



**The European Commission
DG Regio, Brussels**

As a response to the call for stakeholder reactions to the Baltic Sea Strategy, the Union of the Baltic Cities (UBC) cordially draws the attention of the Commission to the work of its own Commissions. Our sectoral Commissions were asked by the Board of the UBC to draft their own comments to be submitted to the European Commission. Please find the contributions attached. Let us also remind that the UBC as an institution has already submitted its contribution which is attached as well.

The contributions highlight first of all that there should be a strong emphasis on **the horizontal approach**. They point to the fact that although the sectoral approach for obvious reasons dominates the discussion of priorities, the horizontal dimension must have a due attention. The report of the Commission on Environment very concretely points to this in its supplementary proposal by linking environmental issues, climate change topics and maritime issues. In a same way the energy issues must be seen linked together.

The reports of the UBC Commissions emphasise also **governance**. The UBC strongly stresses the governance issue in its own statement. Actors reflecting the interests of local authorities give emphasis to governance for the obvious reason that they see the local and regional actors as key contributors in the region.

The crucial role of local authorities is stressed in particular by the Commission of Energy and the Commission of Environment. The local level is the key player in the new energy economy, since according to well documented studies by independent research institutions, it represents the sector with the single most significant impact on both climate change and the emerging new green energy economy. The Commission of Education sees the local level as a key level for educational issues. Governance is also stressed by the Commission of Culture.

Thirdly, the reports of the UBC Commissions highlight **concrete issues and challenges**. The UBC hopes that the concrete proposals highlighted in the reports of its Commissions could help the European Commission to focus its attention to topics that are taken up by our reports.

Sincerely yours,

Paweł Żaboklicki
Secretary General

The UBC Commission on Culture - Contributions to EU Baltic Strategy

The Union of Baltic Cities Commission on Culture supports the central thrust of the draft contribution of the UBC to the new Baltic Sea strategy of the European Union. We agree that it is not new issues of topics, not new institutions or networks, not more formal accountability that solves our challenges. We agree that a holistic ecosystem approach based on accountability and governance are the keys to a better European strategy for the Baltic region.

One of the challenges of EU policy is the weight that the EU places on formal accountability connected to how people use EU money - many feel that the EU at times is more interested in how money is used, than in the results that the policies and support are meant to create.

In recent years there has been economic research that suggests that it is better to attempt positive change by giving the choice of good behaviour rather than by sanctions against bad behaviour. This is research in financial and environmental behaviour that says that we need to create systems that "nudge" people in the right direction. Cities with their close relations to the general public are in the frontline if the EU should want to try such an approach.

A new flexible governance approach must focus on reaching goals, on transparency of process, and on a bottom up strategy that allows individuals and cities to run flexible programs that allow changes in strategy under way in a project.

The Commission on Culture believes that culture can contribute in creating better governance.

The cultural field is an area of society where project competences, ability to focus on goals, but with flexible attention to how one reaches these goals, are all traditional and important tools. Culture is also a field that is based on values and on non-material ideals, on the open discussing of ideas, as well as on the building of identity. All this is of prime importance in building a future based on flexible governance and non bureaucratic accountability.

If we are to succeed in the economic and environmental goals of the Baltic region, we must build values and identities that make reaching such goals more realistic. Because of this it is important that the new EU Baltic Sea strategy also contains a cultural dimension.

The UBC Commission on Culture suggests that culture form an integrated part of the new EU Baltic strategy. Culture should have the role of bridge builder and competence transfer and as an identity builder and debate facilitator in the new Baltic strategy.

Cultural contacts and understanding, not least in the broader meaning of people to people collaboration, and in projects that lead to understanding of the lives of people in all parts of the Baltic region are important in establishing a common feeling of ownership for the whole of the Baltic region in all the cities and local societies of the region.

Finally culture has a role to play in creating and visualising "scenarios" for the future - both for the possible future we wish to build, and for the potential negative futures that we wish to stop. Culture can create scenarios that are accessible to broad populations, and can combine emotion with facts. The role of the arts in establishing frameworks for accessible debate that includes a broad range of people cannot be underestimated.

In a time when all is about money and "value for money", culture offers values in itself.

UBC Commission on Education – Baltic Sea Strategy

People must be educated to protect and preserve the environment for a sustainable development. No matter if it concerns the Baltic Sea, nature or their own homeyard. People need to attain an awareness that can be used everyday day.

UBC Commission on Education proposes the following actions for the effectuation of the Baltic Sea Strategy:

1. Create a network between Youth Nature Schools around the Baltic Sea / in UBC cities and inspire/initiate cooperation with expertise organisations including universities and NGOs – to have joint projects to exchange experiences, like visits, workshops, seminars etc.
2. Elaborate an interactive Baltic Sea protection programme for Youth Nature Schools. Youth Nature schools are usually non-state schools and have their own curriculum. The programme will be part of their curriculum. The program has a goal to inform youth about risks in the Baltic Sea area and make them aware of what they can do in order to protect the Baltic Sea.

Action plan:

2009 - spring

Creating a Youth Nature schools network including expertise organisations as mentioned above

2009 - autumn

Initiating network activities and preparing a joint project.

2010 – spring and autumn

Elaborating an interactive programme for youth and introduce it to the public.

2011 - 2012

Effectuating a programme for youth nature schools.

As partners we will see other UBC commissions, first of all UBC Commission on Environment, Culture and Youth.

Kurt Pettersson
Chairman Commission on Education

Annely Veevo
Head of Secretariat

UBC Commission on Education

The energy strategy for the Baltic sea region.

Energy will be one of the defining issues of this century. A new global revolution is needed in ways that energy is supplied and used. Energy demand is soaring like never before as populations grow and economies take off. Millions of citizens in the new democracies around the Baltic Sea region are expecting to enjoy a lifestyle that requires more energy at the same time the world's oil and gas fields are maturing. Energy policies and associated infrastructure is also a national and regional security issue that concerns us all.

We need this energy revolution not only for stopping the green house emissions that causes climate change, but also for generating jobs and new economic growth. A green New Deal is necessary for job creation in the aftermaths of the recent financial crisis and the global decline in economic activity. EU and the Baltic region need real economy investments as a new economic driver. Substantial research demonstrates that we can save and reduce energy consumption without slowing economic growth. What we need to invest in is a green energy infrastructure that can meet the climate challenge, the future energy demands and a responsible security policy in the region.

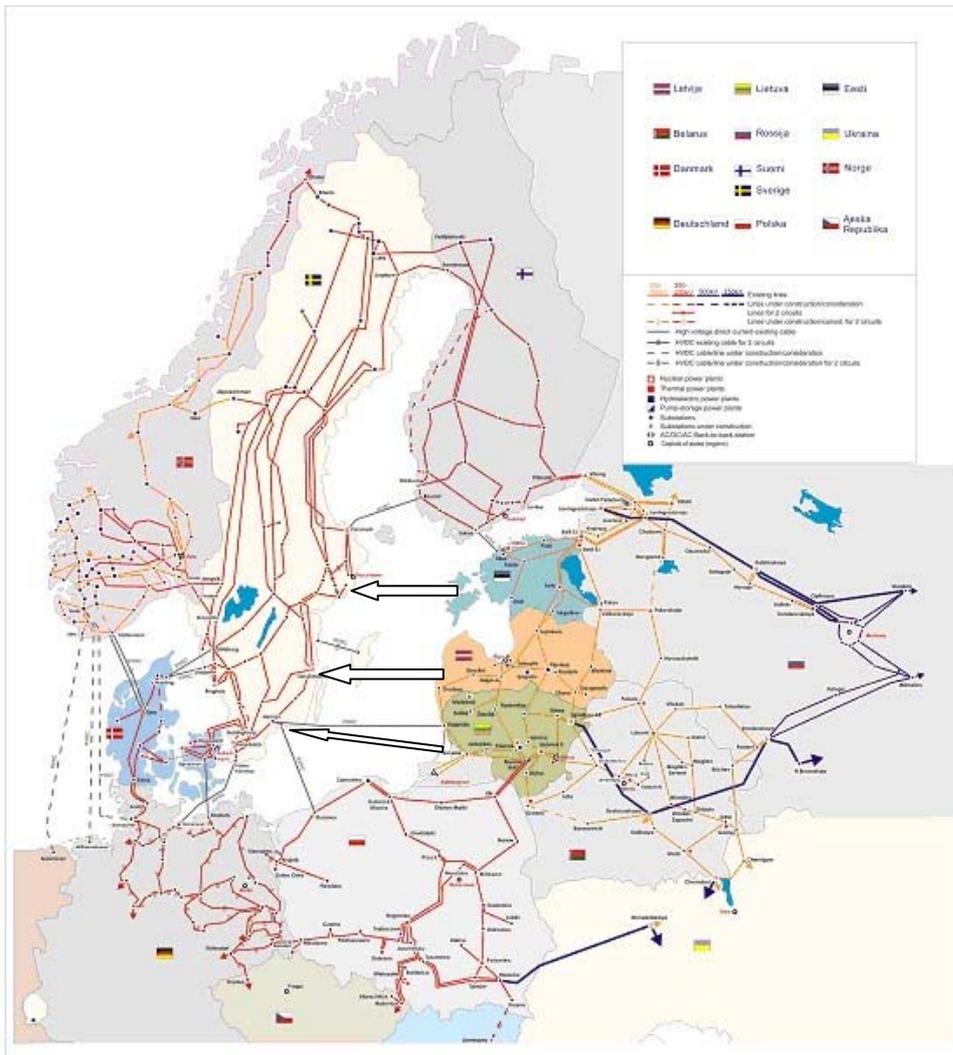
These investments are a must if strategic, environmental and economic targets are to be met. The free market economy cannot manage this alone. There is a need for Pan-European and transnational incentives together with specific regulations in order to set the phase and direction for this New Green Deal. EU can in this context recognize that the Nordic dimension is quite different from the Central, Eastern or Southern from an energy perspective. Each strategy has to be based on each regions specific circumstance. A new energy infrastructure is a massive undertaking and a process that needs support and incentive from both the European and national level but is above and over the capacity of local and regional councils in the region.

UBC representing over 100 cities and municipalities, base our strategy on the assumption that the Baltic region in the near future can and will constitute one integrated energy market with access to a Pan-Baltic electrical power distribution grid. This is the single most important "big tech" achievement and a prerogative for our strategy towards the creation of a new energy economy in the region. This involves and effects multinational power companies in its true meaning as well as national governments. The Union of Baltic Cities represents the voice from the local government level where all energy is both produced and consumed. The local level is the key player in the new energy economy, since it according to well documented studies by independent research institutions; it represents the sector with the single most significant impact on both climate change and the emerging new green energy economy.

In order to support financial risk associated with investments in green energy production the Baltic Sea region there are a need for a significantly increase in electricity market integration.

The future and presumed integrated Baltic power grid makes it possible for every saved kwh to push back the market for high CO2 emissions plants. Hydro and Nuclear power production from some

parts of the Baltic region can then interact and balance the production of solar, wind, biomass and other forms of sustainable and grid connected local green energy production.



Coal based energy production belongs to the Big-tech sector and even if carbon dioxide separation and underground storage of CO₂ is technically possible the cost benefit ratio is not in its favor and it is not a sustainable energy solution for the long term scenario. Fossil fuel production for electricity and/or heat can only be a transitional strategy for certain local and regional industrial stake holders. In the long run this is the same for nuclear power since it with present technology, isn't a renewable energy source even if its production is essentially carbon neutral. But it will be around in the Baltic region for at least the next 60 years to come and has to be incorporated in the strategy.

The Big-Tech areas we would like to stress as vital for reaching the target of 20% reduction of CO₂ emissions are the following.

- The Pan-Baltic integrated power grid
- Financial sector incentive program for the New green Deal for growth and job creation
- Focus on Agriculture – the next energy saving sector

Small tech

In order to kick start the process and create true impact in the region we propose the following 4 flagship projects and high impact action plans.

1 TECHNOLOGY TRANSFER FOR THE CLEANTECH SECTOR.

Technology transfer is the major driving force for progress throughout history. In order to speed up the process of decreasing green house gases in the Baltic region, structured and validated information about different available technologies has to be well known throughout the region. Best practises and new innovative ideas are developed but still the knowledge is in many cases local and as best regional. The project fulfills a Pan-Baltic need to get a system for exchange and transfer of technology and knowledge across regions, countries and municipalities. In additions to that there is a strong market listening in on the data that have a growing economy and interest to source new and relevant technologies for their rapid development.

2 ENERGY ABC – ENERGY ACTIONS FOR BALTIC COMPETITIVENESS

One of the priorities on the agenda in the European countries is to reduce the emissions of greenhouse gases, without decreasing the economical growth and development. Therefore it is essential to concentrate efforts for a more efficient use of energy.

Energy ABC is an educational project where the first step is to inform politicians, management and civil servants in energy efficiency potensial. The second step to educate the operating staff in charge of the energy systems in SME/industries and in large real estates, for instance public buildings. Concrete result of the project are regional energy tutors with a knowledge and competence in energy efficiency issues equipped with tool – the training in energy efficiency and the software ENSAM– that will help them to further disseminate their knowledge to other local energy guides. It is proven in 6 different Swedish municipalites that with the right messures taken a reduction of 40-60% of the energi consumption can be achived without any reducing impact on production output. The result is confirmed by the Swedish Energy Agency and the metod is developed by the University of Linkoping..

Main objective of the project is to strengthen the region by reinforce the economical development and growth, without increasing the negative impact of the environment, especially the climate change. An important objective is to make the topic energy consumption important and a part of the every day agenda for the decisions makers and in that way make sure that the effects of this project leaves a long-term footprint in all participating regions.

LED – LIGHT FOR URBAN AND RURAL AREAS

We are facing a paradigm shift in the field of public lightning. The global cost for public lightning is estimated to 230 billion US\$ and it represents approximately 40% to 80% of the public spending on electrical energy pending on where on the globe you are located. The single most efficient way to reduce green house gases globally would be to replace kerosene lamps with solar and wind powered

light. By lifting the European trade barriers on low-energy lamps and LED technology a huge market will potentially develop together with industrial knowledge and experience. A conversion to LED-lighting would result in a paradigmatic shift within the field of lighting and a reversal of the percentages.

In order to adapt the new technical lighting solution to municipal requirements we need to be able to answer certain questions. How will the city environment be affected? How will LED lighting affect cultural buildings? How will road safety factors be affected? What about the rural environment and sports facilities? We need to support and speed up this development in the Baltic region

4 WASTE WATERTREATMENT

Treatment of municipal sewage is needed all over Europe. Today we struggle to meet the environmental targets regarding among other things Zero Eutrophication and A balanced marine environment. Biological treatment is probably the most important process, used all over Europe to treat municipal sewage. The proposed project will demonstrate new methods to improve the treatment efficiency while at the same time saving electrical energy.

The basic idea is to integrate several measures that can be used in new plants, but also implemented at existing plants, in order to achieve better treatment efficiency. The combination of different measures is the innovation of the suggested method. An important part is to use low temperature heat, e.g. from combined heat and power plants, in order to not only warm the incoming water, but also to stabilise the treatment temperature. Pre-studies and calculations indicate that a stabilised process at e.g. 20 °C will improve the treatment efficiency, especially for nitrogen (N), and possibly for other specific unwanted organic compounds. Other improvements are the possibility to use the excess heat for pre-warming sludge for anaerobic digestion, and possibly to increase the carbon dioxide content in the air which will stimulate the nitrification process.

The health of the Baltic Sea has been seriously damaged since the 1960s due to excessive pollution from the countries in its catchment area. The pollution, such as untreated human waste, toxic materials, and metal (e.g. lead), have resulted in stratification of the Baltic Sea. This process known as stratification has left certain layers of the Baltic mostly freshwater while rendering other layers saltwater. The Baltic Sea, when it is stable, is a mix of freshwater from the rivers of Europe, and saltwater from the North Sea which flows through the straits around Denmark. The source of much of the pollution was, and still is, from the countries of the former Soviet Union and East Bloc. This pollution, in turn, harms a variety of other industries, including fishing and tourism. But by far the most damage is caused by the eutrophication from the highly industrialized agriculture sector in Sweden, Denmark and Finland. These chemicals run off land and into the water supply, eventually ending up in the Baltic Sea.

According to the experts the Baltic Sea is one of the most polluted seas in the world. Along the Swedish/Danish/Finnish coast the water quality is mostly affected by eutrophication due to nutrient load from the drainage area. Other threats to the beautiful sea and the archipelagos that concerns our city members are hazardous chemicals, the increased risk of oil spills, unsustainable fisheries and the decline of biodiversity.

A new program for the agriculture sector in Baltic area has to be presented that work actively to improve the cooperation between research, environmental monitoring and community planning, at both Pan-Baltic, national and regional level. Sectors and corridors close to rivers that are in the drainage area of the Baltic sea has to be protected from intensive industrial agriculture practices and fertilizers. Eco farming and low intensity methods must be tested and supported in these areas in order to reach the targets. Special incentives for eco farming shall be established in the Baltic sea region.

Wetlands and nutrition traps has to be rebuilt or created in order to minimize the drainage of this pollutants into the Baltic sea. From an energy perspective we need to promote low energy intensity production methods in the agriculture sector from environmental reasons and from an energy perspective. Today we in average input 10 Kjoule of industrial energy in order to get 1 Kjoule of food energy. The Agriculture sector must be one of the next sectors for energy savings in the Baltic region.

Nordic countries has a very high-energy consumption per capita due to the energy intensive industry and cold winter climate. UBC is promoting higher energy efficiency in households and more investment into energy production based on renewable, e.g. biofuels, wind power and solar energy.

The Baltic countries leave a huge energy consumption in a global comparison. But if Sweden and Norway alone could save 20% of its present energy consumption and export this Hydro and nuclear power over the integrated grid to the other Baltic and northern European regions, the whole target of 20% CO² reduction could be met for the entire European community.



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Supplementary proposals on EU Baltic Sea Strategy compiled by the UBC Commission on Environment

The UBC Executive Board discussed and adopted its first position paper concerning the development of EU Baltic Sea Strategy in its meeting in Växjö in October 2008. This position paper has been submitted to EU Regio in November 2008. At the same meeting UBC Executive Board decided to request its Commissions to fulfill the position paper by sectoral inputs as they see it relevant. UBC Commission on Environment (UBC EnvCom) discussed the strategy in several occasions, including its annual meeting in Tallinn 30-31st of October 2008. Based on these discussions and feedback gathered from representatives of different cities the UBC EnvCom has identified some key policy issues in EU work relevant for the environment in the Baltic Sea Region and wants to highlight the importance of them in the Baltic Sea Strategy process.

Maritime policy;

Due to exceptional ecological vulnerability of the Baltic Sea, **high and demanding environmental criteria in emission control of vessels** should be applied in the BSR.

IMO has a global mandate to regulate ship emissions, therefore **EU should use its influence in IMO** (and other international organizations) in order to speed up introduction of environmental friendly shipping technology requirements into the BSR (Marpol Annex VI issues).

BSR should be designated by IMO as an ECA region (Environmentally critical area) for NO_x in order to introduce progressive **reductions in NO_x emissions**. BSR needs additional protection for NO_x deposition because the sea is suffering from too high nitrogen load. On average 16% of annual NO_x load is coming from ships and during some periods of the year 50% of NO_x deposition originates from ships travelling in the Baltic Sea.

As eutrophication is one of the main concerns in regard to the ecological state of the Baltic Sea, nutrient load from sea traffic should be strongly limited. **Discharging untreated wastewaters from vessels in the whole Baltic Sea Region including international water bodies should be banned** by international law in the Baltic Sea Region. At the same time wastewater treatment fees should be included in harbour dues (no special fee - system) in all ports of the Baltic Sea Region and standardised technologies developed to facilitate unloading of waste water in harbours.

Baltic Sea should be selected as a pilot area in EU where environmentally friendly shipping practices should be strengthened by using **economic incentives** as a complement to existing regulations to reduce emissions from ships, e.g. differentiated port and fairway dues. This requires cooperation between cities, ports and national and EU maritime authorities.

Integration of safe shipping practices, sustainable use of natural resources, tourism and environment request development of **new instruments for the governance of maritime sector**, including marine spatial planning (see VASAB as reference). The EU BSR Strategy should support innovative and voluntary fore-runner activities in order to speed up the development of improving the state of the Baltic Sea. Good experiences of the New Hansa of Sustainable Ports and Cities project and the “Memorandum of Understanding in Sustainable Port and Maritime Policy in the Baltic Sea Region” serve as an additional reference of voluntary actions.

Agricultural Policy

EU should continue the development of the EU agricultural policy in order to make it to take better into consideration different environmental circumstances in different parts of Europe, such as the Baltic Sea region. BSR should be recognized as an area, where traditional agricultural practices cause heavy damage to the environment and where policy should with immediate effect be changed to strongly **focus on ecologically sustainable non polluting agriculture**. At present EU in some areas support agricultural practices causing heavy eutrophication for the Baltic Sea which can not be considered sustainable. The EU Commission should strongly promote environmental friendly agricultural production serving the ecological needs of the Baltic Sea.

EU funds meant for subsidies to achieve environmental improvements in agriculture should be critically evaluated and remarkable part of the funds should be reallocated for nutrient removal activities also outside the agriculture sector. Especially **pilot projects to remove phosphorus from water bodies** in BSR catchment area should be funded by agricultural funds as new technologies and practices will be developed.

BSR should be developed as a **pilot region of non-polluting farming** in EU.

Climate change and Energy

The BSR is one of the most important forest areas in EU, which means that they also serve as an important **carbon sink** area in Europe. Carbon sinks may have a major role in delaying the climate change process and therefore the role of BSR forests as carbon sinks should be clearly recognized and notified in the strategy and EU should start preparation of a comprehensive **programme how to utilize forests more effectively as carbon sinks** in delaying the climate change process.

BSR is an important producer of renewable energy with huge future capacity and this should be recognized in the EU BSR Strategy. EU should help BSR to develop as a pilot area in Europe in utilization of renewable energy resources; especially wind and soil energy and bio fuels. Especially utilization of bio energy from forests in combined heat and power production (CHP) has a lot of capacity to be developed.

Research

One of the biggest changes in Baltic Sea Environment has been the decreased amount of salted and oxygen rich water flowing into the Baltic Sea from the North Sea during favourable wind and weather conditions. This change may be one of the early signs of the climate change in the BSR and has led to decreased salinity and oxygen deficiency in the Baltic ecosystem. Consequently lowered salinity has impact on cod stocks by limiting their breeding possibilities and resulting smaller cod stocks. There has been much debate of possibilities to **deepen Danish straits** in order to increase the flow of salted water into the Baltic. A

major study should be done in order to find out all ecological, technical and financial issues relating to this question and option of this should be included in the Strategy.

Environmental policy & Legislation & Governance

Implementation of Water frame directive should be speeded up. New actions to reduce the amount of nutrients causing eutrophication of the Baltic Sea needs to be implemented immediately. New phosphorus reduction targets for the Baltic Sea catchment area should be set by the EU in order to restore the satisfactory ecological status of the Baltic Sea. Latest estimations of total nutrient emission reduction need in the Baltic Sea Region is 42 %. For phosphorus in the Baltic Sea Region the EU should adopt the **HELCOM recommendations of maximum 0,5 mg/liter phosphorus content of outgoing waste water** in treatment plants of more than 10 000 inhabitants in the Baltic Sea Region.

The role of EU Commission in HELCOM activities should be strengthened in order to ensure proper implementation of the HELCOM Action programme. Commitments of all stakeholders, especially Baltic governments should be encouraged by the EU Commission. So far, HELCOM represents one of the rare political bodies in BSR including the EU's external dimension in its work.

Governance of environmental and sustainable development policy development process in the BSR is at present fragmented and needs to be strengthened. This should be notified in EU Baltic Sea strategy by giving support to the idea of starting a process to build **a new concept for the BSR governance** which would encourage all relevant stakeholders from different spheres/levels of government together with other stakeholders to find a new way for regional development.

Present EU funding instruments are relevant and should be highlighted in implementation of the environmental and sustainable development policies of the BSR. Anyway the challenges mentioned above underline the need to prepare new focuses and priorities for the next structural funds programme period (2014+), in order to make **funds more useful** and make them to **contribute more effectively** in gaining the sustainable development pattern in BSR.



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Supplementary proposals on EU Baltic Sea Strategy compiled by the UBC Commission on Gender Equality

The UBC Executive Board discussed and adopted its first position paper concerning the development of EU Baltic Sea Strategy in its meeting in Växjö in October 2008. This position paper has been submitted to EU Regio in November 2008. At the same meeting UBC Executive Board decided to request its Commissions to fulfill the position paper by sectoral inputs as they see it relevant. This paper has been written by the Commission on Gender Equality. The goal of the Commission is to create action for gender equality around the Baltic Sea and within the Union of the Baltic Cities.

Equality of women and men constitutes a fundamental right for all, and is an essential value for every democracy. Gender equality means equal rights and responsibilities for women and men, girls and boys. In order to be achieved, this right needs not only to be legally recognized, but to be effectively applied to all aspects of life: political, economic, social and cultural. Still can the lack of gender equality can be found throughout the whole Baltic Sea region.

UBC Commission on gender equality stresses that the gender issues should be given priority and be integrated into all parts of the Baltic Sea strategy. Gender mainstreaming is the integration of the gender perspective into every stage of policy process-design, implementation, monitoring and evaluation-aiming at promoting equality between women and men. It means assessing how policies impact on the life position of both women and men- and taking responsibility to readdress them if necessary. This is a way to make gender equality a concrete reality in the lives of women and men.

Priority actions

Gender equality is necessary to achieve a sustainable society. The Commission on gender equality especially wants to highlight three focus areas that are of great importance for the development of our region. Combating prostitution and human trafficking, issues of the labour market as well as social planning, urban planning and planning work

Combating prostitution and human trafficking

All countries in the Baltic Sea area are destination countries for Trafficking in Human Beings for sexual exploitation, which means that a market for sexual exploitation exists in every country in the Baltic Sea area.

- Combat the demand of prostitution, without the demand there is no market.
- Knowledge campaigns to address the connection between prostitution and trafficking in human beings for sexual exploitation
- The possibility of a co-joint program to support victims of trafficking in human beings for sexual exploitation should be investigated

The international cooperation is of crucial importance to manage to combat prostitution and trafficking in human beings. It is important that this issue is addressed in the strategy. The question

thereby becomes furthermore highlighted and prioritised.

Issues of the labour market

In line with, European Commission, DG employment report on gender equality between women and men - 2008, it is urgent to give priority to structural changes to reach an equal labour market. This consists of equal working conditions, no disadvantages due to parental leave as well as equal possibilities to career development for women and men.

- Promote gender equal labour market possibilities
- Working against gender stereotypes
- Promote women's career opportunities
- Promote child care and parental leave, enabling both women and men to equal job opportunity.

Social planning, urban planning and planning work

To make the Baltic Sea region an accessible and attractive place, gender issues must be acknowledged within social planning, urban planning and planning work. Sustainable development is one of many positive effects that gender mainstreaming brings to these issues. Cities and regions can be planned for prosperity and economic and social growth, taking into account both women's and men's experience and everyday life issues.

- Planning cities and regions, towns and neighborhoods with gender perspective.
- Getting more people involved with local planning issues throughout the Baltic Sea area, especially groups of citizens previously outside of planning processes.