

Director General
Strategy & Implementation Division
Parliamentary Secretariat for European Funds

16th December 2021

Dear [REDACTED]

**SEA Screening for the European Maritime, Fisheries and Aquaculture Fund Operational Programme 2021-2027
Consultation in terms of Regulation 4(6) of S.L. 549.61 (Strategic Environmental Assessment Regulations)**

Reference is made to the OPM's SEA screening consultation on the European Maritime, Fisheries and Aquaculture Fund (EMFAF) Operational Programme 2021-2027, which ERA received by email on 10th December 2021.

The EMFAF Programme is a strategic level document that brings together various objectives and actions aiming at fostering: (i) sustainable fisheries and the restoration and conservation of aquatic biological resources; and (ii) sustainable aquaculture activities, and processing and marketing of fisheries and aquaculture products.

ERA has reviewed the information provided with this SEA screening consultation and provides comments below, with the intention of ensuring that implementation of the Programme avoids major environmental impacts.

Yours sincerely,



Perit Michelle Piccinino
Chief Executive Officer
Environment and Resources Authority

ERA's comments on the Strategic Environmental Assessment (SEA) Screening Report for the European Maritime, Fisheries and Aquaculture Fund Operational Programme 2021-2027

16th December 2021

1. Introduction

- 1.1 ERA welcomes the opportunity to comment on the SEA Screening Template of the EMFAF Operational Programme 2021-2027.
- 1.2 These comments are provided without prejudice to ERA's review and comments on any development projects that may emerge from this programme, when more detailed environmental assessment may be required.

2. General Comments

- 2.1 Most of the initiatives identified in the EMFAF programme are non-physical in nature, related to investment in training, improvements to fishing vessels, data collection, etc. ERA considers that, strategically, these initiatives are unlikely to have a significant adverse impact on the environment.
- 2.2 The EMFAF Programme also specifies that its measures will complement other initiatives in the ERDF, CF and JTF Programme in relation to the decarbonisation of ports, investments in TEN-T seaports, as well as cross-border and transnational programmes in areas related to the green transition and risk management, including in coastal areas.
- 2.3 Whilst most of the proposed measures are generally not infrastructure-oriented, some of the proposed actions could still involve development interventions, such as:
 - a. improving and expanding key port/landing infrastructure, such as landing sites adequately equipped to facilitate small-scale fishing activities, including fully serviced docking areas, moorings, refrigerated warehousing, etc.;
 - b. storage facilities for lost fishing gear and marine litter collected; and
 - c. investments in port infrastructure aimed at adapting to climate change.
- 2.4 Moreover, the programme identifies the fostering of sustainable aquaculture activities as a priority. This may include interventions such as the identification and mapping of the most suitable areas for developing aquaculture, amongst other measures. Once more details are available, the potential environmental impacts of the envisaged aquaculture proposals/operations may still need to be considered at a strategic level in order to avoid significant environmental impacts at project stage, including any relevant cumulative impacts.
- 2.5 Generally, the SEA Screening Template highlights that the details or various specific measures are yet to be determined at project level, and that more detailed evaluation of environmental impacts will be undertaken at project stage. However, considering that most of the above infrastructural development projects will be concentrated around particular coastal areas, it is recommended that the SEA screening conclusion provides a more comprehensive and robust review of the likely impacts (including cumulative impacts) resulting from such interventions, and whether these, based on professional judgement and previous experience, could result in significant environmental impacts. In this regard it is recommended, that any physical/development interventions and commitments are directed toward existing harbours such that impacts/pressures on the coastal environment are avoided at source.