

*Royal Ministry of the Environment*

Environment Directorate-General  
European Commission  
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att: Mr. Patrick Murphy

Your ref

Our ref  
200500395

Date

## **European Marine Strategy – Norwegian views**

We refer to the meeting of the Working Group on Strategic Goals and Objectives (SGO) on 1 April 2005 and to the ongoing consultation of stakeholders via Internet regarding the development of a European Marine Strategy. We would again like to thank the European Commission for giving Norway the possibility to participate in the preparatory phase of the Marine Strategy.

As agreed in the SGO-meeting, Norway hereby provides some further information and views related to the finalisation of the Commission's proposal scheduled for the end of July 2005.

### General comments on scope and objectives

Norway supports the development of a European Marine Strategy 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. We also support that the Strategy should rest on an eco-system based approach to management and cover all relevant sectors. This is in line both with the Norwegian Marine Environment Policy as set out in Report no. 12 to the to the Norwegian Parliament (2001-2002) and with the concept applied for the development of an implementation plan for the management of the Norwegian part of the Barents Sea (both enclosed).

We see it as important that the work on the Marine Strategy is carried forward as planned this year and in parallel with the development of the Green Paper on a European Maritime Policy, scheduled for spring 2006. As discussed in the SGO

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meeting, the Marine Strategy should be seen as the environmental pillar of a maritime policy. It seems important to us to further clarify this relationship with the Maritime Policy in the Communication on the Marine Strategy.

Furthermore, Norway sees it as important that the relationship with the Common Fisheries Policy (CFP) is clarified in order to ensure that the environmental aspects of fisheries are included in the strategy in a way that precludes interference or overlap with existing mechanisms for management of fisheries.

As we have stated at several previous occasions, Norway values highly the work carried out within the framework of the marine regional conventions. We believe that a Marine Strategy could reinforce the regional conventions, by using them as the operational platform for the regional implementation. It is crucial that we build upon the achievements of these conventions.

Finally we would like to stress the importance of a continued close co-operation with third countries. Large parts of the European Seas are under the jurisdiction of countries that are not EU Member States. It will therefore be important to establish mechanisms to ensure voluntary co-operation with third countries. Norway is well prepared for such co-operation and looks forward to contribute to the implementation of a Marine Strategy. We would therefore appreciate a more detailed description on how such co-operation should be carried out in practice and we would of course be prepared to assist in the development of any text you might have foreseen for this purpose.

#### Marine regions

Norway supports the idea of developing a set of marine regions, which will form the basis for the regional implementation of a European Marine Strategy. At national level Norway is in the process of establishing ecosystem based management plans for marine regions with a division based on partly the same criteria as used by the Commission. A balance must be struck between bio geographic and oceanographic features on one side and administrative and political management divisions on the other side. The boundaries of regions should therefore not be rigid, but flexible to allow for adjustment based on new knowledge and developments. In our opinion such flexibility is essential for any Strategy to be efficient, in particular if legal instruments are to be adopted whereby reporting obligations would be introduced based on a regional approach. The adjustment of the border between regions should be carried out within the geographical scope of the existing regional conventions since they provide the most in-depth experience and knowledge within their respective areas. The proposed revision period of 20 years intervals as indicated in the ICES-document seems too long and too rigid.

At a more detailed level, Norway would like to draw the attention of the European Commission to the fact that the south-western borderline between the Barents Sea and the Norwegian Sea as set out in the ICES document diverges somewhat from the

borderline contained in the preliminary considerations for the forthcoming management plan for the Norwegian part of the Barents Sea, scheduled for spring 2006. The rationale behind the borderline is in particular based on a consideration of fishing and impacts on straddling fish stocks between Lofoten and the Barents Sea. This means that the Barents region at least should cover the marine areas outside the Lofoten archipelago, approximately east of 8° E and north of 67° N, as illustrated in the enclosed map. This example also illustrates the need for flexibility in the division of marine regions more in general.

#### Implementation plans

Norway supports the idea of developing implementation plans for the different regions. We believe that the implementation plans should be developed within the framework of the regional conventions in order to build upon existing experience and avoid unnecessary administrative burdens. In addition to regional environmental and socio-economic objectives, it seems to be essential that the implementation plans contain a broad assessment of all environmental pressures in the area including all economic sectors.

#### Monitoring and assessment

Norway agrees that a more co-ordinated approach to monitoring and assessment would be useful and allow for comparison between different regions. At the same time we would like to stress the need to allow for flexibility in the different regions based on their local and regional specificities. Therefore it is our opinion that any legal framework should focus on the essential requirements for reporting obligations without too much detail. Convergence and consistence between monitoring in different regions should not be a goal in itself, but only be required where it could lead to clear benefits for the management of the marine environment, including a better basis for decision making.

We hope that the information and views expressed above will prove useful for you when finalising the proposal for a Marine Strategy. Please contact us if anything is unclear or if any further information is needed at this stage. We remain, of course, at your disposal in case an elaboration of the views expressed above should be needed in a meeting.

Yours sincerely,

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**Enclosure 3**

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