

## Yttrande

**Datum**  
2020-04-20  
**Handläggare**  
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Naturvårdsverket, Egon Enocksson

### **Yttrande från Havs- och vattenmyndigheten rörande samråd om Tysklands havsplan och avgränsning av miljökonsekvensbeskrivning**

Havs- och vattenmyndigheten översänder här svar på detta underrättelsesamråd enligt Esbokonventionen för Tysklands havsplan och avgränsning av miljökonsekvensbeskrivning.

Vi lämnar våra svar på engelska nedan enligt önskemål från Naturvårdsverket.

#### Comments

The Swedish Agency for Marine and Water Management (SwAM) has during a number of years cooperated with BSH, the German responsible MSP-authority. Latest as part of the Baltic wide Pan Baltic Scope project aiming at "bringing better plans" in the Baltic Sea Region. We are looking forward to the revision of the current German Maritime Spatial Plans for the exclusive economic zone from 2009.

We support that the Ecosystem Approach is a structuring concept for the planning and the strategic environmental assessment, and integrated in the tiered German planning approach in which feed-back from SEA at a number of points will be given the planning process (as preliminary assessment, draft, revised and final environmental reports).

The scope of the SEA seems to be including all relevant environmental aspects which relate to activities under the mandate of MSP. Assessments will be made covering a number of cumulative perspectives including activities in neighbouring countries and in the German territorial waters. We encourage the inclusion of climate change and its impacts on the marine environment as an additional cumulative dimension of high relevance in the Baltic Sea.

We welcome the tiered assessment of alternatives and highlight the need for careful consideration of alternatives as part of the MSP-process especially with those sectors (shipping, fisheries and aquaculture, defense and tourism) lacking a tiered planning procedure.

The framework, stages, objectives, criteria and data for the SEA are well presented but more information may be included how the assessments will be carried out including actual methods/tools, expert opinion etc.

We would like to highlight the relatively new Swedish SCI Natura 2000-area SE0430187 *Sydvästkånes utsjövatten* established 2016 neighbouring the German EEZ. The area is of importance for habitat types 1110 sandbanks and 1170 reefs, protecting marine mammals, in particular the Harbour porpoise.

We encourage the development of a zero-alternative as outlined under section 7.2 to evaluate the expected development in the event of non-implementation of the plan. Detailed assumptions may have to be made for the development of different sectors.

We would like the short text on Swedish MSP to be as follows:

**Sweden**

Sweden is in the final phase of its first national set of marine spatial plans. There will be three marine spatial plans (Bothnian Bay, Baltic Sea and Skagerrak/Kattegat). Marine spatial planning is also carried out on a municipal level.

Swedish plans are not binding, but will guide authorities, municipalities and courts in decisions, management, planning and licensing.

We would like figure 4 “Overview of the focal points of environmental assessment for pipelines and data cables” to be clarified as the meaning of the light green of boxes with Environmental Assessment is a bit unclear.

Assessment of economic and social effects if possible in relation to ecosystem services would be relevant in a broader sustainable development perspective.

We are looking forward towards taking part in the online meeting on 23rd April 2020.

Beslut om detta yttrande har fattats av biträdande avdelningschefen Per Olsson efter föredragning av utredaren Jan Schmidtbauer Crona. I ärendets handläggning har även avdelningschefen Mats Svensson, tillförordnade enhetschefen Eva Rosenhall samt utredaren Joacim Johannesson deltagit.



Per Olsson



Eva Rosenhall