Proposer	Content of the proposal	Response from Estonian Ministry of Finance
The County Administrative Board of <b>Stockholm</b>	Based on the draft plan it is not clear to what extent protected areas are combined with fishing regulations, which is increasingly recommended in Swedish protected areas, especially where there are fish spawning grounds. Since protecting spawning grounds not only benefit the fishing industry, but also the ecosystem itself, the Estonian marine spatial plan would probably gain clarity from including spawning grounds as part of the network of protected areas.  To our knowledge, the Estonian marine spatial plan does not include (or plan to) any other closed areas for fishing than spawning grounds. We would like to address that researchers across the world have witnessed that closed areas benefit growth of large reproductive fish, which are especially important for regenerating fish stocks (on a larger scale including areas outside closed areas).	The separate impact assessment report will bring out more thoroughly the importance of spawning grounds and proposes an areas which are most important for spawning. Therefore the conditions of the main solution have been specified and also a map of the most important spawning areas are made. In Estonia fishing regulation are well in place and MSP will not give extensive conditions to regulate this sea use more.
	The County Administrative Boards goal with respect to this future closed offshore area is mainly to protect Baltic Herring when they aggregate <i>before</i> spawning closer to the coast. During the last couple of years catches of herring in the archipelago have decreased dramatically and predatory marine species (cod, seals and seabirds) show signs of food limitation also causing impacts on the coastal ecosystem. Our anticipation is that the closed fishing area will promote small scale coastal fishing including recreational fishing and tourism as well as the ecosystem itself. We hope the Swedish initiatives may inspire Estonia to do something similar, and that combined efforts will give positive results for the Baltic Sea.	Thank you for your input. In spawning time Estonia has a prohibition of fishing for different species. Also fishing regulation are well in place and we do not see that MSP would have to give more conditions to regulate fishing.
	The County Administrative Board of Stockholm are impressed with the Estonian intent to guide future development of aquaculture within the spatial plan. We only have one concern; and that is the lack of guidelines and requirements regarding introducing non-native species or genetically modified species in the sea. For clarity, we recommend adding some guidelines about this to avoid confusion and spread of alien invasive species or genetic strains in the future. We look forward to the completion of the spatial plan.	The separate impact assessment report specifies the impacts of the fish farms.
The <b>Swedish</b> Board of Agriculture	Regarding section 5.1.4 the board notes that in the preliminary impact assessment in the fishing sector (page 17 in the draft of the MSP) it is noted that pollutants accumulate in the fat tissue	Thank you for your input. This was a suggestion from health impact perspective. Estonian MSP has to also consider health impacts and

	of fish and these can have a negative impact on health.  In this context, the Swedish Board of Agriculture would like to stress that it is important to ensure that any advice about consumption of younger Fish does no jeopardize reproduction and sustainable fishing in the Baltic Sea.	this part brought out general situation of health issues regarding fishing. MSP will not give more conditions to regulate fishing therefore there is no health impacts regarding the solution of fishing. General situation is brought out in the separate impact assessment report. MSP cannot affect the consumption of fish and therefore does not jeopardize reproduction and sustainable fishing in the Baltic Sea.
	Regarding section 5.5.4 the board finds that the impact assessment in the draft MSP submitted for comments does not include any expected effects related to commercial fishing of wind energy development areas.	The separate impact assessment report will bring out the effects related to commercial fishing and wind energy development areas.
The Swedish Meteorological and Hydrological Institute (SMHI)	SMHI notes that the draft plan now provides detailed guidelines and requirements for sustainable use of the Estonian marine areas in all relevant fields. Hence, the SMHI has no further suggestions to the proposed draft.	Thank you for your feedback.
The Swedish Transport Administration	The administration wants to stress the importance of accessibility in the sea traffic route between Stockholm and the Gulf of Riga which is described in the Swedish Maritime Spatial Plan. Especially when assessing and making decisions concerning the locations of offshore wind farms upon overlap with sea traffic areas. Furthermore, the Swedish Transport Administration appreciates the collaboration regarding maritime spatial planning in the Baltic Sea area. It is of great importance for the continuity of the sea traffic in the region.	We agree that the importance of accessibility in the sea traffic route between Stockholm and the Gulf of Riga must be taken into account when making decisions concerning the locations of offshore wind farms. Overall the importance of sea traffic is more stressed in the main solution and also the conditions relating to maritime transport have been specified.
Ministry of the Environment of Finland	However, it is not clear based on the draft plan whether the protection of breeding areas applies to the breeding areas of all fish species or only those of Commercial fish, or to those of only certain species. The location of fish farms seems to be concentrated mainly on to deep, open marine areas, which in itself does not reduce nutrient loads, but may decrease the local impact on the environment. The draft plan places a great deal of focus on protecting fish breeding areas. The draft plan could take into account other biodiversity conservation	The separate impact assessment report specifies these themes.

licencing phase and in

measures and the operation of ecosystems as well. The draft plan should also pay closer attention to the requirements of the EU Marine Strategy Framework Directive, so as not to jeopardise the ability to achieve a good status of the marine environment. The approach to the location of wind power is The separate impact systematic. The objective has been to propose assessment report specifies areas for wind power that would keep its these themes. impacts on the environment and natural values as minimal as possible, while also taking into account economic conditions. When it comes to offshore wind power, however, in addition to marine conservation areas and bird migration routes, the draft plan should take into account the State of the marine environment as a whole, including underwater organisms and habitats, as well as endangered organisms and habitats. This type of approach is vital for achieving a good State of the marine environment. As others also indicated in their statements, the Thank you for your Ministry of the Environment wishes to highlight feedback and support for that there are plans to build an underwater our approach. railway tunnel between Helsinki and Tallinn, and that this may have significant environmental impacts on Estonia and Finland. The Ministry of the Environment emphasises the importance of carrying out the development project in question in a way that involves an extensive analysis of its content, a thorough study of the location and an impact assessment, as well as a feasibility study. Based on the Estonian MSP draft, it is partially The main solution and unclear whether the planning of the use is based separate impact assessment on an integrated approach as required under the report will bring out the Maritime Spatial Planning Directive, or if the ecosystem based approach planning has been sector-specific, with the more thoroughly. locations of different types of use being decided on without integrated spatial planning. The draft plan could provide a stronger description of the ecosystem approach as a cross-cutting principle throughout the plan. The Ministry of the Environment emphasises We agree that only MSP in that, in practice, it is not possible to achieve a practise cannot achieve the good State of the marine environment without good status of marine environment. This is the reducing the pressure on the marine environment, organisms and habitats. To achieve overall goal and all conditions and solutions of this, it would be good to have access to inventory and research data on underwater MSP has to strive towards marine biodiversity when guiding the planning the goal. of the location of offshore wind power and The main solution brings aquaculture. When planning the projects, it is out more concretely the also useful to carry out an environmental impact conditions that has to be assessment and take into account the matters taken into account in

	highlighted in the assessment in the decision-	environmental impact
The Minister of	making The Ministry takes notice of the planned	assessment.
The Ministry of	The Ministry takes notice of the planned	Thank you for your
Transport and Communications of	permanent connection between Tallinn and	feedback and support for
Finland	Helsinki mentioned in the draft plan, and is in	our approach.
rimand	agreement with the view presented in the plan, according to which the development project in	
	question will require a thorough analysis, careful	
	study of location, and analyses of feasibility and	
	viability. The Ministry has a favourable opinion	
	of the view presented in the plan stating that	
	connections with neighbouring countries will be	
	prepared based on agreements between the	
	governments of the countries in question.	
The Ministry for	The Draft of the Estonian Maritime Spatial Plan	Thank you for your
Foreign Affairs of	contains many elements that will have a positive	feedback. We will take
Finland	effect on the cooperation between Finland and	your opinions into
	Estonia. These include the issues discussed in	consideration when
	the draft concerning maritime transport and	conducting next processes,
	infrastructure located on the seabed, for	e.g. when developing
	instance.	connections between
	The Ministry for Foreign Affairs is of the	countries.
	opinion that particularly the permanent	
	infrastructure under the Gulf of Finland will	
	require various degrees of coordination between	
	the Finnish and Estonian authorities. It is the	
	view of the Ministry that there are currently	
	sufficient mechanisms in place for coordination	
	between the two countries' ministries of the	
	environment, among others. At the same time,	
	the environmental impact assessment process	
	concerning the planned tunnel between Helsinki	
	and Tallinn, for instance, has shown that there	
	are significant differences between Finland and	
	Estonia when it comes to the preparation	
	process. For this reason, it is of utmost	
	importance for both parties to have a good understanding of the content of the planning	
	process of the other party.	
	The Ministry for Foreign Affairs States that	
	when developing connections between countries,	
	the preparations must be carried out in the most	
	comprehensive way possible. For instance,	
	Security policy issues must be taken into	
	consideration in the preparation process to the	
	extent that this is justified.	
Metsähallitus of	However, it should be borne in mind that,	We agree with you opinion
Finland	according to the objectives set by the Water	and this has been taken into
	Framework Directive, the environmental load	account when drafting the
	must not be increased in areas where the	main solution.
	ecological status of the sea is less than "good".	
	The areas proposed for wind power in the MSP	The separate impact
	have been deemed suitable based on a multi-	assessment report brings
	phase analysis that takes into account the	out the presumable
	restrictions set by different functions and the fact	migration routes of bats.

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	that wind power must not interfere with the main migration routes of birds. However, the plan does not indicate how the flying routes of bats, preferably presented on the map, have been taken into account in deciding on the location of wind power. Metsähallitus hopes that migration routes of bats will be included into the analysis in the final plan.  As the body in charge of managing Finland's land and water areas, Metsähallitus hopes that in preparing its MSP, Estonia will take into account the fact that nature conservation and nature values cannot be subordinated to other uses in all areas. An ecologically balanced network of conservation areas and a good status of the marine environment cannot be attained either if natural values are weakened.	We agree that an ecologically balanced network of conservation areas and a good status of the marine environment cannot be attained either if natural values are weakened. Therefore we have taken into account existing nature protection areas and brought out all other relevant impacts of the marine environment in our separate impact assessment report.
	The draft plan mentions that dumping should generally be avoided during an ecologically sensitive period (e.g. a spawning period), if this is technologically and economically possible. From the viewpoint of Metsähallitus, the effects of dumping are not sufficiently known, which means that the locations of dumping should be planned in line with the precautionary principle. There is a risk that dumping may destroy ecosystems, so taking into account ecologically sensitive periods is not always enough to conserve biodiversity.  The Estonian Maritime Spatial Plan is still in a draft phase and lacks an analysis of potential areas of conflict between different forms of use of the sea and natural values that would demonstrate the possible collisions between the most important natural values of Estonian marine areas and the use value generated by human activity in these areas. The draft plan also lacks a perspective on the future, in which the development of different forms of use and	We agree that the effects of dumping are not sufficiently known, which means that the locations of dumping should be planned in line with the precautionary principle.  Therefore we have specified the conditions of dumping in the main solution taking into account the precautionary principle.  The main solution has a separate impact assessment report where out all other relevant impacts of the marine environment has been brought out more thoroughly.
The Geological	natural values will be examined from the viewpoint of climate change, for example.  Metsähallitus hopes that these perspectives will be taken into account in the final plan and that the plan will include an informative summary of how different forms of use will be combined.  The functions within the area of responsibility of	We have specified the
Survey of <b>Finland</b>	the Geological Survey of Finland (wind power, seabed infrastructure, soil on the seabed and dumping of dredging masses) are drawn up	conditions of dumping in the main solution taking

correctly insofar as the geological parameters into account the are concerned, and that the environmental precautionary principle. impacts have been taken into account appropriately. As concerns licencing for the dumping of dredging masses, the Geological Survey of Finland hopes that sufficient sediment samples are taken from both the dredged materials and soil from the seabed in order to investigate the environmental impacts. If the dredging material or sediments in the dumping area have too high a concentration of hazardous substances, they may have adverse impacts on the marine environment if they enter the column of water. In the worst case, the impacts may be transboundary, as stated in Espoo Convention, and harmful to the Finnish marine environment. The concept of 'Estonian marine culture' Finnish Heritage Thank you for your effectively covers the historical use of the sea feedback. Agency and water areas, marine and underwater cultural heritage as well as modern water-related hobbies and leisure-time activities. Sufficient attention has also been paid to the protection of underwater cultural heritage and the sustainable use of the sea. Finnish Heritage Agency emphasises that with sufficient, well-timed consideration for cultural heritage, the needs of cultural heritage can be reconciled with other functions when it comes to cross-border impacts as well. The Draft of the Estonian Maritime Spatial Plan has paid due attention to the significance of marine areas for tourism, water-related activities such as recreational boating, marine motorsports, sailing and leisure-time opportunities related to waterfront areas. The interest of Finland, Latvia, Russia and Germany in Estonian underwater cultural heritage is expected to grow. Finnish Heritage Agency proposes that tourism could be developed with the countries in question and with other countries around the Baltic Sea, while taking the potential cross-border impacts of tourism into account. Landscape impacts are taken into account In the separate impact particularly as concerns wind turbines, for assessment report are also instance by locating wind turbines at least 10 brought out more kilometres from the shoreline to ensure that the thoroughly social and landscape does not change significantly when cultural impacts, including looking from the land out to the sea. impacts of the views. Furthermore, wind turbines must not dominate the horizon. From the viewpoint of Finnish Heritage Agency, it is important to mention the landscape value of a horizon, free of human impact, which can be observed when looking from the land and from the sea. Finnish Heritage

	Agency States that maritime spatial planning should ensure that a sufficient high sea landscape and experience are preserved. Crossborder impacts will become more obvious if wind turbines are to be built in the exclusive economic zone.	
Helsinki-Uusimaa Regional Council	In preparing the draft, a Special focus has been placed on the management of new forms of use, i.e. aquaculture and energy Production, but the long-term, future-oriented strategic plan could also discuss the potential need for changes to traditional forms of use in the future. Current problems could be highlighted more clearly as well. The basis for the entire draft plan is the environmental perspective and ensuring a good State of the sea, but the draft could describe even more explicitly how it supports blue growth and takes into account the interaction between the land and the sea. Additionally, the draft plan does not directly State its target year. Helsinki-Uusimaa Regional Council notes that North Sea - Baltic Sea TENT-T corridor is linked to the traffic of the Gulf of Finland, and to the currently ongoing project of a railway tunnel connection between Helsinki and Tallinn. In Finland, the alignment of the tunnel is presented in the preparation of the Helsinki Regional Phase Plan sub-phase as an indicative line between Helsinki and Tallinn, and the aim is to propose a corresponding line in the Maritime	The main solution has a separate impact assessment report where all other relevant impacts of the marine environment has been brought out more thoroughly. In addition the main solution has a new chapter about land and sea interactions. Concrete target year has not been planned to bring out.  The permanent connections are planned with the decision of the Government of Estonia with separate detailed national level plans. These are extensive projects the implementation of which has a significant impact on the living and natural environment. The
	Spatial Plan for the Gulf of Finland as well. Helsinki-Uusimaa Regional Council suggest considering discussing the matter and proposing a line in the Estonian MSP, as this would improve the coherence of the plans of Gulf of Finland and Estonia. If implemented, the project would have significant environmental impacts on the land and sea areas in Estonia and Finland, and more widely in the Baltic Sea region.	impact depends largely on the detailed solution of these permanent connections (bridge or tunnel, specific location, etc.). These development projects need a thorough analysis, location-based surveys with analysis of feasibility and viability. Therefore a proposed line for railway tunnel connection between Helsinki and Tallinn will not be included in the MSP.
	The draft plan States that the impacts will be analysed more thoroughly within the framework of the proposed plan by drawing up a separate environmental report. Helsinki-Uusimaa Regional Council suggests that this report could also assess impacts on transport and movement, and on the landscape and cultural environment. Helsinki-Uusimaa Regional Council notes that impacts on climate change are becoming a more and more important part of the environmental	Thank you for your input. The separate impact assessment report has taken this into account.

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	impact assessment process in Finland. However, Helsinki-Uusimaa Regional Council concludes	
	that the draft plan will not cause environmental	
Regional Council of <b>Kymenlaakso</b>	impacts on Finland.  Regional Council of Kymenlaakso considers the Estonian plan to expand international shipping to include also the regions of Sillamäe and Kunda to be very good. This would enable the development of maritime transport and tourism from the eastern Gulf of Finland to Estonia.  Regional Council of Kymenlaakso draws attention to the fact that the North Sea-Baltic Sea TEN-T network corridor and the assessment of the proposed railway tunnel between Helsinki and Tallinn are also important factors connected to the transport connections in the Gulf of Finland. However, international transport development projects are not highlighted in the Estonian Maritime Spatial Plan.  Regional Council of Kymenlaakso considers it very good that the starting point of the pian is	The draft plan 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.  Thank you for your feedback.
	ensuring and maintaining a good State of the sea and the related environment. Ensuring a good State of the sea is a common challenge for the Baltic Sea countries that requires good coordination between various functions and operations. Regional Council of Kymenlaakso considers it good that the Estonian Maritime Spatial Plan has taken into account marine rescue operations and pollution prevention. The plan sets improvement of pollution response capacity as a priority, which is very important from the perspective of marine nature throughout the Gulf of Finland.	
	The Estonian Maritime Spatial Plan maps out the possibilities for increasing aquaculture Production as well. The plan does not pinpoint specific locations for aquaculture, but its potential has been taken into consideration. The plan recommends establishing aquaculture farms primarily in the deeper, more open areas of the sea in order to reduce the local impact of the resulting pollution. Regional Council of Kymenlaakso States that a broad-ranging increase in fish farming in the Gulf of Finland may have negative environmental impacts on the entire a rea of the Gulf of Finland, taking into account the current State of the water in the Gulf of Finland in particular.	The separate impact assessment report specifies the impacts of the fish farms. We have also included a map for unsuited areas for fish farms in the main solution.
The Government of Åland	The draft plan is clearly structured and well documented. The draft plan has been translated well, which makes it easier to read and Comment on the document. The explanations on the map, however, are written in Estonian,	Thank you for your feedback. All of the map layers are available in English in the Estonian MSP web map. Therefore we did not see the need to

	which makes them somewhat difficult to interpret.  The draft plan concentrates largely on two forms of use of the sea, aquaculture and wind power. The fish farming areas are not clearly indicated in the draft plan, as the fish farming techniques are not yet fully developed. The negative environmental impact of fish farming can, however, be reduced through guidance concerning the location and size of farms and, in part, by ensuring that measures to prevent nutrient emissions are made a prerequisite for establishing farming operations. The Government of Åland notes that the areas suitable for wind power are indicated in the draft	also translate the figures in the text. This explanation is included in the main solution.  Thank you for your feedback. The separate impact assessment report specifies the impacts of the fish farms. We have also included a map for unsuited areas for fish farms in the main solution.
City of <b>Helsinki</b>	plan based on wind conditions, water depth, proximity to power lines, ice and wave conditions, and taking into account potential conflicts with nature conservation. A 10-kilometre visual buffer from the mainland has also been indicated in the draft.  The Maritime Spatial Plan has strongly highlighted the objective of efficient use and exploitation of marine areas. The plan foresees an increase in future use. From an economic and economy point of view, the significant use of marine areas also creates an increasing need for environmental management. City of Helsinki is pleased that it has been mentioned in the draft plan that one of the main objectives of the Maritime Spatial Plan is the good status of the	Thank you for your feedback.
	marine environment.  The draft plan presents an impact assessment by sector. City of Helsinki States that it is important to take care of the management of combined impacts, and to carry out assessments widely and from a sufficiently large sphere of influence. The principle of knowledge-based regional development mentioned in the draft plan creates good conditions for assessment. City of Helsinki is pleased that increasing use is sought to be controlled, and impacts will be controlled by means of maritime planning.  City of Helsinki points out that in the draft plan, the analysis of seabed infrastructure has adequately taken into account Helsinki as well, as a result of increased Security of supply and connectivity to European electricity, gas and telecom networks that may advance market opening.	The separate impact assessment report specifies these themes.  Thank you for your feedback.

has been drawn up more clearly and corresponds better to the European Commission guidelines than the draft plans prepared so far by Finland, Sweden and the Aland Islands. The draft States concisely that the maritime spatial plan deals with fairways as shown in the navigational Information. The draft plan also determines the water traffic areas based on the traffic intensity and primary routes. In exceptional cases, a fairway may overlap with other marine uses as well, but in these cases the priority of use is the preservation of the fairway. The regional priorities for maritime transport in the Estonian maritime area are international fairways. The Finnish Shipowners' Association notes that the above-mentioned factors are entirely in line with the perspectives addressed in the guidelines of the European Commission.  The draft States that with regard to maritime transport, the plan does not prescribe a spatial use that is in general different from the current use, which is why the implementation of the plan brings about no additional impact on the natural environment. The draft plan proposes that many environmental aspects related to marine transport may be addressed and mitigated at the project level. The Finnish Shipowners' Association States that perspectives that should be taken into account include the risk of spread of introduced species, pollution of the air and water, and noise generated by maritime transport. However, the Finnish Shipowners' Association sees that these matters do not need to be dealt with in further detail in the draft plan, as they are already regulated comprehensively and bindingly at the international level by the International Maritime Organization (IMO).  The Ministry of Environmental Propose of the European Commission of the Graph Commission of the Co	The Finnish	The Dueft of the Estenion Maritime Spatial Plan	Thenly you for your
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		Fish aquaculture development poses risks to	Thank you for your
achieving good environmental status. The suggestion. The separate			
section 5.2.3. "Planning solution" of the draft impact assessment report			
MSP includes requirements which could be specifies the impacts of the		I	_
insufficient for eliminating nutrient pollution fish farms. We have also		_	
and reaching good environmental status, included a map for unsuited			
especially in the Gulf of Riga where areas for fish farms in the			_
eutrophication is still a challenging problem and main solution.			main solution.

according to Second HELCOM holistic assessment 2011-2016 the reduction of nitrogen and phosphorus are lower than in Gulf of Finland and Baltic Proper. It is encouraged to add a requirement prohibiting the fish aquaculture development in the Gulf of Riga unless there is a proof that the fish farm poses no risk to achieving the good environmental status in the Gulf of Riga.

As the technology of fish farms are rapidly changing we do not see the need for prohibiting fish farm development in the Gulf of Riga. All developments have to meet the condition that the impacts from the establishment of a fish farm shall be at an acceptable level for the state of the marine environment (the activities of the fish farm shall not result in deterioration of the marine environment). The implementation of environmental measures may be required.

As the development of wind energy and crossborder electricity interconnections require determining the corridors for cables, it is suggested to indicate cable corridor areas in the draft MSP, taking into account the corridors for cables and research areas for wind park development of Latvian MSP. The ministry looks forward to further cooperation in planning the development of electricity interconnections and wind energy infrastructure. The main solution indicates possible cable corridors for wind energy development areas. We took into account Latvian MSP when planning these corridors.

## The Ministry of Economics of the Republic of Latvia

As regards the MSP section on suitable areas for offshore wind farms, the Ministry of Economics of the Republic of Latvia has had discussions with experts from the Ministry of Affairs and Communications of the Republic of Estonia on potential joint offshore wind park projects. As one of the potential areas of the Estonian-Latvian joint offshore wind parks was discussed the area in the eastern part of the Gulf of Riga near the Estonian-Latvian border. The draft MSP excludes this wind farm area as a potential site. Therefore the Ministry of Economics of the Republic of Latvia would highly appreciate clarification on whether the exclusion of the above-mentioned potential wind farm location from MSP precludes the possibility of developing such a wind farm by nature, or is there a special implementation procedure for particular wind farm.

The potential wind farm location which you brought out is in the planning area of Pärnu MSP. Pärnu MSP was adopted in 2017 and it will stay valid even when the nation-wide maritime plan is enforced. The aforementioned potential wind farm is planned in Pärnu MSP and therefore it will remain valid. Pärnu MSP solution can also be seen in Estonian MSP web map. The main solution has a separate chapter about Pärnu and Hiiu MSP to state the

situation more concretely.