

## **ERA's comments on the Strategic Environmental Assessment (SEA) Screening and Scoping Report for the AMIF and BMVI Operational Programmes 2021-2027**

**5<sup>th</sup> October 2021**

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### **1. Introduction**

- 1.1 ERA welcomes the opportunity to comment on the SEA Screening Template and the SEA Scoping Report of the AMIF and the BMVI Operational Programmes 2021-2027.
- 1.2 The AMIF and BMVI Programmes are both strategic level documents that brings together various objectives and actions aiming at (i) the efficient management of migration flows; (ii) the development of a common Union approach to asylum and immigration; and (iii) strong and effective European integrated border management at external borders.
- 1.3 These comments are provided without prejudice to ERA's review and comments at project stage when more detailed environmental assessment and/or environmental permitting may be required. Depending on their nature, location and scale, proposed projects may also require different types of environmental assessments, including an Environmental Impact Assessment (EIA) screening procedure in terms of S.L. 549.46 (EIA Regulations) or other assessments, as may be relevant.

### **2. SEA Screening Conclusion**

- 2.1 The SEA Screening Template for both programmes, which was made available together with the scoping report, highlights that the measures proposed by the Programmes are generally very broad and 'soft' in nature, related to the provision of services, hands on training, etc., without requiring any additional infrastructural works. In this regard, ERA considers that, strategically these programmes are unlikely to have a significant adverse impact on the environment.
- 2.2 Whilst most of the proposed measures are generally not infrastructure-oriented, some of the proposed actions could still involve some development interventions (such as the upgrading of coastal radar systems and the refurbishment of buildings housing the coastal optronic systems). Some of these sites are located in sensitive environmental areas and would therefore require more detailed environmental screening by ERA. Depending on their location and type/scale, any development proposal or other physical site interventions related to these measures may need to be reviewed further at project stage to avoid adverse environmental impacts.

### **3. SEA Scoping Conclusion**

- 3.1 ERA also welcomes the preparation of the SEA scoping reports of the AMIF and BMVI Operational Programmes. ERA notes the scope and parameters presented in both scoping reports and that these will be taken into account in the following stages of the programme and its implementation, if an SEA study for both programmes is considered necessary.