



Sisäasiainministeriö
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KESKISEN ITÄMEREN (CENTRAL BALTIC) OHJELMALUONNOKSEN JA YMPÄRISTÖVAIKUTUSTEN ARVIOINNIN KOMMENTOINTI

Seuraavassa Hämeen ympäristökeskuksen kommentit ohjelmaluonnoksesta ja ympäristövaikutusten arvioinnista:

Ohjelmaluonnos:

One of three priorities is environment, which can be seen as a merit of the program. In order to realize the vision and environmental priorities of this program there should be at least 30 % share of funding in priority A in each sub-program to the projects and measures that improve and protect environment in order to meet the challenges mentioned in regional analysis. This can be seen as weakness of the CB-program. Possibility to fund in environmental investments and infrastructure help to realize the environmental objectives of the program.

Häme regional environment centre emphasizes that the expertise of the regional environment centers should be used in selecting most efficient projects to respond the regional environmental challenges in their region. In order to avoid negative environmental impacts of all projects of the program, a systematic environmental assessment procedure must be carried out and documented.

One of the most important tasks in this program should be restraining climate change by changing energy economy in the area by cutting down energy use and using renewable energy. A functioning waste management is also very important. These actions also help protecting the Baltic Sea.

There is a lot of knowledge concerning the state of the environment and the Baltic Sea, that's why the main emphasis of the priority A: Safe and healthy environment should be in **concrete actions and investments** in reducing negative environmental impacts and risks in the area.

The sustainable development is recognized as one of the main principles of the program. However there are conflict objectives in this program, on one hand it wants to reduce for

example the impacts of growing traffic and on the other hand it wants to create better flow of goods and people and accessibility through efficient transport and travel. The program should concentrate on eco efficiency of existing traffic networks and focus on developing railway, water and public transportation.

In priority B the program should put the emphasis on material free economic growth, develop eco efficient products and prefer products that has been produced and used locally (less transport, more work for example in rural areas).

Ympäristövaikutusten arviointi

The description of the main actions in the program, what kind of environmental impacts the program has and how the environmental issues are dealt with in the priorities is quite general by nature

Increased environmental awareness is one of the goals of the program. It's important, but still more important is to emphasis the responsibility for our environment in all aspects of life.

SEA should have been better coped with the program process. Otherwise the results of the SEA do not benefit to steer the program to environmental friendly and sustainable direction and to avoid contradictions between objectives and environmental priorities.

The text in SEA concerning the monitoring of the program doesn't set concrete tasks and timetable to the monitoring. There should also be some consideration about the situation if the program wouldn't be carried out.

The ex Ante SEA needs to be completed with indicators. In a satisfactory ex ante SEA systematic criteria for project selection that takes environmental impacts into consideration must be included. As well indicators that monitor in this program how the environmental priorities and sustainable development are coming true are essential tools in a satisfactory ex ante SEA.

Johtaja

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