



Ministry of Environment of Finland
P.o. Box 35, FIN-00023 GOVERNMENT
Finland

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**Regarding strategic environmental assessment
of Estonian Marine Strategy's Programme of
Measures to achieve and maintain Good Environmental
Status of Estonian marine area**

Thank you for the comments and suggestions sent 30.30.2016 (YM4/552/2015). All suggestions regarding the PoM were transmitted to the authors of respective document. Hereafter we respond to the comments of the SEA document in subsection 1 and comments of the PoM in subsection 2.

1. Answers regarding the SEA of the Programme of Measures

Eutrophication

We agree that growth of aquaculture has tendency to increase nutrient loads. Because of that we decided to suggest in the SEA of the PoM to prefer nutrient neutral or nutrient negative aquaculture solutions in Estonian marine region.

Our conclusion is that the proposed measures certainly support the achievement of GES. The quantitative effectiveness of measures will be revealed by monitoring. The analysis whether the GES is achievable or not is included in the final version of the PoM (see also below: 2. Answers regarding the Programme of Measures).

The PoM takes into consideration the measures of other strategic documents (e.g River Basin Management Plans) and the new measures have been developed in this respect, where there were no existing measures. The SEA has reached the conclusion that the new measures support and complement measures of other strategic documents. At the same time, for example, overwhelming pressure of eutrophication of the sea comes from the land, so achieving GES depends on the effectiveness of the measures of the River Basin Management Plans (assessment of that is not the goal of the SEA of the PoM) and it will be assessed separately (see also below: 2. Answers regarding the Programme of Measures).

Ship-generated waves

The SEA concluded that currently there is no information that the ship-generated waves would be general problem (coastal processes) in the Estonian maritime area. There is a certain local impact on the Bay of Tallinn, where, however, natural coastal processes have already been significantly affected by other human activities. The SEA admits that ship-generated waves might be dangerous for near coastal boat traffic.

Changes of international marine traffic

The SEA report was complemented by adding the condition that all the proposed measures which may have an impact on international shipping need before implementation international cooperation and must be approved by IMO.

2. Answers regarding the Programme of Measures

Regarding the questions raised on the structure and content of the Programme of Measures, the following answers can be given. The structure of the PoM follows the recommendations of relevant EC working groups and does not differ substantially from the Finnish and Swedish PoMs.

The socio-economic analysis (SEA) as well as cost-effectiveness and cost-benefit analysis are conducted for the new measures. The analysis is presented in detail in a separate document, but the most important issues are highlighted in the PoM (PoM version 13.05.2016, available at <http://www.envir.ee/et/eesmargid-tegevused/merekeskkonna-kaitse/merestrategie>; link: "Meetmekava eelnõu PDF"; chapter 4, in Estonian;). The gap analysis is conducted for the each group of MSFD descriptors and the results are presented in the PoM document (see subsequent sub-chapters in chapter 3 under each group of descriptors).

The measure "Developing regional aquaculture programmes to control possible environmental pressures" in the Estonian PoM is primarily not a measure to reduce the eutrophication effects. It is a spatial measure to ensure that the impact from aquaculture (which is one of the blue growth focus areas) is minimized and, if possible, neutral. Possible nutrient negative solutions are a topic under research needs in the PoM.

We agree that a quantitative estimate whether the measures, which are planned in the River Basin Management Plans (RBMPs) for the period 2015-2021, are sufficient to reach the BSAP reduction targets or not should be available for Estonia. Such an activity to analyse whether the measures are sufficient to reach BSAP was started in 2014 and the results (based on a developed river basin model) should be available in October 2016. At this stage, the assumption is made (based on expert judgements) that if all listed measures in RBMPs are effectively implemented the BSAP targets to reduce yearly nitrogen load by 1800 tons and phosphorus load by 320 tons (in comparison to loads in 1997-2003) can be achieved by 2021.

The analysis whether the GES is achievable or not is included in the final version of the PoM. Based on that analysis the following exceptions are justified:

- 1) Exception in achieving GES in regard of eutrophication effects, mostly due to the natural conditions of the Baltic Sea. It means that there exists a time lag between achieving of reduction targets and achieving of GES in the marine areas.
- 2) Exception in achieving GES in regard of some hazardous substances. It is partly also related to the natural conditions, but most importantly, in some cases it is not clear what are the sources of some substances (to implement efficient measures).
- 3) Due to the climate change, the target to reach historical distributional range of ringed seals could be not achieved by 2012 as well, although the management plan will be implemented.

After the PoM is adopted, Finland will be informed further.

With best regards,



Margus Kört
Estonian Environmental Research Centre
Chairman of the board