



Baltic Marine Environment Protection Commission

Working Group on the State of the Environment and Nature Conservation STATE & CONSERVATION 9-2018

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Submitted by	Coalition Clean Baltic
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Background

CCB has already brought to the attention of the Contracting Parties at different levels the situation with plans of the Polish government to implement a project on construction of a waterway connecting the Vistula Lagoon with the Gdansk Bay across the Vistula Spit and Lagoon. Both the Spit and the Lagoon have been designated as BMPAs under HELCOM and Natura 2000 areas under the EU law. In relation to these submissions, Poland has promised to keep the Contracting Parties informed about the developments.

The Coalition Clean Baltic (CCB) as a network of Baltic NGOs committed to protection of the environment and natural heritage within the BSR strongly opposes this project. Besides the negative and irreversible environmental impacts, the processes regarding presenting the project's plans, the environmental impact assessment and limited public consultation are enough reasons to object to this project. For example, the documents provided are not available online, but only on spot and physical documents could be reviewed. The EIA consultation process was only open for one month. Considering the fact that the entire area and bay inside the spit is a Natura 2000 area, this handling of this project process is simply not acceptable. Furthermore, the impact assessment itself and project plans, e.g. suggested benefits are highly questionable. The Vistula Spit is characterized by a unique landscape in the country and Europe, with its banded layout of sandy beach, dunes, a mound covered with forest and rushes creating a visual unity. Negative changes in the landscape caused by the excavation the spit will be permanent and irreversible, it is not possible to avoid or minimize them. Characteristic features of the Vistula Spit, i.e. the continuity of the sandy beach and distant views - a major tourist asset - will remain irretrievably lost. From the point of view of protecting the unique landscape of the Vistula Spit project should not be implemented in any of the proposed variants. In addition, opening up another connection of the brackish Lagoon with more saline Gdansk Bay may casue unpredictable changes in the lagoon's ecosystem

The benefits of maritime transport expected from the project raise serious doubts and the benefits from tourism gained from an intact spit are likely several times higher.

There is no doubt that the planned project will have a significant negative impact on Natura 2000 areas, including both the habitats and priority species. The project plans do not consider the consequences for the ability to reaching favorable environmental status.

The investor claims that the implementation of the project is justified by the overriding public interest. However, this interest has not been demonstrated in any way. On the contrary, criticism from expert groups, social opposition, including from the Pomerania province authorities, where the main element of the project is to be implemented, proves the lack of such an interest. Possible benefits (development of ports and alleged development of tourism within the Vistula Lagoon) are of a purely local character, in addition to the goal of development economic growth can be achieved using other, much less environmentally harmful alternatives (e.g. development of railway infrastructure, financial and organizational support for investments in the field of tourism and recreation). The benefits of the project will not have a general social dimension, and thus it cannot be considered to be the overarching social interest.

The assessment of cumulative impacts on the environment should be presented, in particular in an ecosystem perspective, at the level of the Vistula Spit, the Vistula Lagoon, the Elbląg River and the southern part of the Gulf of Gdansk.

In case implemented, Vistula Spit Canal will be in breach of several HELCOM Recommendations, including

- [15/1](#) – by failing to protect integrity of the coastal strip of Vistula Spit
- [16/3](#) – by failing to ensure natural coastal dynamics along Vistula Spit, both from sea and lagoon sides, as well as potential unpredictable effects on the ecosystem of the Lagoon
- [17/3](#) – by failing to inform and consult with relevant Contracting Parties with regards to construction of new installations affecting the Baltic Sea
- [21/4](#) – by failing to secure adequate protection of coastal biotopes of Vistula Spit
- [35/1](#) – by failing to protect Vistula Spit and Lagoon BMPAs and Natura 2000 sites.
- [37/2](#) – by failing to protect numerous waterfowl birds, being the subject of designation of BMPA and Natura 2000 sites

In light of the above CCB urges all relevant authorities and the general public to refuse to accept implementation of this project. Furthermore CCB asks the EU to follow up on this project and inquire responsible Polish authorities on how requirements laid out in several EU directives have been met.

Action requested

The Meeting is invited to:

- consider presented information;
- urge Poland to share relevant EIA documentation with relevant Contracting Parties for consultation;
- urge Poland to re-consider its plans on Vistula Spit Canal construction in light of major expected environmental impacts it may cause.