

## Interreg NEXT MED Programme 2021-2027 Strategic Environmental Assessment Screening Report and “Do no significant harm (DNSH)”

### Principle Assessment

#### SEA Malta Comments

Page No	Section Reference	Comments
7	2.2 Programme Strategy <ul style="list-style-type: none"> <li>• PO1</li> </ul>	It is suggested that innovation is not limited to “advanced technologies”, but is open to innovative solutions that work with nature, such as nature-based solutions.
8	2.2 Programme Strategy <ul style="list-style-type: none"> <li>• PO2</li> </ul>	It is suggested that “green and blue investment” referred to under PO2 are defined so as to clarify that such investments should contribute to conservation of biodiversity and its sustainable use.
13	3.1.a Biodiversity and ecosystems	The first paragraph of this sub-section makes reference to “internal and external” drivers. It is not clear what such drivers are internal or external to. The <a href="#">IPBES Global Assessment (2019)</a> makes reference to direct and indirect drivers of biodiversity loss.
19	Air	It is recommended that this statement is revised as follows: <i>“Air quality is improved in the EUMCs, with the majority of countries meeting the emissions ceilings for some air pollutants such as NH<sub>3</sub>, NMVOC, NO<sub>x</sub> and SO<sub>2</sub> (European Environmental Agency)<sup>9</sup>”</i> .  Moreover, further clarification is required on which data the following statement is based on: <i>“The situation on the exposure of urban population to concentrations above EU standards for PM<sub>10</sub>, PM<sub>2.5</sub>, O<sub>3</sub> and NO<sub>2</sub> also reflects the need for further efforts in reducing air pollutants (e.g. in Malta, Greece, Italy, Cyprus)”</i> , since Malta only exceeded the PM <sub>10</sub> daily limit value once in 2018.
33	Table 5: Potential environmental impacts of the NEXT MED Programme 2021-2027	The proposed actions under SO 1.1 and SO 1.3 in relation to biodiversity and ecosystems are expected to have a <i>“neutral or (indirect) positive impacts on the environment”</i> (as highlighted in the first paragraph in p.42), particularly if the appropriate safeguards (e.g. the DNSH principle) are taken into account during the selection of projects. Therefore, it is suggested that the <i>Biodiversity &amp; ecosystems</i> column for SO 1.1 and SO 1.3 is updated to “0/+”.