



Enheten för samhällsplanering
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Samråd i Sverige om förslag till havsplan för Estland

Naturvårdsverket har inbjudit Länsstyrelsen i Stockholms län att lämna synpunkter på Estlands förslag till havsplan. steg 2. Naturvårdsverket önskar att svaret skrivs på engelska, därav att våra synpunkter nedan är skrivna på engelska.

Länsstyrelsen vill lyfta nedanstående som särskilt relevant att beakta i den fortsatta processen.

Länsstyrelsens synpunkter

The County Administrative Board of Stockholm welcome the Estonian marine spatial draft plan. Marine spatial planning is a complicated task, requiring a lot of research and analyses compiling information, which the County Administrative Board recognize have been done to an extent that can be anticipated at this stage of planning. We equally find the overall goals of the Estonian plan to be adequate, especially recognizing that good marine environmental status is the basis for human extraction of goods and services.

We agree that acute measures are required to improve the status of the Baltic Sea, and that the main problems to mitigate are impacts from eutrophication, chemical contamination, overfishing and spread of alien marine species. Marine spatial planning is one of several management tools to counteract or reduce risk of negative effects as well as promoting positive effects.

We are impressed by the extent of marine areas that Estonia have protected so far (19%) although there are no protected areas in the economic zone. We look forward to the completion of an ecological coherent network of protected areas in the Baltic involving cross border cooperation and agreements.

Based on the draft plan it is not clear to what extent protected areas are combined with fishing regulations, which is increasingly recommended in Swedish protected areas, especially where there are fish spawning grounds. Since protecting spawning grounds not only benefit the fishing industry, but also the ecosystem itself, the Estonian marine spatial plan would probably gain clarity from including spawning grounds as part of the network of protected areas. This has been done in the Swedish marine spatial plan.

To our knowledge, the Estonian marine spatial plan does not include (or plan to) any other closed areas for fishing than spawning grounds. We would like to address that researchers across the world have witnessed that closed areas benefit

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growth of large reproductive fish, which are especially important for regenerating fish stocks (on a larger scale including areas outside closed areas). Such closed fishing areas will thus be introduced as part of the Swedish marine spatial plan, and the County Administrative Board of Stockholm are currently trying to create a large closed area in the outer archipelago.

The County Administrative Boards goal with respect to this future closed offshore area is mainly to protect Baltic Herring when they aggregate *before* spawning closer to the coast. During the last couple of years catches of herring in the archipelago have decreased dramatically and predatory marine species (cod, seals and seabirds) show signs of food limitation also causing impacts on the coastal ecosystem. Our anticipation is that the closed fishing area will promote small-scale coastal fishing including recreational fishing and tourism as well as the ecosystem itself. We hope the Swedish initiatives may inspire Estonia to do something similar, and that combined efforts will give positive results for the Baltic Sea.

The County Administrative Board of Stockholm are impressed with the Estonian intent to guide future development of aquaculture within the spatial plan. We only have one concern; and that is the lack of guidelines and requirements regarding introducing non-native species or genetically modified species in the sea. For clarity, we recommend adding some guidelines about this to avoid confusion and spread of alien invasive species or genetic strains in the future. We look forward to the completion of the spatial plan.

Beslut i detta ärende har fattats och godkänts digitalt av tf samhällsbyggnadsdirektör Anna Conzen. I handläggningen av ärendet har även deltagit miljöhandläggare Ingrid Nordemar och översiktsplanerare Eva Darolf Linnros, föredragande.