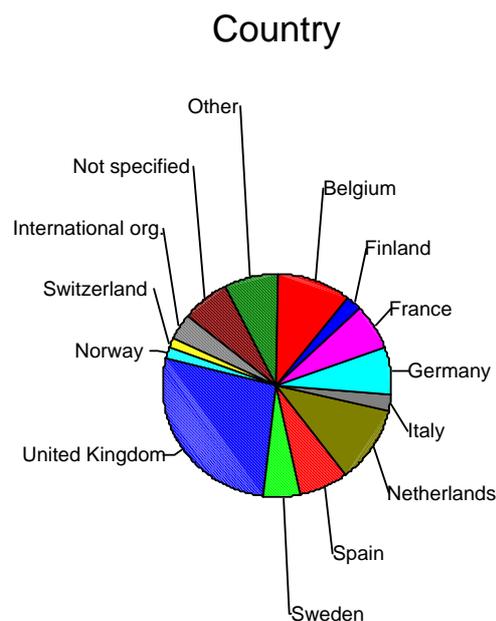




Thematic Strategy on the Protection and conservation of the Marine Environment

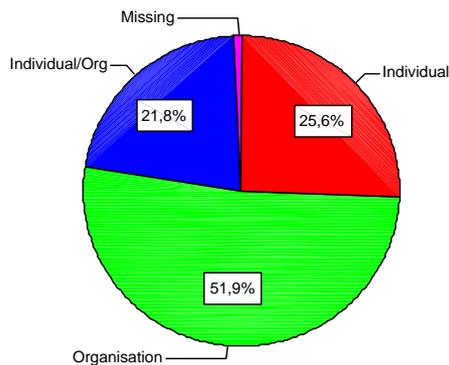
Evaluation of the replies to the Internet Consultation

1. Building upon the results of previous discussions with stakeholders, a final internet-based consultation took place from 15 March to 9 May 2005 to elicit relevant opinions from stakeholders on the specific measures being considered for inclusion in the Thematic Strategy – in particular the possibility of a legal framework.
2. During the eight weeks of the consultation, a total of 133 respondents replied to the questionnaire at Annex 1. This annex also contains a detailed analysis of the replies.
3. While the replies received originated from 22 EU Member States and third countries, half of the replies originated from residents of 3 Member States – UK, Belgium and Netherlands.

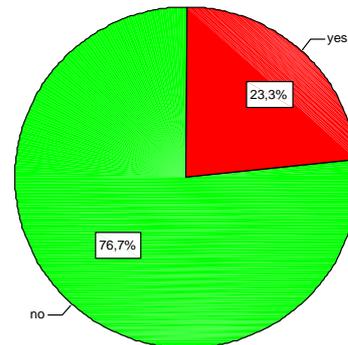


4. Half of the replies originating from organisations and institutions (including Member States), the other half from individuals. About 75% of replies received originated from organisations or individuals not involved in the prior stages of consultation.

Type of respondent



Participation in the stakeholder process



5. The main conclusion that can be drawn from this consultation is that the approach proposed by the Commission was broadly endorsed. The need for strong EU action was underscored by a majority of respondents. More specifically:

- a. the objectives identified for the Strategy were considered of ‘high’ importance by a large majority of respondents;
- b. there was strong support for the dual EU/regional approach proposed for the Strategy; as well as for the set-up of Marine Regions as management units for implementation;
- c. there was strong support for the elements upon which Regional Marine Strategies (referred to as Implementation Plans in the consultation document) should be built, albeit to a lesser extent for the need to produce cost-benefit analyses of measures introduced;
- d. there was strong support for the production of co-ordinated Regional Marine Strategies between Member States, and also involving third countries concerned; as well as for using existing structures stemming from international agreements for developing and implementing Regional Marine Strategies;
- e. there was strong support for the proposed methodology on monitoring.

6. Worth mentioning is that support was generally even stronger from those respondents that had been actively involved in the stakeholder consultation over the past three years.

7. Replies to the last question – regarding timetable for implementation – were the only ones to be more mixed. While a large number of respondents argued that the timeframe for achieving good environmental status of the marine environment was too lengthy, other respondents argued that the proposed deadlines were too ambitious and a third category of respondents even questioned the very idea of proposing precise deadlines prior to the completion of a clear assessment of the state of the marine environment. In addition, a number of specific comments were made in relation to possible adjustments to the timeframe in particular to take into account other existing processes (Water Framework Directive, international targets etc).

QUESTIONNAIRE

1) Respondent identification

Q1 - Are you replying on behalf of an organisation, company, institution or as an individual?

		Number	Percent	Valid Percent	Cumulative Percent
Valid	Individual	34	25,6	25,8	25,8
	Organisation	69	51,9	52,3	78,0
	Individual/Organisation	29	21,8	22,0	100,0
	Total	132	99,2	100,0	
Missing		1	,8		
Total		133	100,0		

Country where you/the organisation/company are/is established:

		Number	Percent	Valid Percent	Cumulative Percent
Valid	Belgium	14	10,5	10,5	10,5
	Denmark	1	,8	,8	11,3
	Finland	3	2,3	2,3	13,5
	France	9	6,8	6,8	20,3
	Germany	9	6,8	6,8	27,1
	Greece	1	,8	,8	27,8
	Ireland	1	,8	,8	28,6
	Italy	3	2,3	2,3	30,8
	Latvia	1	,8	,8	31,6
	Malta	1	,8	,8	32,3
	Netherlands	15	11,3	11,3	43,6
	Poland	1	,8	,8	44,4
	Portugal	1	,8	,8	45,1
	Slovenia	1	,8	,8	45,9
	Spain	9	6,8	6,8	52,6
	Sweden	7	5,3	5,3	57,9
	United Kingdom	36	27,1	27,1	85,0
	Turkey	1	,8	,8	85,7
	Norway	2	1,5	1,5	87,2
	Switzerland	2	1,5	1,5	88,7
	Serbia and Montenegro	1	,8	,8	89,5
	International organisation	5	3,8	3,8	93,2
	Not specified	9	6,8	6,8	100,0
Total	133	100,0	100,0		

Q2 - Have/has you/your organisation participated in the stakeholder process for the development of the strategy:

	Number	Percent	Valid Percent	Cumulative Percent
Valid Yes	31	23,3	23,3	23,3
No	102	76,7	76,7	100,0
Total	133	100,0	100,0	

All replies to the questionnaire were analysed to identify whether there is significant correlation to the different groups of respondents ((i) nationality, (ii) yes/no participation in stakeholder process and (iii) individual / organisation).

Results of this analysis are presented below only for those cases where the Spearman's ρ test¹ on these results showed that differences in opinions are significantly associated to different respondents' group's properties.

2) EU Strategy for the Marine Environment – Scope and Objectives

A new Marine Framework Directive would establish general objectives applicable to all the European waters under the jurisdiction of EU Member States with a view to achieving good environmental status of Europe's seas and oceans - that is, the status of a given ecosystem when all limit reference points and target reference points have been met and the impacts of any human activity is still reversible.

Q3 - To this end the Directive would set a framework for the protection of the marine environment through the integrated management of human activities having an impact on it, with the following specific objectives How would you rank these objectives in terms of importance?

- To protect and, where applicable, restore the function and structure of marine ecosystems in order to achieve and maintain good environmental status of these ecosystems

	Number	Percent	Valid Percent	Cumulative Percent
Valid Medium	24	18,0	18,6	18,6
High	105	78,9	81,4	100,0
Total	129	97,0	100,0	
Missing	4	3,0		
Total	133	100,0		

- To phase out pollution in the marine environment so as to ensure that there are no significant impacts or risk to human and/or on ecosystem health and/or on uses of the sea.

	Number	Percent	Valid Percent	Cumulative Percent
Valid Medium	32	24,1	24,4	24,4
High	99	74,4	75,6	100,0
Total	131	98,5	100,0	
Missing	2	1,5		
Total	133	100,0		

- To control the use of marine services and goods and other activities in marine areas that have or may have significant impact on status of the marine environment to levels that are sustainable and that do not compromise uses and activities of future generations nor the capacity of marine ecosystems to respond to changes

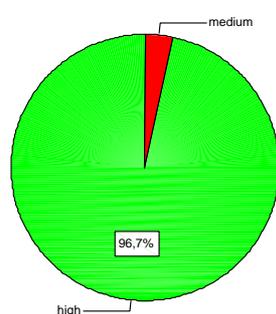
¹ The Spearman's ρ correlation coefficient is a measure of the association between rank orders. Correlation's are based upon pairs of replies and provide an indication of the strength of the relationship between variables that represent characteristics of the group.

		Number	Percent	Valid Percent	Cumulative Percent
Valid	Medium	25	18,8	19,7	19,7
	High	102	76,7	80,3	100,0
	Total	127	95,5	100,0	
Missing		6	4,5		
Total		133	100,0		

As illustrated in the figures below, participants in the stakeholder process valued the control of the use of marine services and goods and other activities higher than those who had not participated. The Spearman's ρ test on these results showed that these differences in opinions are significantly associated to respondents' participation in the stakeholder process.

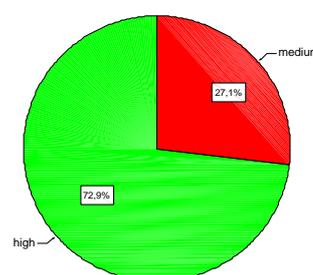
Q3-3: Importance of use control

Participants in the stakeholder process



Q3-3: Importance of use control

No participation in the stakeholder process



- Are there other specific objectives that should be highlighted?

		Number	Percent	Valid Percent	Cumulative Percent
Valid	yes	77	57,9	57,9	57,9
	no	56	42,1	42,1	100,0
	Total	133	100,0	100,0	

- If yes, please substantiate. See [Appendix 1](#) for the replies to this question.

Q4 - The EU/regional approach which would be promoted in a new Marine Framework Directive is a reflection of the need to address shared challenges and to establish; while recognising that the detailed objectives and the appropriate means to achieve them will vary from region to region. The diversity of the marine environment around Europe must be properly reflected in the way the policy implemented.

Do you agree with this balance between EU level and regional responsibilities?

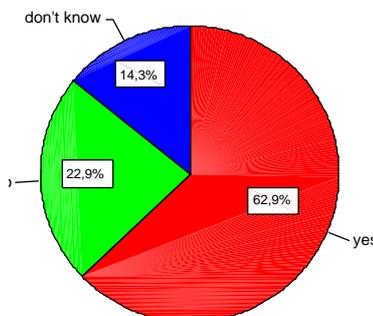
		Number	Percent	Valid Percent	Cumulative Percent
Valid	Yes	101	75,9	81,5	81,5
	No	13	9,8	10,5	91,9
	don't know	10	7,5	8,1	100,0
	Total	124	93,2	100,0	
Missing		9	6,8		
Total		133	100,0		

If no – please substantiate and propose alternative options. See [Appendix 2](#) for the replies to this question.

The figures below show that the percentage of 'don't know' and 'no' answers for individuals were higher than for individuals working in an organisation. The replies of individuals working in an organisation and of the group replying on behalf of an organisation were not different. The Spearman's ρ test on these results showed that these results are significantly associated to individuals' involvement in an organisation.

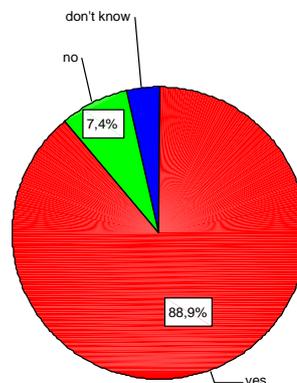
Q4-1 Balance between EU and Regions

Individuals



Q4-1 Balance between EU and Regions

Individuals, working in an organisation



3) Management unit

A new Marine Framework Directive would establish a list of Ecosystem-based Marine Regions for which Implementation Plans would need to be devised to achieve the overall objective of good environmental status through appropriate measures and actions.

Q5 - Do you agree with the use of ecosystem-based Marine Regions as the management unit for the implementation of the Marine Strategy?

	Number	Percent	Valid Percent	Cumulative Percent
Valid Yes	112	84,2	88,9	88,9
Valid No	7	5,3	5,6	94,4
Valid don't know	7	5,3	5,6	100,0
Valid Total	126	94,7	100,0	
Missing	7	5,3		
Total	133	100,0		

If no - please substantiate and propose alternative options. See [Appendix 3](#) for the replies to this question.

4) Content of Implementation Plans

Q6 – How important would be the following elements in the Implementation Plans?

- Assessment of the current status of the Ecosystem-based Marine Region and of the impact of human activities thereon

	Number	Percent	Valid Percent	Cumulative Percent
Valid Medium	43	32,3	34,1	34,1
Valid High	83	62,4	65,9	100,0
Valid Total	126	94,7	100,0	
Missing	7	5,3		
Total	133	100,0		

- Identification and mapping of protected areas

		Number	Percent	Valid Percent	Cumulative Percent
Valid	Medium	47	35,3	37,6	37,6
	High	78	58,6	62,4	100,0
	Total	125	94,0	100,0	
Missing		8	6,0		
Total		133	100,0		

- Regional environmental objectives/standards/values to achieve the strategic objectives of the new Marine Framework Directive

		Number	Percent	Valid Percent	Cumulative Percent
Valid	Medium	33	24,8	27,0	27,0
	High	89	66,9	73,0	100,0
	Total	122	91,7	100,0	
Missing		11	8,3		
Total		133	100,0		

- Programmes of measures and actions to achieve the strategic objectives

		Number	Percent	Valid Percent	Cumulative Percent
Valid	Medium	18	13,5	14,4	14,4
	High	107	80,5	85,6	100,0
	Total	125	94,0	100,0	
Missing		8	6,0		
Total		133	100,0		

- Selection of indicators, limits and reference points

		Number	Percent	Valid Percent	Cumulative Percent
Valid	Medium	53	39,8	43,4	43,4
	High	69	51,9	56,6	100,0
	Total	122	91,7	100,0	
Missing		11	8,3		
Total		133	100,0		

- Programme for monitoring and assessment, including review mechanisms

		Number	Percent	Valid Percent	Cumulative Percent
Valid	Medium	37	27,8	29,6	29,6
	High	88	66,2	70,4	100,0
	Total	125	94,0	100,0	
Missing		8	6,0		
Total		133	100,0		

- Impact assessments at regional level once the contents and implications of the plans are known

		Number	Percent	Valid Percent	Cumulative Percent
Valid	Medium	55	41,4	46,6	46,6
	High	63	47,4	53,4	100,0
	Total	118	88,7	100,0	
Missing		15	11,3		
Total		133	100,0		

- Detailed cost-benefit analysis of programme of measures proposed to favour the least costly option to reach set objectives

		Number	Percent	Valid Percent	Cumulative Percent
Valid	Medium	57	42,9	56,4	56,4
	High	44	33,1	43,6	100,0
	Total	101	75,9	100,0	
Missing		32	24,1		
Total		133	100,0		

- Other – please specify and substantiate. See [Appendix 4](#) for the replies to this question.

5) Preparation of Implementation Plans

Q7 - Do you agree with the proposal that in the case of an Ecosystem-based Marine Region falling entirely within the EU but shared between several Member States a single Implementation Plan should be produced in recognition of the Ecosystem-based Marine Region as the management unit?

		Number	Percent	Valid Percent	Cumulative Percent
Valid	Yes	116	87,2	91,3	91,3
	No	4	3,0	3,1	94,5
	don't know	7	5,3	5,5	100,0
	Total	127	95,5	100,0	
Missing		6	4,5		
Total		133	100,0		

If no – substantiate. See [Appendix 5](#) for the replies to this question.

Q8 - Do you agree that in the case of an Ecosystem-based Marine Region extending beyond the boundaries of the EU, Member States should endeavour to produce a single Implementation Plan together with non-Member States bordering the Region?

		Number	Percent	Valid Percent	Cumulative Percent
Valid	Yes	118	88,7	94,4	94,4
	No	4	3,0	3,2	97,6
	don't know	3	2,3	2,4	100,0
	Total	125	94,0	100,0	
Missing		8	6,0		
Total		133	100,0		

If no – substantiate. See [Appendix 6](#) for the replies to this question.

Q9 Where this proves impossible, should a plan be developed to cover at least the portion of the Region lying under the jurisdiction of the Member State concerned?

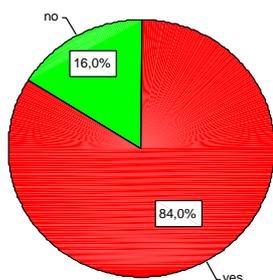
		Number	Percent	Valid Percent	Cumulative Percent
Valid	yes	112	84,2	94,9	94,9
	no	6	4,5	5,1	100,0
	Total	118	88,7	100,0	
Missing		15	11,3		
Total		133	100,0		

If, no substantiate. See [Appendix 7](#) for the replies to this question.

The reply of all individuals to this question was 'yes'. As illustrated in the figures below, this was also the case for nearly all replies on behalf of an organisation (96.7%). However, of the individuals working in an organisation 16% replied 'no'. The Spearman's ρ test on these results showed that these results are significantly associated to individuals' involvement in an organisation.

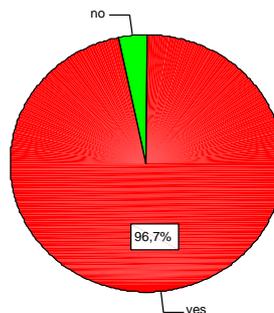
Q 9-1 Implementation plan with 2n-MS 2t

Individual working in an organisation



Q 9-1 Implementation plan with 2n-MS 2t

Respond on behalf of organisation



Q10 – Which structures should be used to develop and implement the plans? Existing structures stemming from International Agreements working on marine protection (OSPAR, HELCOM, Barcelona Convention, Fisheries conventions etc)?

		Number	Percent	Valid Percent	Cumulative Percent
Valid	Yes	82	61,7	76,6	76,6
	No	1	,8	,9	77,6
	don't know	24	18,0	22,4	100,0
	Total	107	80,5	100,0	
Missing		26	19,5		
Total		133	100,0		

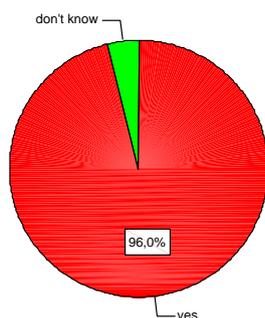
If yes should any changes be brought to current structures? See [Appendix 8](#) for the comments made.

If no explain what structures might be envisaged? See [Appendix 9](#) for the comments made.

As illustrated in the figures below, nearly all respondents who had participated in the stakeholder process indicated that existing structures should be used for developing and implementing the Implementation Plans. About 28% of those who had not participated in this process did not know whether such structures should be used. The Spearman's ρ test on these results showed that these differences in opinions are significantly associated to respondents' participation in the process.

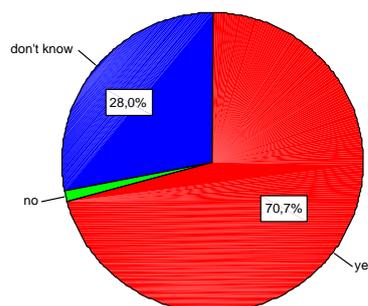
Q 10-1 Use of existing structures

Participation in the Stakeholder process



Q 10-1 Use of existing structures

No participation in the Stakeholder process



6) Monitoring and assessment

For the waters under jurisdiction of Member States within each Ecosystem-based Marine Region, programmes of monitoring and assessment to review the status of marine ecosystems and progress towards achieving good environmental status should be established. A main feature of these programmes should be that they integrate obligations for monitoring and assessment contained in other relevant legislation as well as those deriving from international agreements to which the Community is a party.

Q11 – How important would be the following elements for monitoring and assessment provisions of the framework directive?

- Identification of specific indicators for marine ecosystems

		Number	Percent	Valid Percent	Cumulative Percent
Valid	Medium	44	33,1	34,9	34,9
	High	82	61,7	65,1	100,0
	Total	126	94,7	100,0	
Missing		7	5,3		
Total		133	100,0		

- Data aggregation on basis of Ecosystem-based Marine Regions

		Number	Percent	Valid Percent	Cumulative Percent
Valid	Medium	49	36,8	39,2	39,2
	High	76	57,1	60,8	100,0
	Total	125	94,0	100,0	
Missing		8	6,0		
Total		133	100,0		

- Common technical specifications and standardised methods for analysis and monitoring of marine ecosystems to allow comparability

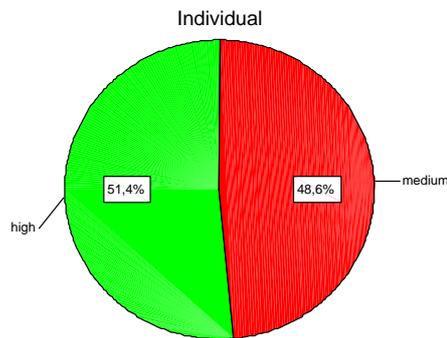
		Number	Percent	Valid Percent	Cumulative Percent
Valid	Medium	41	30,8	33,3	33,3
	High	82	61,7	66,7	100,0
	Total	123	92,5	100,0	
Missing		10	7,5		
Total		133	100,0		

- Adaptation of existing programmes developed at regional level in order to ensure convergence and consistency between them

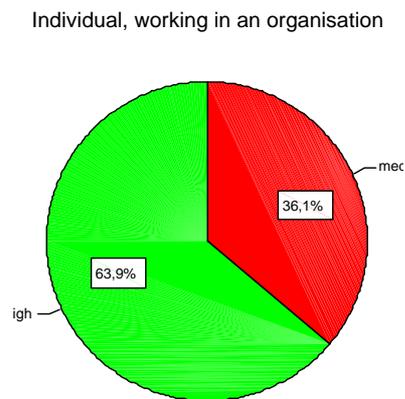
		Number	Percent	Valid Percent	Cumulative Percent
Valid	Medium	44	33,1	36,1	36,1
	High	78	58,6	63,9	100,0
	Total	122	91,7	100,0	
Missing		11	8,3		
Total		133	100,0		

As illustrated in the figures below, about half of the individuals replied 'high' to this question, the other half replied Medium". Individuals working in an organisation valued this adaptation higher, and organisations even more. The Spearman's ρ test on these results showed that these results are significantly associated to individuals' involvement in an organisation.

Q 11-4 Adaptation of existing programmes

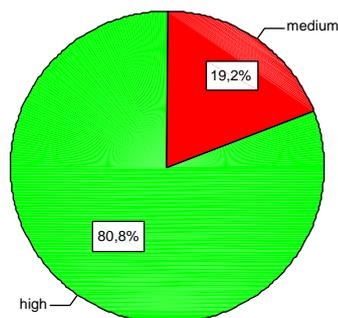


Q 11-4: Adaptation of existing programmes



Q 11-4: Adaptation of existing programmes

Response on behalf of organisation



7) Timeframe for implementation

Q12 - The timeframe for the implementation of a new Marine Framework Directive could be as follows. Does this framework appear to you as sound and realistic?

- 5 years after entry into force of a new Marine Framework Directive – development of Implementation Plans. Implementation Plans would be reviewed if and when necessary and in case every five years thereafter.

		Number	Percent	Valid Percent	Cumulative Percent
Valid	Yes	91	68,4	68,4	68,4
	No	42	31,6	31,6	100,0
	Total	133	100,0	100,0	

- if no substantiate. See [Appendix 10](#) for the comments made.
- 6 years after entry into force of a new Marine Framework Directive – Monitoring and assessment programmes operational

		Number	Percent	Valid Percent	Cumulative Percent
Valid	Yes	70	52,6	52,6	52,6
	No	63	47,4	47,4	100,0
	Total	133	100,0	100,0	

- if no substantiate. See [Appendix 11](#) for the comments made.
- 15 to 20 years after entry after entry into force of a new Marine Framework Directive – achievement of good environmental status of Europe's seas and oceans

		Number	Percent	Valid Percent	Cumulative Percent
Valid	Yes	60	45,1	45,1	45,1
	No	73	54,9	54,9	100,0
	Total	133	100,0	100,0	

- if no substantiate. See [Appendix 12](#) for the comments made.

8) Conclusions

Thank you for participating in this internet consultation. This final free-text box will allow you to provide any further view, opinion and comment on our approach as outlined throughout this consultation.

See [Appendix 13](#) for the comments made.

Nr	Q3 Other objectives – Yes
6	To control coastal zones development and its impact on the marine environment
7	In addition to pollution the environmental impact of intensive offshore marine aggregate upon both the marine ecosystem and the shoreline needs to be addressed. Such non-sustainable industry is severely damaging human resources, fish stocks, coastal accommodation, tourist trade and the fishing industry.
11	Creation of marine nature reserves
12	Marine aggregate dredging
13	Marine Reserves based upon 'no extractive activity' needs to be established within all EU waters. A strategic Environmental Assessment Directive is needed on an EU wide basis on (1) Aggregate Extraction (2) Fisheries and (3) Renewable Energy also liaising with Iceland, Norway, etc. A complete re-assessment of Fisheries Policies within the EU Marine Framework based upon the UK RCEP is required.
15	to control the removal of marine aggregates
16	To consider the damage caused by extracting marine aggregates and to restrict this
18	Much more restrictions on marine dredging and coastal sand extraction.
28	discharges into the sea and the way consent are given and the information is gathered whether these discharges are having a effect on the marine ecosystem
32	To achieve a proportionate balance between the protection of ecosystems and the sustainable use of the marine environment for economic purposes.
33	Unless included under the third bullet-point above, the full environmental impact of shipping (including emissions of air pollutants) should also be part of the marine strategy.
36	To use the structural funds in a way to achieve these goals; To implement a new development model based on the integrated management principles; To be part of a global EU maritime policy as launched by the "green book".
37	Eutrophication and POP/heavy metal pollution of the Baltic Sea
40	impact of radar systems on animals, pollution by oil platforms, impact of waste on animals, pollution in river estuaries
41	LINKING CONSISTENTLY WATER FR. DIRECTIVE WITH NEW MARINE DIRECTIVE AND PREVENTING LAW CONSTRAINTS TO MEMBER STATES IN ENFORCING
44	create a network of marine protected areas at the European level
46	To protect and, where applicable, restore the function and structure of marine ecosystem connections to adjacent coasts and influent rivers in order to achieve and maintain good environmental status of marine-dependent ecosystems
48	Almost all existing (today) natural coastal areas and Islands, including the related underwater seabeds ought to be protected to avoid mass urbanisation along insular and coastal areas. There must be a greenbelt or link between these protected areas to avoid isolation.
50	that a healthy diverse ecosystem must take precedence over unsustainable commercial pressures
52	Ecological thresholds, regime shifts and critical loads
53	the marine environment should also encompass cultural aspects - e.g. underwater and inter tidal archaeology,

Nr	Q3 Other objectives – Yes
54	The strategy must not be limited to the ecosystems, but must encompass the physical and chemical aspects of the marine environment
56	Coastal communities have to change their mentalities and comprehend the importance of protection and sustainable management of marine resources and ecosystems
59	control of air pollution from shipping
61	Conservation of marine biodiversity
62	Enforcement of policy
65	Risk assessment based, scientifically substantiated and achievable approaches should be followed in all cases.
66	Educational programmes for families and industries, economically near to marine life extraction, so as the elaboration of economic alternatives for them.
68	Risk assessment based, scientifically substantiated and achievable approaches should be followed in all cases
71	1. Need to address the underpinning knowledge base of the marine environment and its processes - this has been poorly resourced over the years. 2. To address the existing problems in a concerted and effective manner there is a need for a coordinated and cooperative approach.
73	Risk assessment based, scientifically substantiated and achievable approaches should be followed in all cases
75	To implement flexible and adaptive management based on regular review (scientific and political) of firstly the status of marine ecosystems (their functioning and structure) and secondly the success of implemented management procedures
77	Improving the situation of the marine biodiversity in the European seas, including the development of a network of marine protected areas. Optimising the integration between different policy levels and policy domains.
79	Risk assessment based, scientifically substantiated and achievable approaches should be followed in all cases
80	Priority for the Dutch fisheries is the management of the commercial fish stocks. This shows, is already hard enough. After good stock management, we can focus on other ecosystem aspects.
82	Risk assessment based scientifically substantiated and achievable approaches should be followed in all cases
83	yes - realistic approach; - use of seas for shipping (further development of clean ship approach), sand extraction, dredged material relocation and other economic activities.
89	Operational oceanography is crucial in this context - the lack of observational data and model predictions will be essential in the implementations.
90	Most importantly the Directive should include strategic and enforceable targets with deadlines. This target should set a sustainable condition and drive policy change.
91	There is a need to prioritise the marine ecosystems to which the above objectives should apply. Thus some ecosystems will be more fragile than others, some will be rarer than others and potentially more important to be sustained.
93	To stop the misuse and overexploitation of marine living resources; to fully implement agreements on Marine Protected Areas as recommended by HELCOM, IUCN and others; to protect vulnerable deep

Nr	Q3 Other objectives – Yes
	sea ecosystems
94	To take account of the effect of climate change on the marine environment
95	to protect biodiversity as an intrinsic value (not just capability, goods & services,) to maintain areas where nature is still pristine or at least is allowed to recover to a pristine status, i.e. high seas and coastal fully protected areas.
96	Risk assessment based, scientifically substantiated and achievable approaches should be followed in all cases
97	important to obtain a balanced view
98	It is essential to apply the science based risk assessment to ensure the consistency and the traceability of decisions and their justification
100	The ecosystem-based Marine Region concept should include reference to marine historic environment interests
103	The other specific objectives, that should be highlighted in addition are:
104	To ensure that the costs of implementing the general objectives of the Marine Framework Strategy are proportionate to the risks of not taking action to protect and, where necessary restore the function and structure of marine ecosystems.
105	see additional text
106	The MFD should have a balanced approach. It must be well integrated with other EU Directives. High priority should be given to source control.
109	1) Regulation of airborne contaminants (e.g. nitrogen). (2) Need research to address the undefined concepts (see below). (3) Regarding qu 3b ; Phase out pollution completely? Or just enough to ensure ?
113	Need clarification on relationship to (possibly conflicting or overlapping) objectives of other EC instruments (e.g. CFP, ICZM recommendation). Also, why is the 4th objective on good governance not highlighted here?
114	see additional text
115	The Strategy should maintain current Commission and Member State competence on marine issues. A Directive is not required to deliver the proposed objectives.
117	To aim to achieve policy integration and to take adequate account of the vast experience of international conventions such as MARPOL, OSPAR, etc.
119	ensure scientific/management objectives are developed in consultation with, and communicated clearly to, user groups
120	The effects of urban and agricultural run-off/drainage must not be underestimated. It is not just marine services and activities that affect the sea. The direct pollution of marine towns must also be addressed and assessed.
122	The new marine strategy should strictly be based on scientific risk assessment and not on hazard classes. The approaches should have an eye on achievability (best available techniques) and an economical reasonability.
123	reduce air pollution from maritime transport: i.e. protecting not only the marine environment but also health and impacts on land ecosystem (a true integrated approach)
124	Spatial planning, in particular the impact of port developments on coastal ecosystems and on regional traffic flows on maritime waterways.

Nr	Q3 Other objectives – Yes
125	The use of non-indigenous species in marine aquaculture
127	1) It should explicitly recognise that marine biodiversity needs protecting in its own right and separate from any market value marine resources might possess. 2) All human induced threats to the marine environment must be covered. 3) It must be based on the guiding principles of EU environmental policy. 4) It must ensure an ecosystem approach. 5) The role of the RSCs must be preserved.
128	Why has “allow recovery” been omitted from first objective? Include objective on good governance. Need clear explanation of relationship to objectives under other EC instruments, e.g. CFP. Q4 - Do you agree with this balance between EU level and regional responsibilities?: yes - shared challenges require shared response between EC and Member States, but the responsibilities must be clearly defined. At the same time, we need to manage variation in implementation between regions such that the goals and objectives are achieved.
129	To reduce the risk of introduction of alien species it is VERY important to be aware of that such risks exist even within EU, with Member States bordering different biogeographical areas, even within one Member State. Thus it is important that legislation covers also introductions carried out within EU.
131	The Framework Directive must include aspects of regulatory control on fisheries, shipping, oil and gas exploration, sand and gravel extraction, pollution from land-based sources etc. Where necessary, secondary legislation should be drafted. Transparency and public participation. EU environmental principles must be applied. Provisions for marine reserves. Ecosystem approach.
132	protect marine ecosystems but also related ecosystems
133	To introduce more and better monitoring, control and enforcement of exploitation of the marine life to secure a sustainable exploitation aiming at pre-industrial abundance to secure exploitation for future generations.
134	The strategy should take account of the existing regulations under the Water Framework Directive
137	To apply the three dimensions of Sustainable Development (Environment, Economic, Social) on an equal basis
138	We need EU policy also for high seas.
140	Need to clarify relationship to objectives of other EC instrument, e.g. CFP, ICZM. etc.
141	see in questionnaire
145	<ul style="list-style-type: none"> • To increase awareness and promote the marine environment as a driver for regional/local growth • To ensure the integration of the Marine Environment Thematic Strategy (TS) into all the activities of the Union as well as its consistency with other policy areas • To enhance and support partnership working and stakeholders involvement in the development of the Strategy • To improve evidence base on the marine environment through research and innovation sharing

Nr	Q4-2 Balance between EU and Regions – No
10	There is no need to give some lower demand to for example, new members. No any need.
11	Give power to the EU to designate marine nature reserves
12	If you mean to allow individual member countries to set their own standards and objectives this may well leave us without proper environmental impact assessments as is the case in the UK with marine aggregate extraction.
17	If we want results, strict EU coordination over Member States is essential.
22	The marine environment should be the only target not local economy
24	All countries with a sea access should apply the same commitments
26	As a common EU approach would be dependent on consensus within EU, there is a risk that marine and coastal issues of particular concern for a region and/or country would not receive the attention it deserve within EU. In other words, the effective implementation of the marine strategy can be hijacked by a country or countries with a particular interest (such as fisheries).
28	there is little point in having EU Directives if in one hand you are saying to establish common principles and approaches at EU level then to say to achieve them will vary from region to region, what is need is a common approach with a body that has responsibility to oversee whether the common principles are being achieved, policies are being implemented then forgotten so there seems little point un
37	Environmental considerations should take priority over economical or regional considerations. Ecology and biodiversity as principles are the same everywhere in EU
42	It is up to EU to set the conditions, and then it is up to the regional authorities to determine what they want to achieve within the limits given
66	It also must be considered the South Mediterranean countries out of Europe for an effective conservation of this Sea.
74	The international level must also be taken into account. As regards shipping, many regulations concerning the protection of the marine environment have indeed be, or will be adopted by the IMO.
89	no Yes partly, but regional conflicting interests may conflict with overall EU policies in a MFD.
90	no All specific objectives are [in principle] applicable to all marine ecosystems. The above mentioned 14 specific objectives should be implemented by all regions using specific actions. Only where timeframes are not already mentioned within the objectives, they should be developed in collaboration with the regional conventions, as described for example in Obj. 5, dealing with eutrophication. Special
102	no Individual member states should have more freedom of a Directive - this could constrain regional variation to the extent that it becomes unworkable. The UK has a history of implementing Directives to a high level (e.g. Habitats Directive), an approach which is not always matched by other member states- this unlevelled playing field makes implementation difficult.
107	no see Number 8
114	Greenpeace agrees that action to protect Europe's seas will have to respond to regional threats, sensitivities and socio-economic fabric. To this end we believe that: • a directive rather than a regulation provides the necessary flexibility to allow Member States to use the appropriate tools available to implement overarching objectives; and • regional implementation plans may be necessary to allow for a realistic and differentiated timetable for implementation, notwithstanding the need for legally binding deadlines/timetables at EU level, and for EU set regional-specific quality status criteria and pollution thresholds. However, strategic as well as more detailed objectives, such as broad water quality status objectives, should be set at EU level and should be applicable to all regional seas. These objectives

Nr	Q4-2 Balance between EU and Regions – No
	should be quantitative and outcome orientated (e.g. good ecological status), providing where necessary scope for differentiated means of implementation at regional level. On paper, this could mean that the Framework Directive sets e.g. broad water quality standards for the different regions, building on standards set and agreed in the Regional Conventions. Complicated technical annexes could be avoided by postponing detailed discussions on individual substances, ecological criteria etc until Regional Implementation Plans are agreed at Ecoregion level. Regional Implementation Plans must be legally binding, and must not take the form of politically weaker strategies, action plans or guidelines.
117	See note above re. taking due account of international commitments
123	no The EU approach should be more effective at the international level at IMO
131	no There's a need for a directive rather than a regulation to provide the necessary flexibility to allow Member States to use the appropriate tools available to implement overarching objectives. Regional implementation plans may be necessary to allow for a realistic and differentiated timetable for implementation, not withstanding the need for legally binding deadlines/timetables at EU level.
135	The EU should set not just principles, but minimum standards that are necessary across all regions. Principles do not provide States with sufficient guidance as to their responsibilities, nor do they provide useful indicators against which progress can be measured.
138	no There must be clear minimum requirements for regional policies.

Nr	Q5-2 Ecosystem-based Marine Regions – No
10	Don't know I really do not totally understand your question. If it means new offices and bureaucracy, NO !
22	too much region interest
26	Eco-system based management is desirable but as many marine systems falls under several national jurisdictions, it would be very difficult to apply in reality.
37	EU Directives should be implemented by EU members
41	IS THERE A SIMILAR SYSTEM FOR THE IMPLEMENTATION OF THE WATER FR. DIRECTIVE? IF YES AND IF IT WORKS, THEN OK FOR THE ECOSYSTEM BASED MARINE REGIONS
46	Actually yes, provided the rivers and coasts influencing and depending on their connection with the marine environment are explicitly included in the ecosystem-based marine regions.
52	Marine regions should be based existing marine conventions
89	no Pending on the definition of the "Ecosystems". Oceanic regions are often determined by more physical than biological processes. They may also have seasonal changes in boundaries.
95	ecosystem-based Marine Regions as the management unit.
102	no How will these proposed areas fir in with RAC areas - danger of having too many competing management units
104	There may be case for sub-dividing the Marine Regions into smaller management units. For example, the Mediterranean could possibly comprise the sub-regions of Adriatic, Aegean, Tyrrhenian, Western Med etc seas. The division of a marine region into several discrete constituent parts (if feasible) does give those Member States bordering those seas greater 'ownership' of the issues and solutions.
123	The ecosystem-based Marine Regions approach could be truly effective only if integrated in the IMO legislation
129	Many threats go across ecosystem borders. Thus when it comes to legislation ecosystem-based Marine regions would not be enough as a management unit to achieve the goals set up for the Marine strategy, especially if a common EU legislation would be weaker than that of some Member States.

Nr	Q6-9 Other
13	The EU needs to establish a European Convention to install and supervise the Marine Framework on a European wide basis, with the EU Convention having autonomy from individual EU states, formulated by the treaty.
17	Keep it simple: clear obligatory targets and strict timetables for Member States, some EU funding in post 2007 financing period.
19	Programas de coordinación institucional y participación pública para el diseño e implementación de los Planes
26	Concrete remedial actions or actions to prevent further environmental degradation. The problems are already well known and further assessments will only contribute to delay urgently needed actions.
37	The Baltic Sea is dying and fish is contaminated and corrupted. Please do more than lip servicing about it NOW
48	additional and Regional Political will plus Technical synergy to allow implementation plans to be carried out according to objective criteria
52	Coupled hydrodynamical and ecological modelling
76	Implementation Plans in relation to Marine Fisheries, must be elaborated and implemented in the framework of the FCP by the competent community or national fisheries authorities and regional fisheries organisations
77	A strategy to make concrete the objective of better coherence and harmonisation with other EU policy.
80	An integrated approach is very important
83	Cost Benefit Analysis: economic activities are also important element.
90	Cost of not improving situation needs to be estimated, value of services and good lost should be estimated, if not in monetary then in ecological and societal terms we do not start at Zero, Conventions have identified main pressures and measures, but implementation is problem
92	communication - creation of a public support for the marine strategy
93	Even if it is very important to improve the knowledge of marine ecosystems and the effects of human impact it must be pointed out that there is a lot of knowledge that must be used. Measures must be taken immediately to stop the ongoing degradation of the seas.
94	Cost-benefit analyses to identify least cost approaches are not necessarily always appropriate or robust way to fully assess the benefits of environmental protection or the risks that would be avoided by taking such action
95	We do not start at Zero, Conventions have identified main pressures and measures, but implementation is problem. Cost of not improving situation needs to be estimated, value of services and good lost should be estimated, if not in monetary then in ecological and societal terms.
97	connect to existing regulations (inside EU:Habitat Directive and outside EU: UNEP, IMO)
99	Compliance check with other relevant European and international legislation/conventions
104	Detailed cost benefit of a range of options should immediately follow the assessment of current status and determination of overall objectives. The POM should then be based on the best option to realise the overall objectives.
105	♣ Putting 'other' ecosystem protection measures in place as soon as possible. ♣ Ensuring full

Nr	Q6-9 Other
	ratification and implementation of existing legislation and agreements which benefit marine conservation and protection, followed by enforcement. ♣ Ensuring practitioners and people conducting analysis on the ground, receive and fully understand the methodologies to be applied. ♣ Allowing transparency to track decisions made throughout the process.
108	§ Identification of lead responsibility for each ecosystem based marine region, so as to initiate and assist other countries in this process;
109	Cost-benefit analysis to least costly option does not
110	Strategic Environmental Assessment at a regional level ahead of impact assessment once the contents and implications of plans are known. Marine Spatial Planning (based on SEA). Identification and mapping of sectoral spatial designations such as fisheries closed areas, high risk areas for specific developments (oil, aggregates, wind farms). see final box for additional comments
113	Need guidance on scope of RIPs, e.g. clarification on inclusion of coastal zone. Stress need for integrated management and use of tools like marine spatial planning?
114	Greenpeace considers it essential that Regional Implementation Plans are legally binding, and that their development is being taken forward on the basis of a legal timetable outlined in the Framework Directive. It is essential that the timetable is reflecting the targets already set by international and EU agreements and laws, including the WSSD Plan of Implementation, the CBD, OSPAR, Helcom and Barcom.
115	These steps do not need to be enshrined in a Directive to deliver them. Priority should be given first to assessment and monitoring to identify limits and reference points etc. It is difficult to comment when we have not yet seen the results of the Extended Impact Assessment.
117	There must be both cost-effectiveness analysis AND disproportionate cost analysis as with the WFD. Also, whereas objectives are a good idea, WFD Article 6 experience suggests 'standards' may prove difficult to agree/achieve.
119	A lot of data is already collected through many different agencies which is not fully utilised - need to identify existing monitoring programmes and co-ordinate them. Also, on the protected areas issue - there needs to be a clear reason why areas are protected and not just because they are charismatic or of commercial importance.
120	Establishing a clear European balance so that regional actions do not create unfair or discriminatory trade restrictions within the EU and/or seriously affecting established activities
122	Make sure that the overall strategy can be financed in the general economic situation including adoption mechanisms.
123	Indicators at the single sectors responsible level (not only at the ecosystem-final damage level) + Integration of external environmental costs evaluation into cost-benefit analysis
124	Relevant existing conventions and policy instruments should be incorporated
127	1) Transparency of decision-making and implementation/enforcement is essential. 2) In any cost-benefit analysis a proper attempt must be made to estimate the costs of not implementing any particular measure. 3) Full ratification, implementation and enforcement of existing agreements is very important.
128	Not clear what is meant by "impact assessment". Cost-benefit should help "identify" rather than "favour" least costly option. A 'generic plan' with outline content should be provided. Clarify process to resolve conflicts between different objectives/ measures and who takes that decision? What is the process by which plans are adopted?
129	The priorities need to incorporate the costs for carrying out the suggested activities and it should be a balance between what is needed most (i.e. where the gap of knowledge is largest), versus what one

Nr	Q6-9 Other
	could achieve for reaching the goal. To find e.g. suitable indicators might be a huge task for all the different threats and it might be more fruitful to spend money on monitoring and assessment.
130	However it is important to be able to compare the standards throughout the whole EU. Instead of cost-benefit analyses we consider that an impact assessment within the three dimensions of sustainable development ought to be made at all relevant levels.
131	The Fisheries Secretariat considers it essential that regional Implementation Plans are legally binding, and that their development is being taken forward on the basis of a legal timetable outlined in the Framework Directive. It is essential that the timetable is reflecting the targets already set by international and EU agreements and laws, such as the WSSD, the CBD, OSPAR, HELCOM and BARCOM.
133	Re: Cost-benefit analysis. Please remember that most often recreational fishing/angling has far less negative impact on the marine environment and fish stocks than has commercial fishing. Furthermore recreational angling in most cases provides a better socio-economic value to society at large and to local communities in particular.
138	Gap analysis on protected areas, like Natura 2000 sites for harbour porpoise.
139	Structural plan for the control on the implementation and performance, if it is not included in the review mechanisms of the programme for monitoring and assessment (High)
141	see in questionnaire
145	<ul style="list-style-type: none"> • Co-ordination measures between the European, national and regional/local level in order to: 1) establish common approaches while respecting the subsidiarity principle, and 2) ensure regional/local authorities have the capacity and means to develop these Plans • Integration and co-ordination measures with other European, national and regional/local strategies covering related issues

Nr	Q7-2 Single implementation plan – No
10	Don't know again, are you planning some army of white collars ? NO that. Bu otherwise YES:
22	Because it will fail in some region, so those part of the EU marine regions are less important?
37	Single plan yes, but the EU States should coordinate the work and implement EU directives
89	Regional constrains needs for efficiency to be taken into consideration. However regional interests should not violate the overall objectives.
104	There should be an overall implementation plan but if the idea of sub-regional seas/gulfs is accepted then there would need to be individual plans for those seas (this approach would be similar to the River Basin / Catchments interface proposed for the WFD.
111	As well as a single plan there should also be sub-regional plans for each member state
115	The answer depends on what is contained in the implementation plans - this cannot be answered at this stage.

Autonumber	Q8-2 Implementation plan with non-MS – No
9	Need to be discussed between EU Member States before
17	Implementation Plan with non-Member States could be marvellous, but not easy to achieve. That is why the EU should act even without them.
69	I'm not sure if it is important or factible
86	The objective is desirable , however EU Member States should not postpone the development and implementation of a plan because no agreement with third countries have been reached.
101	Don't think that Member States will find a compromise! Single Implementation Plans better.
104	The answer to Q7 also applies to Q8.
111	Should include sub-regional plans for each non member state
115	The answer depends on what is contained in the implementation plans - this cannot be answered at this stage. There is no guarantee of non-Member state buy-in!

Nr	Q9-2 Implementation plan with non-MS not possible – No
10	Again, not allow lower standards to for example new members
32	A separate regional treaty should be negotiated between all jurisdictions concerned and proper monitoring and enforcement procedures agreed.
48	It should be always possible. It will be necessary to use international legal agreements to solve this and to create an international support fund for this cases ONLY.
57	It would be a waste of time, human energy and money
84	This will require a case by case evaluation to ensure that an effective management process can be achieved. Resources will be wasted if a solely EU based scheme is put in place which is not able to achieve it's goals due to pressures from non EU activities.
102	Is there any point - if that member state already has measures in place to manage its own sea areas?
109	Depends on how critical other areas are on ability to achieve objectives in EU sector.
115	It is difficult to see what value such a plan would have. It would be better to focus efforts in working collectively in Regional Seas Conventions (e.g. agreeing Strategies that all parties can agree and work together to deliver).
123	Trying to involve other States through international institutions- IMO

Nr	Q10-2 Use of existing structures – Yes
6	special pan European structure concerned specially with this issue
7	Additional structure may be required, as well as an overseeing of implementation by urgent enforcement. The legislation must be devoid of 'loopholes' enabling escape from the rulings (as we have seen in the past !)
8	It should be ensured that each of these structures does adjust its structures so that the relevant working groups and mutual representations do as little as possible overlapping work. One on the structures should be appointed to be the lead and coordinate / aggregate information and decisions
9	Need more integration and cooperation between current structures
11	Power of enforcement given to conventions and/or EU level.
12	They must be comprehensively inclusive.
13	See before. A European Convention should take over from OSPAR, (and other conventions) accountable to the EU Parliament (not to the Council of Ministers) to ensure sustainability of our seas. See above (typed in wrong 'yes' column)
17	More EU commitment to HELCOM, please!
21	They would need to be given higher priority within Member States
24	A European structure strictly committed to protect the marine ecosystem
26	Current structures should be used if functional. However, bureaucratic talk forums not involved with remediation activities should not be used. Fisheries Conventions have proven to be useless and should not be used.
29	There should be one structure to create a unity between all organisations
31	Prohibit all outcast of fish under any conditions must be a part of the Fisheries conventions
32	A specific body for each ecosystem-based marine region, which covers all aspects of protection of the marine environment to include commercial activities, monitoring procedures and robust enforcement.
36	To fully involve the representatives of the maritime regions and not only the Members States and NGOs
37	Helcom, CCB, EEB, Greenpeace, FOE
38	Quota on fish should be more stringent. Listen better to scientists and find a way to implement alternative fish production facilities in existing conventions.
41	For regional conventions/action plans covering also non EU lands/seas: EU M.S. as parties should be gathered under 1 EU umbrella within their bodies/working groups and not represent themselves per blocks
42	But they should get the appropriate mandate to act on fisheries and shipping as well
48	To establish an integral follow up method for each international agreement implementation, using sustainable indicators to improve achievements
50	they should be regionalised and reflect the specific needs the stakeholders
52	The conventions should have a coordinating role - nothing more. They are too weak and legally binding programmes of measures should be adopted in national law.
53	Use of organisations set up under other bodies, OSPAR should be used - existing relationships and

Nr	Q10-2 Use of existing structures – Yes
	experience is invaluable. The RACs may have a role to play too from a fisheries point of view. However full Member State commitment is required too so existing structures may need modification with national ones. River basin districts could be useful unit in relation to coastal waters
54	One should consider consolidating the reporting requirements to a single responsible agency
56	It is necessary a new EU Coastal Management Organization
57	Such plans would impact the every day life of thousands of persons. So a simplified system that could be clearly identified and understood would be more efficient.
58	extend region covered by RFOM 's in order to comply with MPA's on sea mounts and continental edges
62	Regional agencies
65	Yes, this is an opportunity to bring more science based approaches to current structures, e.g. the ambiguous and virtually impossible to implement political phase-out goals under OSPAR could be reviewed and replaced with stringent controls.
68	One should bring more science-based approaches to current structures, e.g. the ambiguous and virtually impossible to implement political phase-out goals under OSPAR could be reviewed and replaced with stringent controls
69	I agree with it, but together with national and regional government
71	If fully implemented across the EU the current structures should achieve the aims of this thematic strategy.
73	Yes, this is an opportunity to bring more science-based approaches to current structures, e.g. the ambiguous and virtually impossible to implement political phase-out goals under OSPAR could be reviewed and replaced with stringent controls
75	Further integration is required between marine environmental management and fisheries management. Fisheries are just one of many anthropogenic pressures on the marine environment, albeit a major one. Fisheries management should simply be a part of environmental management with cost-benefit analysis to maximise sustainable gain from the fisheries without compromising environmental management.
76	As already stated, Implementation Plans in relation to Marine Fisheries, must be elaborated and implemented in the framework of the FCP by the competent community or national fisheries authorities and regional fisheries organisations
77	Harmonising the structures, tasks and action areas of the parties concerned, is essential to insure consistency. This harmonisation however must not lead to watering down the environmental objectives.
78	More cooperative spirit
79	Yes, this is an opportunity to bring more science-based approaches to current structures, e.g. the ambiguous and virtually impossible to implement political phase-out goals under OSPAR could be reviewed and replaced with stringent controls]
80	Include RACs on fisheries and aquaculture in process
82	Yes, this is an opportunity to bring more science-based approaches to current structures, e.g. the ambiguous and virtually impossible to implement political phase-out goals under OSPAR could be reviewed and replaced with stringent controls
83	The approaches and goals of these structures should be reviewed. Next to that common objectives between OSPAR and HELCOM should be looked for and also the differences. Subsequently should be aimed at harmonised EU objectives.
86	Yes, a clear coordination mechanism between these structures and the EU should be established; a clear

Nr	Q10-2 Use of existing structures – Yes
	delivery mechanism should also be set up; responsibilities , tasks and roles should be defined
88	Link and coordination with EU legislation should be improved
89	More consideration should be made to the physical conditions boundaries of the ecosystems.
90	Helcom Recommendations need clear mandatory enforcement structure for all EC member states. Fisheries protection measures need to become mandatory in order to be fully implemented. Fisheries and protection issues should be dealt with together under the prime objective of long-term sustainability and of halting the biodiversity decline. The ecosystem approach should be seriously implemented within
93	Mechanisms need to be introduced to enforce the implementations of HELCOM recommendations.
94	OSPAR can play a particularly positive role to play having being instrumental in bringing about improvements in the framework for marine protection. The management structures should also be open to a balanced, and wide ranging group of stakeholders. They should not be dominated by industries such as fishing which have an economic interest in exploitation of natural resources. Management structu
95	Helcom Recommendations need clear mandatory enforcement structure for all EC member states. Fisheries protection measures need to be fully implemented by EC (and not traded for other issues).
96	Yes, this is an opportunity to bring more science-based approaches to current structures
97	use OSPAR (and comparable other regional agreements) OSPAR is already in place and is being accepted
98	This is an opportunity to bring science-based approaches to current structures for consistent decision-making and to improve schemes like OSPAR. e.g. OSPAR
99	The existing structures can be used but the competences and roles should be reviewed after the establishment of the list of Ecosystem-based Regions and assessment of the current status.
100	A link is also required with the International Council for the Exploration of the Seas (ICES) and how marine historic environment factors can be taken into consideration
102	Probably but too complex an issue to explore here
103	The current structure - HELCOM could be used for developing the implementation plans but some changes should be brought to their current practices: New structures to be envisaged is e g the EU Baltic Sea Regional Advisory Council for fisheries.
105	♣ Full ratification and implementation are important aspects on any of the international agreements. It must then be follow-up with proper enforcement. ♣ In some regions, the agreements need to be made stronger and/or more comprehensive to bring them up to the same standard as the others. ♣ Should retain the ability for a region to be more inspirational or implement stronger measures if required or desired. ♣ All should have a requirement to improve rather than simply maintain damaged environments. ♣ It must also be noted that the existing structures are just that, existing. Therefore, if we are to progress environmental protection and conservation to improve the status of the marine environment, stronger measures are required in all EU marine regions.
108	These structures could be given more legal powers to achieve requirements from non EU member states.
109	Theses agreements have different objectives covering different areas of marine activity. Somewhere it is necessary for an overarching organisation to ensure eco-system approach is adhered to.
110	Convergence between the boundaries used by existing structures. Greater integration, in particular between marine environmental structures and fisheries management structures.
116	Much more cooperation and integration between existing structures

Nr	Q10-2 Use of existing structures – Yes
117	This is vital. Also need to recognise international issues such as ballast water/alien species issues
118	Responsibilities must remain at the European level and not shift to the existing structures
119	Need to increase participation in these structures from a broader groups of institutes. There is a lot of expertise in Europe that it not being exploited because they are not associated with government agencies.
120	As a European action, the Commission and the Parliament should be the overriding authorities. The existing agreements and structures should be reviewed in order to allow access/input/consultation actions by other stakeholders.
122	More science, more pragmatism, restrict oneself to best available techniques rather than unrealistic goals.
123	Barcelona Convention Institutions should act more through global institutions-IMO
127	1) Existing structures should be audited to ensure they are fulfilling their obligations. 2) NGO access to all processes should be guaranteed. 3) Enforcement procedures must be improved. 4) The competence of Regional Fisheries Management Organisations should be expanded to include protection of biodiversity from the impacts of fisheries. 5) Regions must be able to go beyond EMS standards.
128	Yes, sensible to build on best available structures and help to integrate between them. However, need to ensure coherent approach, including between the Directive/Communication and CFP and between Regional Implementation Plan structures and RACs.
129	Most important is that the existing structures can enforce the activities and that they are legally binding. For alien species used in aquaculture a suggested free movement within European EU waters, would increase the risk of establishing new alien species and do not follow precautionary or polluter pays principles.
131	The Fisheries Secretariat believes in the legally binding nature of EU measures and is concerned that Member States may escape accountability and enforcement, if the development and implementation of Regional Implementation Plans is administered and delivered by the Regional Seas Conventions. A new marine annex might be needed in the Habitats Directive.
132	See also UNESCO/IOC programmes and IOC/WMO JCOMM
133	Whatever could speed up the process would be welcomed
134	The special nature of marine aquaculture requires the sector to be addressed with its own convention, rather than being tacked onto another convention.
135	While current structures should be used, measures should be taken to ensure that all relevant bodies are involved in the development and implementation of the plans. It is unlikely that any existing body will find its jurisdiction automatically covers the marine ecosystem the plan is to cover. For this reason it may be necessary to introduce an overarching steering group.
138	HELCOM needs more commitment, power and money.
139	YES, see comments underneath
140	Yes, a framework directive should bring together the relevant conventions and agreements. Need to ensure a coherent approach, particularly in relation to CFP and RAC's.
145	<ul style="list-style-type: none"> • To take on board the regional/local dimension of the Implementation Plans, both addressing the potential impacts and roles • To adapt European, national and regional/local existing programmes to the structure of International Agreements

Nr	Q10-3 Use of existing structures – No
22	There should be a new infrastructure which have no vested interest with existing structures. They have to work closely with the existing structures, but it should be independent
84	Well established structures exist. They need to be integrated into the EU system more fully as e.g. as is already occurring in OSPAR. Common goals need to be developed and full buy in achieved. Such a process can help to ensure non EU states become actively involved to achieve the goals.

Nr	Q12-2 Entry into force - 5 years – No
6	no too long a timeframe, can cause irreversible consequences in the meantime. Better 3 years
7	The current and further degradation of our marine environment would make it far more urgent than the five years of delay envisaged. It may well be too late by that time.
13	Much sooner please - the situation is one of urgency
24	much quicker
27	less than 5 years, every 3 years
36	The timeframe must be seen in the framework of the future green book on maritime policy.
37	Two years max. The Baltic Sea will not last as long as the suggested to wait and explore, unfortunately.
38	no maximum 3 years: EU member states have to speed up development of implementation plans as changes in marine ecosystems are becoming increasingly irreversible.
43	no three as five is too much
48	Every 4 years. Save time is preventive measure.
52	5 year schedule is not coordinated with the EU WFD.
56	no Sooner, 3 years; reviews every 5 years
57	no 5 years are not enough
62	3 years for implementation plan
69	I think that 3 years are enough (taken into account that much of the work should be done in the WFD)
83	No
97	no experience with WFD indicates this is not realistic
98	No
102	no This will take at least 10 years, look at the Water Framework Directive!
104	no We suspect that the timeframe may be too short as is being demonstrated by slippage in the WFD timetable
106	no The experience so far with the WFD does not prove this timeframe realistic.
107	no see Number 8
108	no § Certain countries may not have the required baseline data;
110	no Five years is an appropriate timescale for review, however action is needed now! Every opportunity should be used to encourage development of implementation plans as soon as possible. If a new Directive takes some time to be adopted the delay could be costly for marine biodiversity and marine management.
114	Greenpeace can agree to a modified wording of the text: “5 years after entry into force of a new Marine Framework Directive – adoption of Implementation Plans. Implementation Plans would be reviewed if and when necessary and in case every five years thereafter.
115	no It is impossible to comment in a meaningful way as it is unknown what good environmental status means or the measures required to achieve it. More thought and discussion is required between

Nr	Q12-2 Entry into force - 5 years – No
	stakeholders - at this stage the UK cannot endorse these timescales.
117	The data necessary to develop scientifically robust plans does not yet exist. Need to learn lessons from time that will be taken to complete characterisation for the WFD and the outstanding data gaps, etc.
131	It should be: 5 years after entry into force of a new Marine Framework Directive – adoption of Implementation Plans. Implementation Plans would be reviewed if and when necessary and in case every five years thereafter
145	At least initial frameworks/plans, which can be built on should be done within 1 or 2 years at the most after the entry into force of the TS. Commission's CZM programme can be used as an example of good practice and contribute to save time.

Nr	Q12-4 Entry into force - 6 years – No
6	no too long
7	Irrecoverable damage could result within that time frame, if not already.
13	Far too late!
24	much quicker
25	4 years
36	no idea
37	Not longer than 3 to 5 years
38	no maximum 4 years: same as above
48	4 years. Let's make is at the same time.
56	no Sooner, 4 years
57	no 6 years could be too short
62	First monitoring after 2 years of implementation
69	5 years are enough
80	no monitoring should start before entry into force
89	no Will depend on national willingness to support and change monitoring efforts.
97	no as above
99	no 10 years, because a consistent approach has to be developed
100	no 7 years after entry would seem more realistic
102	no As above - too little is known about establishing suitable targets or monitoring regimes
104	no Again we believe that the timetable may be too short.
106	no The experience so far with the WFD does not prove this timeframe realistic.
107	no see Number 8
108	no § Certain countries may not have the required baseline data;
109	Operational monitoring after 6 years is too quick after a plan at
110	no Again, since many monitoring and assessment programmes are already in place or under development, care should be taken to not allow slippage of existing timescales. 6 years would be more appropriate for a review of monitoring and assessment programmes to ensure comprehensiveness and appropriateness.
114	Greenpeace can agree to a modified wording of the text: “3 years after entry into force of a new Marine Framework Directive – Monitoring and assessment programmes operational”
115	no It is impossible to comment in a meaningful way as it is unknown what good environmental status means or the measures required to achieve it. More thought and discussion is required between stakeholders - at this stage the UK cannot endorse these timescales.

Nr	Q12-4 Entry into force - 6 years – No
122	No
125	No
131	no It should be: 3 years after entry into force of a new Marine Framework Directive – Monitoring and assessment programmes operational
145	These Programmes should be operational 2 or 3 years after the entry into force of the TS (1 year after the initial frameworks/plans above mentioned). Early monitoring, parallel to the drawing up of the Implementation Plans, could be useful as a benchmarking tool.

Nr	Q12-6 Entry into force - 15 years –No
6	no too long a timeframe. can cause irreversible consequences in the meantime
7	This would be FAR too late.
13	Far too late!
24	much quicker
32	Should be a shorter timeframe
36	no idea
37	Not longer than 10 years so that the plan is realistic
38	no 15 years or 20 years cannot be a goal itself some ecosystems will and can recover faster. Use recovery speed of the ecosystems to establish a maximum period for recovery to a healthy level (which will be?)
44	no too late to save our seas ...
48	10-12 years, will be enough to see some results.
49	More time is should be given to be able to determine actual improvement of the quality of the environment. Ecosystems should be given more time for recovery. Assessment after 15-20 years is preferable, but there are not to draw any conclusions on the success of the management yet. This should be given at least 25 years.
52	Please consider: 6 + 6 + 6 sensu the EU WFD
56	no 12 years
62	First status review together with first monitoring
63	no should be quicker
65	no The question of how good environmental status is defined must be resolved before a timeline can be put on its achievement.
68	"good environmental status" needs to be defined before a timeline can be put on its achievement
69	10-15 years are enough in most of the cases
73	The question of how good environmental status is defined must be resolved before a timeline can be put on its achievement.
79	The question of how good environmental status is defined must be resolved before a timeline can be put on its achievement.
80	no nice long term goal, but may be too soon - we probably need more time to get there!
82	The question of how good environmental status is defined must be resolved before a timeline can be put on its achievement
83	no 30 years, analogous to Water Framework Directive. Harmonisation with WFD should be envisaged as well.
90	no This approach does not address the main pressures in a way to stop them. If this is done as the first priority, maybe some areas of Europe's seas and oceans will achieve good status by 2020, as the

Nr	Q12-6 Entry into force - 15 years –No
	situation is dramatic right now in relation to eutrophication, pollution with hazardous substances, decline of fish stocks and of other indicators of biodiversity. Furthermore climate change is start
93	Seems to be a very long time compared to the agreement on marine biodiversity and fish stocks in Gothenburg, June 2001.
94	No
95	No
96	no The question of how good environmental status is defined must be resolved before a timeline can be put on its achievement
97	no as above
98	Firstly the envir. quality needs to be defined and subsequently the time schedule can be implemented.
99	no Taking into account the time the marine environment needs for adaptation and recovery a time frame of about 25 years is more realistic.
104	no Until one knows the current status of the seas, what the overall objectives are going to be and the scale of investment required this question is impossible to answer
105	10-15 years would seem a more appropriate timeframe bearing in mind the existing marine and biodiversity targets that have to be achieved within the shorter timeframe we suggest.
106	no The experience so far with the WFD does not prove this timeframe realistic.
107	no see Number 8
114	<p>Greenpeace can agree to a modified wording of the text: 10 to 12 years after entry into force of a new Marine Framework Directive – achievement of good environmental status of Europe’s seas and oceans. While positive estimates suggest that the Marine Framework Directive may not be adopted until three to five years after its first publication – i.e. 2008-2010 – progress should already be underway to meet e.g. the following European and international targets: • by 2004, to have established a regular process for global reporting and assessment of the state of the marine environment (WSSD); • by 2006, to have made every effort to achieve substantial progress to protect the marine environment from landbased activities (WSSD); • by 2006, to have identified marine protected areas in the OSPAR and HELCOM regions; • by 2008 to have taken action to address the under-representation of marine and inland water ecosystems in existing national and regional systems of protected areas (CBD Decision VII/28) • by 2009 to have designated protected areas as identified through the national or regional gap analysis (including precise maps) and complete by [...] 2012 in the marine environments the establishment of comprehensive and ecologically representative national and regional systems of protected areas (CBD Decision VII/28). • by 2010, to have halted the loss of biodiversity in Europe (EU SDS); • by 2010, to have encouraged the application of the ecosystem approach in marine management (WSSD); • by 2010, to have completed a joint network of well-managed MPAs in the OSPAR and HELCOM regions; • by 2012, to have developed marine protected areas consistent with international law and based on scientific information, including representative networks and time/area closures for the protection of nursery grounds and periods (WSSD); • by 2012, to have facilitated proper coastal land use and watershed planning (WSSD); • by 2015, to have integrated all protected areas and protected area systems into the wider land- and seascape, and relevant sectors, by applying the ecosystem approach and taking into account ecological connectivity and the concept, where appropriate, of ecological networks (CBD Dec VII/28). • by 2015, to have achieved environmental objectives under the Water Framework Directive (i.e. out to 1 nm); and • by 2020, to have achieved the cessation of inputs of hazardous substances into the Baltic, with the ultimate aim of achieving concentrations in the environment near background levels for naturally occurring substances and close to zero for man-made synthetic substances. To achieve the above targets, and given that progress should already have been made towards meeting them; it seems feasible to lay down an earlier target year – of 2020. This would require good ecological status to be met</p>

Nr	Q12-6 Entry into force - 15 years –No
	after 10-12 years Some Member States have set themselves even stricter targets. Under no circumstances should EU regulations encourage Member States to revert on their past commitments.
115	no It is impossible to comment in a meaningful way as it is unknown what good environmental status means or the measures required to achieve it. More thought and discussion is required between stakeholders - at this stage the UK cannot endorse these timescales.
117	The timescales for achieving good status should be informed by adequate data and determined following the pressures and impacts analysis which, in turn, requires data
121	no too short timeframe
124	No
127	no 15-20 years is too long; suggest 10-15 years.
129	o Some results may take longer to achieve and this process should be repeated
131	no It should be: 10 to 12 years after entry into force of a new Marine Framework Directive – achievement of good environmental status of Europe’s seas and oceans.
138	no 15 years
141	see questionnaire

Nr	Q13 Conclusion
7	The rapidly declining state of the Southern North Sea North Sea, needs to be addressed urgently. Whilst new legislation is awaited, the situation may become irreversible. Compliance to the Bathing Waters Directive and the Urban Waste Water Directive needs enforcement. and more. Most urgently, offshore aggregate dredging needs ceasing.
9	Need of more cooperation with other international organizations than it is nowadays (e.g. UN Organizations such as UNEP, UNESCO, IOC, FAO
10	Excellent. Needed very much to Baltic Sea
11	It is very important to designate marine nature reserves where NO fishing at all is permitted.
12	We appear to be in dire need of a directive to allow a sustainable use of the marine environment yet defend the ecosystems within that environment.
13	It is obvious that the limitations of the current methodology of dealing with the continuing demise of our seas is ineffective. A substantial radical review and re-assessment is called for, particularly in regard to the damage wrought by offshore aggregate dredging. This is URGENT !!!
17	Member States are working with WFD, which makes it easier for them to continue with Seas later. They should not use WFD as an excuse to avoid new tasks.
19	Why not this internet consultation in other European languages?
20	If this is successful (or even if not) then would be a good idea to share the learning that has come out of it with other countries outside the EU (demonstrate good practice and share learning)
22	Get started we need it as soon as possible!!! We don't have the time to dawdle.
24	It seems to me that this directive should be implemented as soon as possible, with strong objectives as means of enforcement, in order to respond to the emergency of the issue
26	Marine environmental degradation can not easily be observed by average citizens, and there may not be a public outcry in defence of marine resources. However, stakes are high (food security, human health, biodiversity and recreation) and if degradation goes to far, reversing the trends will be complicated, costly or even impossible. Reversing the eutrophication trend in the Baltic is a warning.
29	The problem of marine safety: will it be part of this text or not?
37	Please ban phosphates from washing detergents ASAP. Please control the emissions of 20 larger stationary emitants in each country! Please stop dioxin and other organic pollutants! Please help to save salmon rivers and fish! There is no time left and this is an overdue emergency for years
39	I am concerned that some of the most damaging human activities by European nations will be displaced to other (less developed) regions of the world. I consider that the Marine Framework Directive should address this in principal and possibly bind EU nations to acting in a sustainable and ecologically defensible way in other world oceans.
45	The UK has the longest coastline of all the EU member states. As a result, it has a special interest and expertise in the marine environment and very extensive work has already been carried out on marine protection. For example, a Review of Marine Nature Conservation reported recently after almost six years of discussion and deliberation; this group was made up of a wide range of marine environmental stakeholders and. Also, the UK government has produced its second "State of the Seas" document, "Charting Progress: An Integrated Assessment of the State of UK Seas" as well as a new document from English Nature, which has prime responsibility for advising the government on marine conservation, published on 8 March. The English Nature document proposes new legislation to create a network of

Nr	Q13 Conclusion
	<p>marine protected areas and the introduction of formalised marine spatial planning. The "State of the Seas" document focuses on improved environmental indicators and the protection of more reliable marine data through a new marine data and information partnership. The UK government is now planning to introduce a Marine Act which will set up a Marine Agency towards the end of the decade. Marine protection in the UK is a devolved issue so that the Scottish Parliament, the Welsh Assembly and the Northern Ireland Office have prime responsibility for their countries; this makes co-ordination a major issue for the UK, particularly as our approach is based on eco-systems (an approach we support) and not on arbitrary administrative units. Some of the complications of working between different governments within a relatively small geographical area are being examined through a pilot study of marine spatial planning in the Irish Sea. The study will report later this year. You will understand that against the background of these important and well resourced initiatives (and there are many others) is our concern about the added value of the Commission's approach and its potential to disrupt what are in most cases, local systems based on very different species and habitats. We see the Commission's role largely as one of monitoring to ensure that member states are tackling marine protection in a co-ordinated way with shared objectives and, as a matter of competition, checking that the regime in any member state is not unfairly distorting. The impact of marine protection measures on port development and operations is, as you will appreciate, a major issue and our primary aim is to protect port and shipping activity within the framework of a sensible and viable marine protection policy. We note with concern the lack - with one small exception - of questions relating to balancing the needs of commercial activity with marine protection. There is also the issue of overlap with the Water Framework Directive which makes specific provision for quality standards of marine and transitional waters. To a certain extent, the Directive already deals with some of the issues raised by the Strategy. We would be interested to examine further how the Strategy and the Water Framework Directive relate to each other and avoid duplication and confused objectives.</p>
46	<p>I am concerned that some of the most damaging human activities by European nations will be displaced to other (less developed) regions of the world. I consider that the Marine Framework Directive should address this in principal and possibly bind EU nations to acting in a sustainable and ecologically defensible way in other world oceans.</p>
48	<p>My small ecoconsultancy company was not included as a relevant stakeholder, but we are very aware about what is happening to the sea. National, Regional and Local Authorities and even private enterprises have a lot to say about this but small groups also can contribute with a bunch of ideas . Thank you for this opportunity. any further contact: www.aes2001.net</p>
50	<p>this project must recognise that the ecosystem is paramount</p>
52	<p>Linking the marine waters with coastal waters (and catchments) and oceanic waters is an important stud when developing management plans and actions programmed. Model are needed.</p>
54	<p>The need to set-up appropriate observing, monitoring and forecasting systems must be emphasized. The implementation plans must include setting up the appropriate structures, as is being considered by GMES. The GMES architecture must be the instrument for implementing the Monitoring and assessment requirements.</p>
56	<p>This questionnaire is too simple and predictable</p>
65	<p>Phase out as a goal is not supported as it is not based on Risk Assessment, although strict limitation could be a goal. The terminology is confused - is phase out referring to pollution, or discharges? Assessment of current status is needed because a base-line is needed. Impact assessment at regional level is probably important, but the question is ambiguous - impact of plans, or of pollution?</p>
68	<p>Phase out as a goal is not supported as it is not based on Risk Assessment, although strict limitation could be a goal. The terminology is confused - is phase out referring to pollution, or discharges? Assessment of current status is needed because a base-line is needed. Impact assessment at regional level is probably important, but the question is ambiguous - impact of plans, or of pollution?</p>
69	<p>I'm interested in the participation of the definition of this Directive and its implementation. I have broad</p>

Nr	Q13 Conclusion
	experience in the WFD with many contributions published and 23 years of experience in marine investigation
71	SIC is generally supportive of the ecosystem approach but there is a need for a clear definition of what the EU proposes as an 'ecosystem based marine region' - the nature of the marine environment may make this difficult. Any strategy or directive needs to take cognisance of those currently in development by member States, e.g. A Strategy for the Scottish Marine Environment, and existing Directive
73	Phase out as a goal is not supported as it is not based on Risk Assessment, although strict limitation could be a goal. The terminology is confused - is phase out referring to pollution, or discharges? Assessment of current status is needed because a base-line is needed. Impact assessment at regional level is probably important, but the question is ambiguous - impact of plans, or of pollution?
74	AdF welcomes initiatives aimed at protecting the marine environment, in particularly with initiatives dealing with all sources (sea- and land-based sources). We wonder how this consultation articulates with the work of Commissioner Borg's taskforce on Maritime Policy?
75	Indicators and reference points are highly problematic, there little agreement about their efficacy or appropriateness. There needs to be a shift in thinking towards developing and utilising ecological indicators of the functioning and sustainability of different components of the marine ecosystem that are important to the whole system.
76	The Marine Framework Directive must recognise that questions relating to marine fisheries are more appropriately regulated in the framework of the Common Fisheries Policy (CFP) and under international and regional agreements dealing specifically with such questions. As
77	Marine spatial planning must as an instrument wide attention gets because it is of strategic importance for many of the objectives. The Marine framework directive must clearly express the European Commission's ongoing support of the transparency of processes and the further involvement of the stakeholders.
79	Phase out as a goal is not supported as it is not based on Risk Assessment, although strict limitation could be a goal. The terminology is confused - is phase out referring to pollution, or discharges? Assessment of current status is needed because a base-line is needed. Impact assessment at regional level is probably important, but the question is ambiguous - impact of plans, or of pollution?
80	the socio-economic consequences of the measures should get more attention (prior to and post- decision-making)
82	Phase out as a goal is not supported as it is not based on Risk Assessment, although strict limitation could be a goal. The terminology is confused-is phase out referring to pollution or discharges? Assessment of current status is needed because a base-line is needed. Impact assessment at regional level is probably important, but the question is ambiguous-impact plans or of pollution?
83	Q4:it is important to identify opportunities for harmonisation on EU level, but be more reserved where regional cooperation is more effective. Regional characteristics should be valued, and take into account the priorities following from policy and regulation. Stakeholder involvement should take place at an earlier stage. What is specific role of EU in achieving goals(and accompanying measures)?
86	IFAW strongly supports the elaboration of a EU Marine Directive based on the outcomes from the 2004 Rotterdam stakeholders conference
89	Good luck with the program formulation.
90	A new super-structure makes sense only, when it has greater means for control, implementation and enforcement! Without an enforcement agency like an Environmental Coastguard no improvement over the actual status can be foreseen, as ambitious regional conventions exist, which lack mainly this enforcement power. A marine protection framework directive incl. all guiding EU environmental principles

Nr	Q13 Conclusion
93	It is extremely important to point out the need for an integrated approach to marine governance. Strong legal bases must be introduced, the work should be based on guiding principles for EU environmental policy as the precautionary principle, the principle on preventive actions, the polluter pays principle. Existing regional sea conventions must become stronger.
94	Considerable damage has already been done to Europe's marine environment. The Communication and the Marine Directive should focus on urgent action to allow ecosystems to recover through implementation of effective and practical measures. Chief among these would be the creation of large-scale marine reserves covering 30% of the marine area. At the moment it is not clear which actions would be pa
95	Without good and enforceable definition of good e.s. for marine environments the whole framework is due to fail. This is much harder to do than e.g. for the WFD, as marine systems are open and less well understood in respect to the structure and functions. Integration with Maritime Task Force /Green Paper missing ◊ not horizontal enough legal standing unclear. Without enforcement agency like Envir
96	Phase out as a goal is not supported as it is not based on Risk Assessment, although strict limitation could be a goal. The terminology is confused - is phase out referring to pollution, or discharges? Assessment of current status is needed because a base-line is needed. Impact assessment at regional level is probably important, but the question is ambiguous - impact of plans, or of pollution?
97	join as much as possible with existing directives or agreements; consultation with ALL stakeholders essential, not only with scientists but also with people/organisations who have to work with such Directive
98	Science based decision making must be the leading principle for consistent decisions.
100	It is appreciated that the primary focus of this strategy is ecosystem conservation. However, attention should be directed towards raising the profile of the marine historic environment as a component of the Marine Region plans. We also add that we are fully supportive of action that will help deliver clean and healthy seas and oceans
103	Additional comments, opinions and views on the draft strategy:
104	We strongly believe that the Commission needs to improve the knowledge base before it moves forward on this work. Much of the data in the Communication is dated or is caveated. It is not good practice to base legislation on assumptions, guesswork and feelings. We would also wish to see the Commission undertake a robust impact assessment and rigorous cost-benefit analyses.
105	Further to the assumption that the European Marine Strategy is likely to form the environmental and biodiversity strand of the proposed Maritime Strategy, it must be clear that this strand will not be weakened or compromised by the parallel Maritime Strategy (Maritime Green Paper) process, nor must the Marine Strategy process be delayed. Any future EU Maritime Strategy must respect the European Marine Strategy's (Marine Framework Directive's) Strategic Goals and Objectives and seek to deliver/further these goals and objectives.
106	Sec 1. Q2: Unfortunately we were unable to attend the Rotterdam meeting but we regard ourselves as part of the process.
107	KIMO International is; • Not confident that a formal "EU Marine Strategy Directive" will deliver the high goals and aspirations that have been delivered by the North Sea Conferences and Regional Seas Conventions (OSPAR). • Concerned that there is a risk that any legally binding EU strategy will be hampered by the progress of Member States that have not reached the same level of protection of those in the North East Atlantic and Baltic. • Not confident that the EU Commission Structure will allow the transparency and inclusive mechanisms that currently are available from OSPAR and HELCOM. • Concerned that any attempt by the EU to make this Strategy have legal force could diminish the commitment of Member States to Regional Seas Conventions. • Not convinced that a EU legal framework will bring any additional protection to the marine environment. KIMO International

Nr	Q13 Conclusion
	therefore; • Welcomes the efforts by the EU to co ordinate through the Marine Strategy common principles and objectives to protect the marine environment, • Cannot support the development of a legal framework or instrument with regard to the Strategy. We have no objections to our comments being made public.
109	The relation between the Communication and the Marine Directive is not clear Ecosystem-based marine regions are a nice concept but not clearly definable and may need considerable research and discussion before they can be identified with any scientific consensus The Communication aim "By 2010 to halt the decline of marine biodiversity" is rather wishful: it is not clear what actions should be taken
110	re. content of implementation plans - need to recognise that all the elements are important, but much is already in place under existing regional frameworks, and action to improve protection and management should not be delayed while assessments of current status are repeated! Add comments on Q12.3 If 15 - 20 years is seen as being the global timescale - MS should not undermine these commitments.
112	Nirex wishes to express broad support. We agree with the approach of looking at the theme in a holistic way, we also support the need to protect Europe's seas and oceans by ensuring that human activities are carried out in a sustainable manner. However, it will be very important that the proposals are compatible with existing and proposed future European Directives on radioactive waste management
113	Links to future Maritime Green Paper are critical; need to ensure that important underlying aims and objectives of EUMS are not lost in wider agenda. Not obvious how goals and objectives set out in Communication will be achieved unless there is more detail provided in Directive on how the RIPs should translate these into operational objectives at regional scale.
115	This consultation should have specifically asked whether a Directive is the best way to take forward implementation of the Strategy rather than assume a Directive and only consult on elements of its possible content. The UK does not support this legislative proposal.
116	Report on this questionnaire expected in reasonable delays.
117	1. Effective management must INVOLVE all sectors. 2. Sediment management is vital to effective marine management & must be actively considered. 3. Please pay attention to above comments e.g. on policy integration (NB inc. fisheries), need for consistency between management units, disproportionate cost analysis as well as CEA & the inappropriateness of mandatory 'standards' in the marine env.
118	The objectives from the Strategy must be translated clearly into existing Community legislation
119	This consultation document has been disseminated very poorly. None of my colleagues had even heard of it.
122	Pragmatism! Risk reduction instead of phase-out goals; best available technique instead of rigid theoretical goals; low admin approaches; acceptance of a certain, relatively low risk for the environment as a price for continuing wealth in the EU. Summary: Do the best for the environment that is possible under the difficult economic situation of EU member states, but keep a healthy economy.
123	The ecosystems approach risks to be useless if implementation plans don't integrate a sectoral based approach (maritime transport, fishing activities, other marine-based industries, discharges from land, tourism and coastal management, etc)
124	A focus should be on implementation and enforcement. Better, independent SEAs for infrastructure projects (port developments, bridges etc.) are needed. Better link to the Commission's maritime transport policies is needed, in particular to the 'Motorways of the Sea' initiative. Subsidies (i.e. TEN-T) should be conditioned to fulfil environmental requirements.
127	1) A strong and enforceable definition of "good environmental status" is essential. This is likely to prove harder for the EMS than for example the WFD with marine systems more open and less well understood in respect of structure and functions. 2) The proposed Maritime Strategy must not hold up or weaken the EMS process.

Nr	Q13 Conclusion
128	Need to define the relationship between the Strategy, other EC measures and the proposed Green Paper. Need to elaborate on what must be in the Directive vs. the Communication and the links between them, e.g. it is not obvious how goals and objectives in the latter will be achieved. Need to be clear on who defines 'GES' and who then needs to act, and by when, to achieve it.
129	There is a huge need to cross borders between different sectors to reach the goals set up, both on the EU and global levels as well as nationally. New inland waterways e.g. for better transportations might also be a risk in spreading alien species. Further marine ecosystems are very open, and releases of substances and alien species can easily spread and are difficult to spot until too late.
130	The EU's proposals for a marine strategy deal at this stage with the overall objectives for future work. The focus is on the state of the marine environment. The objectives are of such a nature that Sweden has already adopted them in their essence in the form of national environmental quality targets and international conventions. However the City of Gothenburg welcomes the marine strategy and the
131	The success of the EMS will depend if all activities affecting the marine environment will be included or not. The inclusion of extracting practices and shipping is very important and will decide if the EMS will fail or succeed.
133	The Water Framework Directive must have legal prerogative and the CFP (common fisheries policy) a secondary position, if not the marine strategy shall fail.
134	The issue of ship's ballast water discharge has to be addressed. This has been the subject of discussions in the International Maritime Organisation for years.
135	I fully endorse the marine ecosystem concept as a management tool. I note, however that there are numerous levels at which ecosystems can be identified and hope that the frameworks adopted here can be reviewed as scientific understanding develops.
137	UEPG welcomes the opportunity to respond to this consultation. It represents 19 National Aggregates Associations including the Quarry Products Association (UK) which encompasses the British Marine Aggregate Producers Association (BMAPA). We fully support BMAPA's inputs. Please include UEPG in any further consultation in respect of this Strategy (secretariat@uepg.org - www.uepg.org)
138	Framework directive with clear targets, timetables, criteria and indicators, reporting and more staff for Commission is the right way forward.
139	Since this free-text box is too small (maybe deliberately to get short conclusions) to express my opinion and comments accurately, an addition to this completion has been sent in an e-mail anyway to env-water@cec.eu.int in case you might consider it useful
140	Need to clarify relationship with Maritime Green Paper and ensure that aims and objectives of EUMS are fully reflected in this.
141	see questionnaire
142	see reply 10050578
145	4 overarching principles: 1) Sustainability of the ME and regional/local growth 2) Regional/local dimension, 3) Integrated approach, and 4) Co-ordination and consistency. It would also be useful to identify what kind of eco-systems will be the basis for Marine Regions. In terms of the efficiency and accountability, substantial improvements should be tangible within 5 years after the entry into force.