

Advice on the Strategic Environmental Assessment (SEA/AE) of the Rural Development Program 2007-2013 of Mainland Portugal (PDRc)

Abstract

The National Council on Environment and Sustainable Development (CNADS) was asked by the Board of the Planning and Agro-Food Policy to analyse "*as an entity with environmental responsibility*", the scope defined for the making of the strategic environmental evaluation of the PDRc. This appreciation would contribute to improve the making of a subsequent Environmental Report that would latter be submitted to public consultation. It was seen that there is an ongoing public consultation of the Strategic Environmental Assessment, as of the Rural Development Program 2007-2013 of Mainland Portugal.

In this advice, the Council:

- Identified what could be seen as a fundamental methodology problem in the Environmental Report of the Strategic Environmental Assessment for the Rural Development Program of Mainland Portugal: the fact that there is no analysis and alternative evaluation that can inform the consultations made by the relevant public and authorities, as well as the decision making made by the programming authority, maximising the environmental integration potential that is compatible with the accomplish of the goals of the PDRc. This problem is decisive not only regarding a requisite of the Directive, but also because it compromises the practical utility of the SEA/AE in its whole, when it comes to environmental integration.
- Underlined the insufficient degree of detail of the Report in matters that, due to their sensibility, require a possible specific evaluation of the environmental impact (on its own, or integrated in the SEA/AE) such as happens in the PDRc incidences in the Natura 2000 Network sites.
- Identified a set of matters with lesser global importance, but which can also be decisive when it comes to parts of the Program, parts of the SEA/AE or certain types of impacts: the possible inconsistency in the "*environmental domain*" categories; the insufficient degree of detail in domains which are more relevant for the PDRc, for which there is information; some insufficiency in characterising the current situation and its future evolution without the Program, as well as the effects assessment of each of the measures; the brief clearance of globally positive effects over a series of environmental domains, which is nor supported by an explicit and firm method and, therefore, the weakness of the conclusions exposed in the Non-Technical Abstract when these are determinant for information of the relevant public and authorities; treating, in the Non-Technical Abstract, essential factors for the Program's environmental efficiency, such as the level of incentives in several measures, namely in the ITI for the Natura 2000 Network, as a simple matter amongst others, when it is vital for the adhesion and, therefore, for the expected positive environmental effect; and also referring to the recommendations stated in the Environmental Report relative to improvements to be introduced in the Program regarding improvements to be introduced in the Program, there is, on one hand, an omission of some recommendations that the Environmental Report explicitly fundaments and, on the other, other recommendations based on the Report's analysis are not integrated on the PDRc, but are still on the list, only as recommendations.

- Referred that the Report has other aspects in which the analysis and the conclusions do not reach as far as they could. These were left unmentioned for they would not bring us eful recommendations. Therefore, the aim was to contribute mainly in the critical aspects area which is important to review to give (i) the Report at the desirable quality/validity level and (ii) the SEA/AAE process in the whole, utility in environmental integration and sustainability in the PDRc.
- The considerations about some levels of detail, description of current status and the future evolution of the environment, evaluation of the effects of the measures and global assessment of the impact in each environmental domain (SEA/AAE of the PDRc) were left for the Annex.

The CNADS recommended the following:

- To introduce in the Environmental Report alternatives' analysis, allowing to comparatively effects assessment on the environment of several alternatives in the Program, particularly in the areas where greater impacts, negative and positive, are predicted (this is especially important, for this is a preliminary version of the Environmental Report);
- To deal with a proper degree of detail suited to matters th at, such as the PDRc's incidences in the Rede 2000 Network, probably require specific impact evaluation, on its own, or integrated in the Program's SEA/AAE.
- To correct, in the Environmental Report, some aspects stated in this advice ;
- To inform and transmit near by the relevant public and authorities the reviewed Environmental Report.