



STRATEGIC ENVIRONMENTAL ASSESSMENT

European Cooperation Programme Interreg Amazon 2021-2027

Analysis of the opinion of the Environmental Authority and responses



Damien Barral



July 2022



Cette opération est cofinancée par l'Union européenne dans le cadre du programme Europ'Act avec le Fonds européen de développement régional et le Fonds social européen.





European Cooperation Programme Interreg Amazon 2021-2027

Analysis of the opinion of the Environmental Authority and proposed responses

PREAMBLE

The strategic environmental assessment (SEA) of the Interreg Amazon 2021-2027 programme was finalised in March 2022, based on the February 2022 version of the IACP. The programme and its SEA were submitted to the Environmental Authority (EA), represented by the Regional Environmental Authority Mission of French Guiana (MRAe), on 19 April 2022. The latter issued its deliberate opinion on 16 June 2022.

This note follows the deliberate opinion issued by the MRAe. It provides an analysis of the recommendations made in the opinion of the Ae and how to respond to them.

CONTEXTUAL ELEMENTS TO BE TAKEN INTO CONSIDERATION

Before analysing and responding point by point to the recommendations made in the EA's opinion, we feel it is important to specify certain elements that shed light on the analysis.

- The IACP is a financial programming document for strategic cooperation. As such, it does not foresee specific projects, either in terms of content or location. The environmental analysis carried out and the recommendations made in the SEA are proportionate to this strategic dimension of the document evaluated.
- A distinction should be made between two levels of recommendations made by the EA in its opinion, some of which concern SEA, and others which concern only the IACP operational programme.

SUMMARY OF THE RECOMMENDATIONS MADE BY THE EA AND THE ANSWERS PROVIDED BY THE EVALUATOR

Recommendations of the EA	Elements of a response
1. Context, presentation of the Interreg Amazon 2021-2027 cooperation project and environmental issues	
<p>The environmental authority recommends that the GTC define the prioritisation criteria with regard to environmental considerations and the eco-conditionality criteria that will be used to select the projects supported by the IACP.</p>	<p>These points are already mentioned in the SEA recommendations.</p> <ul style="list-style-type: none"> - The GTC confirms that it will specify these criteria in a IACP implementation document that will enable the OP submitted to the EC to be implemented. Indeed, this programme remains a framework in which overly precise criteria cannot be defined, in the absence of more convincing project elements. - These criteria will be defined in consultation with the partners involved. <p>For example, the environmental prioritization and cross-compliance criteria that could be used:</p> <ul style="list-style-type: none"> - Systematic consideration of sustainable development and the reduction of environmental pollution, - Limiting the impacts of tourism and eco-tourism (adherence to green or sustainable tourism charters), - Optimisation of waste management, recycling and recovery - Relevance of the issues addressed to the IACP and to other existing environmental programmes and strategies
<p>The EA suggests supplementing the output and result indicators with efficiency indicators and specifying whether a IACP evaluation committee is planned to meet, analyse the indicators and propose corrective measures to the Monitoring Committee if necessary.</p>	<p>These are elements of the implementation document that will be drafted later.</p> <p>Furthermore, the elements foreseen in the implementation document do not involve effectiveness indicators. However, the GTC is examining ways of thinking about the individual monitoring of each project with regard to effectiveness indicators.</p>
2. Quality of the environmental assessment	
<p>The environmental authority suggests that the GTC should refer more explicitly to the main elements of the IACP 2014-2020 assessment and the way in which they have been used in the construction of the PCIA 2021-2027.</p>	<p>The IACP review has been a major source of analysis and projection. It is difficult to say how it has been taken into account in each part.</p> <p>The GTC proposes to attach this assessment to the IACP during the public consultation. Nevertheless, the GTC underlines that the main lessons learned for the construction of the PCIA 2021-2027 are</p> <ul style="list-style-type: none"> - Provide an external perspective on the types of projects and themes eligible for the PCIA to maximise the consideration of environmental issues→ The SEA was conducted by actors external to the IACP - Propose criteria for the selection and bonusing of projects→ Some of these were

	<p>proposed in the SEA, partly taken up in the IACP and will be specified in the Implementation Document</p> <ul style="list-style-type: none"> - Propose a realistic monitoring scheme, focused on the main environmental issues and benefits expected from the implementation of the IACP→ This leads to the recommendation of a simple environmental impact monitoring system to ensure its implementation.
The environmental authority recommends that the data presented in the initial state of the programme's cooperation areas should be standardised as far as possible.	<p>Given the disparate data in the territories concerned, it is impossible to homogenise the initial state any further.</p> <p>However, for each theme, a summary paragraph has been added to the SEA initial report in order to highlight the convergences and divergences between the territories.</p>
It draws the attention of the CTG to the problem of lead poisoning, which should be taken into account at the level of the cooperation area.	A paragraph on this topic has been added to the ESR (dimension "Health risks")
It suggests that the initial state of the environment should be illustrated with maps, ensuring that they are easy to read, and that the chapter on the influence of the PCIA's objectives on environmental issues should be clarified.	The lack of available data does not allow us to produce such maps, which are nevertheless very useful. To go further, the Strategic Territorial Diagnosis (STD) drafted before the European programmes can illustrate certain themes more precisely. Also, a platform implemented as part of the "bioplateaux" project co-financed by the PCIA provides the public with a database (guide, study, map, etc.), particularly on marine biodiversity.
3. Linkages with other plans and programmes	
The environmental authority recommends that the summary tables be made more readable by avoiding the use of acronyms.	Acronyms have been systematically explained.
4. Environmental impacts and environmental integration approach	
The environmental authority stresses that the GTC should provide for additional eligibility criteria to specify those mentioned in the IACP, in order to fully integrate the environmental dimension into the selection of supported projects.	These eligibility indicators will be specified in the Implementation Document (DOMO) associated with the IACP.
It regrets that consideration was not given to eco-conditionality criteria when the IACP was being drawn up, as these could reflect the environmental issues identified in the initial state of the environment in the cooperation area.	This echoes several remarks to this effect. At this stage, in the absence of more concrete projects and pending the management rules refined in the 21-27 programming, the GTC cannot go any further, but this precision work will be done in the PCIA implementation document.