

The European Commission Proposal for a Marine Strategy: Shying European Responsibility?

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1 Introduction

In accordance with the requirements of the Sixth Environment Action Programme, the European Commission unveiled its Marine Strategy package on 24 October 2005:

- A Communication to the Council and the European Parliament "*Thematic Strategy on the Protection and Conservation of the Marine Environment*" (European Commission 2005a).
- A Proposal for a Directive of the European Parliament and of the Council "*Establishing a Framework for Community Action in the Field of Marine Environmental Policy*" (Marine Strategy Directive) (European Commission 2005b).
- An Impact Assessment on the Thematic Strategy on the Protection and Conservation of the Marine Environment (European Commission 2005c).

The thematic strategy on the protection and conservation of the marine environment and the Marine Strategy Directive are intended to form the environmental pillar of future European maritime policy which is currently being developed in the form of a green paper. This is of key importance because the green paper is designed to provide a European model for economic development and use of coastal and marine environments for which support in the form of a marine strategy is urgently needed.

The German Advisory Council on the Environment, not least in its in-depth Special Report on Marine Environment Protection for the North and Baltic Seas (SRU 2004a), has repeatedly highlighted the urgent need for an integrated EU marine protection strategy for European oceans and seas. With this in mind, the Advisory Council welcomed in principle the Commission's Communication on the development of a marine strategy (European Commission 2002) while expressly pointing out deficits in the approach taken (SRU 2003). The Council welcomed the planned cross-sectoral integrated protection approach, with its clear objectives and deadlines, and also the planned further definition of strategy measures. Nevertheless, the 2002 approach still contained a number of fundamental deficits. In particular, these involved the exclusion of key problem sectors such as fishing, agriculture and maritime shipping. It was also difficult to see how constructive cooperation could be organised between the EU and the regional marine protection conventions – especially OSPAR (Convention for the Protection of the Marine Environment of the North East Atlantic), the Helsinki Convention (Convention on the Protection of the Marine Environment of the Baltic Sea Area) and the Barcelona Convention (Convention for the Protection of the Mediterranean Sea Against Pollution). Now, unfortunately, both the thematic strategy and the proposed directive are even less effective than the Commission's first proposal presented in 2002. Taking the form of a proposed directive whose targets and programming fall far short of what is needed, the thematic strategy combines probing analysis with a highly deficient plan of action.

2 The European Marine Strategy: Design and Critique

The European Commission's Communication on a thematic strategy stresses in an impressive way the need for a European marine strategy. Among other things, it emphasises both the importance of marine ecosystems as the largest source of biodiversity and the role the oceans and seas play in regulating the Earth's climate. The European Commission also emphasises the contribution made by marine regions in securing economic growth, in ensuring social wellbeing and in maintaining the quality of life for Europe's citizens. It goes on to describe the situation as follows: at present, the marine environment faces considerable pressures from human activities that result in loss of biodiversity, changes in ocean structures, loss of habitats and eutrophication. The North East Atlantic, the Mediterranean and the Black Sea all belong to the marine regions of the world in which fish stocks are most urgently in need of regeneration. The Baltic Sea has suffered long-term damage to its ecology, and this inland sea remains and will continue to remain in a state of eutrophication. The key threats to European marine environments arise from the impacts of the fishing industry, oil and gas production, land-based activities such as agriculture and industry, shipping, coastal development, tourism, and gravel and sand extraction. Apart from the impacts already mentioned, there is the overlying problem of anthropogenic climate change which, ranging from hydrographical and chemical conditions to biodiversity, affects the oceans in their entirety. The damage caused to the marine environment and the resulting destruction of environmental capital threatens the economic growth and the jobs that are generated from use of European oceans and seas. Given the role of marine regions in achieving sustainable development in Europe, the European Commission sees a need to combat these negative developments – an endeavour that would also fulfil the requirements of the Lisbon Strategy.

In the European Commission's analysis, the major obstacles to successful protection of European oceans and seas include:

- Protective measures taken in a range of policy areas that fail to take adequate account of marine protection.
- The lack of enforcement powers among the international organisations for the protection of specific marine regions (particularly the OSPAR, Helsinki and Barcelona conventions) who otherwise make a key contribution to marine protection.
- Inadequate implementation of the international conventions and the lack of enforcement mechanisms.
- The lack in many cases of any linkage between the various strategies, recommendations, conventions, agreements and directives on marine protection.

The European Commission believes that this deficiency analysis highlights the need for integrated policy to protect European oceans and seas – policy that takes account of the different impacts on habitats and sets out clear target-setting and activity requirements (European Commission 2005a).

The European Commission's impressive problem and deficit analysis largely matches those of the German Advisory Council on the Environment and the Network of European Environment and Sustainable Development Advisory Councils (EEAC) (SRU 2004a; EEAC 2004). The problem with the strategy, however, is the yawning gap between the probing analysis and the inadequate conclusions drawn from its findings.

- The European Marine Strategy is restricted to a proposed directive in which responsibility for solving the complex problems of the marine environment is largely 'renationalised'. This renationalisation results in the exclusion of key policy areas in which the EU has centralised powers.
- There is no plan to refine EU environmental law relevant to marine protection.
- Nor are there any provisions for the linking of EU-level action with the international conventions for the protection of the oceans.

Renationalisation of Responsibility for Marine Environment Protection

Given the already strong internationalisation and europeanisation of many policy areas which are relevant in marine environment protection, restricting the marine strategy directive to an approach in which only EU Member States are placed under obligation to develop their own environmental objectives and marine protection activity programmes must appear questionable. The European Commission justifies this restriction by referring to the diverse conditions and needs of the European marine environment (European Commission 2005c, p. 8). While there is no doubt that such diversity exists at regional and national level, the requirements of the international conventions alone show that despite this diversity it would still be possible to give the Directive's provisions greater normative force. Given the tremendous cross-border dimensions of marine environment protection, there would be no real concerns as regards the subsidiarity principle contained in Article 5 (2) of the EC Treaty.

The European Commission sees agriculture and fishing as the key causes of environmental damage in some marine regions. Both agriculture and fishing policy are primarily shaped by EU requirements. No significant progress can be made in these policy areas with national marine protection strategies such as those currently planned. The European Commission believes the recent reforms of these policy areas are adequate in assisting the achievement of good environmental status in the oceans and seas. This analysis is hard to understand given the fact that EU fishing policy still

largely ignores scientific recommendations (including those from the International Council for the Exploration of the Seas (ICES)) for sustainable management of fish stocks and the protection of ecosystems against the impacts of fishing. The case is similar with regard to the Common Agricultural Policy (CAP), which has not prevented the agricultural sector becoming responsible for the major portion of nitrate inputs into coastal waters (SRU 2004a; 2004b; DAW and GRAY 2005). It is already clear that without changes to applicable EU law, Member States will make no substantial progress in the areas covered by this key common policy and that the EU Commission can thus expect national progress reports to be negative. The proposed directive gives no indication as to how the European Commission should deal with such reports from Member States. It is planned that in such cases, the Member States will be required to provide suitable proposals for activities to the European Commission who will then make a statement as to how European policy already tackles these problem areas or intends to introduce measures or adjustments in the future (European Commission 2005a, p. 7). Given the knowledge already available, this detour via national problem reporting results in delays that cannot reasonably be justified.

Because many of the impacts on the marine environment can only be influenced by European legislation, the Member States have only a few areas in which they can achieve improvements by implementing their own measures. It is nevertheless right in principle to require the Member States to develop marine protection strategies as part of an integral European Marine Strategy. For the fishing, agricultural and shipping sectors in particular, the European Commission itself is required to develop a protection strategy and to propose clear objectives and activity programmes which include a binding plan of action. In flagrant contradiction of its own requirements, the underlying approach used in the EU strategy lacks an integrated approach that takes in all impactors and will not achieve its goals. In fact, by referring to what it considers to be adequate reforms in the excluded policy areas, the European Commission gives the impression that it is trying to shy its responsibility.

Lack of a Strategy to Refine European Environmental Law

The strategy not only excludes other sectors, it also lacks vital linkage to other European directives like the Water Framework Directive, the Nitrates Directive and the Urban Waste Water Treatment Directive. These all serve to protect inland freshwater and thus the marine environment. Because these directives fail to consider the special role of the oceans and seas as the final sink, it would make sense to link them to the marine strategy – something not provided for in the proposed strategy. The European Commission itself points to the existing inconsistencies regarding the measures, programmes and targets that contribute towards marine protection but were not

necessarily designed with that particular goal in mind. The European Commission has unfortunately failed to draw the necessary conclusions from this finding.

No Linkage to International Marine Protection Conventions

What also remains unclear is how proper linkage can be secured between the European Marine Strategy and existing international marine protection conventions. Both the European Union and its Member States are contracting parties to key international marine environment protection agreements such as OSPAR and the Helsinki Convention and are committed to complying with their provisions. In its Special Report on Marine Environment Protection for the North and Baltic Seas, the German Advisory Council on the Environment pointed to the fact that with its legally binding nature and being backed up by sanctions, European legislation can make an important contribution to effective implementation of the goals, objectives and measures of international marine protection agreements (SRU 2004a, Para. 508 ff.). The strategy does not contain any plans for the European Union to play a more active role in this regard. The proposed directive merely states that when drawing up their national marine protection strategies, Member States shall, as far as possible, build upon existing programmes and activities developed in the framework of structures stemming from international agreements (Article 5 (2) subparagraph 2 of the proposed directive). The European Commission's proposal thus falls short of its objective of providing for better enforcement of international conventions. Instead, when drawing up their national marine protection strategies, the Member States are left to decide for themselves how much importance they place on the binding provisions of international conventions and the resolutions passed within their frameworks.

3 The Proposed European Marine Strategy Directive

The action taken under the European Marine Strategy is reduced to a proposed marine strategy directive whose elaboration and implementation is exclusively a matter for the Member States. The directive aims to create a framework for the development of national marine strategies to protect European oceans and seas. These in turn should assist the achievement of good environmental status in the European marine environment by 2021 (Article 1). The scope of the proposed directive covers all European waters on the seaward side of the baseline from which the extent of territorial waters is measured extending to the outmost reach of the area covered by the sovereignty or jurisdiction of Member States (the 12 or 24-mile zone and – where designated – the Exclusive Economic Area), including the bed of all those waters and its sub-soils (Article 2).

In the proposed directive, each Member State shall, in respect of each marine region concerned, develop a marine strategy for its European marine waters in accordance with the following plan of action (Article 4):

- An initial assessment, to be completed within four years after the date the Marine Strategy Directive enters into force, of the current environmental status of the waters concerned and the environmental impact of human activities thereon (status report).
- Within the same period, determine good environmental status for the waters concerned.
- Within a period of five years, establish a series of environmental targets (target-setting).
- Within a period of six years, establish and implement a monitoring programme for ongoing assessment and regular updating of targets (monitoring).
- By 2016 at the latest, develop a programme of measures designed to achieve good environmental status (planning).
- Put the programme into operation by 2018 (operationalisation).

Member States with marine waters in the same marine regions or sub-regions are required to coordinate their actions, including with third (non-EU) countries. Coordinating activities should be performed by existing institutions. When developing their strategies, Member States shall, as far as possible, build upon existing programmes and activities developed in the framework of structures stemming from international agreements (Article 5).

As the first step in developing national marine strategies, Member States must make an initial assessment of their European marine waters comprising a description of the waters, an analysis of the habitat types (biological components, physical and chemical characteristics, and hydromorphology), of the predominant pressures and impacts, and of the economic and social use and the cost of degradation of the natural habitat (Article 7).

To determine good environmental status as the first step towards achieving its objectives, the European Commission has set itself the goal of developing qualitative descriptors and detailed criteria within a period of two years (Article 8).

Another important point is the requirement for Member States to give due consideration to the social and economic impacts of the measures contained in their programmes. They must conduct a detailed cost-benefit analysis prior to implementing any new measure (Article 12).

Under Article 13 of the Marine Strategy Directive, Member States must inform the European Commission immediately if, for any of the following reasons, they identify an area where the environmental targets cannot be achieved with national measures:

- Action or inaction on the part of another Member State or a third country.
- Natural causes or force majeure.
- Actions taken for overriding reasons of public interest which outweighed the negative impact on the environment.

Under Article 14, the European Commission must be informed if a Member State identifies an issue which has an impact on the environmental status of its European marine waters which cannot be tackled by measures adopted at national level.

The European Commission reserves the right to assess whether, in the case of each Member State, the programmes notified constitute an appropriate means of achieving good environmental status, including their coherence across the Community and to reject a programme or any aspect thereof, on the basis that it does not comply with this Directive (Article 15).

Other items in the Directive relate to requirements for Member States to assess their national marine strategies every six years, ensure the active involvement of all interested parties in the implementation process, make information available to the public and submit a series of reports to the European Commission (Articles 16-19).

The Commission will review the Directive no later than fifteen years from the time it enters into force (Article 20) (European Commission 2005b).

4 Critique of the Proposed Directive

Apart from the proposal for a strategy whose structure and implementation is left solely to the Member States, the proposed directive itself also invites criticism. A key weakness of the Marine Strategy Directive is its extremely unambitious plan of action. The first four years after the directive enters into force are dedicated to describing the marine environment and identifying existing damage and impacts. Given that comprehensive status reports have already been drawn up as part of the work performed in international cooperation activities on marine protection, an accelerated approach would appear more than justified. A period of six years has been allocated to implementing a monitoring programme, although this is actually a prerequisite for the environmental status report. Even taking into account the fact that the proposed directive will not enter into force for at least another three years, the Member States still have until 2016 to develop their marine strategies and until 2018 to implement them. This leaves some ten years in which no positive developments whatsoever can be

expected. Good environmental status must, however, be achieved by 2021. If it is assumed that the goals the Member States draw up for their respective marine regions are similarly ambitious to those in the programmes of the various regional marine protection conventions, it would be unrealistic to expect the goals and objectives to be achieved in the remaining three years once the measures are put into operation. And given the experience gathered in implementing the Air Quality Framework Directive, it would also make sense to draw up a set of interim goals and objectives. Otherwise, there is a risk that the Member States will allow too much time to pass during which no action is taken at all and then once the deadlines have passed, they will suddenly be under pressure to take action which will result in ineffective programmes being cobbled together for the sake of 'being seen to be doing'.

One item in the proposed directive that can be given a positive assessment is the ambitious goal of achieving a good environmental status in European marine waters by 2021. The definition of good environmental status is left to the Member States – the European Commission does, however, intend to provide the necessary criteria and standards for them to do so. There is thus a risk that some Member States will define either very vague or very weak objectives. Whether this can be avoided by the required cooperation between riparian states and the standards to be set by the European Commission remains to be seen.

The proposed directive requires that each Member State perform a cost-benefit analysis prior to introducing any new measures. This requirement is particularly difficult to understand because the goal, namely that of achieving good environmental status by 2021, has already been laid down. For this reason, it would make sense in this particular case (if at all) to perform a cost-effectiveness analysis instead. But any decision in favour of the latter must still consider whether the measures can be implemented in such a way as to ensure the goal is achieved within a sensible timeframe.

In comparing the current proposed directive with the Communication from the European Commission Towards a European Marine Strategy in 2002, the impression arises that the European Commission now considers marine environment protection less important (SRU 2003). The European Commission only seems able to produce a rudimentary framework for a European marine strategy and wants to wait and see if the expected discussion process with the Member States, who will soon reach their limits with regard to their own programmes, will produce enough political pressure to force integration of marine environment protection into other policy areas. The European Commission currently appears to lack either the courage or the political will to come up with an urgently needed cross-sectoral approach to establishing a European marine strategy (SRU 2004a; EEAC 2004).

5 Summary Evaluation and Recommendations

5.1 The Need for an Holistic Strategic Approach

The deficit analysis conducted by the European Commission has identified many weaknesses in current marine protection policy. But this does hide the fact that the underlying requirements of a European marine strategy cannot be met solely with a proposed marine strategy directive that exclusively targets EU Member States. That the Member States have been called upon to develop national marine strategies is to be welcomed and the aim of achieving good environmental status in European marine waters by 2021 can be seen as positive. Nevertheless, it is difficult to see at present how this self-appointed goal can be achieved solely with a planned directive that is characterised by its relatively meagre normative impact. The European Commission's proposed Marine Strategy Directive constitutes a highly inadequate approach to marine environment protection. This reduced approach does not deliver what is expected of a European marine strategy, namely a cross-sectoral, integrating action programme to protect marine waters, with clear objectives and a plan of action containing stringent deadlines. It is highly doubtful that the discussion process expected to ensue once the vaguely worded directive has been implemented will produce enough political pressure to force the integration of marine protection measures into other policy sectors. The German Advisory Council on the Environment therefore recommends that, in further efforts to develop the Thematic Strategy and the Marine Strategy Directive, and also in the pending discussions within the European Council and in parliament, the German government make every effort to ensure that:

- Marine protection be integrated into all relevant common sectoral policies, particularly the Common Agricultural Policy (CAP), the Common Fisheries Policy (CFP) and transport policy.
- Existing EU environmental law be amended to take in the requirements of marine environment protection (especially the Water Framework Directive and the Nitrates Directive) and that coordination of legal instruments to protect marine waters be improved and linked to sectoral policies.
- The goals and measures agreed under international conventions and their respective programmes be better and more explicitly integrated into the European Marine Strategy.
- A realistic plan of action be drawn up within the Directive which includes the interim goals needed to allow achievement of good environmental status in European marine waters by 2021.

5.2 German Advisory Council on the Environment Proposals for Reform

With regard to further refining the reform proposals, reference is made to the need for revision of EU sectoral policies and existing EU environmental law as identified in the German Advisory Council on the Environment's Special Report on Marine Environment Protection for the North and Baltic Seas (2004a):

Reform of the Common Fisheries Policy (CFP)

Despite the potential for improvement in certain areas, existing legislation on the Common Fisheries Policy (CFP) lays down what can certainly be considered as ambitious goals in law and contains the key instruments to ensure sustainable fisheries. It has yet to be applied effectively, however. There is thus an urgent need for more determined action in the following areas:

- The construction of new fishing boats should no longer be promoted by the Community or the Member States. Subsidies that indirectly contribute to maintaining overcapacities must also be withdrawn.
- Scientific recommendations (such as those made by ICES among others) must be made the sole criteria for determining catch quotas. Where necessary, multi-annual catch limits should be fixed under the management and replenishment plans for the stocks involved.
- To reduce by-catch, larger-meshed nets along with deterrent systems and escape windows must be prescribed, and guidelines developed which force fishers to avoid by-catch intensive areas. A special protected area network should also be agreed – particularly with regard to by-catches – and a general ban on discards should be implemented with effective sanctions.
- The European Commission should be given considerably more regulatory powers with regard to emergency measures to protect fish stocks and the marine environment.
- Monitoring of fishing activities should be more centralised and preferably conducted by institutions of the European Commission.
- To make management of catch quotas more effective, consideration should also be given to making catch quotas more flexible in respect of individual fishing rights (SRU 2004a, Para. 265 ff.).

Reform of the Common Agricultural Policy (CAP)

There is an urgent need for agriculture to adapt to the environmental needs of sustainable development, especially when it comes to protecting the marine environment. The Common Agricultural Policy (CAP) should thus be subjected to further reform that goes beyond the compromise on agriculture agreed in June 2003, and particularly in respect of the following issues:

- The targets aimed at increasing production contained in Article 33 (1) EC should be replaced with more environmentally focused wording.
- The marine environment protection targets must actually be integrated into agricultural policy (see Article 6 EC).
- Payment of agricultural subsidies must be completely decoupled from production volume without broad exceptions.
- Modulation or reallocation of funding from the first to the second pillar of the CAP must take place in significantly greater scope than has been the case to date (SRU 2004a, Para. 354 ff.).

Transport Policy

Shipping must be environmentalised as soon as possible. On the one hand, this means further development of existing environment protection and safety requirements. On the other, it means significantly more effective enforcement of existing provisions. The following issues are of key importance in this regard:

- Determined implementation of the accelerated phasing-out of single hull tankers and the ban on transportation of heavy oil in such vessels is a key element of marine environment protection.
- It must be ensured that all Member States make an appropriate number of inspectors available for all ports and anchorages and comply with the minimum inspection quota of 25 percent of the vessels entering their ports.
- Efforts should be made to ensure that in future, the requirements of the 1995 International Convention on Standards of Training, Certification and Watchkeeping (STCW) and EU Directive 2001/25/EC are also applied for ships' crews trained before 2002.
- With regard to discharging operating and cargo residues and dumping ship-generated waste into marine waters, the German Advisory Council on the Environment calls for greater consideration to be given to this pollution path. Although they are still in need of improvement, the EU measures on port reception

facilities, port state controls and the monitoring of ships in transit play a key role towards reducing such pollution inputs.

- To reduce atmospheric emissions from shipping, it is necessary – at least for EU marine waters and ports – to set limits for sulphur content in fuel used in shipping. Binding limits should also be set for NO_x emissions from shipping (SRU 2004a, Para. 359 ff.).

EU Environmental Law

The internationally agreed generation target – to continually reduce discharges of harmful substances with the aim of ceasing them altogether by 2020 to reduce concentrations of these substances in the marine environment to near-zero or near natural levels – should be enshrined in all relevant EU rules and regulations (SRU 2004a, Para. 291 ff.).

Water Framework Directive

- The identification of so-called priority substances and the subsequent classification of priority hazardous substances under the Water Framework Directive must be made subject to the needs of marine environment protection. Substances classified as 'priority hazardous substances' should at least include those pollutants listed by OSPAR and the Helsinki Convention as substances 'for immediate priority action'.
- It is of key importance that at EU level, the Member States agree as soon as possible emission thresholds for those substances classified as priority substances for which no adequate restrictions apply at present. In addition, national emission thresholds should be identified for other pollutants listed in the Annex to the Water Framework Directive.
- The German Advisory Council on the Environment also sees a need, with regard to eutrophication and pollutant inputs, to point out the differences between the effective reach and the area of applicability of the Water Framework Directive. Beyond the area of applicability of one nautical mile from the coastline seawards, marine waters are at least indirectly affected by a reduction in land-based nutrients under the Water Framework Directive. Management plans and action programmes are to contribute to protecting territorial and marine waters (21st Recital and Article 1 of the Water Framework Directive) so that in the case of nitrogen and phosphate, restrictions on nutrient inputs also focus on the sensitivity of the oceans and seas and not solely on the status of fresh waters and coastal waters (SRU 2004a, Para. 349 ff.).

Nitrates Directive

- The German Advisory Council on the Environment sees an urgent need for reform of the Nitrates Directive. This should include amendment of the maximum quantities for pure nitrogen contained in the Directive relative to location and also as regards enforcement controls by introducing area-related livestock density restrictions.
- Significant reductions in nutrient inputs could be achieved if, as is required, the Nitrates Directive were actually applied in practice to coastal and marine waters throughout the European Community. Eutrophied coastal and marine waters and those at risk of eutrophication must be designated and treated as areas at risk under existing legislation (SRU 2004a, Para. 322 ff.).

Nature Conservation

To secure area-specific protection of particularly valuable, representative and/or sensitive habitats and species, the German Advisory Council on the Environment recommends that the integrated protected area network provided for by the EU Habitats and Birds directives, HELCOM's System of Coastal and Marine Baltic Sea Protection Areas (BSPA) and the OSPAR protected area programme be established as quickly and as effectively as possible.

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