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Finland's comments on the Estonian Marine Strategy's Programme of Measures 2022-2027 and the related Strategic Environmental Assessment

The Finnish Ministry of the Environment received notification from the Ministry of the Environment of Estonia concerning the Strategic Environmental Assessment (SEA) of the Estonian Marine Strategy's Programme of Measures 2022-2027 on 14 February 2022. The Ministry of the Environment replied on 20 December that Finland wishes to participate in the planning procedure for the Estonian Marine Strategy's Programme of Measures 2022-2027 and the related Strategic Environmental Assessment in accordance with Article 10 of the Protocol on Strategic Environmental Assessment to the UN/ECE Convention on Environmental Impact Assessment in a Transboundary Context. On 6 October, the Finnish Ministry of the Environment received a further notification from the Ministry of the Environment of Estonia concerning the Draft of the Estonian Marine Strategy's Programme of Measures 2022-2027 and its environmental report.

The Finnish Ministry of the Environment has, in accordance with the Protocol on Strategic Environmental Assessment, informed the public and the authorities and given them an opportunity to provide statements and opinions on the documents sent by Estonia. The documents have been made available on the lausuntopalvelu.fi website. The material has also been available on the Ministry of the Environment's website. The Ministry of the Environment has also requested comments and opinions from 36 authorities and other bodies.

During the consultation period from 24 October to 30 November 2022, statements were received from The Government of Åland, The Federation of Finnish Fisheries Associations, WWF Finland, Finnish Heritage Agency and Finnish Border Guard. The statements received are enclosed in their entirety and the summary of the statements is presented below in English.

Government of Åland. The Government of Åland states that Estonia's marine strategy program is extensive and contains several good action proposals that also enable cross-border cooperation. The environmental assessment is well documented.



The marine strategy program contains constructive proposals and reflections on coexistence, for example, in relation to the protected areas, wind turbine areas and the implementation of HELCOM's marine noise plan. There are interesting proposals for compensation measures for aquaculture and for counteracting the effects of hydromorphological influence. The program also includes well-formulated texts about the importance of safeguarding maritime cultural heritage and traditional coastal lifestyles. It is important to preserve such traditions and small-scale fishing for the local population and to utilize information on the coastal environment of the local population.

In the document, Estonia describes its marine sea plan and the importance of defining valuable underwater landscapes. The document also includes a description for producing a guide to 2027 that will solidify the exploitation of the marine environment while taking local values into account (section 5.2.6). The Government of Åland would like to cooperate in such work. It is important to strengthen the local population's demand for a long-term and sustainable use of marine resources. The Government of Åland works in the EU project eMSP NBSR where a working group focuses on marine spatial planning in relation to the development of a sustainable blue economy.¹ The Government of Åland is open to collaboration in various coastal-related issues concerning e.g. a sustainable blue economy and coexistence in coastal areas as well as different cross-border Baltic Sea issues.

Federation of Finnish Fisheries Associations. Estonia's marine strategy program is consistent with Finland's marine strategy program. In this way, the cooperation of the coastal states of the Baltic Sea for the benefit of the Baltic Sea provides the best conditions for reaching the desired goals.

The Federation of Finnish Fisheries supports the plan's proposal to develop marine aquaculture as combined aquaculture, in order to slow down the eutrophication of the Baltic Sea. It should be noted that several wind turbine areas are being planned for the marine areas of the Finnish and Estonian economic zones due to the current energy challenges. From the perspective of marine management, sufficient information is not available on the cumulative impacts of the offshore wind industry on the fish stocks, natural conditions and fishing in the Baltic Sea region.

The program proposes developing offsetting measures for disturbing or destroying the seabed. The Federation states that such measures should be developed swiftly and in cooperation between states. The Federation also states that more research is needed on the effects of offshore wind power on the state of the Baltic Sea and on other forms of utilization of the sea.

WWF Finland. WWF Finland would like to draw attention to measure BALEE-M017 "Improving the effectiveness of the existing network of marine protected areas".

¹ For further information see: <https://www.emspproject.eu/project-activities/community-of-practice/sustainable-blue-economy/>.



This measure is missing a reference to the EU Biodiversity Strategy's objective of increasing the coverage of the network of protected areas. The measure should clearly state that Estonia's goal is to achieve a protected maritime network area that covers 30% of the country's sea area and strictly protects 10% of the country's sea area. Although the objective is shared by the EU, each country should participate in reaching it. In addition to this, the measure should take into account the qualitative development of the network with regard to monitoring, management, exploitation plans and the development of regional consistency at HELCOM level.

Finnish Heritage Agency. The Finnish Heritage Agency welcomes the fact that the proposed measure BALEE-M032 "Developing compensatory measures for disturbing or destroying the integrity of the seabed" takes into consideration cultural heritage, such as wrecks, and that the implementation of the measure necessitates considering the preservation of underwater cultural heritage. The measure also enables setting conditions for preserving cultural heritage.

The Agency also draws attention to the measure BALEE-M020 "Improving the condition of fish spawning areas and migration routes, stimulating populations and updating protection measures". When planning the measure it is necessary to take into account the cultural heritage of local streams and the possible needs for investigation and preservation during rehabilitation measures.

The Agency applauds that the programme has also recognized the importance of intangible maritime heritage such as the traditional lifestyle of the coast and maritime skills.

Finnish Border Guard. Finnish Border Guard states that the measures and goals of the Estonian Marine Strategy's Programme and its environmental assessment are worthwhile.

The following parties specifically notified that they have no comments: Finnish Meteorological Institute, Finnish Transport and Communications Agency Traficom, Federation of Finnish water protection associations and Centre for Economic Development, Transport and the Environment of Uusimaa.

The Ministry of the Environment thanks for the opportunity to comment on the draft of the Estonian Marine Strategy's Programme of Measures 2022-2027 and its environmental report. On the basis of the statements received, and reflecting its own views, the Ministry of the Environment would like to state that Estonian Marine Strategy's Programme of Measures is well prepared and acknowledges the European Union's Marine Strategy Framework Directive (MSFD) article's 13, 14 and 15, which deal with the program of measures, exceptions, and recommendations for community actions.

The Ministry of the Environment agrees to the conclusion by Estonia that the impacts of the Programme of Measures are predominantly positive, and that although Estonia's Programme of Measures is planned from a national point of



view, it does benefit from a wider ecosystem based approach since this provides also transboundary benefits and improves the overall effectivity – of both Estonia's and Finland's Programme of Measures', respectively.

The Ministry of the Environment notes with appreciation that a majority of Estonia's new measures have similarities with Finland's respective set of new measures (similarities detected for 13 of all 21 measures). Additionally, BALEE-M039 and BALEE-M076 have similarities with Finland's previous POM for 2016-2021. This fact makes it beneficial for both Estonia and Finland to cooperate when carrying out their respective POMs, due to similar methods for many measures, as well as transboundary aspects of measures that intend to reduce the pressures on the marine biota, e.g. maritime traffic, nature conservation, underwater noise, marine litter, fisheries, and seafloor integrity.

Yours sincerely,

Permanent Secretary

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Specialist

Anniina Kaikkonen

Enclosures

Statements received

For information (without enclosures)

The Ministry for Foreign Affairs of Finland