

Patrick Murphy
European Commission
DG Environment
Rue de la Loi 200
B-1049 Brussels
Belgium

Edinburgh/Den Haag, 4 November 2003

Dear Mr Murphy

European Marine Strategy – Working Group on Strategic Goals & Objectives

The Working Group on Marine Environment and Coastal Zones (WG Marine) of the European Environmental Advisory Councils (EEAC) welcomes the progress that is being made towards a Marine Strategy for Europe, which we believe is a timely and important initiative. Our group intends to concentrate its efforts over the next year in assisting DG Environment to develop an effective and holistic marine strategy. Our future inputs will build on a letter the WG Marine sent to the Greek Presidency in June 2003 in respect of the Communication ‘Towards a Strategy to Protect and Conserve the Marine Environment’ (COM (2002)539 final) (copy attached). However, the group has asked me to raise a few specific points relating to the development of the Marine Strategy.

We understand that the EU Water Directors will meet on 24-25 November and consider the establishment of an Expert Working Group on Strategic Goals and Objectives in relation to the EU Marine Strategy process. The WG Marine agrees with the Environment Council conclusions¹, that the strategy needs to include ambitious, clear and coherent objectives. We therefore strongly endorse and support the proposal for this Expert Working Group, and hope that the following matters could be considered within the Group’s Terms of Reference.

Integration

Our group is particularly disappointed that the Communication is structured in a sectoral fashion, given that it identifies over-dependence on a sector by sector approach as being one of the weaknesses of current maritime management. We agree with the Environment Council conclusions² that there is a need to clarify the connection between the Marine Strategy and marine aspects of Directives, and the need to recommend further measures for the integration of environmental aspects in other Community policies. It is therefore essential to set strategic cross-cutting goals, objectives and targets rather than simply to refine sectoral objectives, and a dedicated Strategic Goals Expert Working Group seems the most appropriate mechanism to do this.

Desired state

The European Economic and Social Committee³, in relation to consistency between policies, recommends that the Commission should define the concept ‘good state of the marine environment...’. We believe that the current state of the seas should not be taken as the baseline. Failure to recognise this means accepting an already degraded marine environment as a baseline, and therefore insufficient ambition to deliver recovery.

¹ Conclusions of Environment Council 2491 meeting, Brussels 4 March 2003 (6677/03 Presse 54), para 7 (a)

² Conclusions of Environment Council 2491 meeting, Brussels 4 March 2003 (6677/03 Presse 54), para 7 (g and h);

³ Opinion of European Economic & Social Committee (2003/C 208/04) para 4.2.1.

We therefore urge that an attempt should be made to define the desired state which an EU strategy should seek to attain, and suggest that the Expert Working Group on Strategic Goals & Objectives is the appropriate forum to provide such a definition.

Taking account of existing objectives and targets

With respect to many of the objectives in the Communication, as we are sure you recognise, there is a need to take account of existing commitments and targets stemming from various regional Conventions, such as Barcelona, HELCOM and OSPAR and international mechanisms such as UNCLOS and the World Summit on Sustainable Development (WSSD) 2002. For example, in relation to the proposed Objectives 1 and 2 of the Communication, targets for establishing a representative network of Marine Protected Areas by 2012 (WSSD) and by 2010 for the North Sea (OSPAR) are pertinent. Equally, the WSSD commitment to recovering fish stocks by 2015 clearly has a bearing on objective 3. In developing strategic goals and objectives, it will be important to both ensure there is no conflict, and to maximise synergy, with these existing commitments.

Lack of clear targets

In relation to the stated objectives in section 7 of the Communication, many of the actions listed are fairly general. In the absence of more detailed targets and deadlines, many will be hard to verify progress against. This is insufficient, since detailed targets were excluded from the 6th Environmental Action Programme on the specific assurance that they would appear in the Thematic Strategies.

Link between Objectives and Actions

It is important to ensure that the actions identified in the marine strategy can deliver the objectives set. In the Communication, there are some examples where there is doubt as to whether this will be the case, eg we question whether the stated actions will be sufficient to attain the 'elimination of human-induced eutrophication problems by 2010'. It would seem a logical and effective use of resources for the proposed Expert Working Group to identify the actions required to achieve the goals and objectives it recommends.

Conclusion

In light of the above, we consider that it is critical for an Expert Working Group on Strategic Goals and Objectives to be established, and our group has agreed that I should offer my services on this Group, on behalf of EEAC, should you so wish. We would be more than willing to elaborate on our comments in this letter, and plan to provide further comments on other aspects of the Communication as a contribution to the further development of a Marine Strategy. You may also like to know that the Marine Thematic Strategy will be the focus for the EEAC Annual Conference in October 2004, timed to contribute to the Stakeholder Meeting which we understand is planned for November 2004.

We look forward to assisting DG Environment in developing an effective, coherent and holistic Marine Strategy.

On behalf of the EEAC Working Group on Marine,

Yours sincerely,



Michael Scott
Chair of the EEAC Working Group on Marine
Deputy Chairman, Scottish Natural Heritage