Central Baltic Cooperation Programme 2014-2020

Ex Ante Evaluation and Strategic Environmental Assessment

Environmental Report

February 2014

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LIST OF ACRONYMS

CBC	Central Baltic Cooperation
BAT	Best Available Technique
DPSIR	Drivers Pressures State Impact Response. Framework used by the EEA
EEA	The European Environmental Agency
EIA	Environmental Impact Assessment
EMAS	Eco Management and Auditing Scheme
EMS	Environmental Management System
END	Environmental Noise Directive
IED	Industrial Emissions Directive
IPPC	Integrated Pollution Prevention and Control
ISO	International Standards Organisation
GES	Good Environmental Status
HELCOM	The Baltic Marine Environment Protection Commission
LCP	Large Combustion Plants
NGO	Non-governmental Organisation
SEA	Strategic Environmental Assessment
ТО	Thematic Objectives
WFD	Water Framework Directive
UNESCO	The United Nations Educational, Scientific and Cultural Organization

1 NON TECHNICAL SUMMARY

This is a final report of the Strategic Environmental Assessment of the Central Baltic (CBC) Programme 2014-2020. The report has been compiled and passed the public hearing and consultations together with the draft CBC Programme.

The report is one of the outcomes of the strategic environmental assessment (SEA) process and the SEA itself is a part of the ex-ante evaluation of the programme development. The SEA has been carried out according to the requirements of the European Union (EU) the SEA Directive which foresees environmental assessment of national and interregional plans prior to their adoption. The SEA procedure did follow the good practice of the strategic assessment, it has been integrated into the planning process and public has been involved in the process of preparation of the report. The former has been implemented by the regular communication of the environmental experts with the programme team and by making amendments/contributions to the draft versions. The latter has been a continuous process which official part was the public display of the results and public hearings in all relevant member States and/or regions.

The ultimate aim of the SEA is to assess the potential negative and positive effects of the selected CBC Programme objectives to the environment with suggestions on how the positive effects can be strengthened and negative effects mitigated.

The drivers-pressures-state-impact-response framework (DPSIR) is used for the assessment. The DPSIR framework is also suggested for the programme and project environmental performance assessment.

Environmental issues which shall be addressed by the programme activities are suggested to be based on existing policy documents. As the programme area is of the Central Baltic, it is recommended to focus mainly on the policies and instruments suggested by the Baltic Sea protection committee - the Helsinki Commission (HELCOM). Special concern shall be paid on the most recent HELCOM Action Plan. Other environmental policies to consider are the 7th EU Environmental Action Programme and other EU strategic environmental policy documents. The policies and action plans aiming on the achievement of good environmental status (GES) of waters, air and habitats are of special concern. Especially response to the drivers and pressures that are of cross border character are preferred.

The proposed selected action areas are evaluated in this report and accordingly the environmental management measures are proposed on programme and project level. The measures form an integrated system where the programme activities will contribute to the environmental measures and project activities to the programme measures. Goals to be set, progress and results should be measurable based on environmental indicators. This is compulsory for programmes and projects with direct impact and recommended for the activities that are not directly addressing the environmental objectives.

It is also recommended that all the projects within the programme would assess impact of the planned activities to the environment, and plan and control the activities with a significant impact.

2 INTRODUCTION

2.1 Objective of the SEA Report

The strategic environmental assessment (SEA) is carried out to evaluate the effects of the programme and its planned measures to the environment.

The objective of the SEA is to present a framework for the assessment of potential negative and positive impacts of the CBC Programme priorities and objectives and to provide guidance on how to set environmental measures to project proposals.

The overall objective of the CBC Programme is to enhance development into favourable direction. It is highly logical that within the **implementation of the programme objectives** the activities **shall** ultimately **have a positive effect on the environment**. This involves also reduction of harmful effects. As a minimum the measures shall have no effect at all or being neutral towards environment.

As a result of the SEA a management plan is proposed to achieve the goals listed above.

2.2 Scope

The SEA addresses environmental challenges in various aspects.

First, it is important to stress that the programme does not initiate any new significant activity that is not covered by existing policies. It is expected that projects which will be carried out within the thematic objectives aim to contribute to current action plans. It is assumed that the (strategic) environmental assessment of those plans have already been carried out by the Member States.

Second, the SEA has a look into existing environmental strategic documents. The following strategic policies are consulted in a hierarchical order:

- European Union environmental strategies and policies (Especially those that are related to water environment--the Marine Strategy Framework Directive, the Water Framework Directive, the Floods Directive and other related strategic documents, etc.);
- Regional (Baltic Sea) environmental policies (HELCOM strategies and action plans, etc.);
- National environmental policies.

It is assumed that these policies reflect current priority areas of environmental concern and actions within the Central Baltic region.

Relevant national authorities are approached and public consultations are held in order to complement the policies with newest environmental challenges and review of implementation of existing policies.

The SEA will not go into lower levels of policy making, although it is encouraged that the measures would address among other aims, improvement of local environmental conditions.

2.3 Key concepts

2.3.1 Strategic Environmental Assessment

Strategic Environmental Assessment (SEA) is a relatively new discipline. It has been introduced to make it easier for decision makers and other stakeholders involved in the planning process to take environmental aspects into consideration in their work. SEA helps to formulate policies, prepare and implement plans and programmes in more environmentally conscious way.

SEA is required by the European Union for certain types of plans and programmes as a compulsory part. This requirement is introduced by the European Directive 2001/42/EC and is adopted by all the EU Member States.

The very **basic idea of** conducting **the SEA** is to:

- Minimise potential negative environmental impacts and/or;
- Maximize potential positive environmental impacts.

Environmental aspects should be taken into consideration in line with economic and social considerations. Environmental aspects shall get its weight in the decision making process.

2.3.2 Sustainable development

One of the key development paradigms worth remembering is the concept of sustainable development. **Sustainable development** is a core concept of balanced development. It should be used as it has been formulated for the UN Earth Summit 1992 and has been evolved in sustainable development process. The main problem is that recently this term is mistakenly or deliberately mixed with sustainable growth. The latter is the term that is mainly aiming at economic growth only or sometimes includes social development goals. Sustainable growth is therefore in conflict with the idea of balanced growth — a balance between economic and social and environmental goals. Also the growth itself is debatable objective if to speak of environmental quality. The main message is that the development shall be balanced between three goal areas:

- Economic;
- Social and;
- Environment.

The UNESCO brings into the picture (see Figure 1) also a political sphere which is highly relevant in a globalizing world.

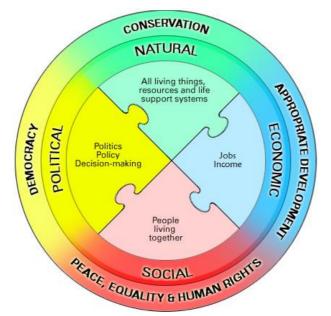


Figure 1. Sustainable development. Source: UNESCO¹

2.3.3 SEA as an integrated part of planning process

It is discussed and disputed about the content of the Strategic Environmental Assessment and within the CBC Programme assessment process the SEA means the following:

- The SEA is an integral part of the planning process;
- The environmental consequences of the plan are discussed regularly with the Planning Team and the alternatives will be taken into account already during the planning process;
- Final results of the SEA will be presented in an Assessment Report that will be revealed together with the main documents for the public hearing and discussions;

¹http://www.unesco.org/education/tlsf/mods/theme_a/popups/mod04t01s03.html

• Stakeholders are consulted through the planning process. The main stakeholders are the Ministry of Environment and/or other relevant state and local authorities, and environmental NGOs.

The scheme below illustrates the relationship between the CBC Programme and the SEA process. Programme design and the SEA steps are depicted with the light blue background. Further actions in the programme implementation are shown with darker blue shade.

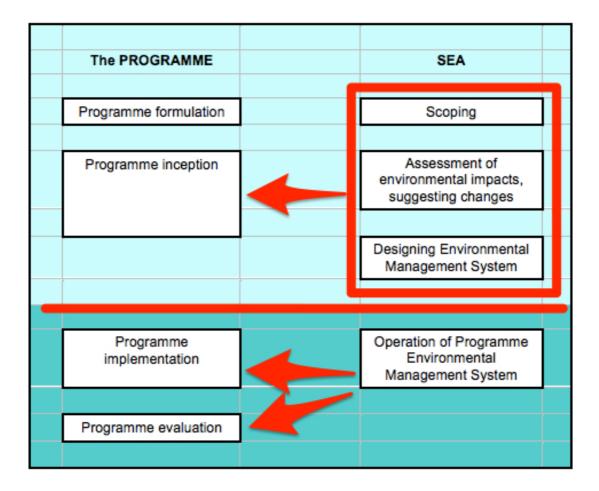


Figure 2. The relationship between the different steps in the CBC Programme and the SEA process.

2.3.4 The causal framework

It is proposed that for better understanding and classification of the problems, a Drivers-Pressures-State-Impact-Response (DPSIR) Framework should be used in the assessment process. It is a simple explanation of cause-effect relationship.

The DPSIR framework is used in an assessment process and it is recommended to be used also later at the programme/project implementation stages.

The DPSIR Framework is used by the European Environment Agency², so building links to an environmental component to which the programme and the projects contribute should be relatively easy.

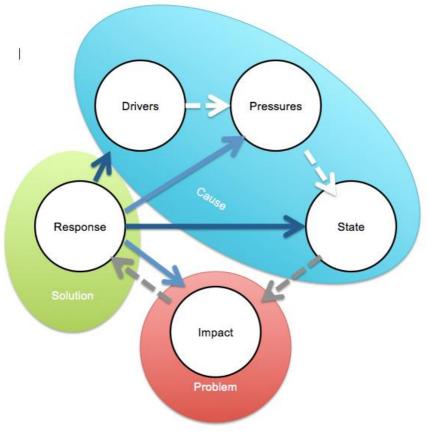
² http://glossary.eea.europa.eu/terminology/concept_html?term=dpsir

The **Driving force** presents overall processes in society that are root causes of processes in the society. These can be very general but also related to certain objectives, which form the basis for the CBC Programme. As an example these drivers can be expressed as social wellbeing of all citizens, economic development of a named region, access to high quality water resources by a certain group, recreational opportunities for elderly people etc.

Pressures depict more concrete activities, which are serving a general purpose. E.g. designing and constructing small port, renovating old path between villages, i.e. pressures are the factors that are directly causing the change in the environment. State expresses status of environment within the DPSIR Framework. The **status** (of environment) is described in details by extensive strategic studies. E.g. the status of water body can be established "bad" as according to the water management plan by the EU Water Framework Directive, status of local air is considered to be "good", etc. Of course along with the qualitative assessments quantitative assessments exist and also for given good-bad status the criteria that are based on real data are given in the policy papers. Changes in status are reflected as "impacts" and those changes can be beneficial or negative to the environment.

The goal of the programme and particular projects from environmental point of view shall be the achievement of positive impacts or reversion of negative trends in environment. The measures shall contribute ideally to the solution, which is called **response** in the DPSIR Framework.

Box 1. The DPSIR Framework (Drivers-Pressures-State-Impact-Response).



Relations between DPSIR elements are presented in the figure below.

Figure 3. The relationship between the elements of the DPSIR Framework

In order to handle the environmental issues all factors have to be managed – drivers, pressures, state and impact. These actions or measures fall within the DPSIR Framework under category "response".

One additional positive aspect of using the DPSIR Framework is the possibility to use indicators that can be combined with each other. Finding appropriate indicators is a great challenge for the programme design and the SEA within it. But when finally chosen, they make a solid basis for further programme process evaluation as they enable ideally to measure the overall progress of the programme. The indicators can be also equally used in the assessment of the contribution of individual projects to environmental problem solution. These indicators will be referred to in the management plan.

2.3.5 Alternatives, including "zero" alternative.

Strategic assessment has been complemented by the assessment of development alternatives. Initially the alternatives have not been presented in the report although they have been considered in the assessment process. After the consultations it has been suggested that clear description of alternatives assessment, including presentation of the "zero" alternative should be provided in the report.

2.4 Objectives of the assessment

The Strategic assessment has been carried out at two levels. First, it evaluates potential consequence of chosen thematic objectives and second, it attempts to foresee environmental impacts of possible project activities that will be carried out within the frame of selected objectives.

The general programme indicators are proposed by the SEA which shall make it possible to assess impact on the environment during the programme implementation period and at the end of the programming period. The Ex-Ante Team elaborated the indicators further in the Strategic Environmental Assessment process and came up with suggestions which are presented below in Chapter 3.

2.4.1 Programme level

The information on the CBC programme is presented in details in the main programme document. Here a brief extract is presented for a quick review for those who are reading primarily this document.

The Central Baltic programme has chosen 4 thematic objectives (TO) which have been translated into the programme priority axes (priorities). The following priority axes have been chosen:

- 1. Competitive economy of the Central Baltic region
- 2. Sustainable use of common resources
- 3. Well connected Central Baltic region
- 4. Skilled and socially inclusive Central Baltic region.

2.4.2 Project level

Similarly to the general indicators, the projects have to involve indicators for the evaluation of their impact from the very beginning of the project development (proposal stage), monitoring and final evaluation.

In some countries a set of indicators for project development has been elaborated and it has been used to develop a sample project assessment format. A simple and easily understandable format would be beneficial for the project selection, development and final assessment. It would also form a basis for the CBC Programme development and its further implementation phase.

2.5 Organisation of SEA and consultations

The strategic environmental assessment has been carried out as a logical framework presented in Figure 1. Regular consultations with the programming team have been carried out and the environmental aspects of the programme have received attention during the overall process of ex-ante assessment as well. In addition, the public consultations are carried out in all the Member States that

are subject to the CBC Programme. Different alternatives of programme priorities have been assessed during the programme development process,

Results of the consultations have been analysed and considered after the end of the consultation process.

2.6 Environmental issues to be considered

As the financing of the actions applicable for the CBC Programme is limited, the focusing of the actions is important in order to deal with the most significant issues. Therefore, a hierarchy of environmental issues is proposed. The Baltic Sea and related environmental issues are located in the center point of the target area. Other more distant objectives are environmental problems of European and global level. Also, problems of bi-or multilateral interest can be significant. The least attention should be paid to local issues, unless they pose a serious threat or opportunities. Schematic overview of environmental focus is presented on the scheme below (Figure 4).

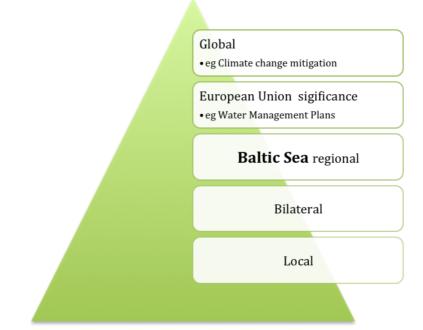


Figure 4. Hierarchy of environmental problems to be addressed by the actions within the CBC programme

2.6.1 The Baltic Sea environmental actions

The CBC Programme is focused on the enhancement of the Central Baltic area. It is highly obvious that the main issues to be considered are those affecting the state of environment of the Baltic Sea. From the environmental point of view the actions shall have an influence to the drivers, pressures and impacts that have a negative effect on the Baltic Sea. The Baltic Sea environment is addressed by the Baltic Marine Environment Protection Commission - Helsinki Commission (**HELCOM**). HELCOM vision is a healthy Baltic Sea environment with diverse biological components functioning in balance, resulting in a good ecological status and supporting a wide range of sustainable human, economic and sustainable activities. For the CBC programme activities HELCOM Action Plan is a relevant basis document.

Goals set in the plan are:

- The Baltic Sea unaffected by eutrophication;
- The Baltic Sea life undisturbed by hazardous substances;
- Favourable status of the Baltic Sea biodiversity;
- Maritime activities in the Baltic Sea carried out in an environmentally friendly way.

Four sets of objectives are proposed in the action plan. These objectives are addressing drivers, pressures, state as well as impact.

In regards to eutrophication the objectives are:

- Concentrations of nutrients close to natural levels;
- Clear water;
- Natural level of algal blooms;
- Natural distribution and occurrence of plants and animals;
- Natural oxygen levels.

Biodiversity objectives:

- Natural marine and coastal landscapes;
- Thriving and balanced communities of plants and animals;
- Viable populations of species.

Hazardous substances:

- Concentrations of hazardous substances close to natural levels;
- All fish are safe to eat;
- Healthy wildlife;
- Radioactivity at the pre-Chernobyl level.

Maritime activities:

- Enforcement of international regulations no illegal discharges;
- Safe maritime traffic without accidental pollution;
- Efficient emergency and response capabilities;
- Minimum sewage pollution from ships;
- No introductions of alien species from ships;
- Minimum air pollution from ships;
- Zero discharges from offshore platforms;
- Minimum threats from offshore installations.

In addition to goals set in the HELCOM documents, **other strategic environmental policy documents** shall be considered and discussed with the stakeholders, especially those of policies that require action which extends over national and/or regional borders or are of the cross border character. Once again, the environmental quality of the Baltic Sea could be seen as the main uniting factor, but other aspects of environmental quality shall be taken into account as well. One of the example is the protection of atmospheric air.

2.6.2 European Union Environmental Policy

European Union environmental policy is one of the areas where to see environmental challenges. Policy documents that are created as a result of framework directives might be of special interest to the projects. Two sets of policy documents are relevant due to their nature – water related policies and environmental policies of cross-border nature.

There are at least three significant water policy documents to be considered which all are aiming at good status of waters: surface water, groundwater and marine water. Documents to be consulted in a project development and evaluation process are:

- The <u>water management plans</u> compiled as a result of the Water Framework Directive 2000/60/EC. The first planning and implementation circle is coming to an end by 2015. The planning activities for the next period (2015-2022) have already started. There is now a much better picture of shortcomings in the planning process itself and implementation of the plan. A special part of the water management plans concerns coastal waters that are common for the whole Baltic Sea area.
- Specific actions related to <u>water quality</u> (e.g. the use and release of priority substances into water bodies, nitrates in ground- and surface water, etc.). These issues are tackled in the EU legislation that complement the WFD Directive – the Groundwater Directive 2006/118/EC; the Priority Substances Directive (2008/105/EC) and the Nitrates Directive (1991/676/EEC) that

target agricultural nitrate releases. Issues of the groundwater protection and mitigation of the priority substances shall be incorporated in the water management plans.

- The <u>flood risk management plans</u> that are developed according to the Floods Directive 2007/60/EC) are requested by the Commission to be harmonized with the abovementioned water management plans. Bringing the flood risk management plans in line with the water management and other plans poses challenges to the stakeholders not only within one single state but this is also an issue which rises interest in all Member States.
- The <u>Marine Strategy Framework Directive</u> (2008/75/EC) aims to achieve Good Environmental Status (GES) of the EU's marine waters by 2020 and to protect the resource base upon which marine-related economic and social activities depend. There are number of actions ahead of the Member States within the CBC Programme Period (2014-2020) which provides challenges and opportunities for the projects related. For example, the establishment of environmental targets and associated indicators to achieve GES by 2020 (by 15 July 2012); the establishment of a monitoring programme for the ongoing assessment and the regular update of targets (by 15 July 2014); the <u>development of a programme of measures designed to achieve or maintain GES by 2020</u> (by 2015); the review and preparation of the second policy planning cycle (2018 2021).

Other environmental policies that address problems of cross-border nature can be subject to the CBC financed programme activities as well. As an example these can be served issues that are related to:

- Urban noise. <u>The urban (agglomeration) noise management plans</u> are compiled according to the Environmental Noise Directive (2002/49/EC) in all Member States. These plans are made for all major cities around the Baltic Sea, the plans involve mostly capitals, but also other bigger cities with above 100 000 inhabitants and more are covered by the noise abatement plans. There are several challenges in achieving the objective of safe sound levels.
- Air quality. <u>The air quality management plans</u> according to the Air Quality Directive (2008/50/EC) provide basis for acute air pollution problems. Achievement of target levels of air pollutants concentrations in the urban and industrial areas is a great challenge in all states around the Baltic. Levels of specific pollutants like particulates (sizes of 10, 2,5 and 1 micrometer or PM₁₀, PM_{2,5}, PM₁), benzene or other priority air polluting substances are high in an ambient air and cause an environmental problems and poor health of citizens in most of European urban areas.
- Pollution caused by major polluters. <u>Addressing large polluters is recently merged under the</u> <u>Industrial Emissions Directive (2010/75/EC)</u>. The new IED is not only merely a cosmetic <u>change incorporating seven old directives but entails several all new and more strict and</u> <u>stringent requirements that industries have to face</u>. The directives that have been merged into the IED and which can be of regional importance are Large Combustion Plants (LCP) and Waste Incineration Directives.

One sphere of European environmental policy that the projects could not neglect concerns the <u>biodiversity policy and action plans</u> aimed at good status of habitats. Main applicable policy document here is the EU Biodiversity Strategy, adopted in 2012 "<u>Our life insurance, our natural capital: the EU biodiversity strategy to 2020</u>". The strategy is in line with the commitments made by the EU leaders. The strategy calls to halt the loss of biodiversity and ecosystem services in the EU by 2020. There are six main targets, and 20 actions to help Europe reach its goal.

The six targets cover:

- Full implementation of EU nature legislation to protect biodiversity;
- Better protection for ecosystems, and more use of green infrastructure;
- More sustainable agriculture and forestry;
- Better management of fish stocks;
- Tighter controls on invasive alien species;
- A bigger EU contribution to averting global biodiversity loss.

Biodiversity conservation is related to the <u>Natura 20</u>00 areas governed by the Habitats and Birds Directive. Significant Natura 2000 areas are located in the Central Baltic area and balanced management of these areas provides challenges and opportunities for the projects within the CBC programme.

The list above is not exhaustive and is not meant to be. The project developers can come up with other significant environmental, social or even better the sustainable development issues that their project would like to address and which does fit in with the thematic objectives.

It is known that implementation of those directives demands large efforts and resources from all sectors within society. Contribution to the actions foreseen in individual plans and moreover, proposed pilot projects to find solutions for these problems might be of interest of the CBC programme.

2.6.3 Contribution to the solution of global environmental problems

Even higher level category of the environmental problems compared to regional or European levels are those of **global extent**. Most spoken and attention is paid to CO_2 emission reduction and climate change mitigation which is a widespread global target. But there might be other fields that do not attract such attention and funding, such as biological diversity issues – for example, protection of unique arctic, boreal and other ecosystems, habitats etc. It is proposed that the nine thematic priorities presented in the recent Union Environment Action Programme (2013-2020) would be taken as a basis for this. Briefly one can be seen below the priority areas with short explanations.

The EU environmental priority objectives for 2013-2020 are:

- To protect, conserve and enhance EU's natural capital;
- To turn the EU into a resource efficient, green and competitive low-carbon economy;
- To safeguard EU citizens from environment-related pressures and risks to health and wellbeing;
- To maximize the benefits of EU environment legislation;
- To improve the evidence base for environmental policy;
- To secure investment for environment and climate policy and get the prices right;
- To improve environmental integration and policy coherence;
- To enhance the sustainability of EU cities;
- To increase the EU's effectiveness in addressing regional and global environmental and climate challenges.

Resource efficient, green and competitive low-carbon economy has been chosen by the CBC programme as one of the priority objectives; although, the projects might find it useful to contribute to other EU priority environmental objectives as well.

2.6.4 Environmental issues of bi-or multilateral interest

It could also be discussed that some of the problems might be of special **bilateral interest** of two countries or more member states (even related to those two and not necessarily within EU, but as of European Economic Area or covered by the neighborhood policies).

2.6.5 Specific significant environmental problems

Other specific environmental topics what the stakeholders would bring up as problem areas should not be neglected. These topics can be for example emerging issues that are not covered by environmental policy and/or legislation yet. Significant environmental impediments to economic and/or social development could be tackled here by the projects.

3 Assessment of activities proposed in the CBC Programme

Below, an assessment is made based on proposed specific objectives, results and indicators.

The assessment is made on the level of specific proposed objective and this is based on certain assessment criteria. The majority of the background to the selection criteria is presented above. Here a brief conclusion is made.

Assessment of the alternatives, including the "zero" alternative.

The <u>zero alternative</u> to the actions have been taken by the programme as business as usual. As its is explained above, the programme does not initiate any new environmental actions. The programme contributes into implementation of the existing plans and programmes. Therefore the "zero" alternative means that the planned actions could not be implemented or they will be implemented with the delay. As an example can be bought the Estonian Water Management Plans which openly do refer to the fact that the state has only budget that can cover about a half of costs of planned actions. It is assumed that the programme can contribute into development of more efficient and effective actions, cross-border cooperation enables to reach the environmental goals more effectively, etc.

Alternatives of the programme have been discussed with the programming team during the programme development period and suggestions for better consideration of environmental goals, elimination of extremely negative actions etc have been part of the process. The current CBC Programme is a result of the interactive process as it is described above.

Assessment of environmental aspects of the objective. Here, it is assessed whether the impact from potential project activities is direct or indirect and what is the geographical extent of possible projects. The objective is evaluated using the DPSIR Framework in order to establish which category the objective is potentially targeting. In terms of the DPSIR, it is assessed if the objective responds to Drivers, Pressures, State or Impact. In some cases, where the objective is not specified, it is expected that the response can target several environmental categories.

Environmental criteria. Assessment is made in order to find possible environmental indicators for the assessment of the programme progress during the implementation period. The list is not complete and definite. The assessment's main aim is to hint possible environmental criteria at the priority objective level. In several cases possible indicator development lies upon project developers.

Potential environmental impact is assessed against environmental criteria in cases when it is possible to foresee for potential projects at current stage and level of generalisation. Assessment is made by expert evaluation while using a simple scale. Here "-" depicts negative impact and "++" strong positive impact. "0" denominates neutral impact. As one can see, the impact may vary for the programme objectives. If the assessment result is in the brackets (), it indicates that the planned action does not have a direct impact, but the potential environmental effect can appear at project development stage.

	Priority axis/investment priority/specific objective/description	Environmental aspects. Objectives/ responses (DPSIR) to be considered	Environmental criteria	Potential environmental impact	Comments
PA1	PRIORITY AXIS 1: Competitive economy of the Central Baltic	c region			
IPa	Investment Priority 1 (1.1): promoting entrepreneurship, in participusiness incubators (IPa)	cular by facilitating the econom	ic exploitation of new ideas and	d fostering the crea	tion of new firms, including through
	Specific objective 1 (1.1.1): More innovative knowledge intensive	enterprises			
	This specific objective aims to exploit the opportunities of "green" (i.e. exploiting the potential of environment friendly technologies), "silver" (i.e. exploiting the potential of the needs and challenges related to ageing population), "blue" (i.e. exploiting the potential of the Baltic Sea resources) economy, as well as the potential of ICT and low-carbon solutions as a basis for new business creation. Knowledge intensive enterprises are identified as the ones with a potential to grow and internationalize, aiming to achieve higher value added than the regional average level of the industry they operate. The Central Baltic region has a good potential to strengthen its position as a globally competitive technology start-ups region. This specific objective is well positioned to offer opportunities for joint exploitation of that potential. This specific objective aims also to target challenges related to the sustainability of the businesses operating in sparsely populated, isolated island and archipelago communities. Seasonality of some traditional activities (e.g. tourism, fishing, agriculture) adds complexity to the challenge. Specific attention is paid to the need of developing diverse set of skills to be successful and sustainable in isolated and	attention on the Baltic Sea marine environment and archipelago ecosystems should be paid in identifying environmental aspects. Response target: Drivers and Pressures of different kind.		-/0/+	In general, a vast variety of enterprises are selected. According to the nature, their impact might be from negative to positive. Environmental impact of activities directed at maintaining a good environmental status or revert negative trends is positive. Especially when speaking of "green technologies". Other activities will have assumingly neutral or negative impact. The latter have to be assessed and control mechanisms set at project development phase. E.g. businesses in sparsely populated areas might get into conflict with other values of

Priority axis/investment priority/specific objective/description	Environmental aspects. Objectives/ responses (DPSIR) to be considered	Environmental criteria	Potential environmental impact	Comments
sparsely populated areas.				these areas and therefore balance between economic, social and environmental has to be achieved and maintained.
Specific objective 2 (1.1.2): More entrepreneurial youth				
This specific objective aims to use the potential of young generation for making the Central Baltic region more entrepreneurial and competitive in coming years. Joint Central Baltic activities will be based on good experience within all regions supporting youth entrepreneurship and attracting young people to engage into cross-border, international activities. Joint activities aim to motivate young people to establish student firms and create international teams, which can serve as a basis for future business partnerships across the borders within the Central Baltic region.	Indirect Scope: (Global), regional, local Response target: Not specified at this stage	To be assessed individually for the project during the development phase	(+/-)	No direct impact can be identified at this stage of programme planning. Environmental assessment has to be carried out if needed at the project development phase.
Investment Priority 2 (1.2): Supporting the capacity of SMEs to e	ngage in growth in regional, na	tional and international markets,	and in innovation pro	ocesses (IP d)
Specific objective 1 (1.2.1): More services and products develop	ed and sold in new markets by	Central Baltic SMEs		
This specific objective aims to support the Central Baltic SMEs to enter into the new markets. New markets are defined as markets outside the European Union / EFTA. The approach is to use cluster-based approach for cooperation within the Central Baltic region to enable the SMEs entering the new markets with new or adapted products and services.	Indirect/direct Scope: (Global), regional, local Response target: Not specified at this stage	To be assessed individually for the project during the development phase	(+/-)	No direct impact can be identified at this stage of programme planning. Environmental assessment has to be carried out if needed at the project development phase.
	 sparsely populated areas. Specific objective 2 (1.1.2): More entrepreneurial youth This specific objective aims to use the potential of young generation for making the Central Baltic region more entrepreneurial and competitive in coming years. Joint Central Baltic activities will be based on good experience within all regions supporting youth entrepreneurship and attracting young people to engage into cross-border, international activities. Joint activities aim to motivate young people to establish student firms and create international teams, which can serve as a basis for future business partnerships across the borders within the Central Baltic region. Investment Priority 2 (1.2): Supporting the capacity of SMEs to e Specific objective a ims to support the Central Baltic SMEs to enter into the new markets. New markets are defined as markets outside the European Union / EFTA. The approach is to use cluster-based approach for cooperation 	Objectives/ (DPSIR) to be considered sparsely populated areas. Objectives/ (DPSIR) to be considered Specific objective 2 (1.1.2): More entrepreneurial youth Indirect This specific objective aims to use the potential of young generation for making the Central Baltic region more entrepreneurial and competitive in coming years. Joint Central Baltic activities will be based on good experience within all regions supporting youth entrepreneurship and attracting young people to engage into cross-border, international activities. Indirect Scope: (Global), regional, local Response target: Not specified at this stage Joint activities aim to motivate young people to establish student firms and create international teams, which can serve as a basis for future business partnerships across the borders within the Central Baltic region. Indirect (Global), regional, new markets outside the European Union / EFTA. This specific objective a ins to support the Central Baltic SMEs to enter into the new markets. New markets are defined as markets outside the European Union / EFTA. Indirect/direct Scope: (Global), regional, local The approach is to use cluster-based approach for cooperation within the Central Baltic region to enable the SMEs entering Indirect/direct Scope: Not specified at this stage	Objectives/ (DPSIR) to be considered sparsely populated areas. Objectives/ (DPSIR) to be considered Specific objective 2 (1.1.2): More entrepreneurial youth Indirect This specific objective aims to use the potential of young entrepreneurial and competitive in coming years. Joint Central Baltic activities will be based on good experience within al regions supporting youth entrepreneurship and attracting young people to engage into cross-border, international activities. Indirect Scope: (Global), regional, local To be assessed individually for the project during the development phase Joint activities aim to motivate young people to establish student firms and create international leams, which can serve as a basis for future business partnerships across the borders within the Central Baltic region. Response target: Not specific objective 1 (1.2.1): More services and products developed and sold in new markets by Central Baltic SMEs This specific objective aims to support the Central Baltic SMEs markets outside the European Union / EFTA. Indirect/direct Scope: (Global), regional, Ical To be assessed individually for the project during the development phase The approach is to use cluster-based approach for cooperation within the Central Baltic region to enable the SMEs entering Indirect/direct Scope: (Global), regional, Ical To be assessed individually for the project during the development phase	Objectives/ (DPSIR) to be considered environmental impact sparsely populated areas. Specific objective 2 (1.1.2): More entrepreneurial youth To be assessed individually generation for making the Central Baltic region more entrepreneurial and competitive in coming years. Joint Central Baltic activities will be based on good experience within all regions supporting youth entrepreneurship and attracting young people to engage into cross-border, international activities. Indirect Scope: (Global), regional, local To be assessed individually for the project during the development phase (+/-) Joint activities aim to motivate young people to establish student firms and create international leams, which can serve as a basis for future business patnerships across the borders within the Central Baltic region. Indirect Scope: (Global), regional, local To be assessed individually for the project during the development phase (+/-) Investment Priority 2 (1.2): Supporting the capacity of SMEs to engage in growth in regional, nore propoch is to use cluster-based approach for cooperation within the Central Baltic region to enable the SMEs entering Indirect/ Scope: (Global), regional, local To be assessed individually for the project during the development phase (+/-) This specific objective 1 (1.2.1): More services and products developed and sold in new markets by Central Baltic SMEs To be assessed individually for the project during the development phase (+/-) The approach is to use cluster-based approach for cooperation within the Central Baltic region to enable the SMEs entering <

	Priority axis/investment priority/specific objective/description	Environmental aspects. Objectives/ responses (DPSIR) to be considered	Environmental criteria	Potential environmental impact	Comments
PA2	Cluster is defined as an established cooperation between similar or complementary businesses and R&D institutions. Meta-cluster is co-operation between established clusters within the Central Baltic region to undertake joint activities for entering new markets. PRIORITY AXIS 2 (TO6): Sustainable use of common resource	ces			
IPc	Investment Priority 1 (2.1): Conserving, protecting, promoting and	d developing natural and cultura	al heritage (IPc)		
	Specific Objective 1 (2.1.1): Natural and cultural resources devel	oped into sustainable tourism a	ttractions		
	The intention is to find ways to develop cultural and natural resources into tourist attractions and products to improve the attractiveness of visiting and living environment. This specific objective aims to find balance between preserving and developing the natural and cultural resources. A first step for implementing activities under this specific objective will be to map the common natural and cultural resources of the Central Baltic region.	Direct Scope: Regional, local Response target: State of environment, impact	Degree of protection of applicable natural resources Pressures to the natural resources avoided by managed tourist activities	+/-	Potential impacts of the actions which might be carried out within this planned objective are varying from positive to negative. In order to avoid misinterpretation of the objective, especially negative impact, clear environmental goals have to be set for specific projects. E.g. which natural resources are activities addressing, which are the criteria of environmental component etc.
	Specific Objective 2 (2.1.2): More sustainable marine and coasta	I ecosystems			
	This specific objective aims to address joint challenges and issues related to maritime spatial planning of territorial waters	Indirect Scope: Regional, Local	Impact on coastal areas Degree (efficiency) of	+	Environmental values have to be mapped and considered in

			— · · · · ·		
	Priority axis/investment priority/specific objective/description	Environmental aspects. Objectives/ responses (DPSIR) to be considered	Environmental criteria	Potential environmental impact	Comments
	and exclusive economic zones and integrated coastal zone management. It should lead to sustainable use of the fragile resources of the Baltic Sea and its coastal areas.	Response target: drivers, pressures, state	resource use		the spatial plans.
IPf	Investment priority 2 (2.2): Promoting innovative technologies reduce air pollution (IPf)	to improve environmental prote	ection and resource efficiency i	n the waste sector,	water sector, soil protection or to
	Specific objective 1 (2.2.1): Wider use of innovative methods and	d technologies in water sector			
	This specific objective aims to target the reduction of the nutrients and toxins inflows and impact of runoffs from agriculture.	Direct Scope: Regional Response target: Pressure	Number of eliminated/reduced sources of nutrients and toxins inflows which affect the	+/++	This objective provides a clear reference to the pressures that lead to water pollution. It corresponds well with the EU
	The objective is to support activities leading to development of innovative methods and technologies within the Central Baltic region. Worked out and implemented methods and technologies should have a potential for being used in other markets.		water quality in the Baltic Sea		and the Baltic Sea regional environmental policies.
	Relevant step for implementing activities under this specific objective will be to determine the list of priority sources of nutrient and toxins inflows to be tackled. For that, existing information of national, regional and transnational organizations will be used.				
	Priority list will be used as well for determining good division of work with other financing programmes.				
е	Investment priority 3 (2.3): Action to improve the urban environ reduction of air pollution and promotion of noise-reduction measured] regeneration and decontamin	nation of brownfield s	sites (including conversion areas),
	Specific objective 1 (2.3.1): More integrated urban development	processes based on Central Ba	ltic best practice		

	Priority axis/investment priority/specific objective/description	Environmental aspects. Objectives/ responses (DPSIR) to be considered	Environmental criteria	Potential environmental impact	Comments
	This specific objective targets the challenges and opportunities related to improving the urban space via joint urban planning activities. Integrated urban management is understood as a broader set of activities than planning required by planning legislation. It includes activities preceeding to official planning processes and activities following official planning process.	Indirect Scope. Regional, local Response target: Drivers, Pressures	Environmental aspects identified and considered in the planning process	+/-	No direct impact can be identified at this stage of programme planning. Environmental assessment has to be carried out if needed at the project development phase.
	This specific objective is seen to contribute to the specific objective 1 "Improved commuting and faster transport by developing integrated transport solutions and transport corridors" of priority axis 3 within urban areas and connecting urban areas with their hinterlands.				
PA3	PRIORITY AXIS 3 (TO 7): Well connected Central Baltic region	on			
IPc	Investment priority 1 (3.1): developing and improving environn transport, ports , [] multimodal links and airport infrastructure, in			vstems including [] inland waterways and maritime
	Specific objective 1 (3.1.1): Improved commuting and faster tran	sport by developing integrated t	ransport solutions and transport	corridors	
	This specific objective aims to identify and target the challenges related to the integration of different transport nodes to save time in transportation of both passengers and cargo and reduce the CO_2 emissions. It also aims to identify and target the challenges related to the improvement of the transport corridors within the Central Baltic region in North – South and East – West directions. Transport corridors are understood as infrastructure and logistics networks for passengers and cargos movement. This	Direct Scope: Global, regional, local Response target: Driver, pressure	Negative environmental impact avoided (e.g. emissions into atmospheric air) CO ₂ emissions reduced compared to initial status per unit	+/-	This objective addresses potentially large number of specific actions that might have different impacts on different scale. The project developers have to check project goals coherence with EU and regional environmental policies at least. Also the projects have to pass the environmental impact

	Priority axis/investment priority/specific objective/description	Environmental aspects. Objectives/ responses (DPSIR) to be considered	Environmental criteria	Potential environmental impact	Comments
	specific objective aims to target established transport corridors which have a potential to be further improved (i.e. extended, made more efficient) and new transport corridors which have a significant potential.				assessment if appropriate in order to avoid "environmental short-cuts".
	Focus within this specific objective is to achieve improvements in transport corridors and nodes leading to faster movement of people and goods. Travel time reductions and time reductions in moving goods should be accompanied by lower carbon emissions (understood as less CO ₂ emissions per person, per tonne).				
	Specific objective 2 (3.1.2): Improved services of existing small p	ports to contribute to the tourism	development		
	This specific objective aims to contribute to the improvement of the services of small ports (e.g. rescue services, joint marketing), with the objective to attract more visitors and improve the travel opportunities of local people.		Degree of environmental problems avoided and/or reduced (e.g. pollution load, nuisance to the protected	+/-	Port development projects have always a potential environmental impact. It is suggested that significant
	Small ports defined as ports serving local people and visitors will be mapped and the priority list will be determined in cooperation with responsible regional and national organisations of the Central Baltic region.	Sidle	areas (Natura 2000 areas) etc.)		environmental aspects of planned activities are identified and addressed by the beneficiaries.
	Also small ports as parts of larger marina areas are seen as potential beneficiaries.				
	Investments for improving small ports services are meant for improvements on land.				
PA4	PRIORITY AXIS 4 (TO 10): Skilled and socially inclusive Cent	tral Baltic region		·	
	Investment priority 1 (4.1): Developing and implementing joint edu	lucation and training schemes (ETC-specific)		

Priority axis/investment priority/specific objective/description Specific objective 1 (4.1.1): Improved social inclusion and more s	Environmental aspects. Objectives/ responses (DPSIR) to be considered	Environmental criteria	Potential environmental impact	Comments
This specific objective will target a wide range of practical community and local level social problems by joint educational/training activities. Community and local level problems (thematic or territorial) can be related for example to health, minorities, safety, gender, elderly and low entrepreneurship.	Indirect impact Scope: undefined at this stage Response target: undefined at this stage	To be assessed individually for the project during the development phase	(0/+)	Objectives within this priority axis do not have direct implicit impact to the environment. Although there is a certain potential to use this objective for environmentally beneficial activities. Environmental objectives can be therefore considered at the project development stage.
Specific objective 2 (4.1.2): More aligned vocational education ar	nd training (VET) programme in	Central Baltic region		
This specific objective aims to contribute to the development and further integration of Central Baltic labour market.	Indirect impact Scope: undefined at this stage	To be assessed individually for the project during the development phase	(0/+)	
Development of skills and better matching work opportunities with skills can have a strong impact on decreasing the social exclusion.	Response target: undefined at this stage			
Central Baltic joint actions are justified by linking them to specific needs of enterprises operating within Central Baltic region.				

4 Environmental management for the implementation of CBC Programme

4.1 General outline

The environmental management system for the CBC programme aims to ensure the fullest possible integration of relevant environmental issues in the design and implementation of activities. Important position in the system is dedicated to indicators that would enable to set the targets and assess the progress and results.

It is proposed that the environmental management system consists of a set of indicators:

- Programme environmental indicators;
- Project environmental indicators.

Indicators will be set and completion assessed at programme and project levels.

Relationship between programme and project set of indicators is shown in the following scheme (Figure 5). The programme environmental indicators will have a relation to the project result indicators.

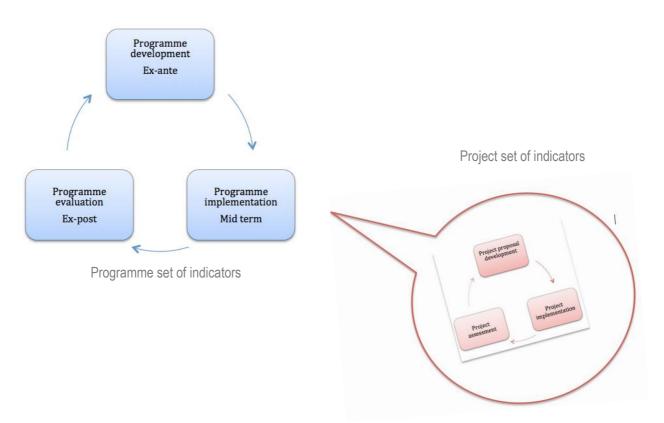


Figure 5 Relationship between programme and project indicators

It is recommended to carry out the assessment by using environmental indicators. The programme can respond to management actions that regulate the driver, pressure, state, or impact (DPSIR).

- **Drivers** = social, demographic and economic forces;
- Pressures = human activities (causing the pollution, deterioration, etc.);
- State = measured conditions, trends (of the environment);
- **Impacts** = significance (does the pressure cause major (positive or negative) change in environment);

• **Responses** = actions, decisions, adaptations.

4.2 Programme indicators

For the programme level, the following activities are suggested to be carried out:

- Ex-ante environmental assessment of proposed activities (Assessment of project proposals before implementation);
- Mid-term environmental assessment (Assessment during the project implementation);
- Ex-post environmental assessment of completed activities (after the project implementation).

Ex-ante and Ex-post environmental evaluations are recommended to be a compulsory part of the project preparation and project reporting. Mid-term evaluation is ought to be optional. For instance, the assessment of environmental aspects is suggested to be carried out when the project content aims at environmental improvements, e.g. achieving objectives set by the priority axis 2 (TO 6). Ex-post evaluation is relevant for particular project assessment and for the entire CBC programme evaluation.

Environmental management is especially important for the activities within the Thematic Objective 6 "Environment and resource efficiency"- protecting the environment and promoting resource efficiency.

4.3 **Project indicators**

Environmental problem targeted assessment of environmental aspects of the project aims at full integration of the environmental issues into the project plan. In particular this enables to:

- Inform project stakeholders (e.g. the project management team, project steering committee, the decision makers responsible for project approval, project internal and external monitoring, etc.) on key environmental concerns for their project;
- Support full integration of relevant environmental issues into detailed design of the activity.

The initial assessment is conducted during the project preparation and content planning of Cross-Border activities. Relevance and completeness will be checked during the decision and approval process of project applications.

It is suggested that project applicants will propose simple format indicators, which could be based on self-assessment by using the following basic questions:

- 1. Which environmental issue will be targeted using a DPSIR framework?
- 2. Which objective of the existing actions plans (e.g. HELCOM Action Plan, water management plan, Natura2000 management plan, etc.) the planned activity contributes to? What are the key indicators of success, based on existing plans? What is the mechanism of measuring and reporting the success?
- 3. If the project addresses another (emerging) environmental issue, then what is the issue and how the project aims in environmental response?

It is proposed that the assessment shall consider both, direct and indirect impacts. The project should assess what is the environmental impact of planned project objectives and project activities.

4.3.1 **Project objectives assessment**

Environmental goals of the project have to be established and shall include progress **indicators of the planned project objective**. The very basic question here to be answered is: How does the project improve environment? It means which environmental issue the activity contributes to, positively or negatively. This is very relevant for the activities which do have a direct impact on environment. This shall be in line with the programme indicators when relevant. For the establishment of environmental objectives assessment is suggested if the project assists in achieving goals set in existing multinational (global), EU, HELCOM, national or local environmental policy documents. Below there is a table to be considered for self-assessment.

Environmental problem to be	Contribution to the existing	Indicator
-----------------------------	------------------------------	-----------

addressed (DPSIR)	policy instrument	
	Global environmental issue (optional, in relation to the EU and national environmental policies and measures)	
	Environmental policy issues addressed on the EU level (various plans of cross-border nature, e.g. water protection, air quality, habitats protection)	
	Environmental protection objectives set in the HELCOM Action Plan (the Baltic Sea specific)	
	Nationalenvironmentalmanagementmeasures(dealingwithenvironmentalnuisances, etc.)	
	Environmental protection objective set on local level (sustainable development goals—balanced development)	

4.3.2 Environmental assessment of project performance

All project activities have impact on the environment – either positive or negative. It is suggested that the indicators of **project environmental performance would be used**.

Here the question lies how do planned project activities influence the environment? For example, how project travel can be optimized in order to save the environment? Or could we use the eco-labelled products or services? Do the companies providing services have an environmental management system? Are they EMAS certified?

It is suggested that the projects would evaluate the aspects of the project activities by themselves and assess which of those would have significant impact to the environment and set criteria to control these aspects.

Project activity	Significance of environmental aspect of the planned project activity	Control method to reduce harmful effects and increase positive effects to the environment

5 Information on the SEA consultations

The SEA consultations have been held together with the draft CBC Programme consultations. Therefore the information on SEA public hearings coincide with the general CBC consultations.

National and regional events in in Tallinn, Helsinki, Riga, Visby, Norrköping and Gävle were held gathering more than 180 participants – organisations from governmental, non-governmental and private sector both experienced project partners from the current Programme, as well as new organisations to this cooperation.

In Helsinki, Riga and Tallinn also presentations of the SEA report has been made by the responsible consultants.

The reports have been available for the general public on CBC programme website and on websites of responsible national institutions. The public had opportunity to comment on the report. Summary of comments and responses is attached to this report as an annex.

Annex I Overview of the comments received on the SEA report		
Question 3 (online survey): Do you have any comments on the SEA report?		
Comment submitted (organisation)	Response (to be completed by the authors of the SEA report)	
Hopefully it does not increase the amount of reporting. (MTT Agrifood Research Finland)	Programme response: Information will be gathered from projects in order to assess their environmental impact. The full details of the information to be provided will be specified	
Comments submitted by Swedish regions (by e-mail, 17.1	1.2014)	
Comment submitted (organisation)	Response (to be completed by the authors of the SEA report)	
The programme draft priorities seem to be coherent with the needs of the Central Baltic Region. The connected SEA report appears to be developed in interplay and integrated with the programming process, which is very positive. (Region Gotland, County Administrative Board Gävleborg and Nynäshamns kommun)	-	
In an environmental evaluation the description of alternatives is crucial. This relates to the need of common understanding between citizens and decision makers on one side and the programming team on the other, that the best alternatives have been chosen. To this a zero option has to be added describing the possible development without the programme support. In the SEA report you can find such a zero alternative but the clear link to other alternatives is missing. Such alternatives which have been considered and rejected can although be found in the draft programme document. The analysis of the overall environmental goals and policies including plans and directives which have to be in focus in the realization of projects is very good. The ranking of prioritization of environmental goals is well in line with the needs for achieving Sweden's environmental objectives in the county of Gävleborg.	Programme response: The comments are taken for information at this stage and will be further elaborated in consultation with the authors of the SEA report. SEA team: as there have been several comments from different stakeholders about alternatives the SEA report will be amended. The zero and other alternatives will be described in the report.	
There are several important parts in the programme relating to the needs in Gävleborg for a shift to a sustainable society. It is about how to utilize and protect our shared nature resources, better efficiency of transports and utilize our collective skills.		
The Central Baltic Programme draft also deals with the culture environment question, which Gävleborg is very much in favor of because the region is poised to develop the tourism business connected to the world heritage in the region – Hälsingegårdarna.		
The shift towards a sustainable society is a challenge laid down legislative in Sweden as well as in the European Union. This programme can contribute to a better environment as well as living standard for our countries and for the single human being.		
(County Administrative Board Gävleborg)		
The view in the SEA report's assessment underlining the fundamental difficulties in evaluating the future environmental effects of the specific objectives set out in the priority axes is	Programme response: The comments are taken for information at this stage and will be further elaborated in consultation with the	

Annex I Overview of the comments received on the SEA Report and responses

shared by Region Gotland.	authors of the SEA report.	
What is worrying in the SEA report is that only two out of ten assessments are positive (Specific Objective 2 - 2.1.2: More sustainable marine and coastal ecosystems and Specific Objective 1 - 2.2.1: Wider use of innovative methods and technologies in water sector). For the other priorities assessed the environmental impacts are deemed at various scales, to have either a positive or negative impact on the environment - directly or indirectly. This is not to be seen as criticizing the SEA report - on the contrary. It is positive that the report highlights that the overall environmental impacts of the Central Baltic Programme priorities are not deemed clearly and overwhelmingly positive.	SEA team: The programming team and the SEA Team are aware of the issue of potential negative impacts and together the measures will be proposed that would enable to avoid or reduce negative impacts and strengthen positive impacts of the programme.	
(Region Gotland)		
There are some comments in the SEA to highlight, that should influence the ongoing process of developing the final Central Baltic Programme 2014-2020. In the programme draft, table 2 (Overview of the programme investment strategy) there is a very clear description of the measures and connected indicators for follow up. The SEA report proposes to add more indicators for some of the specific objectives. The following indicators are suggested to be added: Priority Axis 2, TO6, SO1 and SO2 Result indicator to be added: Description of environmental and cultural values preserved. Priority Axis 2, TO6, IP2, SO1 Result indicator to be added: Decreased amount of nutrients and toxins. Priority Axis 3, TO7, IP1, SO1 Result indicator to be added: Decrease in emission of CO ² . (Norrköpings kommun)	Programme response: The comments are taken for information at this stage and will be further elaborated in consultation with the authors of the SEA report. SEA team: The programming team and the SEA Team are aware of the issue of potential negative impacts and together the measures will be proposed that would enable to avoid or reduce negative impacts and strengthen positive impacts of the programme.	
Comments submitted by Latvian State Environmental Set	rvice	
(by e-mail, 20.1.2014; Letter sent out 13.1.2014 Nr.1.8.248, translated to English)		
Comment submitted	Response (to be completed by the authors of the SEA report)	
The detailed impact (both positive and negative) can be determined only for a particular phase of the project when the proposed activity is already specified in the planning stage. In general, at this stage of the programme it is quite impossible to objectively evaluate the programme's overall impact on the environment and sustainable development in the region.	SEA Team: This is general comment, no further action needed in relation to SEA report. Significance of the project preparation is stressed. Interference is proposed already in the SEA Report. Further development of environmental aspects of the project development and management principles will follow together with the programme development team.	
The Centre for Economic Development, Transport and the Environment of Southwest Finland		
(Letter sent in 17.1.2014)		
Comment submitted	Response (to be completed by the	

Comment submitted	Response (to be completed by the

	authors of the SEA report)
The environmental assessment has a clear structure, it has been done satisfactorily and it fulfills the requirements set for it. In order to be aware of the environmental impact of the programme it is crucial that the environmental impact of each project is assessed and is shown in a transparent way. Attention is paid to table p15- 21 where it has been said that "Environmental assessment has to be carried out if needed at the project development phase". The environmental impact should be taken into account in the selection of projects. Projects with a clear negative impact should not be funded at all. The horizontal objective of low-carbon economy should also be taken into account in the selection of projects.	Programme response: An environmental assessment will be part of the Application Form and will be a required for all projects to fill in. The OP already states that projects with a negative impact will not be funded. SEA Team: Further development of environmental aspects of the project development and management principles will follow together with the programme development team.
The Ministry of the Environment, Finland (Letter sent in 17.1.2014)	
Comment submitted	Response (to be completed by the authors of the SEA report)
The table showing the environmental impact as +/- is too general. It should have been done in more detail, taking into account the impacts mentioned in the SOVA directive, Annex 1. Based on the current table it is not possible to get a full picture of the possible environmental impact of the different priority axes or programme as a whole. Taking into account the insecurity related to the impact of the programme a qualitative assessment would have been justified. This could describe the potential impacts of the programme and take into account the insecurities. The environmental assessment does not include an analysis or impact assessment of the different scenarios related to programme content. The assessment also lacks a description of the current status of the environment and the likely development if the programme is not implemented (requirement of the SOVA directive, Annex1). At least such a comparison, a so called zero option, would have been possible to include more clearly. The environmental assessment should at least contain justifications for why the options have not been assessed. Related to this, one content requirement for the environmental assessment is that it should present an analysis of why the presented options have been chosen. It should also be noted that the options do not have to cover the whole programme but may cover only parts of the programme.	SEA team: As there have been several comments from different stakeholders about alternatives the SEA report will be amended. The zero and other alternatives will be described in the report. In regards to the description of the state of environment, the SEA Report refers to various policy papers and does not close the list leaving it open for further consideration. It is explained that the projects can and most likely will address various environmental problems at different scales. Extract from the most important and relevant policy papers is drawn (HELCOM Action Plan and EU Environmental scope of the projects might be from local/national policies up to global issues and therefore it is left for the projects to choose which environmental state they would like to improve or maintain. How to integrate this principle into project development and management practice will be elaborated further with the programme

development team.