

# **Preliminary Comments on the Scope Definition Report for the Strategic Environmental Assessment of the Fishery Operational Program 2007-2013**

## **Abstract**

By request of the Fishery and Aquaculture Directorate-General, National Council on Environment and Sustainable Development (CNADS) issued a statement on a document corresponding to the Work Version, dated from May, 2007, to which the **Scope Definition Report for the Strategic Environmental Evaluation (SEE) of the Fishery Operational Program for the term of 2007-2013** corresponds.

This document corresponds to a first stage of the SEA, having arisen from the Council the following comments:

- The proposed framework regarding goals and methodology is considered ambitious, although compatible with the principles that should prevail in an exercise of this nature.
- The general proposed methodology, as soon as the previous presentation, analysis and alternatives assessment so as to inform the relevant authorities and public consultation are surpassed, is coherent and well organised, namely distinguishing their several stages and identifying the expected tasks and products associated to each one of those stages in an objective manner. However, it is not clear the way in which it intends to help to grow and insure a wide public discussion and participation, something essential for credit and success in the operative stage.
- There is a visible worry in "comparing" the Program with the most important ongoing national and european processes related with the fishery and related themes.
- It is clearly visible the concern to include all the environmental themes focused on the SEA Directive that should be subjected to assessment <sup>(\*)</sup>. The matrices proposed for the integrated analysis of these factors with the organisational domains of the Program present a coherence that is susceptible to generate consistent information in terms of impact analysis.
- As for **indicators**, it is considered necessary to review some of the proposed ones, so they can represent the desired ambition and coherence, being an example of that need the indicator corresponding to the governance factor. The indicators proposed for the biodiversity and marine and coastal aquatic systems are, to some extent, overlapped, making their use unclear and unobjective. The "use of soil in coastal zones" indicator needs explanation, for it is not understandable what will be measured, how and to what goal in a sector it corresponds.

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<sup>(\*)</sup> See "CANADS Comments about the *Strategic Environmental Assessment Critical Factors Report* of the proposals of the Operational Programs, within the scope of the QREN (200-2013) and European Directive (2001/42/EU)", approved in 21-09-2006; and "CNADS Advice on the Strategic Environmental Evassessment of the Rural Development Program 2007-2013 of Mainland Portugal", approved in the 18th of January, 2007 – [www.cnads.pt](http://www.cnads.pt)