



Baltic Marine Environment Protection Commission

HELCOM Platform for sufficiency of measures

SOM Platform 2-2019

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Background

The attached document contains comments from Latvia to document 4-3 "Proposal on an approach for the selection of new actions for the updated BSAP".

Action requested

The Meeting is invited to take note of the comments.

Comments from Latvia to the Document 4-3 for the SOM Platform meeting 2-2019 on the proposal on an approach for selection of new actions for the updated BSAP

(Prepared on 09.09.2019 by K.Pakalniete (AKTiivs Ltd.), the ESA representative from Latvia in the SOM platform)

Responding to the meeting Document 4-3 for the SOM Platform meeting 2-2019, we would like to provide comments and proposals on the approach for selection of new actions for the updated BSAP. We hope they would help improving methodological soundness and transparency of the measures' selection process and we invite to consider them as part of SOM platform meeting 2-2019 on 16-17 September 2019.

The given document includes:

- 1) summary of comments on the proposed approach (described in the meeting Document 4-3 "Proposal on an approach for the selection of new actions for the updated BSAP"),
- 2) proposals for modifying and further specifying the approach, which address:
 - a. clarifying and further specifying the selection criteria and their content,
 - b. possible approach for combined assessment of the measures (combining assessments from the selection criteria).

1) Summary of comments on the proposed approach

Clarifying aim and role of Steps 2 and 3 in the measures' selection process

The proposed approach includes 3 steps, where Step 2 covers assessment of relevance and effectiveness of measures, including among other also cost-effectiveness, and Step 3 covers cost-effectiveness of measures. To our opinion the aim and role of each step in the measures' selection process should be clarified. In particular since the cost-effectiveness is considered in both steps. It should be clarified what is the specific aim and role of the cost-effectiveness assessment in each step and in particular – how it is taken in the measures' selection process. The logic of having Step 3, if the cost-effectiveness is assessed in Step 2 already and considered in the selection of measures together with other criteria, is not really clear.

We would propose to see Step 2 as assessment of all relevant impacts of measures (reflected by the criteria), including the cost-effectiveness. These could be rather qualitative assessments (e.g. using simple qualitative assessment categories, like low-medium-high). Outcome of this step could be combined assessment of each measure (assessments from all criteria, could be based on qualitative multi-criteria assessment), which is used for selecting measures for the proposed list of effective measures.

Step 3 would provide more detailed cost-effectiveness analysis of selected measures (e.g. quantitative assessments, incorporating uncertainties), and this result could be used together with the qualitative multi-criteria assessment to come up with the proposed list of effective measures. The detailed cost-effectiveness assessment could be performed for selected short-list of measures (selected based on Step 2 with the qualitative multi-criteria assessment). The detailed cost-effectiveness assessment results could also be used for revising, if necessary, the cost-effectiveness assessments in the qualitative multi-criteria assessment (hence impacting the combined assessment of measures).

We propose modification in Figure 1 to clarify this aspect (the modified Figure is provided below). To our opinion this is not just conceptual issue, but clarifies how the decisions on measures' selection are made.

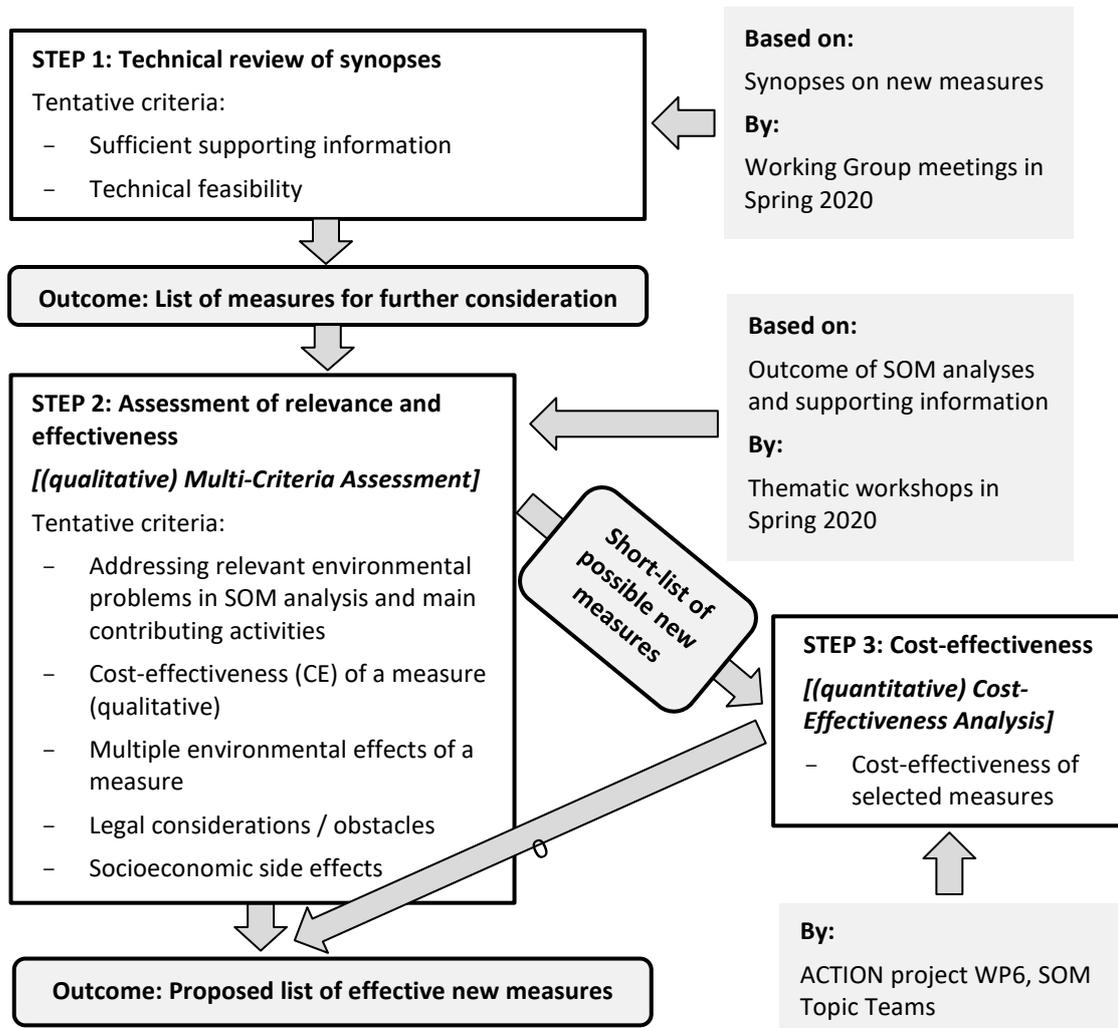


Figure 1. Proposals on steps and draft criteria for the review and selection of new actions for the updated BSAP [modified version according to the comments and proposed clarifications/corrections].

Clarifying the selection criteria used in Step 2

We would suggest using concrete, distinct (not overlapping), reasonable number of relevant selection criteria in Step 2.

The criteria should not overlap. For instance, the current proposed criteria include “Effectiveness of a measures” and “Cost-effectiveness of a measure”. It would lead accounting the effectiveness twice in the combined assessment (combining assessments from all criteria).

The criteria should cover relevant impacts and implementation aspects of measures. However the number of criteria should be reasonable to avoid unnecessary complication of the assessment process.

Content of each criterion should be concrete and specified. For instance, the currently proposed criterion “Sustainability” looks too broad and unclear (taking into account also complexities in the sustainability definition).

The proposed (modified and further specified) criteria for Step 2 are described in Chapter (a).

2) Proposals for modifying and further specifying the approach

a. Clarifying and further specifying the criteria for Step 2

The proposed criteria were indicated in the modified Figure 1 and are explained in the table below.

Applying identical assessment scales (e.g. with 3 categories) for all criteria would facilitate combined assessment of a measure. Possible approach for the combined assessment is described in Chapter (b).

We would propose not including benefits from environmental improvements as the selection criterion. The environmental effects of measures, including multiple effects, which are included among the criteria, indicate the level of benefits (overall, the higher the effect improving state of the environment, the higher the benefits from environmental improvements). Hence, including the benefits in additional criterion would lead to accounting this impact twice in the combined assessment of a measure. Moreover, it could be rather difficult to assess the benefits for single measures (the positive environmental effect of a single measure is commonly marginal to be captured by economic evaluation of benefits). The benefits could be assessed afterwards for sets of measures for specific environmental problems (for instance, the benefits of achieving GES in relation to nutrient pollution).

Draft criteria	Specification	Possible (qualitative) assessment scale (3 categories)	Corresponding scores for the combined assessment
Addressing relevant environmental problems in SOM analysis and main contributing activities	To what extent a measure addresses relevant environmental problems identified in SOM analysis and the main activities contributing into these problems	Addresses to high extent Addresses to moderate extent Addresses to limited extent	3 2 1
Cost-effectiveness (CE) of a measure	Cost-effectiveness of a measure, combining Costs and Effectiveness of a measure. Effectiveness in reducing the addressed environmental problem. The effectiveness assessment may consider whether the measure will be effective given the expected climate changes.	Low-Moderate-High for Costs Low-Moderate-High for Effectiveness Low-Moderate-High for Cost-effectiveness	Possible approach for deriving the Cost-effectiveness score from the Costs and Effectiveness' categories is provided after the table 3 High CE 2 Moderate CE 1 Low CE
Multiple environmental effects of a measure	Multiple environmental effects can include positive "side" effects (i) on other environmental problems identified in SOM analysis; (ii) on wider environment (e.g. air quality, biodiversity, mitigating climate change).	High multiple effects Moderate multiple effects Low multiple effects	3 2 1
Legal considerations / obstacles	Whether the proposed new action requires implementation by a third party; are there other relevant legal considerations or obstacles.	No obstacles Moderate obstacles High obstacles	3 2 1
Socioeconomic side effects	Are there negative socioeconomic side effects to consider? E.g. negative impacts on relevant sectors, employment, access to raw material.	No negative impacts Moderate negative impacts High negative impacts	3 2 1

Possible approach for deriving the Cost-effectiveness score from the Costs and Effectiveness' categories:

Cost category	Effectiveness category
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	3 high	2 moderate	1 low
1 high	2	1	1
2 moderate	3	2	1
3 low	3	3	2

b. Possible approach for combined assessment of the measures

Combined assessment for each measure could be derived by combining assessments from all selection criteria (in Step 2). Below is an example of such evaluation approach assuming 3-category scale applied for all criteria (with the common general interpretation from 1 being the worst to 3 being the best level). Such semi-quantitative approaches for evaluation of measures have been used in EU and national assessments.¹

For each measure an average score can be calculated from the individual scores for the criteria. This average score can be interpreted in terms effectiveness category according to the scoring as shown in the table below. For instance, if the average score for a measure from all the criteria is below “1.5” (which is lower than “moderate” in the used 3-category scale), a measure has low effectiveness. If the average is above 2.5, a measure has high effectiveness.

Explanation of the effectiveness categories for the combined evaluation of the measures:

Explanation of Categories	Scores
Low effectiveness	< 1.5
Neutral effectiveness	1.5 – 2.5
High effectiveness	2.5 – 3

The outcome of the evaluation of measures could look like below.

Measures	Score for Criterion 1	Score for Criterion 2	Score for Criterion 3	Average score from all Criteria	Effectiveness category
Measure 1	2	3	3	2.7	High
Measure 2	2	2	1	1.7	Neutral
Measure 3	2	2	2	2	Neutral
Measure 4	1	2	1	1.3	Low
Measure

Advantage of such approach is that it is relatively easy to apply and might be feasible for the complex BSAP update process. The outcome would be more informative than with simple Yes/No assessments or qualitative descriptions for the used criteria. The main limitation relates to the simple scoring scale (from 1 to 3) resulting in similar effectiveness categories for many measures (e.g. “neutral” effectiveness category). However such outcome could support the selection of measures (for instance, excluding measures with “Low” effectiveness, indicating measures with the highest priority for implementation – the measures with the “High” effectiveness category).

¹ See, for instance, the EU assessment ARCADIS (2012) “Pilot project ‘4 Seas’ – plastic recycling cycle and marine environmental impact. Case studies on the plastic cycle and its loopholes in the four European regional seas areas”. Final report of a project for the EC (Project No BE011102328); an example for national assessment AKTiiVS, LHEI (2016) “Socioeconomic assessment of additional measures for achieving GES”. Report of a project to support development of the national MSFD Program of measures in Latvia.