural projects emerging from this Programme should be subjected to further environmental screening, so as to ensure that such proposals do not result in adverse impacts onto the natural environment,</p>

		including protected natural sites and their landscape.
Chapter 7 - Recommendation for a better environmental integration		ERA acknowledges that the proposed mitigation measures considers both international and national environmental objectives and processes, with a view to protect the holistic environment.
<ul style="list-style-type: none"> Measures to prevent, reduce and offset adverse effects 		N/A
<ul style="list-style-type: none"> Measures to promote, diffuse environmental best practice 		N/A
Chapter 8 - Follow-up for the implementation phase		N/A
<ul style="list-style-type: none"> Environmental indicators 		N/A
<ul style="list-style-type: none"> Provisions for an environmental monitoring system 		ERA welcomes the recommendation that, following the adoption of plans/policies emerging from this Programme, monitoring is necessary so as to measure their effectiveness and ensure no adverse environmental effects.
Chapter 9 - Conclusion		ERA notes the conclusions of the SEA Environmental Report of the Euro-MED Interreg Programme 2021-2027. It considers that any eventual plans/projects that involve development or other similar site interventions, emerging from this Programme, require further environmental screening so as to ensure effective protection of the environment.
<ul style="list-style-type: none"> Information of potential alternatives and justification of the Programme choices 		N/A
<ul style="list-style-type: none"> Quality of information and rationale for analysis 		N/A

Appendix 1 – Non technical summary		N/A
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Additional general comment : N/A