



REPUBLIC OF ESTONIA  
MINISTRY OF THE ENVIRONMENT

[REDACTED]  
Federal Maritime and Hydrographic  
Agency of Germany  
EingangOdM@bsh.de

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Our ref 29 June 2021 No 6-6/20/4634- /8

Regarding the second draft of the maritime spatial  
plan for the German EEZ in the North Sea and the  
Baltic Sea

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Germany, acting as the Party of Origin, has notified Estonia according to the Protocol on Strategic Environmental Assessment (SEA) to the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) regarding the revision of the German maritime spatial plan. By a letter dated 10 March 2020, Germany notified Estonia in the early stage of the revision process. Based on the statements received during the publication of the relevant documentation that had been sent by Germany, the Ministry of the Environment has informed that Estonia does not intend to participate in the transboundary impact assessment procedure regarding the revision of the German maritime spatial plan. However, by a letter dated 4 December 2020, Germany has initiated international consultations for the revision process, i.e. the draft maritime spatial plan and the environmental reports stage. The Ministry of the Environment of Estonia organized a public display of the aforementioned documentation and sent the received statements to Germany.

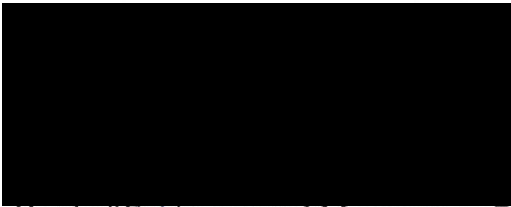
Now the revision process has reached the second draft of the maritime spatial plan and the revised environmental reports stage. By a letter dated 4 June 2021, Germany has sent to Estonia the aforementioned documentation in English, i.e. the respective webpage link. Germany has also clarified that the provisions of national law provide the public and public bodies with the opportunity to comment only on those amendments to the draft plan which affect their interests for the first time or to a greater extent than the previous draft plan.

The Ministry of the Environment of Estonia organized a public display of the aforementioned documentation. Information letters have been sent to numerous authorities and non-governmental environmental organizations, also notice of the public consultation procedure has been given in the official publication *Ametlikud Teadaanded*. In the announcements, a reference has been made to the respective webpage where all the relevant documentation is available. Also information concerning the further international consultation online meeting (15 June 2021) has been added. The public display took place from 10 to 22 June 2021. Statement has been received from the Estonian Fund for Nature (enclosed). A summary of the statement – written by the Ministry of the Environment – is included below. Health Board informed that they do not have comments.

The Estonian Fund for Nature finds that some of their proposals made in January 2021 (in the first draft revised maritime spatial plan and the environmental reports stage) have not been taken into account but are still relevant.

The Estonian Fund for Nature noted that in relation to subchapter 2.1 of the plan, more profound justification should be provided for the preference of maritime affairs. This should include a precise reference to the provisions of UNCLOS setting out the priority of shipping over the environment, or alternatively, this principle could be rephrased so that environmental needs are at least at the same level as shipping. The principle that the development of offshore wind energy must not take place at the expense of biodiversity should be brought out more clearly. The documentation should consider measures to prevent negative effects on birds and bats, also alternative ways of laying foundations to ramming should be considered. Mining should be excluded in protected areas and other sensitive marine areas (including loon stopover sites), the reservation of marine areas for hydrocarbon extraction should be disclaimed.

In addition, the Estonian Fund for Nature proposed that measures to reduce the negative environmental impact of fisheries, and in particular fish farming, should be implemented. Where appropriate, spatial restrictions should be imposed (also with regard to marine protected areas). Concerning Norwegian lobster fisheries reservation areas, a more selective approach to fishing that also takes into account the functioning of the ecosystem should be stipulated. In relation to subchapter 2.2.1 of the plan, the interrelationship between the different uses should be brought out more clearly. As a more general comment, the Estonian Fund for Nature has emphasized that the maritime planning process needs more effective international consistency and assessment of cumulative effects across the whole sea.



Head of Environmental Management Department  
acting Deputy Secretary General

Annex:

1) statement by the Estonian Fund for Nature

