

<b>Proposer</b>	<b>Content of the proposal</b>	<b>Response from Estonian Ministry of Finance</b>
<p>Ministry of Transport and Communications of <b>Finland</b></p>	<p>The Ministry of Transport and Communications refers to its earlier statement LVM/953/02/2019 (to the first draft) and states that it has no objections regarding the draft Maritime Spatial Plan of Estonia and the related Impact Assessment Report.</p>	<p>Thank you for your feedback.</p>
<p><b>Finnish</b> Transport and Communications Agency Traficom</p>	<p>Traficom states on the draft Maritime Spatial Plan that, even if it provides guidance on the maintenance and planning of safe sea routes, it does not pay attention to the transboundary impacts with respect to e.g. shipping routes and shipping in general.</p> <p>Traficom is happy that the Maritime Spatial Plan designates areas on the coast of the Gulf of Finland in Estonia where STS (Ship-to-Ship) operations, including bunkering, are still allowed.</p> <p>Further, to ensure the safety of water transport, protect the marine environment and facilitate maritime rescue operations, the Maritime Spatial Plan designates places of refuge, ports and water areas where a ship in distress at sea can be guided. However, Traficom's attention was drawn to the fact that no such areas have been proposed on the coast of the Gulf of Finland where, as estimated by the Finnish authorities, the risk of oil spills is high. Traficom wishes to ask what the reason is for not designating such places of refuge on the coast of the Gulf of Finland?</p>	<p>Estonian MSP is not making significant changes to the existing shipping routes and therefore there are no significant transboundary impacts to shipping. There are small-scale alterations of the routes in Gulf of Riga due to the wind energy development areas.</p> <p>Places of refuge has been set by the Order No. 529 of the Government of the Republic on 18.08.2005. Similarly, bunkering and STS- areas are defined by the Order No. 51 of the Government of the Republic on 25.06.2020. MSP cannot change the regulations and therefore brings out the relevant information to other uses. The relevant authorities in Estonia have not declared an interest for additional places of refuge during MSP process.</p>
<p><b>Helsinki-Uusimaa</b> Regional Council</p>	<p>The Helsinki-Uusimaa Regional Council is happy that the Maritime Spatial Plan also presents the</p>	<p>Estonian MSP is going to be legally binding after adoption. Therefore the objects we plan and show in the maps</p>

	<p>safety aspects of maritime transport.</p> <p>The rationale of the Estonian Maritime Spatial Plan mentions a tunnel as a potential new fixed connection, but the map included in the plan does not show a tunnel connection. Even if building a tunnel will require several planning stages and joint agreements, the Helsinki-Uusimaa Regional Council repeats the wish presented in the previous statement that a tentative tunnel connection would also be presented on the map included in the Maritime Spatial Plan.</p>	<p>have to be carefully considered. We cannot show tentative tunnel connection as we are not planning it with MSP but by a separate designated planning process.</p>
<p>Regional Council of <b>Kymenlaakso</b></p>	<p>The Regional Council of Kymenlaakso refers to its earlier statement on the Estonian Maritime Spatial Plan and points out that the premise for the plan related to safeguarding and preserving a good status of the marine environment is highly relevant.</p>	<p>Thank you for your feedback.</p>
<p>Metsähallitus of <b>Finland</b></p>	<p>Metsähallitus points out that a good status of the marine environment has not been reached in any part of the Baltic Sea. The main problem seems to be the too high nutrient load and the consequent eutrophication. This is why Metsähallitus considers it desirable that the Estonian Maritime Spatial Plan would also include an assessment of the “old” uses of marine areas, as these may have impacts in terms of reaching the objectives related to a good status of the Baltic Sea.</p>	<p>Impact assessment report (IA) brings out that for traditional uses, such as fishing, maritime transport, the rules of using the sea are already well established and do not require significant additional regulation. MSP cannot change the existing regulations. Therefore Estonian MSP is not making significant changes to the existing uses and IA has to assess the impacts of the plan.</p>
	<p>What Metsähallitus considers positive is that the Maritime Spatial Plan takes into account the network of protected areas (Natura 2000), including the areas that are being planned, and that the envisaged new uses of marine</p>	<p>Thank you for your feedback.</p>

	<p>areas, especially wind power production areas, have been excluded from these. Another new use of marine areas in the Estonian Maritime Spatial Plan is aquaculture. Metsähallitus considers that aquaculture has been adequately accounted for in the plan. The Maritime Spatial Plan does not designate any concrete areas for this use, but it provides guidelines and conditions for developing the sector. This is a good way to proceed, and it provides the opportunity to consider the potential areas more broadly as more advanced fish farming technologies are developed.</p>	
	<p>Metsähallitus considers that the combined impact of the measures have also been clearly accounted for. Metsähallitus notes that with respect to wind power production the drafting process and impact assessment of the Estonian Maritime Spatial Plan leans on the available studies and expert statements. With respect to impact assessment, it is mentioned that there is far less information available on the marine environment than on the continent. However, the Impact Assessment Report states that, in cases where further details are needed for the survey of a marine area with respect to the living natural environment, proposals will be made to include a condition for the decisions under the plan that such studies should be further elaborated or repeated when the permit application is being processed.</p>	<p>Thank you for your feedback.</p>
<p><b>Finnish</b> National Board of Antiquities</p>	<p>The National Board of Antiquities states that, with respect to possible indirect impacts, the plan mentions the possibility to use</p>	<p>The details of transboundary offshore electricity grid development are currently discussed on a transboundary level by the relevant authorities and</p>

	<p>cables to link the envisaged offshore wind farms e.g. to Finland in the future and that this could have transboundary impact e.g. on the underwater cultural heritage in Finland's territory.</p>	<p>will not be solved by MSP. However, as the planning documents defines detailed conditions for underwater cables and other infrastructure facilities (including the need to consider underwater cultural heritage) there are no significant impacts to tackle on the current strategic planning level.</p>
	<p>With respect to the consideration of cultural heritage, the National Board of Antiquities notes, in addition to its earlier statement, that due to its nature, cultural heritage as such (e.g. shipwrecks in Estonian marine area) has no transboundary impacts, yet many aspects of cultural heritage are transboundary and cross the present national borders (e.g. the historical shipping routes between Tallinn and Helsinki and the concept of the Bridge of Finland/Suomen silta that describes the connection between the peoples of Estonia and Finland.</p>	<p>MSP states that the permanent connections are planned with the decision of the Government of Estonia with separate detailed national level plans. This also includes the planning of the railway tunnel between Helsinki and Tallinn. Transboundary impacts will be assessed in that planning process.</p>
	<p>The Estonian Maritime Spatial Plan describes cultural heritage and the possible threats and damages measures in other sectors may be cause to it in connection with the different sectors. It is mentioned, quite appropriately, that to prevent harmful impacts, cooperation is needed with the National Board of Antiquities to avoid damages to underwater cultural values.</p> <p>Through this statement procedure the National Board of Antiquities has had a very interesting opportunity to follow maritime spatial planning in Estonia and the relevant and interesting ways how cultural heritage and socio-cultural values have been handled in it.</p>	<p>Thank you for your feedback.</p>

<p>The Geological Survey of Finland</p>	<p>The Geological Survey of Finland notes that the operations within its area of responsibility (wind power, seabed infrastructure, seabed soil, dumping of dredging masses and fixed connections) have been listed in sufficient detail and their impacts have been recorded in a way that enables an appropriate assessment of the draft plan.</p>	<p>Thank you for your feedback.</p>
	<p>With respect to licencing for dumping, the Geological Survey of Finland hopes that sufficient sediment samples are taken from both the dredged materials and soil of the seabed in the dumping site to investigate the environmental impacts. If the dredged materials contain contaminants at too high levels, this causes adverse impacts on the marine environment during dredging or if the materials enter a water column. The same applies to sediments in the dumping site, i.e. even if the material dumped were clean, the material in the dumping site may contain contaminants at levels that exceed the limits, and dumping may cause seabed sediments to puff into the water column and have adverse impacts on the marine environment. In the worst case, the impacts may exceed the limits set in the Espoo Convention and be harmful to Finland's marine environment. However, in the plan the dumping sites are far away from Finland's sea area, which makes it unlikely that any considerable harm could be caused on the Finnish side.</p> <p>The Geological Survey of Finland notes that the operations within its area of responsibility in the Estonian Maritime Spatial Plan have been recorded in sufficient detail and their environmental</p>	<p>MSP is not planning new dumping areas and states the conditions for designating new dumping areas. One of the conditions is: <i>The choice of site (including depth), time (e.g., outside fish spawning periods and critical period of juveniles) and technology (e.g., measures to limit the spread and spread of suspended solids) should take into account wider impacts on marine biota, but more narrowly impact on fish and thereby on the fishing industry along with its socio-economic aspect.</i></p> <p>Dumping can happen only with an environment permit and when issuing the permit the impacts will be assessed in more detail.</p>

	<p>impacts have been taken into account. Except for the comments concerning dumping, it has no objections regarding the plan.</p>	
<p><b>WWF Finland</b></p>	<p>WWF considers the draft Maritime Spatial Plan of Estonia as a whole quite good and comprehensive, but wishes to draw attention to the fact that the plan does not take adequately into account the needs related to the development of a network of marine protected areas to reach the objectives presented in accordance with the new EU Biodiversity Strategy adopted by the European Commission.</p> <p>WWF points out that, as mentioned in the rationale of the Maritime Spatial Plan, the plan does not include any new nature sites to be protected, and considers that it would be very important that potential nature protection areas identified in separate processes would be included and taken into account in the Maritime Spatial Plan. WWF is worried about the fact that transboundary planning remains highly superficial in the Maritime Spatial Plans of both Estonia and Finland.</p>	<p>The Action Plan of the Estonian Marine Strategy measures include the establishment of a network of marine protected areas in the Estonian EEZ. At the end of 2020, the project “Preparation of a proposal for offshore protected areas in the Estonian EEZ” was completed, in the course of which a proposal has been made for the establishment of two protected areas in the EEZ (areas 73.3 and 36.7 km<sup>2</sup>). The Estonian MSP will consider them as potential nature reserves (until applications are processed). The establishment of protected areas is a process separate from the MSP.</p>
	<p>WWF also draws attention to the fact that, for many traditional uses of marine areas such as maritime transport and fishing, the plan only presents the current situation on a map, instead of a critical assessment of whether these activities should be restricted e.g. in the Natura areas or whether the development plans of these sectors for the future are in line with sustainable development.</p>	<p>Impact assessment report (IA) brings out that for traditional uses, such as fishing, maritime transport, the rules of using the sea are already well established and do not require significant additional regulation. MSP cannot change the existing regulations and will be legally binding. Therefore Estonian MSP is not making significant changes to the existing uses and IA has to assess the impacts of the plan.</p>
	<p>To conclude, WWF points out that constant growth in the use of marine areas is not compatible with the goal of reaching a good</p>	<p>Only MSP in practise cannot achieve the good status of marine environment. This is the overall goal and all</p>

	<p>status for the seas, which is why the plan should state more clearly how sustainable blue growth can be detached from unsustainable use of natural resources and marine areas.</p>	<p>conditions and solutions of MSP have to strive towards the goal.</p> <p>The biggest problem in the Baltic Sea is eutrophication. Eutrophication is not addressed by MSP but by other instruments such as the Water Framework Directive, the Marine Strategy and the measures proposed there.</p>
<p>Federation of <b>Finnish</b> Fisheries Associations</p>	<p>The Federation of Finnish Fisheries Associations has no objections concerning the draft Maritime Spatial Plan of Estonia or the related Impact Assessment Report. The Federation is happy that fishing and aquaculture have been taken into account in the Maritime Spatial Plan.</p>	<p>Thank you for your feedback.</p>
<p>The <b>Finnish</b> Shipowners' Association</p>	<p>The Finnish Shipowners' Association has no objections concerning the draft Maritime Spatial Plan of Estonia or the related Impact Assessment Report.</p> <p>The Association is very happy that shipping has been taken into account in the Maritime Spatial Plan, and that it is not in conflict with the UN Convention on the Law of the Sea. The Association also considers that the traffic separation schemes approved by the International Maritime Organization (IMO) have been duly taken into account.</p> <p>The Association sees offshore wind farm areas as an opportunity, because they support the development of maritime logistics and maritime industry. The Association is happy for the remark in the text of the Maritime Spatial Plan and in connection with potential offshore wind farms that the need for sufficiently wide and safe sections for maritime</p>	<p>Thank you for your feedback.</p>

	transport will be taken into account.	
Ministry of the Environment of <b>Finland</b>	The Ministry of the Environment has no comments on the content of the plan or its impact assessment. Estonia takes good account of the ecosystem approach and emphasizes the application of this principle in several contexts. The ecosystem approach is particularly important for fish farming, as the state of the Baltic Sea is still poor in many respects and eutrophication will remain a major problem for several decades to come. Fish farming can increase eutrophication, as the Baltic Sea is unable to remove enough nutrients, even on local scale. This problem has also been recognized in Finland. Overall, the ecosystem approach presented in the plan is well-prepared, although on the question of fish farms the Ministry of the Environment wishes to point out that the proposed depth (5m and over) appears somewhat shallow.	<p>The MSP Impact Assessment Report recommends that fish farms to be established in the marine areas with the depths of <b>at least 5 m</b> (Areas unsuitable for fish farming). The limit is proposed by the experts based on previous scientific studies.</p> <p>In addition, MSP imposes a condition that the impacts associated with the establishment of a fish farm must be at an acceptable load for the state of the marine environment (the activities of the fish farm must not lead to a deterioration of the marine environment) and, if necessary, environmental measures must be implemented. Environmental measures are measures to prevent, avoid, reduce and mitigate, and where appropriate, remedy adverse environmental effects associated with the performance of a proposed activity (inc suitable technology). Environmental measures also include environmental monitoring.</p>
	The Finnish and Estonian maritime spatial plans cover both regional and economic zones. With regard to the exclusive economic zone, the countries' plans seem to overlap, and the reason for the overlap should be investigated.	Thank you for your feedback. We will adjust the map layers so there will not be an overlap.
Åbo Akademi - <b>Finland</b>	The Estonian plan is based on an ecosystem approach comprising 12 so-called Malawi principles. Although a commitment to an ecosystem approach is expressed in the plan, it remains unclear to what extent this will ultimately be implemented. Under the Malawi system, points 1 to 5 as set out below are a minimum requirement, but individual marine habitats and important ecosystems that form the basis for	Although these aspects are not specifically stated in the English translation of the Maritime Spatial Plan, the impact assessment of the current plan is based on a range of different nature values not only from different nature protection areas but also beyond. Specifically, during planning process we developed a methodology with which to perform CEA on ecosystem elements that combines existing scientific evidence with expert judgement which is then



	<p>these principles are not provided. It would be important to set out in more concrete terms how these points will be implemented and how climate change is expected to affect the structure and functioning of the ecosystem in the future.</p>	<p>communicated through a dynamic online tool to environmental managers. Most importantly, the tool is capable of quantifying both single and synergistic effects of most important human activities on a broad range of nature assets. In the planning process the cumulative environmental effects of the combined effects of human activity (fisheries, aquaculture, wind energy, mining and maritime transport sectors) were assessed on nature assets (selected seaweed, invertebrate, fish habitats as well as bird and mammal species) to suggest effective mitigation strategies, and to attain sustainable planning solutions. More details on our approaches can be found at freely downloadable publication: Kotta, J.; Fetissoff, M.; Szava-Kovats, R.; Aps, R.; Martin, G. 2020. Online tool to integrate evidence-based knowledge into cumulative effects assessments: Linking human pressures to multiple nature assets. <i>Environmental Advances</i>, 2, 100026. <a href="https://www.sciencedirect.com/science/article/pii/S2666765720300260">https://www.sciencedirect.com/science/article/pii/S2666765720300260</a></p> <p>MSP alone cannot manage climate change. This is the overall global and national goal and all conditions and solutions of MSP has to strive towards the goal.</p>
	<p>The Maritime Spatial Plan only includes existing high conservation value areas and areas already subject to existing plans. The areas identified in the draft plan represent 19% of Estonia's territorial waters and are mainly located in coastal areas. It is notable that areas beyond the existing network have been excluded, as it is likely that high conservation value areas exist beyond it. It would therefore be important to identify areas with high conservation values, including Natura 2000 habitats</p>	<p>This comment also relates to the response above.</p> <p>In addition to that HELCOM has set a target of defining at least 10% of the marine basins of each of the Baltic Sea sub-basins as coastal or marine protected areas. 19% (6800 km<sup>2</sup>) of the Estonian marine area is covered with protected natural objects. In the marine areas surrounding Estonia, this objective has not been fulfilled in the case of the Baltic Proper, whereas Estonia has no protected zones in the exclusive economic zone. At the end of 2020, the project "Preparation of a proposal for offshore protected areas in</p>

	<p>and common mussel, seaweed and common eelgrass habitats, beyond the existing network. Unless these areas are identified and mapped, it is likely that they will be designated for other activities, such as fish farming or wind farms. Furthermore, the draft plan states that new conservation areas should be designated in open seas and deeper water areas, but no such areas are presented in the plan. This is an important consideration, given that 30% of all EU sea areas will need to be protected by 2030. To achieve this target, Estonia will need to significantly expand its network of marine conservation areas. Overall, the plan fails to take a comprehensive approach with regard to the underwater environment, with the emphasis largely placed on spawning grounds, which of course matter greatly too. The existing marine conservation areas incorporate intensive inshore fisheries and areas designated for the disposal of dredging waste. Both of these activities are in conflict with marine conservation aims.</p>	<p>the Estonian EEZ” was completed, in the course of which a proposal has been made for the establishment of two protected areas in the EEZ (areas 73.3 and 36.7 km<sup>2</sup>). The Estonian MSP will consider them as potential nature reserves (until applications are processed). The establishment of protected areas is a process separate from the MSP.</p> <p>We would like to clarify that following the conditions set by the MSP, the conflict between marine conservation aims and other sea uses ( e g disposal of dredging waste) are alleviated – no conflicting new areas and activities are allowed.</p>
	<p>The summary sets out no designated areas for fish farming. Instead, it identifies areas that are not suitable for this purpose, due to the presence of marine traffic, for example. Although the plan states that fish farms should not be permitted within conservation areas, restrictions on fish farming have not been consistently imposed across all conservation areas. Fish farming in close proximity to conservation areas also has negative impacts on biodiversity within these areas, which should be recognised in the plan. On an interesting note, the draft plan suggests that placing</p>	<p>The plan sets out no designated areas for fish farming and this is because rapidly developing farm technologies and site specific effects on the natural environment. The current understanding of the Estonian Ministry of the Environment is that the fish farms are given permits only in case they can guarantee zero emission of nitrogen and phosphorus to the adjacent environment. This suggests that even if the fish farms are located in proximity to conservation areas such farms do not pose significant threat to the natural environment.</p> <p>In addition, MSP imposes a condition that the impacts associated with the</p>

	<p>shellfish and algae farms close to fish farms may allow for the uptake of excess nutrients associated with fish farms and thus reduce their negative impact. However, no scientific evidence is presented to support this hypothesis and the argument that mussel farming “clears” the water through this mechanism is also not based on science. The plan also proposes mussel farms in conjunction with wind farms, but no thorough analysis of the evidence is provided. Given that water quality in the Baltic Sea remains poor, careful consideration should be given and detailed environmental impact assessments should be carried out before activities like fish farming, which have been shown to be associated with impaired water quality, are promoted. Some evidence of such an approach is present in the draft plan.</p>	<p>establishment of a fish farm must be at an acceptable load for the state of the marine environment (the activities of the fish farm must not lead to a deterioration of the marine environment) and, if necessary, environmental measures must be implemented. Environmental measures are measures to prevent, avoid, reduce and mitigate, and where appropriate, remedy adverse environmental effects associated with the performance of a proposed activity (inc suitable technology). Environmental measures also include environmental monitoring.</p> <p>Mussel farming is currently considered as a feasible internal measure to combat against adverse effects of eutrophication in the Baltic Sea area. While forty years of land-based measures have slowed the rate of increase of eutrophied areas in the Baltic Sea, they have failed to solve the problems of algal blooms, oxygen free dead zones and biodiversity loss caused by excessive levels of nitrogen and phosphorus. And here we advocate that this should be based on small farms, each situated in a locally optimal growth location, while minimizing potential negative environmental impacts. This is because system level adverse impacts have been only reported from large, intensive farms.</p> <p>For more information please see: Kotta, J.; Futter, M.; Kaasik, A.; Liversage, K.; Rätsep, M.; Barboza, F.R.; Bergström, L.; Bergström, P.; Bobsien, I.; Díaz, E.; Herkül, K.; Jonsson, P.R.; Korpinen, S.; Kraufvelin, P.; Krost, P.; Lindahl, O.; Lindegarth, M.; Lyngsgaard, M.M.; Mühl, M.; Sandman, A.N.; Orav-Kotta, H.; Orlova, M.; Skov, H.; Rissanen, J.; Šiaulys, A.; Vidakovic, A.; Virtanen, E. 2020. Response to a letter to editor regarding Kotta et al. 2020: Cleaning up seas using blue growth initiatives: Mussel farming for eutrophication</p>
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	<p>The draft plan designates a relatively high number of areas suitable for the disposal of dredged materials. All of these areas have also previously been used to deposit dredged substances. Many of these areas are located in relatively shallow waters, and there is overlap with important spawning areas. The plan does state that waste should not be dumped during critical points during the spawning season, but the increased sediment levels resulting from disposal activities often have long-term negative impacts on the wider area. Depositing waste from dredging inland is not discussed as an alternative, although this would be the preferable solution. As noted above, the sites designated for dredging disposal also overlap with marine conservation areas.</p>	<p>No new deposits or new dumping areas are planned with the Maritime Spatial Plan. In the web map you can see already existing ones. The plan sets a condition that there can be no conflict with natural values.</p>
<p>The Ministry of Environmental Protection and Regional Development of the Republic of <b>Latvia</b></p>	<p>Please, make it clear in section 5.3.1 of the Estonian MSP that fish farming in the Gulf of Riga is not allowed or mark the Gulf of Riga in section 5.3.1 “exclusion zone” as a zone where the development of fish aquaculture is not allowed. Following the precautionary principle and taking into account the current increased level of eutrophication, the development of fish aquaculture poses a risk to increase nutrient discharges into the marine environment with already historically high concentrations of nutrients (N and P) (thus</p>	<p>The plan sets out no designated areas for fish farming and this is because rapidly developing farm technologies and site specific effects on the natural environment. The establishment of fish farms are to be avoided in unsuitable areas. The development of fish farms is directed through guidelines and conditions. The current understanding of the Estonian Ministry of the Environment is that the fish farms are given permits only in case they can guarantee zero emission of nitrogen and phosphorus to the adjacent environment. This suggest that even if the fish farms are located proximity to conservation areas such farms do not</p>

	<p>increasing the risk of eutrophication and deteriorating the chances of achieving good marine status in Latvian marine waters).</p>	<p>pose significant threat to the natural environment.</p> <p>In addition, MSP imposes a condition that the impacts associated with the establishment of a fish farm must be at an acceptable load for the state of the marine environment (the activities of the fish farm must not lead to a deterioration of the marine environment) and, if necessary, environmental measures must be implemented. Environmental measures are measures to prevent, avoid, reduce and mitigate, and where appropriate, remedy adverse environmental effects associated with the performance of a proposed activity (inc suitable technology). Environmental measures also includes environmental monitoring. The aim of the Estonian MSP is to develop nutrient-neutral aquaculture.</p>
	<p>Please, include a clause or an explanation in section 4.4 that the water traffic areas included in the Pärnu County MSP are indicative and cannot affect the use of the sea outside Pärnu MSP. As already stated in section 4.4 of Estonian MSP – the spatial information of water traffic areas in the Estonian MSP does not coincide with the information included in the Pärnu MSP. The Estonian MSP does not intend to change the use of the sea specified in the Pärnu MSP, nevertheless one of the water traffic areas of the Pärnu MSP at the Latvian border ends at the Latvian Wind Farm Research Area “E5” included in the Latvian MSP. This should not affect the possibilities of evaluating and developing offshore wind energy project according to Latvian MSP.</p>	<p>Pärnu MSP was adopted in 2017 (before Latvian MSP) and it will stay valid even when the nation-wide maritime plan is enforced. Pärnu MSP is legally binding as will be Estonian MSP.</p> <p>Estonian MSP cannot change Pärnu MSP as we are not going to “re-plan” it with Estonian MSP, therefore it will remain valid.</p> <p>In Pärnu MSP there is a condition: <i>if the fairway overlaps with a possible development area for wind energy, co-operation shall be established with the Maritime Administration in order to identify areas suitable for the construction of wind farms;</i></p> <p>Therefore it will not affect the possibilities of evaluating and developing offshore wind energy project according to Latvian MSP.</p>
<p><b>Latvian</b> Nature Protection Agency</p>	<p>...remains precautionous concerning Latvian Specially Protected Marine areas “<i>Irbes Šaurums</i>” and “<i>Ainaži-Salacgriva</i>” near the</p>	<p>Although these aspects are not specifically stated in the English translation of the Maritime Spatial Plan, the impact assessment of the</p>

	<p>border of the territorial sea and the exclusive economic zone (which are also included in the Nature 2000 network) – in particular in relation to the cumulative effects of possible wind energy projects of both countries. Nature Protection Agency points out that the wind energy areas envisaged in the Estonian MSP are located relatively close to the planned Wind Farm Research Area “E5” included in the Latvian MSP, therefore it would be necessary to assess cumulative environmental impacts.</p>	<p>current plan is based on a range of different nature values not only from different nature protection areas but also beyond. Specifically, during planning process we developed a methodology with which to perform CEA on ecosystem elements that combines existing scientific evidence with expert judgement which is then communicated through a dynamic online tool to environmental managers. Most importantly, the tool is capable of quantifying both single and synergistic effects of most important human activities on a broad range of nature assets. In the planning process the cumulative environmental effects of the combined effects of human activity (fisheries, aquaculture, wind energy, mining and maritime transport sectors) were assessed on nature assets (selected seaweed, invertebrate, fish habitats as well as bird and mammal species) to suggest effective mitigation strategies, and to attain sustainable planning solutions. More details on our approaches can be found at freely downloadable publication: Kotta, J.; Fetissof, M.; Szava-Kovats, R.; Aps, R.; Martin, G. 2020. Online tool to integrate evidence-based knowledge into cumulative effects assessments: Linking human pressures to multiple nature assets. Environmental Advances, 2, 100026. <a href="https://www.sciencedirect.com/science/article/pii/S2666765720300260">https://www.sciencedirect.com/science/article/pii/S2666765720300260</a></p> <p>In addition, MSP imposes that the proposed activities must not jeopardize the conservation objectives of Natura 2000 sites. The likelihood of possible adverse effects can be prevented and reduced by taking into account the environmental aspects of the projects, by appropriate preparation and, if necessary, by taking appropriate mitigation measures.</p>
<p><b>Latvian Maritime Administration</b></p>	<p>One of the water traffic areas at the Latvian border ends up at the</p>	<p>The water traffic area which you are referring is in the planning area of</p>

	<p>Latvian Wind Farm Research Area “E5”. Latvian Maritime Administration reminds that midpoints of the territories reserved for navigation on the Estonian-Latvian border were previously submitted to the Estonian Maritime Administration.</p>	<p>Pärnu MSP. Pärnu MSP was adopted in 2017 (before Latvian MSP) and it will stay valid even when the nation-wide maritime plan is enforced.</p> <p>Estonian MSP cannot change Pärnu MSP as we are not going to “re-plan” it with Estonian MSP, therefore it will remain valid.</p> <p>Pärnu MSP solution can also be seen in Estonian MSP web map, to give an overview about the planning solutions of Estonian sea space as a whole. The main solution has a separate chapter 4.4 about Pärnu MSP to state the situation more concretely.</p>
<p>Freeport of <b>Riga</b> Administration</p>	<p>Concerns are expressed about the proposed locations for wind farms in Estonian MSP and the possible negative impact on safe movements of ships to the Freeport of Riga (also other ports on the coast of the Gulf of Riga). It is emphasized that in order to maintain competitiveness of the Freeport of Riga, it is important to maintain and in no way narrow the existing shipping lanes in the Irbe Strait. These shipping lanes are the only ones that can ensure the entry of cargo and passenger ships into the Gulf of Riga. It is also emphasized that any increase in the distance that is necessary for ships to access the Freeport of Riga, has a significant negative impact. Therefore, it is asked to re-evaluate the direct transboundary impacts in the light of these aspects (or to give explanations with justification if such changes are not planned).</p>	<p>The plan already states that in the wind park area No.2 the basic passage corridors (water traffic area) will be left free of wind turbines.</p> <p>In the MSP planning document additional condition will be set to ensure the close cooperation of both Latvian and Estonian relevant authorities to agree on the precise solutions of wind turbines and water traffic during the licensing stage and environmental impact assessment.</p>
<p>Ministry of Transport and Communications of the Republic of <b>Lithuania</b></p>	<p>According to Lithuanian Transport Safety Administration, the current seaways appear in the territory foreseen for the renewable (wind) energy development, to the west of the</p>	<p>In the MSP there was already designated a basic passage corridor in area No. 2 to ensure the safety of intensive international shipping in the area. The condition that follows the solution is: <i>basic passage corridors for shipping must be maintained free of</i></p>

	<p>Saaremaa Island. Area of concern was marked in the attachment.</p>	<p><i>wind turbines in order to ensure smooth international freight transport and optimal journey length and the need for turns. Precise solutions are developed at the superficies license stage.</i></p>
<p><b>The Swedish Agency for Marine and Water Management</b></p>	<p>As far as we are aware, it is unusual for harbour porpoises to stay in estonian waters, but it is not well studied either. It is possible that Estonia has more information about the possible presence of porpoises in the relevant area. It is therefore important to gather the available data on possible occurrence of porpoises within the area in the environmental impact assessment for the offshore wind areas.</p>	<p>According the international study; <a href="https://www.sambah.org/SAMBAH-Final-Report-FINAL-for-website-April-2017.pdf">https://www.sambah.org/SAMBAH-Final-Report-FINAL-for-website-April-2017.pdf</a>, no harbour porpoises were detected in Estonian waters during the two-year period. In addition, the Estonian Maritime Institute has been obliging to carry out whale watching on board fishing vessels since EU accession, and no harbour porpoise has been seen so far.</p>
	<p>We have in our previous response commented on the overlap between energy areas and shipping routes. It would be relevant to carry out a risk analysis related to traffic intensity and the need for shipping routes through the energy areas.</p>	<p>The Estonian MSP clearly indicates that in wind park areas the basic passage corridors (water traffic area) will be left free of wind turbines. Conditions for close cooperations are set in the plan for the next, more detailed planning stage. Estonian Maritime Authority has been involved in the planning process and is satisfied with the current approach. Therefore the need to carry out a risk analysis is not recognised from our part.</p>
	<p>We noted that one shipping route north from Gotland on the Swedish side is missing in the Estonian plan, which should be adjusted.</p>	<p>Thank you, we have added this route to the water traffic areas.</p>
	<p>There are Swedish pelagic fisheries interests in areas proposed for wind energy, mainly in the wind innovation area. The potential impacts on fisheries and solutions for coexistence could be clarified.</p>	<p>The potential impacts of wind energy areas on fisheries are elaborated in an updated version of the impact assessment report and planning materials.</p>
	<p>The main solution shows fisheries in the whole planning area. We would welcome using the plan to indicate the most important areas for fishery as a basis for future</p>	<p>In an updated version of the plan, there are schematic maps where most intensely used fisheries are demonstrated.</p>



	trade-offs in relation to other interests.	
	We welcome having the Ecosystem Approach as a point of departure in planning and impact assessment, as well as broadening the scope in an “Extended Impact Assessment” to include social and economic dimensions while still fulfilling the regulations of the SEA-directive.	Thank you for your feedback.
	We would welcome aspects of the strategic environmental assessment to be more explicitly related to the objectives and targets of the Marine Strategy Framework Directive.	The Environmental impact assessment Report of the MSP has been based on the objectives Marine Strategy Framework Directive.
<p><b>Swedish</b> Meteorological and Hydrological Institute (SMHI)</p>	<p>SMHI discourages from the development of fish farms, foreseen in the Estonian MSP Impact Assessment Report. Even, as suggested in the Report, with shellfish farms placed in the vicinity of fish farms located in the coastal sea, such activities will eventually add to the total nutrient load to the Baltic Sea.</p>	<p>The plan sets out no designated areas for fish farming and this is because rapidly developing farm technologies and site specific effects on the natural environment. The establishment of fish farms should be avoided in unsuitable areas. The development of fish farms is directed through guidelines and conditions. The current understanding of the Estonian Ministry of the Environment is that the fish farms are given permits only in case they can guarantee zero emission of nitrogen and phosphorus to the adjacent environment. This suggest that even if the fish farms are located proximity to conservation areas such farms do not pose significant threat to the natural environment.</p> <p>In addition, MSP imposes a condition that the impacts associated with the establishment of a fish farm must be at an acceptable load for the state of the marine environment (the activities of the fish farm must not lead to a deterioration of the marine environment) and, if necessary, environmental measures must be implemented. Environmental measures are measures to prevent, avoid, reduce and mitigate, and where appropriate,</p>

		remedy adverse environmental effects associated with the performance of a proposed activity (inc suitable technology). Environmental measures also includes environmental monitoring. The aim of the Estonian MSP is to develop nutrient-neutral aquaculture.
<b>Swedish</b> Transport Administration	The Swedish Transport Administration wants to stress the importance of accessibility in the sea traffic routes between Sweden and the Gulf of Riga. The sea traffic routes are described in the Swedish Maritime Spatial Plan. It is especially important to take into account when assessing and making decisions concerning the location of offshore wind farms.	The plan already states that in the wind park areas the basic passage corridors (water traffic areas) will be left free of wind turbines.  In the MSP planning document additional condition will be set to ensure the close cooperation with neighbouring countries to agree on the precise solutions of wind turbines and water traffic during the licensing stage and environmental impact assessment
The County Administrative Board of <b>Gotland</b>	The maritime spatial plan as well as the environmental assessment notes that Estonia, like most countries, is a long way from a fossil-free energy system. As part of the solution, the maritime spatial plan handles infrastructural solutions and identifies an intensification of the port network as well as better logistics (shorter downtime with the main engine running, fewer ships main engines running at one time in port), and use of ships with a lower level of pollution.  The County Administrative Board of Gotland recommend a clearer connection to renewable fuels and the landbased spatial planning for a future fossil-free energy system. For example, consideration should be given to the transition to electricity and hydrogen (and LBG/LNG) as a direction.	Thank you for your proposition. Although we fully support the idea of the transition to renewable fuels, the MSP is not the right tool to initiate landbased fossil-free energy planning.
	The County Administrative Board of Gotland looks well upon the maritime spatial plan and the	Thank you for your feedback.

	<p>environmental assessment mention of different opportunities for future energy production incl. heating/cooling and energy distribution (eg. cable and hydrogen). It is also well that the plan mentions transfer between countries.</p> <p>In regard to wind production the Estonian aim - by 2030, 80% of the heat produced in Estonia should be based on renewable energy sources and wind energy could cover one-third of the country's electricity consumption needs by 2050 – indicate a needed volume of 4500 MW. According to the Estonian Energy Development Plan 2030, the aim is to set up wind turbines with a total installed capacity of up to 500 MW in offshore wind farms, the construction of which would significantly develop the business of the sector. The County Administrative Board of Gotland is well aware of the various conflicts of interest regarding wind energy but wants to encourage further high ambitions and following intentions in the maritime spatial plan.</p>	
	<p>The environmental assessment as well as the maritime spatial plan illustrate and analyzes the advantages and disadvantages of several different areas of use of, for example, wind farms. In these analyzes migration routes for birds have been taken into account and the plan has undergone adjustments since the previous proposal. The County Administrative Board of Gotland do however want to emphasize the importance of Estonia being an important migration and resting area, especially for Arctic</p>	<p>As part of the preparation of the Estonian MSP, the available information on the results of the census of birds staging in the high seas and coastal waters since 2000 was collected for analysis. As a result of the analysis, the abundance forecasts of staging birds with a resolution of 1 km<sup>2</sup> were prepared covering the entire Estonian marine area. In addition, existing knowledge on the main autumn and spring migration corridors for different bird groups (land birds, geese, black geese, swans, arctic waterfowl) was gathered. MSP solution takes into</p>

	<p>seabirds, such as large parts of the West Siberian population of sea trout, blackbirds, algae and smallmouth bass. Estonia has an important role in the conservation of these areas and it is therefore important that knowledge about this has been taken into account.</p>	<p>account bird staging areas and migratory corridors.</p>
	<p>The County Administrative Board of Gotland notes that the maritime spatial plan and environmental assessment reflect upon the impact of climate change but finds that this needs to be developed. Climate change is one of the greatest challenges of our time and should be given further focus and the need for continued tools to manage the effects of climate change should be analyzed.</p>	<p>MSP alone cannot manage climate change. This is the overall global and national goal and all conditions and solutions of MSP has to strive towards the goal.</p>
	<p>The County Administrative Board of Gotland lacks Estonia's own assessment of how the maritime spatial plan can affect the environment in surrounding countries, such as Sweden and Sweden's economic zone. It is possible that it was handled in various other projects such as Baltic Scope, but should in that case be reported.</p>	<p>The updated version of the plan will include some additional conditions for mandatory cooperation with neighbouring countries. The impact assessment report will be updated as well.</p>
	<p>The legends of the plan's map base have not been translated from Estonian, which has made it difficult to interpret the meaning of the maps. In future international data, this should be reviewed.</p>	<p>These will be translated before adoption.</p>
<p>The National Board of Housing, Building and Planning of <b>Sweden</b></p>	<p>The National Board of Housing, Building and Planning have concentrated the study of the Estonian MSP on the connections between our countries and how they are displayed in the plan. We would like to commend you on your impact assessment that has been extended to include all the aspects of sustainability.</p>	<p>When Estonian MSP is adopted, then it will be made available also in BASEMAPS platform where all Baltic Sea MSPs will be available.</p>

	<p>Our comment is that the map when it concerns the water traffic areas and the fairways over the Baltic sea ought to display how these connects with the systems outside the Estonian borders. This would make it easier to comprehend the importance and impact of the infrastructure, even though that area isn't a part of Estonia and therefore not a part of the plan.</p>	
<p><b>BirdLife Sweden</b></p>	<p>BirdLife Sweden has limited knowledge on Estonian bird distributions. Hence, we recommend the MSP to align and adapt to Important Bird and Biodiversity Areas (IBAs) in Estonia. We assume that relevant authorities have contacted the Estonian Ornithological Society (EOS) for discussions and transfer of knowledge.</p>	<p>IBAs were selective of Estonian Natura 2000 sites and all the most important bird areas in Estonia, which are fully or largely protected as all national parks, protected areas or conservation areas.</p> <p>As part of the preparation of the Estonian MSP, the available information on the results of the census of birds staging in the high seas and coastal waters since 2000 was collected for analysis. As a result of the analysis, the abundance forecasts of staging birds with a resolution of 1 km<sup>2</sup> were prepared covering the entire Estonian marine area.</p> <p>The impact assessment of the proposed activities has been carried out in cooperation with the EOS and the assessments are based on their basic study of Marine Spatial Plan "Analysis of Bird Staging Areas" Estonian Ornithological Society, 2019.</p>