

Mr George PAPANDEOU
Minister for Foreign Affairs
1, Vassilis Sophias Ave.
Athens
Greece

Den Haag/Lisboa, 10 June 2003

EU Marine Policy and specifically the EU Marine Strategy

Dear Minister,

On behalf of the Working Group on “Coastal Zones and Marine Environment” of the European Environmental Advisory Councils (EEAC), a network of formal advisors on environmental policy and sustainable development to the respective governments of the EU member states and accession countries, I am writing to express our view that EU Marine Policy presently under formulation should better reflect an holistic and integrated view of marine (oceans, seas and coasts) affairs.

We note and welcome the attention and urgency given to Maritime Safety issues at the recent Brussels European Council, in the aftermath of the *Prestige* accident. We also note and welcome the fact that the March Environment Council supported efforts of the Commission towards a more comprehensive marine strategy (“Towards a strategy to protect and conserve the marine environment”, COM(2002) 539 final). However, we are concerned that the spirit and sense of urgency that informed the Heads of State discussion are not reflected in the present proposals, which are expected to cover the full range of marine issues and their interactions.

In addition, we feel that the present approach is not adequately integrated with international agreements and other commitments signed up to by member States, such as the *UN Convention on the Law of the Sea*, the *Johannesburg Plan of Implementation*, and the *EU Sustainable Development Strategy*, which between them provide a framework for protection and sustainable development of the marine environment. Furthermore, the present proposals do not appear to adequately reflect the principles on which these agreements (and the proposed EU Marine Strategy) itself are predicated including an holistic approach, the integration principle, the precautionary principle and better management of risks, and the Ecosystem Approach. In particular, we believe the present Strategy risks perpetuating the current fragmented and sectoral approach, reflecting specific interests and dispersed responsibilities which is not in line with the integration principle enshrined in Art.6 TEC and the relevant international agreements referred to.

We strongly support building a European wider marine policy on such principles and thereby establishing European responsibility and performance regarding marine affairs as a whole.

The EEAC Working Group has undertaken an initial analysis of the proposals “Towards an EU marine strategy“. In this context, we feel that some major issues require further consideration, which include, but are not restricted to, the following:

- i) **Integration and synergy between marine sectoral policies, international conventions and agreements.** For example, there is insufficient attention given to the potential synergy between policies and targets stemming from regional agreements such as OSPAR, Barcelona and HELCOM Conventions and international mechanisms such as the International Maritime Organization (IMO), the Intergovernmental Oceanographic Commission of UNESCO (IOC), and the United Nations Convention on the Law of the Sea (UNCLOS).
- ii) **The importance of the land-sea interface** and implications for a more integrated approach to policy and management. For example, there is **inadequate consideration of the need for change to agricultural policy and practice** to address the influence of that sector and catchments on the marine environment, particularly the problem of marine eutrophication.
- iii) **Greater prominence to governance mechanisms, particularly sea use planning**, to provide more efficient allocation of space for different activities whilst reducing conflict between activities and with wildlife and ensuring cross-sectoral issues such as cumulative effects are taken account of. Such planning should be based on the scale of the EU large marine ecosystems (*e.g.* Baltic Sea, North Sea, Northeast Atlantic, Iberian Atlantic Region, Mediterranean Sea, Black Sea).
- iv) In view of the impacts suffered by the marine environment, for example the pervasive and long-term effects of fishing, there is an urgent need to **explore mechanisms to enable recovery**, as well as maintenance, of European marine ecosystems and biodiversity. In particular, consideration needs to be given to a European network of marine protected areas (coastal and oceanic) which does not rely solely on the Birds and Habitats Directives to meet international targets within the international agreements referred to herein. This should incorporate more effective means of regulating extractive use such as fishing, through the inclusion of no-take areas.
- v) **Strengthen the scientific basis for management and policy making**, not only through better integration of large scale marine research and monitoring programmes within the EU (such as an enlarged European Global Ocean Observing System) but also through more effective management models based on forecasting systems and best practice by relevant stakeholders. However, unless there is the **political will to actually take account of the evidence**, in view of the principles referred to above and the experience of, for example, implementation of the Common Fisheries Policy, a strengthened scientific base will not in itself bring improvements across the full range of marine sectors.
- vi) Encouragement to implement adequate and effective actions for **increasing public awareness and understanding of marine issues amongst the stakeholders**, and at all levels, together with the **required institutional adjustments**.

We recognise that the proposals towards a Strategy seek to address complex and difficult issues. We intend to undertake a more detailed analysis, which we will offer as a contribution to the further development of the draft Strategy, and which we hope will be of value to the EC and other interested parties. However, even this cursory analysis indicates what is in the spirit of UNCLOS (which states that “*the problems of ocean space are closely interrelated and need to be considered as a whole*”), namely that it is essential that we move towards a common European policy for the marine environment (ocean, seas and coastal zones).

We therefore urge the Heads of States at the **European Council of Thessaloniki in June 2003** to address this important aspect of European affairs and cooperation, with a view to strengthening the capacity and the role of Europe to meet urgently and effectively the challenge of achieving sustainable use of the marine environment for the benefit of humans and wildlife.

A copy of this letter goes to the Governments of all states served by the EEAC Working Group member councils.

Yours sincerely,

Prof. Carlos S. Reis
Chairman of the EEAC WG on Coastal Zones and Marine Environment
Special Advisor of the Portuguese CNADS
(National Council for the Environment and Sustainable Development)

Members of the EEAC Working Group “Coastal Zones and Marine Environment”,
having prepared these recommendations, are:
German Environmental Advisory Council (SRU)
Dutch Wadden Sea Council (WSC)
Portuguese National Council on Environment and Sustainable Development (CNADS)
English Nature (EN)
Scottish Natural Heritage (SNH)

cc: European Commission, DG Environment

letter was also sent to:

Mr. Ilias Plaskovitis
Secretary General for European Affairs
Ministry for Foreign Affairs
Greece

Ms Vasso PAPANDREOU
Minister for the Environment, Regional Planning and Public Works
President of the EU Council of Ministers
Greece

Mr. Franco Frattini
Ministro degli Affari Esteri
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