

Juhani Damski Ministry of Environment of Finland registry.ym@gov.fi Your ref 09.12.2022 VN/5171/2022

Our ref 17.02.2023 6-3/22/4462-7

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

The Ministry of the Environment of the Republic of Estonia would like to thank you for your opinion about strategic environmental assessment (SEA) of the Estonian Marine Strategy's Programme of Measures 2022 - 2027.

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

We inform that goals of the EU Biodiversity Strategy have been taken into account in general level in SEA of the Estonian Marine Strategy's Programme of Measures 2022 – 2027. On the other hand the goal of Marine Strategy is to achieve or maintain the good environmental status of the Estonian maritime area and for that environmental targets are established. Focus of the measure BALEE-M017 is to improve the effectiveness of the existing network of marine protected areas. Because the Programme does not establish the borders and exact location of marine protected areas, therefore SEA cannot give an assessment of the area share of the total marine area to be protected. However, in the compliance analysis there has been assessed whether or not the achievement of the goals set in other strategic documents is supported during the implementation of the Programme. The conclusion of the compliance analysis is that the Programme supports the goals set by other strategic documents.

Another aspect in your letter: The Finnish Heritage 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.

We explain that the cultural heritage along the water bodies is primarily associated with historical settlements and the traditional way of life. The presence of cultural heritage is site-specific, and the conditions necessary for its preservation are developed as needed during the preparation of specific development projects.

Finally, because of a majority of Estonia's new measures have similarities with Finland's respective set of new measures we agree that future cooperation in implementing the Programmes is important.

Sincerely Yours,

Kaupo Heinma

Point of Contact for the Espoo Convention