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**STRATEGIC ENVIRONMENTAL ASSESSMENT OF
MARITIME COASTLINE STRATEGIES**

Environmental report
submitted for consultation

Addendum on additional targets

February 2021

North Atlantic West Channel Coastline



Évaluer les Politiques et Innover
pour les Citoyens et les Espaces



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Introduction

The first two parts¹ of the Namo Sea Basin Strategy Document (SBSD), forming the Maritime Coastline Strategy (SFM), were adopted by interprefectorial order on 24 September 2019. This strategy defines a maritime space planning, five vocation zones and 30 strategic targets to be achieved in each of these zones or on the whole coastline. This document is the local version of the Maritime Spatial Planning Directive (MSP) and the Marine Strategy Framework Directive (DSCMM). The second cycle of the Marine Environment Action Plan (MEAP) is thus integrated into the Sea Basin Strategy Document.

The order of 11 July 2018 on the criteria and methods to be implemented for the preparation of the first two parts of the Sea Basin Strategy Document recalls that the environmental objectives (mentioned in Article R. 219-7 of the French Environment Code) are defined so that the pressures exerted by human activities on the marine environment are compatible with the achievement or maintenance of good environmental status of marine waters by the end of the current cycle of the "Marine Strategy" framework directive. This order also recalls that the indicators associated with the environmental objectives include targets against which the achievement of the objectives is assessed.

At the time of the adoption of the façade strategy, certain environmental targets could not be defined due to a lack of data or because consultations were not yet ended. 28 targets were to be defined and agreed upon on the NAMO coastline, within a timetable that would allow for the taking into account of:

- work under the first cycle of the Bay of Biscay Marine Environment Action Plan (MEAP) (2016-2021), on the "M003" measure aimed at setting up strong protection zones;
- the new issues and new ambitions of the Sea Basin Strategy Document, in particular the artificialisation of the coastline and seabed, docking areas, accidental catches of sea birds and cetaceans, the preservation of functional habitats for sea birds and the preservation of eelgrass beds;
- the revision of the Schéma Directeur d'Aménagement et de Gestion des Eaux (SDAGE) Loire-Bretagne [Loire Bretagne water development and management master plan].

Work was carried out to evaluate and consolidate existing monitoring networks in order to define them at the time of the adoption of the action plan: the coherence between these networks and those used for monitoring the objectives of the Water Framework Directive was sometimes reinforced on this occasion. However, following this further work, 1 target could not be set: the indicator concerned is therefore designated as a "candidate for the 3rd MSFD cycle", with further work to be carried out to make it operational for the next MSFD cycle. For this second cycle, this indicator will therefore not be monitored and reported to the European Commission.

Following the joint consultation process with the Sea Basin Strategy Document Action Plan and Monitoring Scheme, the 28 additional targets and associated derogations will be adopted through an amendment to Annexes 5, 6a and 7 of the Maritime Coastline Strategy adopted on 24 September 2019.

Finally, in the development of the SFM, 16 targets for socio-economic objectives were also adopted as "defined and agreed in the development of the action plan according to the baseline values". As the work of the Action Plan was not successful in this respect, no additional targets are proposed for this round. It also appeared that

¹ Part 1: the existing situation, the challenges and a vision for the future of the coastline in 2030 (part 1); Part 2: definition of strategic targets from an economic, social and environmental point of view and associated indicators, accompanied by a vocational map which defines, within the maritime areas, coherent zones with regard to the challenges and general objectives assigned to them.

in the context of the development of the monitoring system (part 3 of the Sea Basin Strategy Document), a certain number of indicators could not be filled in immediately, which requires work to operationalise these indicators in anticipation of the next cycle and to define the missing targets within this framework.

The document "Complement to the North Atlantic Channel and West Coast Strategy on environmental objectives, indicators, targets and derogations" produced as part of the joint consultation on the action plan and monitoring mechanism of the Sea Basin Strategy Document explains in summary form how each of the additional targets set were defined and the nature of the work carried out.

As the Maritime Coastline Strategy has been the subject of an environmental assessment, dealing in particular with the potential environmental impacts in relation to the ambition of the targets set, it is necessary to complete it today with regard to the setting of additional targets. This is the purpose of this Addendum, which has two objectives:

(1) analyse the ambition of the 28 additional targets defined after the adoption of the Maritime Coastline Strategy. This analysis will be carried out in this addendum in relation to the three sets of targets presented in the above-mentioned document, namely (i) targets relating to the definition of strong protection zones, (ii) targets relating to the taking into account of the new issues and new ambitions of the Sea Basin Strategy Document in relation to the first cycle of the Marine Environment Action Plan, and (iii) targets established in the context of the construction of the Loire Bretagne water development and management master plan and its consistency with the Sea Basin Strategy Document;

(2) conclude from this analysis on the possible modification of the conclusions of the SEA of the strategic strand that could result from the setting of these 28 additional targets.

Targets for the definition of Strong Protection Zones

Eight targets are covered by this first set. They concern the following environmental objectives: D01-HB-OE3, D01-HB-OE4, D01-HB-OE6, D01-HB-OE10, D01-OM-OE06, D06-OE02 and D07-OE03. Most of them are formulated in a qualitative way, along the lines of "Increase of habitat area X in strong protection". The setting of these targets refers directly to the implementation of measure M003-NAT1B adopted as part of the first cycle of the Marine Environment Action Plan (MEAP), which provided for "completing the network of marine protected areas by establishing strong protection in sectors of remarkable marine biodiversity". The aim of this measure is to create a coherent, connected network of strong protection zones (SPZ) that is representative of the diversity of marine ecosystems on each coastline in mainland France. These strong protections will be instituted as a priority within existing marine protected areas.

In order to judge the ambition of the targets proposed by the NAMO coastline, it is therefore necessary to go back to the implementation of measure M003-NAT1B. The latter was the subject of a national framework note in June 2018 proposing the following steps for its implementation:

- Step 1: Inventory of existing strong protections in the MPA network;
- Step 2: Analysis of the coherence of the current network of strong protections in MPAs;
- Step 3: Identification of sectors and issues requiring a higher level of protection to strengthen the network
- Stage 4: Association and then consultation of the Sea Basin Councils on the additions to be made to the network of strong protections by 2030 and establishment of the corresponding target as a proportion of the EEZ in strong protections in mainland France and intermediate targets for 2021 and 2026
- Stage 5: Installation of strong protection on the coastlines

As these different stages are planned to take place until the end of 2019, they should have made it possible to set quantitative targets for the proportions of habitats at stake located in the SPZs (for example: 10% of the area of habitat X located in the SPZ). However, the process has been delayed, particularly in the early stages, and has not allowed the definition of the new SPZs to be achieved within the timetable for setting the additional targets of the Maritime Coastline Strategy. In a national working group, it was therefore decided on 13 March 2020 to change the wording of the targets initially envisaged, as described in this extract from the national working group's decision statement:

"In order to reflect the different levels of progress and ambition of the coastlines, the following general wording is proposed:

"Increase [the proportion] of the area of [name of habitat] in strong protection [in each of the following areas [, with at least one area per high or major stake sector]: list of potential SPZs relevant to this habitat]*

** Naming of an area intended to host an SPZ, the precise perimeter of which will be defined after local consultations."*

This wording may be adapted for each indicator, with or without the bracketed words. This wording thus provides for an increase in the coverage of strong protection, with, if possible, a list of potential SPZs in which this habitat will be protected, and, if possible, a criterion of representativeness of strong or major issues.

Note that in some cases, more specific targets are proposed, in the following form: "X% of the known area of habitat X is located in a strong protection zone"

With regard to the NAMO coastline in particular, we can emphasise the following with regard to this implementation process common to all coastlines:

- that 58 study areas for potential SPZs could be defined (12 study areas for existing SPZs and 46 study areas for potential SPZs);
- that these study areas are both inshore and offshore, even though the main issue at stake in the offshore area is the reefs, whereas other important issues are also present in the offshore areas (e.g. muddy canyons);
- that these study sectors take into account many coastal zone issues, but not the functional areas for fisheries (spawning grounds, nurseries, etc.) such as those in estuaries, for example, with the coast justifying this lack of knowledge by the need for additional information;
- that two of the eight targets in this first set are quantitative in nature: (1) that of D01-HB-OE04 (100% of the bioconstructions of the species *Sabellaria alveolata* are located in the SPZ), and (2) that of D01-HB-OE10 (100% of the reef sub-areas of the Natura 2000 site "Celtic Seas - Bay of Biscay slope" are located in the SPZ);
- that the DO6-OE02-Ind2 target details the targets for each particular habitat (9 in total) with varying levels of precision and ambition: from "the maximum possible in the SPZ" for eelgrass beds to "No target" for the last four habitats on the list.

In conclusion, with regard to the ambition of this first set of targets, it is regrettable that in most cases a quantitative target has been abandoned in favour of an "upward trend" associated with a list of "potential" SPZs whose actual surface area has yet to be defined (in fact, a potential SPZ within a larger MPA only gives an indication of the surface area that will finally be retained at the end of the consultation processes that have yet to be conducted). The designation of a list of new protected areas to be created is nevertheless an important step forward, particularly on the NAMO coastline where this list is substantial, even if it is as much a matter of the national protected areas strategy as of the maritime coastline strategy.

It should be remembered that one of the "framework" objectives of the National Protected Areas Strategy 2020-2030 is to achieve 10% of the area covered by SPZs by 2022.

3 This objective is global for all French waters and therefore does not apply to each coastline. Nevertheless, the OFB sets a benchmark of 5% in mainland France, with a minimum of 3% on each coastline.

Targets for addressing the new challenges and ambitions of the Sea Basin Strategy Document

Twelve targets are covered by this second set. They concern the following environmental objectives: D01-HB-OE5, D01-HB-OE6, D01-OM-OE01, D01-OM-OE04, D01-OM-OE05, D06-OE01, D08-OE04 and D11-OE01 and refer to four different topics which we will deal with in turn: (1) specific habitats (for the first two objectives), (2) sea birds (for the next three), (3) the integrity of the seabed and in particular artificialisation (for D06-OE01) and (4) two other anthropogenic pressures (docking areas and noise).

1. PARTICULAR HABITATS

The three targets concern the avoidance or reduction of physical disturbance to eelgrass beds and subtidal and circalittoral sedimentary habitats, particularly in the 3-mile zone, which are important issues.

On the NAMO coast, only one of these three targets is partially quantitative, i.e. the Natura 2000 sites where eelgrass is protected by decrees relating to the list of protected plant species (this is only the case for sites in the Pays de la Loire region, hence the term "partially quantitative"). The other targets are more of a qualitative "downward trend" nature.

Given this qualitative dominance, this first group of targets can be considered relatively unambitious in terms of the fundamental ecological functions of these habitats and their high sensitivity to anthropogenic pressures (anchoring, trolling). For NAMO, it should nevertheless be pointed out that the qualitative target concerning the areas of eelgrass beds prohibited for anchorages is accompanied by the mention "At least prohibition in the SPZs constituted in the framework of the above indicator for particular habitats", which echoes the mention "the maximum possible in SPZs" which was the target for the Eelgrass beds habitat.

2. SEA BIRDS

The four targets concerned are the reduction of incidental catches of sea birds, the reduction of the pressure exerted by certain introduced and domesticated species on sea bird breeding sites and the maintenance/restoration of functional sea bird habitats in coastal wetlands.

On the NAMO coast, two of these four targets are quantitative and the other two are qualitative, in particular because certain elements of knowledge have yet to be established (map of functional sites or reference value / state 0).

In addition to their partially quantitative nature, the setting of these targets was based on consultation with the Groupement d'Intérêt Scientifique Oiseaux Marins (GISOM), which also undertook to monitor the indicators associated with these targets. This second group of targets can therefore be considered to be rather ambitiously defined.

3. ARTIFICIALISATION

The three targets concerned are the average rate of artificialisation of the foreshore (structures and facilities in the water) and the coastal bottom (structures and facilities in the water and underwater between 0 and 20 metres).

For the NAMO coastline, these three targets are "semi-quantitative", i.e. they are worded as follows: "Trend towards a decrease in the average rate of artificialisation in relation to the average reference rate evaluated at x% for NAMO over 6 years".

The characterisation of a reference rate of artificialisation was therefore essential to establish these targets. This rate was established by CEREMA for the linear and foreshore areas only (i.e. for indicators 1 and 2) and for the period 2002-2014, within the framework of a report entitled "Artificialisation of coastal and littoral marine environments, Methods for determining indicators 1 and 2" (CEREMA, 2021), which can be found in the appendix to the explanatory note mentioned in the introduction.

From both a methodological and regulatory point of view, the production of this reference value represents a considerable advance. Indeed:

- methodologically, this calculation raises many challenges such as (1) taking into account only the physical losses (linear or surface of the structures) or also the physical disturbances generated by the structures, or (2) the need to adapt to the changes in the reference land/sea boundary, currently being redefined. These challenges raise in particular strong issues of coherence between the calculation carried out by CEREMA and other existing calculations (within the framework of the coastline management strategy for example);
- from a regulatory point of view, the EO indicators of the MSFD and their targets are subject to a compatibility obligation for authorisations at sea, which increases the requirement in terms of the reliability of the results, and requires that they can be converted into absolute values in an accurate manner to facilitate the processing of authorisations.

The setting of semi-quantitative targets can therefore be considered to be a real step forward, which has moreover been the subject of much debate and required many explanations of the study carried out by CEREMA and its method. However, the fact that no quantified target for reducing the rate of artificialisation has been set for this cycle poses a certain risk to achieving the national objective of "zero net artificialisation by 2030" at the end of the next cycle. Furthermore, the implementation and monitoring of these targets remains a challenge in terms of support for the instructing services.

4. OTHER ANTHROPOGENIC PRESSURES

The two targets concerned by this fourth set are, on the one hand, the number of ports equipped with careening areas with an effluent treatment system and, on the other hand, the spatial extent of events with a high level of noise related to impulsive emissions.

The first target is of a qualitative nature "upward trend" and the second is not yet fixed as work is still in progress. It is therefore difficult to comment on the ambition of these two targets, although the former appears modest.

Targets established in the framework of the SDAGE construction

Eight targets are covered by this third set. They concern the following environmental objectives: D05-OE01, D05-OE02, D07-OE03, D08-OE07 and D09-OE01. Two subsets can be distinguished within these eight targets:

- on the one hand, the relative targets of D5 (Eutrophication), which take the form of % of streams, rivers and watercourses leading to eutrophied marine areas whose nitrate/phosphate concentrations are compatible with the GES threshold values for the Nutrients criterion (mainly with regard to the Chlorophyll a criterion);
- on the other hand, the targets relating to D7, D8 and D9 (hydrographic conditions and contaminants), which concern obstacles that cannot be removed in rivers (D7), the quality of sediments and coastal water bodies (D8) and the microbiological quality of coastal waters (D9).

Before commenting on the value of these targets, let us first recall the strong link between SDAGE and Sea Basin Strategy Document. Indeed, by virtue of IX of Article L. 212-1 of the French Environment Code, the SDAGE must be compatible or made compatible with the environmental objectives defined in the Marine Environment Action Plan, at the time of its periodic update provided for in IV of Article L. 212-2. Conversely, the Marine Environment Action Plan includes environmental objectives and associated indicators for achieving good environmental status of marine waters, which are compatible or made compatible with the SDAGE (Article L. 219-9 of the French Environment Code). In accordance with the provisions mentioned in IX of Article L. 212-1 and insofar as many of the pressures on marine ecosystems are generated on land, the environmental objectives of the Sea Basin Strategy Documents concerning these pressures on land or in relation to water policy define new results to be achieved within the framework of the SDAGEs currently being drawn up for the third management cycle 2022-2027. As a result, the SDAGEs and WFD MoPs must define the measures contributing to the achievement of these results, within the limits of their legal scope, unless derogations to the achievement of these objectives are integrated into the Coastline Strategic Documents.

Within the framework of this necessary coordination, the setting of targets for this third set was the subject of several national working groups involving the departments responsible for drawing up the SBSDs (DIRMs), SDAGEs (Water Agencies) or both (basin DREALs). In addition, in order to contribute to the setting of eutrophication targets, a modelling study on the restoration of the GES of coastal waters by reducing the flow of nutrients from rivers has been entrusted to IFREMER by the DEB. As a result of the methodological limitations of this study, it was not used to set river-by-river abatement levels, and the targets finally adopted were instead a global % of rivers with a concentration compatible with GES (see above).

With regard to the NAMO coastline in particular:

- half of the D5 targets are below 100%, resulting in "mechanically" associated derogations because only a proportion of 100% is compatible with achieving the GES. Of the two targets concerned, the target for nitrate flows is much lower than 100% (as only two out of 11 rivers have flows compatible with a good status of coastal water bodies, i.e. a target of 18%), whereas the target for phosphates is close to 100% (91%);
- the target for D7 is set qualitatively as "Upward trend";
- the two targets relating to D8 are, for one of them, not defined (the associated indicator therefore having candidate status and will not be reported to the EC)

for this cycle), and for the other less than 100% of the coastal water bodies in good chemical status (82%), which also justifies an exception for the 18% of water bodies not reaching GES (i.e. 7 water bodies out of 39);

- finally, the target relating to D9 is quantitative in nature and presents a good level of prevention since it sets the number of monitoring points showing a deterioration in microbiological quality at 0.

In total, with derogations necessary for two objectives (D05-OE01 and D08-OE07), the targets set appear to be unambitious overall. They illustrate in particular the recurrent difficulty in reducing diffuse pollution "on land", in particular of agricultural origin, since it is nitrate flows that are most concerned. Insofar as this pollution then affects the quality of the marine environment, it also illustrates the difficulty of the Coastline Strategic Documents (DSFs) in 'influencing' the objectives of the SDAGEs to a great extent, despite the efforts made in this respect and mentioned above. The fact that the SDAGEs were drawn up earlier and that the timetable for drawing up the two documents is different no doubt partly explains this result, on which progress will have to be made in the next cycles. Finally, it should be noted that on the NAMO coast, this difficulty in increasing the ambition of certain SDAGE objectives/targets with regard to eutrophication of coastal waters led the Sea Basin Council stakeholders to include a specific action on this subject in the Sea Basin Strategy Document action plan in order to supplement those provided for in the SDAGE Loire Bretagne.

Conclusion

At the end of this analysis, it can be considered that a dozen additional targets have been defined in a rather ambitious way (i.e. a little more than 40%), the others presenting a medium to low level of ambition.

As the environmental assessment of the Maritime Coastline Strategy concluded that a significant proportion of environmental objectives had targets with modest ambition, the setting of additional targets discussed in this addendum does not appear likely to significantly alter the conclusions of that assessment.